

Administrative Review Report

Prescott School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/21/2019	01/29/2020
On-Site Review	02/17/2020	02/18/2020
Site Selection Worksheet	11/21/2019	11/25/2019
Entrance Conference	02/17/2020	02/17/2020
Exit Conference	02/18/2020	02/18/2020

Commendations:

From the Nutrition Program Consultant (NPC):

The district's Food Services webpage is very well developed and informative. The menus posted on the website are bright and appealing. Great job making resources available online!

The district's local wellness policy and corresponding wellness initiatives are outstanding! The district's local wellness policy is very comprehensive and meets all content requirements. The district also puts great effort into making the policy publicly available through multiple avenues. The promotion of the wellness policy would make it very easy for an interested person to get involved with the wellness committee and initiatives. It is clear that student, staff, and community wellness are valued in the Prescott School District. The district is encouraged to share photos from school wellness activities with the DPI School Nutrition Team social media page to highlight the awesome things happening in the district.

The staff members responsible for meal benefit oversight do an excellent job managing direct certification and meal applications. The benefit issuance information was organized and easy to review. Out of the 163 eligibility statuses reviewed, there was only one error--great job! Additionally, the verifying official did a great job handling a challenging verification scenario. Keep up the great work!

From the Public Health Nutritionist (PHN):

Thank you to all staff at Prescott School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the food service director for sending documentation ahead of the on-site visit in a timely manner; this greatly expedited the AR. The food service director is well-versed in the child nutrition program regulations and does a great job menu planning, forecasting, and overall managing five schools. Malone Intermediate School had a perfect week of review for breakfast and lunch with above 90% of grains as whole grain-rich! The kitchen, store room, cooler, freezer, and cafeteria were clean, organized, and staff were friendly. Malone Intermediate goes above and beyond by recycling all milk cartons, which is beneficial to the environment. The cafeteria also has clear signage showing students how to select a reimbursable meal. Thank you for serving healthy, nutritious meals to the students of Prescott School District!

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Findings and Corrective Action:

Site Name	
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	106
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Sharing Information with Other Programs form posted on the Food Services webpage does not allow households to consent to having their meal benefit information shared for individual purposes. The form only allows households to consent to share their information for a bundled set of purposes. Households must provide consent for each individual purpose their information will be shared.</p> <p>Corrective Action: Update the form so that there is a separate checkbox for each reason their free/reduced-price eligibility will be shared. Upload the modified form into SNACS.</p>
Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA offers field trip meals, but the POS system for field trip meals does not meet POS requirements. Currently, student accounts are charged for meals based on who ordered a meal and the charges are removed if it is later communicated that the student did not take their meal. The charges are based on which students ordered a meal, and not on which students actually received a reimbursable meal at lunch time.</p> <p>Corrective Action: Modify the POS system so that students are checked off by an adult as they take their meal at lunchtime on the trip. Completed sheets should be returned to food service and used for charging student accounts. Submit a written plan detailing how field trip meals will be counted and claimed going forward, including a copy of the check off sheet that will be used at the POS.</p> <p>The Field Trip meal resources on the Lunch Menu Planning webpage can be of assistance for these items (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).</p>
Site Name	

