

Administrative Review Report

Seeds of Health, Inc.

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/27/2023	03/22/2023
On-Site Review	03/22/2023	03/23/2023
Site Selection Worksheet	01/27/2023	03/21/2023
Entrance Conference	03/22/2023	03/22/2023
Exit Conference	03/23/2023	03/23/2023

Commendations:

Thank you to all staff at Seeds of Health for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director (FSD) and Authorized Representative 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 and Authorized Representative were very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

The Food Service Director (FSD) does a great job managing the day-to-day operations and challenges. It is clear that the FSD highly values customer service, nutrition education, and providing the students appealing meals that they want to eat. The FSD collects student feedback and uses to push for menu variety from the vendor, which shows the dedication to student satisfaction. The FSD also puts great effort into ensuring all schools are getting the menu items they need from the vendor and that any issues with food deliveries are addressed. Keep up the great work!

Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/22/2023 07:40 PM	Finding: The Annual Financial Report (AFR) for 21-22 was inaccurate. The report was completed using a report from the accounting software that had parameters set incorrectly. The result was that the software report was not an accurate reflection of the revenues and expenditures for July 1, 2021 -- June 30, 2022. The CFO uncovered this issue when preparing for the review and took steps to correct the internal accounting spreadsheet based on the accurate reports in the software accounting system. Corrective Action: Manually correct the AFR for 21-22. Please ensure that the beginning fund balance reported on the 21-22 AFR is accurate based on the corrected accounting reports. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.
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	Flagged 03/22/2023 07:26 PM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item. Corrective Action: Provide a timeline for when a school meal program civil rights complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.

