

# Administrative Review Report

Greenfield School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/31/2019	12/03/2019
On-Site Review	12/16/2019	12/18/2019
Site Selection Worksheet	10/31/2019	10/31/2019
Entrance Conference	12/16/2019	12/16/2019
Exit Conference	12/18/2019	12/18/2019

## Commendations:

### From Nutrition Program Consultant (NPC):

Thank you to the staff at Greenfield School District for the courtesies extended during the on-site review. Thank you for being available for answering questions and providing additional information. All were 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.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work. The cafeteria was inviting and interactions between staff and students during meal times were positive and customer-service focused.

The determining official does a great job managing the free and reduced-price benefits. There were minimal errors in the benefit issuance review. Conversations with the food service director indicated that there are many noteworthy initiatives occurring in the district including guest meal servers, "try days," and in-classroom visits from the food service director. The printed menus for the district are eye-catching, fun, and advertise various promotions such as "new vegetable week." Each school kitchen has a comprehensive binder containing menus, recipes, and nutrition/allergen information for all foods offered in the district. These binders are updated regularly and serve as references for students, staff, and parents that have questions about the foods served in the schools. Great job compiling and managing these valuable resources. The food service director is running a very nice program!

### From Public Health Nutritionist (PHN):

Thank you to all staff at Greenfield School District for the warm welcome and cooperation during this Administrative Review (AR). Edgewood Elementary School had a perfect week of review for breakfast and lunch and Maple Grove Elementary School had a perfect week of review for lunch. The food service director has a thorough understanding of USDA School Meals Programs and their meal patterns. Staff were pleasant to work with and friendly; kitchens were clean and organized; and signage was ample to show students how to select a reimbursable meal. Staff have a great understanding of Offer versus Serve (OVS) and all meals served on the day of review were reimbursable. Thank you for serving healthy, nutritious meals to the students of Greenfield School District!

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Verification (200 - 204)	
<b>Question #</b>	200	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/16/2019 01:55 PM</p>	<p><b>Finding:</b> There was an error on the verification collection report (VCR). The school food authority (SFA) indicated in sections 5-6 and 5-7 that direct verification was conducted. However, this was not the case.</p> <p><b>Corrective Action:</b> Once notified by the DPI consultant that the VCR is unlocked for editing, please correct this error and resubmit the report. Additionally, if the outcomes of the communications with the household that was verified incorrectly result in a decrease in benefit status, please also update the results section of the VCR to reflect this outcome.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/19/2019 09:21 AM</p>	<p><b>Finding:</b> The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31).The policy does not contain language regarding foods provided but not sold, food and beverage marketing, or the triennial assessment.</p> <p><b>Corrective Action:</b> Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. It is recommended to review the Local Wellness Policy Checklist and the Local Wellness Policy Builder when updating the policy (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a>). The builder can assist in adding in specific language regarding the missing content areas.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	126	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/16/2019 01:31 PM</p>	<p><b>Finding:</b> One application listed three household members' names but had the number "2" listed in the household members box. This discrepancy means that application should have be considered incomplete and should not have been processed until clarification was obtained from the household about the number of members.</p> <p><b>Corrective Action:</b> Contact the household to verify the number of household members. Update the application accordingly on behalf of the household, ensuring that the updates are dated, initialed, and are paired with adequate notes to reflect the conversation with the household. If needed, reprocess the application and update the benefit issuance list accordingly. <i>Corrected on-site; no further action required.</i></p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	