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Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: On the Annual Financial Report (AFR), all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). There were not any revenues or expenditures recorded for the Wisconsin School Day Milk Program (WSDMP). The revenues on the 2018-19 AFR should reflect the reimbursements received for the program in the entire school year 2017-18 school year. The expenses should reflect the total costs associated with serving free milk to free and reduced-price eligible students in grades K-5 in the school year 2018-19.</p> <p>Corrective Action: Review the AFR webcast and/or manual on the DPI website then manually update the 2018-19 AFR on hard copy with revenues and expenses broken out by program and category (https://dpi.wi.gov/school-nutrition/training/webcasts#afr; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-instructions.pdf).</p> <p>Upload the a copy of the corrected report into SNACS. Once approved, the report will need be updated in the online portal by the DPI accountant. After December 31, SFAs cannot electronically modify their AFR.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials. See technical assistance section of the report for resources to assist with this.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: One student was approved for free meal benefits based on a direct certification approval letter the determining official received from the student's former SFA. An approval letter is not adequate source documentation to establish a meal benefit for a transfer student. There was no any other valid documentation available to support this student's free benefit.</p> <p>Corrective Action: Contact the student's prior SFA and request a copy of the exact direct certification run that the student matched on. The copy should only contain the name of the one student in question and should have all other students' information blacked out. If this documentation cannot be obtained, the SFA must obtain some other form of sufficient documentation to support the free meal benefit which could be a direct certification match completed by Prescott School district, or the household could choose to complete an income application for this student.</p> <p>If no documentation can be obtained to support the free benefit, the household must be sent an adverse action letter and be changed to "paid" status 10 calendar days after the date the letter is sent. In SNACS, please upload any documentation obtained or a copy of the adverse action letter sent. A template adverse action letter has been uploaded in the Documents tab of SNACS.</p>	
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	134	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: The direct certification upload files contain the names of all enrolled students with access to school meals, including the St. Joseph's students as is required. However, the St. Joseph's students are assigned to the code "100" in the software system, which is the same DPI school code assigned to the Prescott 4K (which is "not in program").</p> <p>For this reason, the direct certification reports that show data by school code incorrectly show the data for St. Joseph's as Prescott 4K. This coding error makes it appear that St. Joseph's students are not run through direct certification, but that the 4K students are. The food service director stated the St. Joseph's DPI school code cannot be assigned in the</p>	

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	software system because it is four digits, and the system limits the codes to three digits. Corrective Action: Submit a plan describing how this reporting error will be corrected. The food service director will likely need to assign the St. Joseph's students to a different code in the software system that is not associated with any other schools in the SFA.
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The professional standards tracking tool utilized by the SFA is missing several pieces of required information. The tool does not list each staff members' hire date, title/position, or the required hours of training.</p> <p>Corrective Action: Please update the tool so the missing information is included. Upload the modified tool into SNACS. <i>Corrected on-site; no further action required.</i></p>
Site Name	Malone Intermediate (3-5)
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The following three non-reimbursable meals were observed at Malone Intermediate School during lunch service on 2/18/20:</p> <ol style="list-style-type: none"> 1. Cheeseburger on WG bun, milk, Cutie (short 1/2 cup fruit and/or vegetable) 2. Cheeseburger on WG bun, milk, Cutie (short 1/2 cup fruit and/or vegetable) 3. Applesauce, broccoli, smile potatoes (missing third component) <p>Corrective Action: Submit a statement indicating understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Explain how these errors will be corrected and avoided in the future.</p>
Site Name	Malone Intermediate (3-5)
Form Name	Meal Components and Quantities - Review Period (409-412)

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Question #	409	
TA Log #		
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Production Record Requirements were not met. The following information was either missing or not recorded:</p> <ol style="list-style-type: none"> 1. Planned number of meals at breakfast (not recorded) 2. Actual number of servings prepared at lunch (can update column header to reflect planned/actual or create a second column for actual) 3. Planned/actual quantity prepared (in purchase units) at breakfast and planned quantity prepared (in purchase units) at lunch (can update column header to reflect planned/actual or create a second column for planned) 4. Age/grade groups at breakfast and lunch (e.g. 3-5 for Malone Intermediate School) <p>Corrective Action: Submit a plan of action for how the items listed above will come into compliance.</p>
Site Name	Malone Intermediate (3-5)	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: During breakfast service at Malone Intermediate, cheese sticks and yogurt are served out of container without utilizing temperature control (e.g. mechanical refrigeration or ice-lined insulated containers equipped to maintain a temperature of 41 degrees or less). After meal service, any unserved cheese sticks and yogurt are returned to the cooler for future service without any temperature monitoring or recording of temperatures. This practice does not adhere to the Time as a Public Health Control SOP or other related SOPs in the food safety plan.</p> <p>Corrective Action: Milk, cheese, and other dairy products are considered time/temperature control for safety (TCS) foods, and thus must be held under temperature control or be handled using time as a public health control procedures. Saving and re-servicing TCS foods held outside of temperature control is not allowable per the Wisconsin Food Code, although local enforcement by the sanitarian conducting food safety inspections may vary. Regardless of which option for serving TCS foods is used, a corresponding SOP must be included in the site-specific food safety plan</p>