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Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/22/2023 07:33 PM</p>	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific content relating to public involvement, foods sold outside school meals, food/beverage marketing, triennial assessment, and updating/informing the public is lacking.</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1006	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/22/2023 07:34 PM</p>	<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.</p> <p>Corrective Action: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment.</p>
Site Name	Tenor Hi	
Form Name	Meal Compliance	
Question #	1	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:38 PM</p>	<p>Finding: The daily minimum requirement for fruit was not met for 9-12 grade for breakfast meal service during the week of review. On Wednesday, February 8 only ½ cup of fruit was served. The daily minimum requirement for 9-12 grade is 1 cup daily.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</p>
Site Name	Tenor Hi	
Form Name	Meal Compliance	
Question #	2	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 03/28/2023 03:37 PM	<p>Finding: Staff were unclear about the high school meal pattern requirements for lunch. It is important for staff to understand the meal pattern requirements.</p> <p>Meal pattern resources on WI DPI's Menu Planning webpage may be used as training resources. The Meal Pattern e-learning resources will also be helpful.</p> <p>Corrective Action: Have food service staff complete training on the high school meal pattern. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Tenor Hi	
Form Name	Meal Compliance	
Question #	5	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/28/2023 03:32 PM	<p>Finding: On the day of review, the students served themselves the fruit component, however the portion size for these items were not communicated to the students through any signage.</p> <p>Since self-serve fruit is being used to meet the daily 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.</p> <p>Corrective Action: Submit a picture of signage depicting the portion size of fruit and/or vegetable self-serve items on the serving line.</p>
Site Name	Tenor Hi	
Form Name	Dietary Specification Assessment Tool (Off Site Review)	
Question #	11	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/28/2023 03:48 PM	<p>Finding: The weekly juice limit was exceeded at breakfast. No more than half (50 percent) of the total fruit offerings may be in the form of juice. A total of ½ cup of fruit (including whole fruit and juice) were offered one day during the week of review and of that ½ cup was juice. This means 100% of the fruit offered was in the form of juice. This exceeds the 50% juice limit.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</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	Flagged 03/22/2023 05:30 PM	<p>Finding: The correct non-discrimination statement was not included on all program materials, including the school website and the CEP public release.</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name		
Form Name	Reporting and Recordkeeping (1500 - 1501)	
Question #	1501	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 03/22/2023 07:30 PM</p>	<p>Finding: The food service director conducts direct certification runs but does not have their own access to the direct certification (DC) system. The only certified user in DC is the current authorized representative. Each DC user must have their own login and password. Only school staff members currently involved with school nutrition program operation may have DC access.</p> <p>Corrective Action: The food service director must obtain their own DC access. This is a two-step process that involves setting up a username through the Wisconsin DWD system, and then submitting the completed DC access request form. To satisfy this corrective action item, copy the Nutrition Program Consultant on the email sent when submitting the DC access request form. Corrected on-site.</p>
Site Name	Tenor Hi	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/23/2023 05:29 PM</p>	<p>Finding: During breakfast observation at Cathedral Square, there were issues with the POS and student selection of reimbursable meals. A portion of student coming up to the meal service line selected less than a reimbursable meal (e.g. grain and milk with no fruit, grain only, juice only, etc.). Some of these students were checked off as having taken a reimbursable meal on the tally sheet, and some were not. There was no tracking on the tally sheet of non-reimbursable meals or of individual items taken by students.</p> <p>At the end of service 35 reimbursable breakfasts were recorded by the server on the tally sheet. The reviewer observed 49 students come up to the service line, 20 of which took less than a reimbursable meal. Based on the reviewer's observation, 29 reimbursable meals were served. Fiscal action will be assessed as necessary for the non-reimbursable meals that were recorded as reimbursable.</p> <p>During lunch observation at Cathedral Square, there were a few students that grabbed a milk from the line and went back to their tables. This was not part of a reimbursable meal and the milk was not noted on the tally sheet.</p> <p>Corrective Action: Modify the POS procedures for breakfast at Cathedral Square to ensure that only fully reimbursable meals are being recorded on the tally sheet in the meal count section.</p> <p>If students are going to take just one item or an incomplete meal, they must be charged for this. Alternatively, these items/incomplete meals could be recorded in a separate area on the tally sheet--these would then be considered non-program foods given away for free. If kids are going to be allowed to take non-program foods for free which are then tracked, a fund transfer into the food service fund is needed to account for the cost of these items. The food service account cannot absorb the cost of providing non-program foods for free.</p> <p>The corrective action for this finding may include additional training for the staff, signage or other communication for students, and rearrangement of the meal service line. Please provide a written plan describing how this POS issue will be resolved.</p>
Site Name	Tenor Hi	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	323	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/24/2023 11:24 AM</p>	<p>Finding: The SFA has some procedures in place for edit checks prior to meal claim submission, however additional controls and edit check records are needed. Please</p>

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		<p>refer to the corresponding technical assistance portion of this report for additional explanation of edit check requirements.</p> <p>Currently, a staff member at each school site is supposed to compare the daily meal counts for breakfast and lunch on the tally sheets to that day's school attendance in the student information software system. When the employee signs and dates the tally sheet, they are certifying they checked the numbers in the software and that there were not more meals served than students in attendance that day. However, the attendance numbers staff check are not recorded so the food service director may not necessarily know if the attendance was indeed checked.</p> <p>The director collects all tally sheets back from all sites each month and manually adds up the totals for each site and each meal. The totals are entered into a spreadsheet and the total meals divided by operating days is compared to each school's average daily attendance.</p> <p>While these current procedures are designed to minimize errors, the food service director should review all daily meal counts for all meals at all schools prior to claim submission. The director should ensure there are no individual serving days where meals claimed exceed the number of attendance-adjusted eligible students. This will further reduce the risk of any claiming errors and align more closely with edit check requirements.</p> <p>Corrective Action: Submit a completed, more detailed edit check spreadsheet for March 2023. The edit check file should show the number of meals claimed each day at each site for each meal. Each school's report should also include the highest enrollment for the month and the attendance-adjusted enrollment for the month. The director should compile all of this data each month once the daily check off sheets are obtained from all schools. The director should review the data for errors and investigate any issues prior to claim submission. The DPI CEP edit check template may be used as an example.</p>
Site Name	Tenor Hi	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/23/2023 10:20 AM</p>	<p>Finding: The number of operating days reported on the February claims for Tenor High were not accurate. However, the meal counts were correct. There were 15 operating days during the month on which school was in session and meals were served. However, the claim showed 17 operating days. This was found to be an error related to snow days where there was no in-person class and no meal service. The number of operating days on claims must reflect the number of days the site served meals during the claiming month, which may vary by site and meal.</p> <p>Corrective Action: Please provide a statement explaining how it will be ensured that operating days are accurately reported on claims going forward.</p>
Site Name	Tenor Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:28 PM</p>	<p>Finding: Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 12 meals on the day of review, Wednesday, March 22, 2023 with the missing vegetable component at Seeds of Health- Tenor High School Journal Square.</p> <p>Corrective Action: Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 12 meals on Wednesday, March 22, 2023 that were not offered the vegetable component.</p>
Site Name	Tenor Hi	