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<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/16/2019 01:39 PM</p>	<p><b>Finding:</b> The SFA did not complete a confirmation review before verifying application(s).</p> <p><b>Corrective Action:</b> 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 (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf</a>).</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	209	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/16/2019 01:51 PM</p>	<p><b>Finding:</b> One application selected for verification was verified incorrectly. The initial application was approved for a free benefit based on income. The household then matched to direct certification (DC) on 10/16/19 with a Z code. The family was incorrectly allowed to keep their initial free benefit without submitting any income information because of the DC match. However, the DC match supported a reduced-price, not free, benefit.</p> <p><b>Corrective Action:</b> Contact the household in writing to request the necessary verification documents to support the approved free benefit. If the household does not respond by the given due date, follow up with the household in accordance with pages 112-114 of the Eligibility Manual (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf</a>). If the household does not respond with the requested information in a timely fashion, send the household a written notice of adverse action and change the benefit to reduced-price after the required 10 calendar days. Submit copies of these communications via SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	213	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/16/2019 02:04 PM</p>	<p><b>Finding:</b> The SFA's notice of adverse action (i.e. "We Have Checked Letter") states that households must request a hearing within seven days of the date on the letter. However, SFAs are required to give households 10 calendar days after the letter is sent to file an appeal/request a hearing before the benefit is decreased. The SFA does give households the full 10 days before decreasing the benefit, but the letter does not adequately reflect this.</p> <p><b>Corrective Action:</b> Review the Notice of Adverse Action section of the Eligibility Manual on pg 57. It is also recommended to review the DPI template letter (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-we-have-checked.docx</a>). Update the "We Have Checked Letter" template used in the SFA and upload into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)	
<b>Question #</b>	314	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/17/2019 05:33 PM	<p><b>Finding:</b> The SFA uses a software program for processing free/reduced-price meal applications. However, this software program is not listed in the appropriate place on the online contract. Additionally, the Schedule A section of the contract does not accurately reflect the beginning-of-the-line point of service setup occurring at most of the elementary schools.</p> <p><b>Corrective Action:</b> Update the online contract and submit for approval. Email the assigned consultant when this is completed. <i>Corrected on-site; no further action required.</i></p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/06/2019 11:04 AM	<p><b>Finding:</b> The DC notification letters, application approval/denial letters, and verification letters contained an incorrectly formatted non-discrimination statement. The statement's formatting must not be altered in any way and the font size must be the same as the main text in the document.</p> <p><b>Corrective Action:</b> Update program materials to include the correctly formatted non-discrimination statement. Upload a copy of the updated materials into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1217	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/17/2019 05:25 PM	<p><b>Finding:</b> The professional standards tracking tool does not contain all required information. The tool does not specify the professional standards category/number of required training hours for each staff member. Position titles are included for each staff member, but it is not indicated if staff members are full-time (require 6 hours of training) or part-time (require 4 hours of training). Please reference the DPI Professional Standards webpage for more information (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards">https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards</a>).</p> <p><b>Corrective Action:</b> Please update the tracking tool so that it includes the missing information. Upload the updated tool in SNACS.</p>
<b>Site Name</b>	Maple Grove EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/18/2019 02:45 PM	<p><b>Finding:</b> The pre-K students were being served the K-5 meal pattern, but were not being served at the same time and in the same place as the older students. Children who are not yet in kindergarten must be served the pre-K meal pattern if not co-mingled with other grade groups at meals. This finding also applies to Edgewood Elementary, where pre-K students at lunch were not co-mingled.</p> <p><b>Corrective Action:</b> Submit a statement for Edgewood Elementary and Maple Grove Elementary describing the specific changes made to meal service in order to serve the pre-K students the age-appropriate meal pattern.</p>
<b>Site Name</b>	Edgewood EI	

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<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	409	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/18/2019 02:50 PM</p>	<p><b>Finding:</b> The planned number of meals on the breakfast production records at Edgewood Elementary were not consistently filled in daily during the week of review. Visit the Production Record Requirements for reference (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>).</p> <p><b>Corrective Action:</b> Submit one week of completed breakfast production records at Edgewood Elementary, showing the planned number of meals recorded daily. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
<b>Site Name</b>	Maple Grove El	
<b>Form Name</b>	Civil Rights (811-812)	
<b>Question #</b>	811	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/18/2019 11:59 AM</p>	<p><b>Finding:</b> The non-discrimination "And Justice for All" poster was not located in the meal service area in a location visible to students (FNS Instruction 113).</p> <p><b>Corrective Action:</b> During the on-site review, the poster was moved to a different wall where it is visible by students. <i>Corrected on-site; no further action required.</i></p>
<b>Site Name</b>	Maple Grove El	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/18/2019 12:01 PM</p>	<p><b>Finding:</b> The most recent food safety inspection report was not posted in a publicly visible location.</p> <p><b>Corrective Action:</b> During the on-site review, the report was relocated to a different wall in the cafeteria where it is visible to anyone present in the cafeteria. Please ensure that the most recent food safety inspection report is in a publicly visible location at all schools. <i>Corrected on-site; no further action required.</i></p>
<b>Site Name</b>	Maple Grove El	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/18/2019 02:47 PM</p>	<p><b>Finding:</b> The following product was identified in the SFA's storage area as non-domestic and not documented: Vegetable Blend (Canada).</p> <p><b>Corrective Action:</b> Complete and submit a Non-Compliant Product Form for the product listed above (<a href="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</a>).</p>