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	<p>and adhered to. Consider the following options to modify the current procedures:</p> <ol style="list-style-type: none"> 1. Serve the TCS food items out of a mechanical refrigeration unit that is regularly monitored, such as the milk cooler. 2. Utilize time as a public health control (TPHC) procedures. Under this plan, leftovers cannot be saved for future service and must be discarded. 3. Utilize ice-lined milk bags, barrels, or containers so that temperature control is used, along with monitoring of temperatures. Please reference the template SOP for Use of Milk Bags: Monitoring Temperature Option for language pertaining to this practice. 4. Work with local regulatory authority/sanitarian to develop an alternative, approved method for re-serving milk and other TCS foods that have been held outside of temperature control during meal service. <p>Submit a statement describing how TCS food items held outside of temperature control during service will be handled going forward. It is recommended to consult with the local sanitarian to establish procedures for appropriately saving these leftover, unserved TCS items. If any SOPs are updated or modified, please submit these as part of the corrective action. Communications with the sanitarian (if applicable) may also be submitted as part of corrective action.</p>
Site Name	Malone Intermediate (3-5)
Form Name	Wisconsin School Day Milk Program
Question #	4
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Milks are being claimed based on attendance counts or another counting system rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Milk Program (WSDMP) must be recorded as the students receives a milk.</p> <p>During program observation, students took the class roster with student milk choices indicated down to the cafeteria to pick up the appropriate number of milks. After returning to the classroom, the students handed out the milk to those who ordered one. The roster indicating who wanted milk was then returned to the kitchen for entry into the software system. Teachers were not checking or marking off if and when</p>

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	<p>students actually received their milk. This was observed at the review site, Malone Intermediate.</p> <p>Corrective Action: Determine how accurate POS counts will be obtained for WSDMP at Malone Intermediate. It is also advised to ensure that POS requirements for the program are understood at the other schools that operate WSDMP. Please implement the new POS process as soon as possible, including providing training to teachers that will be responsible for POS records.</p> <p>To satisfy the corrective action, please submit:</p> <ul style="list-style-type: none"> • a detailed statement, outlining how the accountability system for claiming milk has been changed to include an approved POS • provide copies of any communications sent to teachers regarding proper POS expectations • after implementation of the new POS process, provide two weeks of WSDMP counts for Malone Intermediate
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Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/24/2020	1768	314	Administrative Review	ALL				

Comments

Alternate SFA Agreement	Created By	Created Date
<p>Prescott School District has taken on responsibility for the school nutrition programs at St. Joseph Catholic School (St. Joe's) through an alternate SFA agreement, which went into effect prior to the start of the 2018-19 school year. The agreement appears to be working well for both parties, and it is commendable that Prescott School District has taken on this extra responsibility in order to serve the children of St. Joe's. The agreement was signed by the appropriate officials and uploaded into the online contract as required. This agreement should be renewed annually to ensure the terms are still acceptable to both parties.</p> <p>The agreement currently stipulates that St. Joe's will be responsible for distributing the meal applications to households, supplying a computer and staff person to operate the POS, maintaining/replacing food service equipment at St. Joe's, providing smallwares for cooking/serving, and paying health department inspection fees. The terms of the agreement are largely up to local discretion, however it is important to consider how tasks and costs will be continue to be divided between Prescott and St. Joe's.</p> <p>Prescott could consider altering the terms of the agreement so that it's Fund 50 will pay for the cooking/serving smallwares and health inspection fees at St. Joe's. The health inspections are required as part of NSLP participation (and would not be required outside of</p>		2/24/2020 11:19:09 AM

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NSLP unless perhaps the church/school was regularly selling food for other purposes) and the smallwares (such as utensils, trays, etc.) are likely used primarily for lunch service. Further, if St. Joe's did not pay the local regulatory authority the health inspection fees as required, the Prescott food service director would be held responsible by the state agency to ensure proper payment is made.