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Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:31 PM</p>	<p>Finding: Signage was not posted at Seeds of Health Tenor High School- Journal Square at lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal.</p> <p>The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage.</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch service line.</p>
Site Name	Tenor Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/29/2023 08:26 AM</p>	<p>Finding: Substituted menu items, that were replaced by the vendor, were not recorded on the production record. Any changes to the planned menu must be documented on the production record. When documenting substitutions be specific about the identity, portion size and description of the item.</p> <p>Corrective Action: Submit a statement which indicates understanding that all substituted menu items will be documented on the production record in detail with what food is being served, portion size and any necessary description.</p>
Site Name	Tenor Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:24 PM</p>	<p>Finding: The daily minimum requirement for fruit was not met for 9-12 grade for lunch meal service during the week of review. The following represent the portion sizes:</p> <ul style="list-style-type: none"> ● Monday, February 6- ½ cup fruit ● Tuesday, February 7- ½ cup fruit ● Wednesday, February 8- ½ cup fruit ● Friday, February 10- ½ cup fruit <p>The daily minimum requirement for 9-12 grade is 1 cup daily.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</p>
Site Name	Tenor Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:26 PM</p>	<p>Finding: The weekly minimum requirement for fruit was not met for 9-12 grade for lunch meal service during the week of review. Only 3 cups of fruit were offered during the week of review. The daily minimum requirement for 9-12 grade is 5 cups weekly.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</p>
Site Name	Tenor Hi	
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>Flagged 03/28/2023 03:19 PM</p>	<p>Finding: At both Seeds of Health Tenor High Schools- Journal Square and Cathedral Square production records were not consistently and accurately filled in daily during the week of review. Between the two campuses examples of these issues included not completing and/or not correctly completing the following sections:</p> <ul style="list-style-type: none"> • amount of reimbursable meals served, • milk usage, • accurate amounts of menu items leftover, • listing substituted items and time meals were received from vendor <p>Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements.</p> <p>Corrective Action: Submit one full week of accurate and completed breakfast and lunch production records, from each high school, including amount of reimbursable meals served, milk usage, correct amount of menu items leftover, listing substituted items (if applicable) and time meals were received from MCFI 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	Tenor Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	432	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/28/2023 03:44 PM</p>	<p>Finding: The weekly minimum requirement for fruit was not met for 9-12 grade for breakfast meal service during the week of review. During the week of review only 4.5 cups of fruit were offered. The weekly minimum requirement for 9-12 grade is 5 cups.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</p>
Site Name	Tenor Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/28/2023 03:43 PM	<p>Finding: There was a daily grain shortage at lunch meal service during the week of review. Only 1 oz. eq. grain was offered which does not meet the minimum 2 oz. eq. grain requirement for the 9-12 meal pattern.</p> <p>Corrective Action: Describe specifically how Seeds of Health- Tenor High School will work with the vendor to address shortages and create a plan for these situations in the future.</p>
Site Name	Tenor Hi	
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/28/2023 03:34 PM	<p>Finding: Staff at times seemed unclear about the Offer versus Serve (OVS) requirements for lunch. It is important for staff to understand the OVS requirements. OVS resources on WI DPI's Menu Planning webpage may be used as training resources. The OVS and Meal Pattern e-learning resources may also be helpful.</p> <p>Corrective Action: Have food service and school staff responsible for determining reimbursable meals attend training on Offer vs. Serve. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Tenor Hi	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/23/2023 10:17 AM	<p>Finding: The nondiscrimination "And Justice for All" poster is not located in the meal service area and/or not visible to students (FNS Instruction 113). At Journal Square, there was no poster. At Cathedral Square, there was a small version of the correct poster up behind the service line.</p> <p>Corrective Action: Provide a statement and or image of how this requirement will be met at Journal Square. During the visit at Cathedral Square, the correct poster was printed in the correct size and hung up in a publicly visible location--no further action required at Cathedral Square. Corrected on-site.</p>
Site Name	Tenor Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/23/2023 10:15 AM	<p>Finding: At Journal Square, the most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected on-site.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
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03/24/2023	3253		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>The SFA has created their own professional standards tracking sheet. The form includes space for all of the required information and is appears to work well for the SFA. However, there were a few specific details that were missing or in need of editing:</p> <ul style="list-style-type: none"> • Ensure that all hire dates are filled in. • It is recommended that the Authorized Representative record at least 4 hours of professional standards training annually (including civil rights training) due to their involvement in financial management of the Child Nutrition Programs. • Ensure that each staff member listed that has duties in Child Nutrition Programs has their own tab in the tracking tool. • Double check the full time vs part time designations and the corresponding required hours. <ul style="list-style-type: none"> ○ For professional standards purposes, staff that work 20 or more hours in school nutrition each week are "full time." Staff that work less than 20 hours each week in school nutrition are "part time." Full time staff need 6 hours of annual training, and part time staff need 4 hours of annual training. For staff hired January 1 or later, only half of the required annual hours are needed during the first school year of employment. 									3/24/2023 11:51:16 AM		
03/24/2023	3252		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>The U. S. Department of Agriculture (USDA) regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made.</p> <p>Although it is not required to complete an edit check incorporating an attendance factor at breakfast, USDA regulations prohibit claiming for free and reduced price breakfasts in excess of the number of children approved for free and reduced price breakfasts.</p> <p>Please refer to the CEP Edit Check template for an example. For further assistance understanding edit check requirements, it is recommended to review the Edit Check section of the Site-Based Claiming webcast or the Counting/Claiming/POS webcast.</p>									3/24/2023 11:30:50 AM		
03/23/2023	3251		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>USDA Community Eligibility Provision guidance was expanded in memo SP 54-2016 to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.</p>									3/23/2023 6:30:10 PM		
03/23/2023	3250		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> 1. Document the complaint using the USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to: 									3/23/2023 6:26:33 PM		