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## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/18/2019	1227	1005	Administrative Review	ALL				
<b>Comments</b>								
<b>Local Wellness Policy Triennial Assessment</b>					<b>Created By</b>		<b>Created Date</b>	
<p>SFAs must complete an assessment of their local wellness policy (LWP) at least once every three years, with the first triennial assessment completed not later than June 30, 2020. The assessment must measure the SFA's compliance with their LWP, a description of the SFA's progress toward meeting LWP goals, and how the LWP compares to a model policy. A report must be developed and released to the public, but there is no mandatory template for this report.</p> <p>The Wellness School Assessment Tool (WellSAT) allows SFAs to evaluate how their policy compares to a model policy (<a href="http://www.wellsat.org/default.aspx">http://www.wellsat.org/default.aspx</a>). It includes 67 policy items considered to be best practices for school wellness. SFAs rate the extent to which their policy contains language related to each policy item. Scores are calculated for comprehensiveness (extent to which recommended content areas are covered in the policy) and strength (how strongly the policy items are stated).</p> <p>The Local Wellness Policy Report Card is a free, online tool SFAs may use to evaluate compliance with their policy and provide a description of progress made toward meeting policy goals (<a href="https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web">https://docs.google.com/a/dpi.wi.gov/forms/d/1u6LUEy3Vd_sTU-s8fq0EYc-UscxZK-edIFq28WtqSIU/edit?usp=drive_web</a>). SFAs enter their policy-specific objectives and evaluate the extent to which they were achieved. The tool includes a section for SFAs to input their WellSAT scores. Following completion of the tool, a report is generated. If fully completed, the report card meets all requirements of the triennial assessment. Please visit the Local Wellness Policy webpage for more information (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a>).</p>							12/18/2019 1:33:04 PM	
12/18/2019	1217	700	Administrative Review	ALL				
<b>Comments</b>								
<b>Non-Program Foods on the Annual Financial Report</b>					<b>Created By</b>		<b>Created Date</b>	
<p>The Annual Financial Report (AFR) showed that the non-program food category operated in the negative for the 2018-19 school year. Discussions with the business director indicated this was because the large food service capital expenditures for remodeling and updates were allocated to NSLP, SBP, and non-program foods. This allocation process made it appear that non-program foods were losing money, when really this was due to allocation of a large amount of capital expenditures.</p> <p>The completed non-program food revenue tool showed that revenue requirements were met and that prices are high enough to generate adequate revenue. The SFA documented that catering prices are set high enough to generate adequate revenue. The SFA is compliant with non-program food revenue requirements despite the negative balance for this category on the AFR. When allocating large expenditures (such as equipment or capital) to different categories on the AFR, it is highly recommended to use the allocation tool found on the Financial Management webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx</a>). This tool converts non-program food sales into meal equivalents and assess the number of lunches and breakfasts served to determine proper allocation. This method is recommended instead of allocating based on food cost for NSLP, SBP, and non-program foods.</p>							12/18/2019 10:25:02 AM	
12/18/2019	1215	700	Administrative Review	ALL				
<b>Comments</b>								
					<b>Created By</b>		<b>Created Date</b>	
							12/18/2019 10:18:57 AM	
12/18/2019	1214	705	Administrative Review	ALL				
<b>Comments</b>								
<b>Shared Food Service Expenditures</b>					<b>Created By</b>		<b>Created Date</b>	
<p>There are several expenses that are shared between food service and other school departments. These expenses have been prorated to convert them to direct food service costs and are charged to food service accordingly. Discussions with staff members and review of financial documentation indicate that these shared expenses are allocated correctly to food service. However, the SFA is reminded to retain all supporting</p>							12/18/2019 10:11:09 AM	