There are several considerations regarding the stipulation that St. Joe's pays for food service equipment repairs/replacements. Typically, revenue generated from the school meal programs is used to repair and replace food service equipment. As required by the agreement, Prescott receives all revenues from the service of lunches at St. Joe's and thus St. Joe's does not have its own separate food service fund to pay for its food service equipment. If the St. Joe's lunch program generates enough revenue through reimbursements and household payments to cover more than the costs of its meal production, it may have additional revenue accrued into the Prescott Fund 50 account that could be used to cover some of its equipment costs (if desired). However, it is important to consider what would happen to equipment purchased by Prescott for St. Joe's if the agreement was terminated. It is possible that Prescott would need to take the equipment back or sell it to St. Joe's, since it would have been paid for with the Fund 50. The agreement could continue to require St. Joe's to pay for its equipment repairs/replacement, which would mean that equipment would belong to them and could add value to the church/school even if the agreement were ever terminated. Please consider these items when determining how St. Joe's equipment will be paid for going forward.

Please also keep in mind that through this agreement, the Prescott food service director/authorized representative is ultimately responsible for the full food service operations in the Prescott School District and St. Joe's.

02/24/2020	1767	700	Administrative Review	ALL				
Comments								
Revenue and Expenditure Tracking					Created By		Created Date	
Revenues are recorded when measurable and available. Because the state aid for the Wisconsin School Day Milk Program (WSDMP) is not known until the claim is paid out in the spring of the school year after the claim is submitted, the revenue for WSDMP should be recorded when there is a cash receipt. Federal reimbursements are measurable and available once the monthly reimbursement claims are completed. Expenditures are recorded when the expense is incurred, provided that goods/services are received. For this reason, milk purchased for service in the WSDMP would be recorded as an expenditure when the milk order is received.							2/24/2020 10:13:16 AM	
02/19/2020	1712	1407	Administrative Review	Malone Intermediate (3-5)				

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Comments					Created By	Created Date
TCS Foods						
<p>Time/temperature control for safety (TCS) foods are foods that require time and temperature control to prevent the growth of pathogens. Ideally, all TCS foods would be held under temperature control (such as mechanical refrigeration or ice-lined insulated containers equipped to maintain a temperature of 41 degrees or less) at all times, including during meal service.</p> <p>However, TCS foods may be held without temperature control if specific conditions are met under a practice called "Time as a Public Health Control." Please refer to the Wisconsin Food Code Fact Sheet: Time as a Public Health Control for detailed procedures regarding this practice (https://datcp.wi.gov/Documents/TimePHCFactSheet.pdf). To utilize "Time as a Public Health Control," the school must have a corresponding SOPs in the site-specific food safety plan. Template SOPs are available on the SNT Food Safety webpage (https://dpi.wi.gov/school-nutrition/program-requirements/food-safety). If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.</p> <p>TCS foods include:</p> <ul style="list-style-type: none"> • Milk and dairy products • Shell eggs • Meat (beef, pork, and lamb) • Poultry • Fish • Shellfish and crustaceans • Baked potatoes • Heat-treated plant food, such as cooked rice, beans, and vegetables • Tofu and other soy protein • Sprouts and seed sprouts • Sliced melons • Cut tomatoes • Cut leafy greens • Untreated garlic-and-oil mixtures • Synthetic ingredients, such as textured soy protein in meat alternatives 						2/19/2020 7:37:36 AM
02/18/2020	1699	806	Administrative Review	ALL		
Comments						
Professional Standards Tracking					Created By	Created Date
<p>When comparing the professional standards tracking tool to the civil rights training roster, there were several employees not listed on the civil rights roster. The food service director confirmed that the staff members in question did attend the training but failed to sign in. Please ensure all staff members sign in when attending</p>						2/18/2020 4:41:43 PM