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<ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> ○ Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 ○ Fax: (608) 267-0363 ○ Email: jessica.sharkus@dpi.wi.gov 					
<p>3. Maintain a 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 with a legitimate need-to-know.</p>					
03/23/2023	3249		Administrative Review		FSD
Comments					
			Created By	Created Date	
<p>When including the non-discrimination statement on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current full official statement.</p> <p>The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.</p> <p>The abbreviated statement, "This institution is an equal opportunity provider", is only used when space is limited, such as printed menus.</p> <p>All non-discrimination statements must be in the same size font as document's main text. Statement words and formatting cannot be altered.</p> <p>Additional languages are found on the USDA FNS Non-discrimination webpage. Please ensure the most updated statement is on all necessary program materials. On some of the materials reviewed, including the website, the statement used was not the most updated.</p>					
				3/23/2023 6:25:09 PM	
03/23/2023	3248		Administrative Review		FSD
Comments					
			Created By	Created Date	
<p>Any food items purchased with money from the non-profit food service account that is taken by a student but is not part of a reimbursable meal is considered a non-program food. This includes students that want just a juice at breakfast or want to take just a milk at lunch--which was observed at Cathedral Square.</p> <p>SFAs must generate adequate revenue from non-program foods so that the total revenue meets the requirements in 7 CFR 210.14 (f). If non-program foods will be given away, the cost of these items must be covered by a non-federal funding source. Reimbursement money from USDA cannot be used to cover the costs of providing these non-reimbursable items to students free of charge because they are considered non-program foods.</p> <p>Therefore, these non-program foods must be tracked and recorded throughout the year to ensure that another funding source covers the cost of providing the items for free. Alternatively, the SFA could take measures to ensure students only select full reimbursable meals and not individual meal components.</p> <p>Please refer to the Non-Program Foods section of the Financial Management webpage for resources.</p>					
				3/23/2023 6:22:29 PM	
03/23/2023	3247		Administrative Review		FSD
Comments					
			Created By	Created Date	
<p>Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable meal.</p>					
				3/23/2023 6:15:49 PM	
03/23/2023	3246		Administrative Review		AR
Comments					
			Created By	Created Date	
<p>The Child Nutrition Program Annual Financial Report (AFR) is due annually by August 31. SFAs should submit the report by this date. If the school still has an ongoing financial audit (e.g. GAP or single audit) at the time the AFR is due, the AFR should still be submitted on time. SFAs may modify their AFR online until December 31, so any changes needed as the result of the audit can be made in online services until that date. Please refer to the AFR manual for details on modifying the report.</p>					
				3/23/2023 6:11:05 PM	
03/23/2023	3245		Administrative Review		AR