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documentation for these charges, such as an annual assessment of labor time for the delivery driver, annual time study showing amount of time delivery truck is used for food service, etc.								
12/18/2019	1212	703	Administrative Review	ALL				
Comments								
Equipment Expenditures				Created By	Created Date			
As part of a large remodel project, the SFA spent Fund 50 dollars on custom desks for the food service administrators and on a water mixing valve. The costs for each of these items exceeded the capitalization threshold of \$5000, but these items are not listed on the DPI equipment preapproval list nor was DPI preapproval obtained. However, the USDA currently does not provide clear guidance on specific allowable remodeling costs. The purchase of these items were reasonable, necessary, and allocable to food service. Going forward, the SFA should call DPI prior to purchasing any equipment over \$5000 if the specific item is not on the equipment preapproval list.					12/18/2019 10:02:59 AM			
12/17/2019	1211	305	Administrative Review	ALL				
Comments								
Student Account Refunds				Created By	Created Date			
<p>The SFA has written procedures describing how families may be refunded for money left in a student account when the student leaves the district. The procedures indicate that anyone can opt to donate their account balance to the Angel Fund. It is also indicated that balances under \$5.00 that are left unclaimed after attempts at contacting the household to issue a refund will be donated to the Angel Fund. These procedures do not align with USDA guidance regarding account refunds.</p> <p>When any student leaves the district or graduates, SFAs must attempt to contact the student's household to return any funds remaining in the account. Currently, there is no approved flexibility to simply set a dollar threshold (e.g., \$5.00) below which a refund will not be issued. SFAs can transfer remaining funds in a student's meal account to a sibling in the same household who remains in the district.</p> <p>Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed," they cannot be used to offset another negative account, unless paid households have chosen to donate those funds to the school food service account or Angel Fund. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property (<a href="https://www.revenue.wi.gov/Pages/UnclaimedProperty/Home.aspx">https://www.revenue.wi.gov/Pages/UnclaimedProperty/Home.aspx</a>). The DOR has rules concerning unclaimed property that must be followed (<a href="https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf">https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf</a>).</p> <p>SFAs are encouraged to develop policy language which clearly explains how households will be contacted to issue refunds (e.g., via email, phone, mail), the number of times (e.g., three attempts) before the SFA will no longer attempt to issue a refund, and that the school will report the funds as "unclaimed property."</p> <p>Please reference the Financial Questions &amp; Answers document on the Financial Management webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf</a>). Please contact a financial specialist with further questions (<a href="https://dpi.wi.gov/school-nutrition/directory">https://dpi.wi.gov/school-nutrition/directory</a>). The SFA should work towards amending these procedures to comply with USDA requirements.</p>					12/17/2019 6:12:07 PM			
12/17/2019	1208	305	Administrative Review	ALL				
Comments								
Alternate Meals for Negative Account Balances				Created By	Created Date			
<p>The district's unpaid meal procedures specify that students will be offered a non-reimbursable alternate meal including a vegetable, roll, and milk for a price of \$1.25 when certain criteria are met. Per USDA SP 23-2017, if the SFA charges households for a non-reimbursable alternate meal, the meal is subject to Smart Snacks requirements (7 CFR 210.11) and the requirement for revenue from non-program foods (7 CFR 210.14(f)). To comply with the Smart Snacks requirements, the SFA could assess the dinner roll/vegetable using the Smart Snacks calculator and assess it as a combination snack item. If compliant, this combo could then be priced as a unit and sold with an a la carte milk as the alternate "mini meal."</p> <p>If the SFA will be offering students the alternate "mini meal" described in the unpaid meal procedures, the SFA must consider how this could be offered in a manner that will not single out any students for their unpaid meal balances. Discussions with the food service director suggest that the alternate meal is rarely (if ever) given, and that students are typically given the reimbursable meal regardless of account balance in conjunction with increasing communications with parents.</p>					12/17/2019 6:02:25 PM			