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training, especially the required annual civil rights training, to document their participation. Retain all sign in sheets for training for at least three years plus the current as year, as is required for all other program documents.								
02/18/2020	1698	1300	Administrative Review	Malone Intermediate (3-5)				
Comments								
Water Access					Created By		Created Date	
During breakfast, students may get water from the water fountain outside the cafeteria. During lunch, there is a water cooler and cups available just after the cashier station. The water access observed at the school is adequate and many students were observed drinking water from the cooler. However, there are several possible ways to offer water to meet the potable water requirement. Please reference the USDA memo SP-28 2011 for more information and a Q&A about water access (https://fns-prod.azureedge.net/sites/default/files/cn/SP28-2011osr.pdf).							2/18/2020 4:28:33 PM	
02/18/2020	1690	811	Administrative Review	Malone Intermediate (3-5)				
Comments								
And Justice for All Posters					Created By		Created Date	
The "And Justice for All" posters were displayed prominently in the review sites. However, some of the posters were the new version of the poster (with the USDA building picture) and some were the old version of the poster (with the Statue of Liberty). New, updated posters are available for order through the DPI School Nutrition Team. These new posters should replace the old ones in all schools. Please order new posters as needed and update them in the school cafeterias. Orders can be placed here: https://forms.gle/shUAzpwgRWbMryFm8 .							2/18/2020 1:33:37 PM	
02/18/2020	1688	705	Administrative Review	ALL				
Comments								
Allowable Costs					Created By		Created Date	
As a reminder, all expenses charged to Fund 50 must be necessary, reasonable, and allocable. Costs that are shared across the district can only be charged to Fund 50 if it can be determined how much of the item/service was directly used by food service. The district charges \$200 per year to food service for phone bills. While it was unclear how this \$200 charge was initially determined, there are direct food service costs for phone service that exceed the amount being charged. The bookkeeper collaborated with the IT department to confirm that there is a monthly bill of about \$747 specifically for seven custom calling services used in the district. Of these seven services, two of them are specifically for food service. This would mean that the district could be justified in charging food service the appropriate portion of this bill monthly. However, the							2/18/2020 12:56:14 PM	

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district chooses to charge a yearly \$200 to food service. Please ensure that documentation supporting this charge is retained.									
02/18/2020	1687	409	Administrative Review	Malone Intermediate (3-5)	FSD				
Comments									
Production Records, Serving Sizes						Created By		Created Date	
Serving sizes must be listed for each menu item. On some days, fruit was written on production records, but the serving size did not reflect what was actually served. For example, Cuties were written with 1 each, when in practice 2 each were served, which credits 1/2 cup fruit. Consider also adding the count to items such as apples, as different sizes credit differently.								2/18/2020 9:51:09 AM	
02/18/2020	1686	409	Administrative Review	Malone Intermediate (3-5)	FSD				
Comments									
Standardized Recipes						Created By		Created Date	
Ensure standardized recipes are updated when new products are introduced. If a whole grain product is on the recipe, but an enriched product is used in practice, the recipe should be updated to reflect that.								2/18/2020 9:49:41 AM	
02/18/2020	1684	700	Administrative Review	ALL					
Comments									
Student Account Refunds						Created By		Created Date	
<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. At this time, USDA does not allow free or reduced-price eligible households to donate funds remaining in their accounts—they must be refunded in full.</p> <p>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 (https://www.revenue.wi.gov/Pages/UnclaimedProperty/Home.aspx). The DOR has rules concerning unclaimed property that must be</p>								2/18/2020 8:46:33 AM	