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Comments					Created By	Created Date
<p>The ending balance, on June 30, can never be a negative balance. A transfer must be made from non-federal funds to bring the ending balance to \$0.00. A negative ending fund balance requires an operating transfer from non-federal funds to cover the deficit. Some examples of non-federal funds are the General Fund (10), the Angel Fund (21), Gift Fund (60), donations etc. Transfers into the food service fund must be permanent and may not be transferred out in the following year if the food service fund balance is positive.</p> <p>The school food service fund may not have an ending fund balance more than three-month operating expenses, as this is considered "Excess Cash Balance". Federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status. To calculate, divide the SFA's annual food service operating expenses by nine operating months to obtain the SFA's average monthly expenses. Multiply this amount by three to obtain the SFA's three-month average expenses. If the three-month net cash resource limit is exceeded, a spend-down plan is required.</p>						3/23/2023 6:05:06 PM
03/23/2023	3244		Administrative Review	FSD		
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<p>Additional record retention rules apply for CEP schools. These are detailed in 7 CFR 245.9 and the USDA CEP Planning and Implementation Guidance. The records listed below must be kept as long as the SFA is in CEP (including any extensions), plus three fiscal years after the submission of the last Claim for Reimbursement which was based on the data. In any case, if audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.</p> <ul style="list-style-type: none"> Data used to calculate the identified student percentage (which is usually primarily direct certification data) Annual selection of the identified student percentage CEP applications Annual CEP intent forms Eligibility worksheets submitted with CEP applications CEP approval packets sent by DPI after application is submitted and approved Total number of breakfasts and lunches served daily Free and paid claiming percentages used to claim meal reimbursement Non-Federal funding sources used to cover any excess meal costs School-level information provided to the State agency for publication 						3/23/2023 6:01:23 PM
03/23/2023	3243		Administrative Review	FSD		
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<p>SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). There is room for improvement in food security at Cathedral Square. As the kitchen area continues to be rearranged, please consider how all of the food items may be further safeguarded, such as store in a locked area at non-meal service times.</p>						3/23/2023 6:00:03 PM
03/23/2023	3242		Administrative Review	FSD		
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<p>All food service employees must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information. Please ensure that each food handler has a signed form on file that is readily accessible during an inspection or review.</p>						3/23/2023 5:56:24 PM
03/23/2023	3241		Administrative Review	FSD		
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<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.</p> <p>Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.</p> <p>Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.</p> <p>Please remember that a food safety plan is a working document. This means it should be updated as procedures change in response to menu modifications, new equipment, or other operational changes. Staff members and other food handlers should be held accountable for the procedures outlined in the site-specific food safety plan. Modifications should be made for each serving site based on the specific school's procedures. Any SOPs that do not apply to the school site should be omitted from the school's food safety plan. Further, any additional SOPs that are relevant to the school's procedures should be developed and added to the food safety plan.</p>				3/23/2023 5:55:10 PM	
03/23/2023	3240	Administrative Review	FSD		
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<p>As a reminder, two or more milk types must be available to all students at each meal, and one milk type must be unflavored at each meal. During breakfast observation at Cathedral Square, only one milk type was set out on the line before service. After the reviewer pointed out the single milk type, an additional milk type was put out on the line before service began.</p>				3/23/2023 5:50:12 PM	
03/23/2023	3239	Administrative Review	FSD		
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<p>School nutrition staff should carefully consider when and how much hot food to put out on the line. At lunch at Cathedral Square, the hot entree was taken out of the warmer and put in the steam table well before service time. The entrees were stacked higher than the edge of the steam table and may not have been as hot anymore at the meal service time. This a potential food quality issue to be mindful of.</p>				3/23/2023 5:47:46 PM	
03/23/2023	3238	Administrative Review	FSD		
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<p>The school sites save excess food items from the vended meals to use later when it is reasonable to do so. This can be a good way to reduce waste and have back-up items on hand in case some menu items are not delivered in correct quantities. Please be sure that staff members are continually monitoring the quality of these food items. Some of the items on-hand were past the quality "best by" date on the package and some pieces of whole fruit out on the "fruit bar" were diminishing in quality. Rotation of items to ensure "first in, first out" is also recommended.</p>				3/23/2023 5:44:44 PM	
03/22/2023	3223	Administrative Review	FSD		
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<p>Supply Chain Assistance (SCA) Funds are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs.</p> <p>The USDA Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers includes detailed information on allowable ways to utilize these funds.</p> <p>SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount to the funds received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. The SCA funds do not need to be accounted for separately from other funds in the nonprofit school food service account, but their use must be tracked. The SFA may determine the best way to do this. Other documentation such as invoices, receipts and other documentation that includes</p>				3/22/2023 7:51:17 PM	