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12/17/2019	1205	1214	Administrative Review	ALL				
Comments								
On the online contract, the person listed as the "Food Service Director" is considered a manager within the district. The person listed as the "Authorized Representative" is the staff member that is considered the food service director in the district for professional standards purposes. It is highly encouraged to update the online contract so that it accurately reflects the authorized representative and food service director roles.						Created By		Created Date
								12/17/2019 5:37:47 PM
12/17/2019	1204	317	Administrative Review	Edgewood EI				
Comments								
At the review sites it was observed that when students were charged for a lunch, a total price of \$2.45 or \$0.00 showed up on the cashier screen. The screen is not visible to the students, but is visible to the cashier. Discussions with the food service director and food service secretary indicated that on the last review, there was an overt identification issue due to meal prices visible on the screen that was corrected during the review. On that review, the different prices for each category of reimbursable meal showed up on the screen as "reimbursable lunch price." At that time, settings were changed to remove this. On the current review, the price that is showing up on the screen indicated the total amount the student or adult owes for all charged item(s). This total purchase price cannot be removed from the screen because cashiers in the district must know how much payment to collect from customers when sales are made. Please ensure that cashier screens are not visible to students at all schools.						Created By		Created Date
								12/17/2019 4:54:02 PM
12/17/2019	1203	406	Administrative Review	Edgewood EI	FSD			
Comments								
<b>Pre-K Meal Pattern, Milk</b>						Created By		Created Date
Only unflavored milk is allowable under the pre-K meal pattern. Flavored milk may not be served. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk ( <a href="https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk">https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk</a> ). For more information on the Pre-K meal pattern visit the Pre-K webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool</a> ).								12/17/2019 3:26:39 PM
12/17/2019	1202	406	Administrative Review	Edgewood EI	FSD			Janelle Winter
Comments								
<b>Pre-K Meal Pattern, OVS</b>						Created By		Created Date
If students are not co-mingled, Offer Versus Serve (OVS) may not be utilized. It is not an appropriate service style for pre-K students and may interfere with the nutrition goals of the pre-K meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.								12/17/2019 3:18:58 PM
12/17/2019	1201	406	Administrative Review	Edgewood EI	FSD			
Comments								
<b>Pre-K Meal Pattern, Co-Mingling</b>						Created By		Created Date
Pre-K students are allowed to be served the K-5 meal pattern when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in pre-K or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns.								12/17/2019 3:17:50 PM
12/17/2019	1200	402	Administrative Review	Maple Grove EI	FSD			
Comments								
<b>In-House Yield Study</b>						Created By		Created Date
An in-house yield study may be warranted if yields are consistently higher or lower than specified in the Food Buying Guide (FBG). 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. Procedures are available on the Menu Planning webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy</a> ). The carrot dippers were pre-packaged with a dip included. It was difficult to								12/17/2019 2:50:23 PM