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<p>followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).</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.” Please reference the Financial Questions & Answers document on the Financial Management webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf).</p> <p>Please contact a financial specialist with further questions (https://dpi.wi.gov/school-nutrition/directory).</p>								
02/17/2020	1682	305	Administrative Review	ALL				
Comments								
Accounting for Alternate “Courtesy Meals”					Created By	Created Date		
<p>The SFA's unpaid meal charge policy states that students will be offered a non-reimbursable "courtesy meal" once they meet certain negative balance criteria. While this meal is rarely given out (as there are significant efforts in place to obtain payment prior to offering the "courtesy meal"), it is given free of charge. The cost of providing non-reimbursable alternate meals free of charge must be covered by non-federal funds. The SFA must record when and how many of these meals are served. These meals must then be paid for with a non-federal fund transfer or they must coded to "a la carte" so that they are included in the non-program food revenue tool. It is possible (and likely given the SFA's volume of non-program food sales) that the revenue generated from the sale of other non-program foods would be adequate enough to cover the cost of giving away a few of these alternate meals over the course of the school year. Please reference the Unpaid Meal charges resources on the Financial Management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management). Of particular interest may be the Unpaid Meal Charges In a Nutshell and the 2017 Unpaid Meal Charges Guidance Q&A.</p>						2/17/2020 6:20:37 PM		
02/17/2020	1681	1207	Administrative Review	ALL				
Comments								
Professional Standards Two Year Flexibility					Created By	Created Date		
<p>SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years, however some training must be completed each year. For example, a full time staff member could complete 12 hours of training over the defined two year period. This option does not require additional approval from the state agency.</p>						2/17/2020 6:10:58 PM		

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02/17/2020	1680	805	Administrative Review	ALL					
Comments									
Special Dietary Needs Accommodations					Created By	Created Date			
<p>The SFA is not currently making any accommodations for special dietary needs requests. However, if families inquire about such accommodations in the future, it is recommended that the food service director review the Special Dietary Needs webpage and contact the DPI School Nutrition Team for additional guidance, as needed (https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs).</p> <p>A signed medical statement from a licensed medical practitioner (in Wisconsin anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.</p> <p>SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.</p>						2/17/2020 6:09:54 PM			
02/17/2020	1679	803	Administrative Review	ALL					
Comments									
Procedures for Processing Civil Rights Complaints In CNP					Created By	Created Date			
<p>All SFAs must have procedures or policies (written preferred) for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended for SFAs use the Template Civil Rights Complaint Procedures to create written procedures (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx). 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. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints. Civil rights complaints that are filed with the district, must be forwarded to the Civil Rights Division of USDA FNS within five days.</p>						2/17/2020 6:08:04 PM			
02/17/2020	1678	305	Administrative Review	ALL					

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Comments								
Visiting Students					Created By		Created Date	
<p>It is allowable to charge visiting students of school age the paid student lunch price and claim them in the paid category. This is not required, but it is an option that may be desirable especially if non-enrolled school aged children frequently visit the district during meal periods.</p>							2/17/2020 6:05:19 PM	
02/17/2020	1677	305	Administrative Review	ALL				
Comments								
Extra Meal Purchases					Created By		Created Date	
<p>Per the food service director, when students take additional items in addition to their reimbursable meal they are typically charged a la carte prices per item. On the rare occasion a student takes an entire second meal, they are charged the adult meal price. Due to Smart Snacks requirements, each individual food item sold to students outside of the reimbursable meal, on the school campus, during the school day must meet the Smart Snacks standards. A bundled second meal charged at the adult meal price would not meet Smart Snacks standards. Please ensure that staff consistently charge students a la carte prices for each item they select in addition to their reimbursable meal.</p>							2/17/2020 6:03:41 PM	
02/17/2020	1676	126	Administrative Review	ALL				
Comments								
Following Up on Questionable Applications					Created By		Created Date	
<p>All approved meal benefit applications were approved for the correct benefit. However, on one application a reported income was not included in the final calculation. While this did not result in a different benefit determination, it is crucial that all incomes are included in the income calculation. The determining official should update the application to reflect the true income determination with all reported incomes included.</p> <p>Additionally, there were several applications with questionable incomes reported. There were a few instances when a household reported the exact same amount of income in two different places. While it is possible that multiple household members may make the same amount of income, it is also possible that household reported the same income source twice. The determining official correctly approved these applications at face-value, however is it highly recommended to obtain additional clarification from the household in these situations. If the income is misreported, it could change the family's benefit and possibly prevent them from receiving a benefit they need and are eligible for.</p>							2/17/2020 5:53:41 PM	
02/17/2020	1674	314	Administrative Review	ALL				