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domestic origin should be maintained for the required period of three years plus the current school year.			
DPI has developed a Supply Chain Assistance (SCA) Funds Expense Tracker that SFAs may use to track these funds, however, SFAs may use any form of tracking.			
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<p>Special Dietary Needs - The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.</p> <p>Policy Requirements - At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of the SFA. If Seeds of Health already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.</p> <p>Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:</p> <ol style="list-style-type: none"> 1. an explanation of how the child's physical or mental impairment restricts the child's diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner <p>A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.</p> <p>SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within Offer vs. Serve for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.</p> <p>Brand Names - In some situations, a State licensed healthcare professional may request a particular brand name of a product as a substitute on the medical statement. Generally, SFAs are not required to provide the specific brand requested, unless the brand name item is medically necessary. Instead, the SFA must provide a reasonable modification that accommodates the child's disability and provides equal opportunity for the child to participate in and benefit from the Program. In situations where the requested substitute is very expensive or difficult to procure or obtain, it would be reasonable for the SFAs to follow up with the family to see if a different substitute would be safe and appropriate for the child.</p> <p>For example, a medical statement for a child with gluten intolerance may request a specific brand of gluten-free bread. If a modification request indicates a brand name item, in most instances, a generic brand is sufficient, unless the brand name item is medically necessary. This can be determined through the interactive process with the child's parent or guardian. In the example above, if the medical statement lists a specific brand of gluten-free bread, the SFA could check with the family to see if it would be safe and appropriate for the SFA to provide a different brand. In this instance, the family could then affirm the brand name change.</p> <p>Timing of Medical Statements - Sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child's parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child's need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p>			3/22/2023 7:48:33 PM