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determine how many cups of carrots were in the packaging, so staff opened one and conducted an in-house yield study to determine there were ½ cup carrots.							
12/17/2019	1194	1101	Administrative Review	ALL	FSD		
<b>Comments</b>							
<b>Smart Snacks</b>						<b>Created By</b>	<b>Created Date</b>
Smart Snacks only applies to foods and beverages sold to students during the school day on the school campus outside of a reimbursable meal. Crediting is not involved with Smart Snacks. Crediting is only applicable to reimbursable meals.							12/17/2019 9:47:20 AM
12/17/2019	1191	400	Administrative Review	Edgewood EI	FSD		
<b>Comments</b>							
<b>Around the World in 80 Trays</b>						<b>Created By</b>	<b>Created Date</b>
Help the School Nutrition Team reach our goal of 80 SFAs participating in Around the World in 80 Trays. Take the pledge and use the week of January 21-24, 2020 to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students. Visit the NSLP webpage for event information. Document the event (pictures, video, sound clips etc) and send to DPIFNS@dpi.wi.gov so we can share your success on social media!							12/17/2019 9:26:15 AM
12/17/2019	1190	400	Administrative Review	Edgewood EI	FSD		
<b>Comments</b>							
<b>School Breakfast Challenge</b>						<b>Created By</b>	<b>Created Date</b>
Join schools throughout Wisconsin to increase breakfast participation or to start a new breakfast program. The challenge begins December 2nd, 2019. Schools with the highest increase in breakfast participation will win up to \$1,000! New this year, participate in the Big Cheese bonus round for a chance to win an additional \$1,000 for your program. Prizes are provided by No Kid Hungry. Visit <a href="http://bit.ly/SchoolBreakfastChallenge">http://bit.ly/SchoolBreakfastChallenge</a> for details.							12/17/2019 9:25:53 AM
12/17/2019	1189	400	Administrative Review	Edgewood EI	FSD		Janelle Winter
<b>Comments</b>							
<b>School Breakfast Challenge, continued</b>						<b>Created By</b>	<b>Created Date</b>
In addition, all schools participating in the Challenge are eligible to apply for NKH's breakfast grants. For these grants, there is no free and/or reduced-price meal percentage requirement. Grants will support schools with the purchase of approved equipment, materials and program initiatives. Deadline is December 6, 2019. Visit the Hunger Task Force website for details ( <a href="http://bit.ly/SchoolBreakfastChallenge">http://bit.ly/SchoolBreakfastChallenge</a> ).							12/17/2019 9:25:34 AM
12/16/2019	1183	208	Administrative Review	ALL			Kirsten Voss
<b>Comments</b>							
<b>Verification, Confirmation Reviews</b>						<b>Created By</b>	<b>Created Date</b>
Before verification can begin, the confirming official (CO) must review each approved application selected for verification to confirm that the initial determination was accurate. After the CO confirms the initial determination, then the verifying official may begin the verification process by contacting the household to request supporting documentation. If the CO disagrees with the initial determination, then specific procedures must be followed to proceed as specified in the Eligibility Manual ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf</a> ).							12/16/2019 2:28:41 PM
12/16/2019	1182	132	Administrative Review	ALL			
<b>Comments</b>							
<b>Direct Certification Duplication</b>						<b>Created By</b>	<b>Created Date</b>
On many of the direct certification (DC) runs, all of the children's names are duplicated. Each name should only be listed once on DC runs. The SFA has not incorrectly reported any data based on these duplicate names, however this warrants further investigation. The determining official should work with the appropriate school or software staff members to resolve this issue.							12/16/2019 2:23:30 PM
12/16/2019	1181	126	Administrative Review	ALL			