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Comments					Created By	Created Date
Online Contract Schedule A						
<p>The schools listed on Schedule A of the online contract do not exactly match the DPI directory. DPI recognizes Malone Elementary and Malone Intermediate as one school that operates in two buildings. However, each of these schools is assigned a school code for the school nutrition programs and are treated like separate schools for food service purposes.</p> <p>During the next contract submission in spring 2020, it may be required to update the contract to match the directory and treat these schools as one school with two buildings. Please consult with the DPI nutrition program consultant that conducted the administrative review prior to the 2020-21 online contract submission.</p>						2/17/2020 5:27:04 PM
02/17/2020	1672	314	Administrative Review	ALL		
Comments					Created By	Created Date
Online Contract Role Designations						
<p>On the online contract, there were two different names listed for the authorized representative and the food service director. The person listed as the authorized representative actually serves in both roles, and should be designated as such as the contract. The person previously listed as the director assists the director, but is not considered the director for authoritative or professional standards purposes.</p> <p>It is allowable for the same person to be designated as the authorized representative and the food service director. However, it is highly recommended that the authorized representative be a person that the director reports directly to (such as the business manager, superintendent, etc.). Having two different people designated ensures that all communications are received by multiple people, that someone will receive communications in the event of staff turnover, and that there is a form of "checks and balances" regarding the food service programs.</p>						2/17/2020 5:23:47 PM
02/17/2020	1671	208	Administrative Review	ALL		
Comments					Created By	Created Date
Documenting the Verification Process						
<p>The confirming/verifying official does complete a confirmation review prior to contacting the household chosen for verification. However, this is not well-documented. Further, the verifying official does not sign-off and date the application once the verification process is complete. The official should improve the confirmation review and verification completion documentation. The official could sign and date on the application when each process is complete, or the verification tracker form could be used throughout the process to assist in recordkeeping</p>						2/17/2020 5:14:20 PM

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(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-tracker-form.docx).									
02/13/2020	1643	1601	Administrative Review	ALL					Kirsten Voss
Comments									
Summer Food Service Program Outreach						Created By		Created Date	
<p>A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:</p> <ul style="list-style-type: none"> Promotion of the summer meals locator on the DPI Summer Meals webpage Promotion of calling 211 to locate meals in the area Promotion of the ability to text 'food' to 877-877 to locate meals in the area Promotion of the Summer Food Service Program webpage 								2/13/2020 1:14:26 PM	
02/13/2020	1642	711	Administrative Review	ALL					
Comments									
Adult Meal Pricing						Created By		Created Date	
<p>The SFA establishes the adult lunch by charging \$1.00 more than the lowest paid student lunch. It appears that adult breakfasts are charged \$0.50 more than the lowest paid student breakfast. This method has consistently resulted in adequate adult meal prices. However, there are also tools available on the Financial Management webpage that can be used to determine the minimum prices that must be charged for adult meals annually: the Adult Meal Pricing Worksheet and the reimbursement rate charts</p>								2/13/2020 1:00:13 PM	