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<p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.</p> <p>Resources - The Special Dietary Needs Flowchart outlines the process of accommodation determination. The USDA Q&A on Accommodating Special Dietary Needs resource, the USDA Special Dietary Needs Handbook, and Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) contain additional detailed information.</p>							
03/22/2023	3221		Administrative Review		FSD		
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<p>SFAs are required to retain basic records demonstrating compliance with local wellness policy (LWP) requirements. For assistance in the creation and updates of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A summarized "In a Nutshell" resource, policy content checklist, a wellness policy builder, and wellness policy report card found on the LWP webpage. The policy builder contains a variety of sample language that SFAs can adopt and modify to suit their needs instead of needing to come up with language from scratch.</p> <p>The SFA must review and update the local school wellness policy (LWP) on a periodic basis. The frequency of updates is a local decision and is based on the content and structure of the plan (7 CFR 210.31).</p> <p>SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. The SFA must permit parents, students, physical education teachers, school health professionals, school administrators, school board members, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders invited to participate in the committee, their relationship to the SFA, and those who participated in the review and update of the LWP (7 CFR 210.31). SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31). Suggestions for including a variety of stakeholders include:</p> <ul style="list-style-type: none"> • sending a letter to parents/families; • providing status updates in teacher/staff trainings; • posting a call for volunteers on the school website; • including a blurb on the school, SFA, or local community newspaper, newsletter, and/or blog; • partnering with community organizations to spread the information; and • posting information about the process on social media. <p>SFAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). The SFA must inform the public about the content, implementation of, and updates to the Local Wellness Policy (LWP) on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31).</p> <p>An assessment of the Local Wellness Policy (LWP) must be conducted once every three years, with the first assessment completed no later than June 30, 2021. It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.</p> <p>SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. The SFA is required to inform and update the public about triennial assessment. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public including: mailing flyers, newsletters, emails, website postings, and newspaper articles.</p>							
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LWP content must address all of the required content areas, which can be found in the checklist . If there are content areas that the SFA chooses to be more strict on than the USDA requirements, that is acceptable but the written policy content should reflect this and still include language on the content area. For example:							
<ul style="list-style-type: none"> USDA requires that policies address foods sold outside of the school meals programs. The SFA decides not to allow any foods to be sold outside of the schools meals on the school campus. Instead of the SFA including detailed language in policy for the Smart Snacks standards for foods sold, it may state something like, "The school does not allow any foods to be sold outside of the school meal programs." 							
03/22/2023	3307	431	Administrative Review	Tenor Hi	FSD		
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Milk is a required component as part of the National School Lunch Program (NSLP). Schools must accurately record daily usage by milk type on production records (e.g., skim chocolate milk, 1 percent white milk, skim milk).							3/28/2023 3:54:15 PM
03/22/2023	3305	431	Administrative Review	Tenor Hi	FSD		
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Regarding substitutions, any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. It is always better to substitute something creditable, rather than have a missing component. Be specific on production records about the identity, brand, portion size and description of items served.							3/28/2023 3:50:20 PM
03/22/2023	3322	432	Administrative Review	Tenor Hi	FSD		
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It is required that the last student in line be offered all the meal components in the required portion sizes and several times during the week of review, per the production record, and the day of the onsite review, the site ran out of at least one meal component or food item. The site should confirm with their vendor the amount of food received to guarantee enough food is onsite to offer to all students at each meal service when able. It is also recommended that Offer vs. Serve be correctly implemented which will allow students to have a choice on which items they take at meal time rather than automatically giving all students certain items which will decrease the chance of running out of food items.							3/29/2023 8:30:59 AM