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Comments									
<b>Child Income on Application</b>				<b>Created By</b>			<b>Created Date</b>		
On one application, there was a child income listed that exactly matched one of the incomes listed for an adult household member. The SFA correctly approved the application using all of the reported incomes. However, it is recommended to follow up with the household and confirm the child income was reported correctly. It is possible the child may be eligible for a better benefit if this was an error in application completion.							12/16/2019 2:21:08 PM		
12/16/2019	1179	323	Administrative Review	Edgewood El					
Comments									
<b>Average Daily Attendance</b>				<b>Created By</b>			<b>Created Date</b>		
It is highly recommended to use school-specific average daily attendance (ADA) numbers each month when completing claims for reimbursement. This would yield the most accurate edit checks. Currently, the SFA uses a 95% attendance factor for all schools each month.							12/16/2019 1:09:37 PM		
12/11/2019	1121	709	Administrative Review	ALL					
Comments									
<b>Non-Program Foods Revenue Tool</b>				<b>Created By</b>			<b>Created Date</b>		
The SFA completed the DPI non-program food revenue tool in October 2019. The tool indicated compliance with USDA requirements. However, there were several errors in the tool: extra lunch entrees were not included in the non-program food section, the incorrect selling price was listed for a reduced-price lunch, and the incorrect reimbursements were listed for free and reduced-price breakfasts. Please ensure these items are addressed when completing the tool in the future.							12/11/2019 10:26:07 AM		
During the on-site review, the food service director corrected the tool and uploaded it into SNACS. After these corrections, the tool still indicated compliance with non-program food revenue requirements.									
12/11/2019	1119	711	Administrative Review	ALL					
Comments									
<b>Adult Meal Pricing</b>				<b>Created By</b>			<b>Created Date</b>		
When using the Adult Meal Pricing Worksheet to determine minimum adult meal charges, the USDA Food Value received and the state aid must be included in the calculation. The SFA's adult meal charges are compliant with regulations, but it does not appear that the meal pricing worksheet was fully completed with the necessary information.							12/11/2019 9:38:26 AM		
12/06/2019	1106	803	Administrative Review	ALL					
Comments									
<b>Process for Handling Civil Rights Complaints</b>				<b>Created By</b>			<b>Created Date</b>		
The SFA has several board policies that address discrimination complaints, including a separate SOP regarding food service employment. However, these procedures do not speak specifically about how the SFA will handle complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. There are specific actions SFAs must take for these types of complaints. Please review the Civil Rights webpage and work towards adopting procedures that comply with the USDA requirements ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights</a> ).							12/6/2019 10:27:30 AM		
11/21/2019	1002	807	Administrative Review	ALL					
Comments									
<b>Civil Rights Form</b>				<b>Created By</b>			<b>Created Date</b>		
The Civil Rights Compliance Self-Evaluation (PI-1441) form must be fully completed annually by October 31. While the form was completed on time, the section regarding racial/ethnic data for food service staff in part 7 was left blank. Please ensure food service staff information is filled in when completing the form going forward.							11/21/2019 9:42:40 AM		
12/19/2019			Administrative Review	ALL					
Comments									
<b>Breakfast Participation</b>				<b>Created By</b>			<b>Created Date</b>		
School Breakfast Program participation at Edgewood Elementary is low in comparison to breakfast at other elementary schools within the district and in comparison to lunch at									

# Administrative Review Report

## Greenfield School District

Edgewood. It is highly encouraged that the food service director and Edgewood principal hold a collaborative meeting to explore strategies for increasing breakfast participation at the school.

Research indicates that students that eat breakfast have improved learning outcomes and improved nutritional status. Please reference the fact sheets regarding this research on the Food Research and Action Center (FRAC) website (<https://www.frac.org/programs/school-breakfast-program/benefits-school-breakfast>). Developing strategies to encourage school breakfast participation can help get more students starting the day with a nutritious meal so they are ready to learn when the school day starts.

Some strategies to consider include:

- Actively encourage students to visit the cafeteria when they arrive to school. This could be achieved through verbal encouragements by staff members or fun signage.
- Market the breakfast program to teachers and share information about the benefits of breakfast on academic behavior. Increasing teacher buy-in could result in teachers more actively encouraging students to visit the cafeteria for breakfast before coming to class.
- Increase breakfast program marketing to parents. There are several brochures, letters, and videos on the Resources for the School Breakfast Program webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). Reminding parents of the nutritional benefits and convenience of school breakfast may encourage them to have their children participate.
- Offer fun promotions at breakfast time to draw more kids into the cafeteria, such as a color-your-own breakfast bag day or bring your stuffed animal to breakfast day.
- Consider alternative breakfast models, such as Grab n Go, Breakfast After the Bell, or Breakfast in the Classroom. These alternative models may make it easier for students participate, particularly if they do not have time to sit in the cafeteria and eat before the school day begins.
- Consider offering the "breakfast bags" in transparent bags or a "build your own breakfast bag" so the students can see what is inside the bag or fill their own bag. The visual appeal of the menu items may attract more customers.
- For more ideas on breakfast promotion and supporting resources, please visit the Resources for the School Breakfast Program webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). There is a resource that specifically addresses breakfast promotion for elementary students.