

Administrative Review Report

Racine Charter One, Inc.

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/27/2023	04/04/2023
On-Site Review	04/04/2023	04/05/2023
Site Selection Worksheet	01/27/2023	02/01/2023
Entrance Conference	04/04/2023	04/04/2023
Exit Conference	04/05/2023	04/05/2023

Commendations:

Thank you to all staff at the School Food Authority (SFA) for the warm welcome and cooperation during this Administrative Review (AR). The Authorized Representative was very receptive to the reviewer's suggestions, and this was appreciated. The Authorized Representative is eager to learn and make changes to improve program compliance. Thank you to all the staff that work hard to serve healthy, nutritious meals to the students.

Recommendations:

The School Nutrition Team is offering both in person and virtual training this summer. The cost is \$10/person. Visit the [School Nutrition Summer Training webpage](#) for more information.

It is highly recommended that the authorized representative and food service director use the [CEP Calendar of Program Requirements](#) to help keep track of tasks and due dates. The digital version of the calendar has links included, though it could also be printed and written on as tasks are completed. The calendar is designed to be fairly comprehensive and is generally organized in the order that things must be completed each year.

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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	<p>Flagged 04/25/2023 02:05 PM</p>	<p>Finding: To complete the comprehensive resource management portion of the review, a 2021-22 school year statement of revenues and expenses for the food service account was requested. The needed documentation was not provided prior to the on-site visit and the documentation presented during the on-site review was not sufficient. This documentation is still needed in order to complete this section of the review.</p> <p>Corrective Action: Upload the 2021-22 school year statement of revenues and expenses for the food service account into SNACS. This statement should support the data reported on the Annual Financial Report (AFR). A copy of the AFR is not what is needed, but instead the reports/data that were used to complete the AFR.</p> <p>After receipt of this documentation, the resource management review will be completed by the reviewer. Additional corrective action may be needed, depending on what the review of the financial statements reveals.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/25/2023 01:55 PM</p>	<p>Finding: When students select foods/beverages that are not part of a reimbursable meal, the items are considered non-program foods. Examples include students wanting milk to go with a cold lunch or just choosing a juice at breakfast. If students select incomplete meals, the meal is not reimbursable and each individual item they take would then be considered a non-program food.</p> <p>SFAs must generate adequate revenue from other non-program foods so that the total revenue meets the requirements in 7 CFR 210.14 (f).</p> <p>The SFA must either charge students for the non-program foods they take, or must have another method to track non-program foods students take for free so a fund transfer can be made into the food service fund.</p> <p>If the SFA will allow students to take non-program foods free of charge, a "transfer" or journal entry would need to be made into the food service fund for the total cost of these items because food service dollars (reimbursements) would be covering the total cost of serving these non-program foods free of charge.</p> <p>Corrective Action: Determine if students will be charged for the individual non-program foods they take, or if the school will allow students to take non-program foods for free and have the food service account reimbursed for the cost of these items (such as by the general fund).</p> <p>Submit a description of the procedures that will be implemented to ensure the food service account generates sufficient revenue for non-program foods.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	711	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 04/11/2023 10:57 AM	<p>Finding: Adult meal prices are not set according to FNS Instruction 782-5 Rev. 1. The adult prices listed in the contract for adult meals were \$4.65 for lunch and \$2.56 for breakfast. These prices are compliant, however these are not the actual prices charged in the SFA. Adult breakfasts are not truly offered in the school. Adult lunches are being sold for \$3.00 which is not a high enough price.</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: Utilizing the Wisconsin Adult Meal Pricing Guide on the Financial Management webpage on the SNT website, determine the minimum price required for adult meals at your SFA. Notify SFA staff and update prices by the corrective action due date. Upload the calculations used to determine the adult meal price and a copy of the communication sent to staff into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 12:08 PM	<p>Finding: The Public Release was not distributed to the required locations for the 22-23 school year.</p> <p>Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year. Be sure to include at least one media outlet and at least one grassroots organization. Please also specify which form will be used.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 12:09 PM	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</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 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.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/25/2023 01:39 PM	<p>Finding: Civil Rights training did not occur or documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1). All staff received civil rights training in March/April 2023 except the executive director who is currently designated as the food service director on the online school nutrition contract.</p> <p>Corrective Action: Have the executive director complete the civil rights training before the corrective action deadline. Upload the sign in</p>

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		sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 12:11 PM	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. Please ensure this is completed fully (including signed and dated) by the deadline each year.</p>
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	Flagged 04/11/2023 10:48 AM	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Content regarding policy leadership, food/beverage marketing, the triennial assessment, and updating/informing the public was lacking.</p> <p>Further, the policy did have some language regarding school meals, foods sold outside school meals, foods provided but not sold, nutrition education, and physical activity. However, the content could use improvement. The SFA should especially focus on improving specificity of language related to school meals, food sold, and foods provided but not sold. Saying these items will meet the "U.S. Dietary Guidelines for Schools" or "meet or exceed the school's nutrient guidelines" is not sufficient. The Healthy Hunger-free Kids Act of 2010 and USDA Smart Snacks standards should be referenced.</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 #	1003	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/11/2023 10:50 AM	<p>Finding: SFA did not invite a diverse group of stakeholders to participate in the committee to develop, update and review the Local Wellness Policy (LWP) 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: Provide a statement of understanding that the LWP committee must invite a diverse group of stakeholders.</p>
Site Name		

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Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2023 10:49 AM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</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: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2023 10:37 AM</p>	<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), or documentation could not be provided showing how this was completed.</p> <p>Conversations with the SFA indicated that the SFA provides meals for summer school students, but this is not through SFSP. It appeared that the promotion of summer meals in the prior summer was only for the NSLP (or SSO) summer meals--not SFSP promotion.</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 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.</p>
Site Name		
Form Name	Community Eligibility Provision (2109 - 2110)	
Question #	2110	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/25/2023 01:58 PM</p>	<p>Finding: The SFA could not provide documentation showing the CEP notification letter to households for the 2022-23 school year was distributed.</p> <p>Corrective Action: Submit a statement explaining the plan to ensure that the CEP notification letter is sent to all households after July 1 but prior to the start of the 23-24 school year. Please ensure the letter used contains the full non-discrimination statement.</p>
Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2023 10:33 AM</p>	<p>Finding: Some of the practices observed in the school did not align with the currently approved online contract. The contract incorrectly listed the school as participating in the Afterschool Snack Program (ASP). The contract inaccurately indicated that the school uses a software program for POS and free/reduced applications. The vended meal agreement for 22-23 was not uploaded in the contract. The POS meal accountability methods listed in the contract were also inaccurate. The contract also stated the school does not participate in Offer vs Serve, but students were observed taking fewer than all of the required meal components. The adult prices listed on the contract were higher than the prices that were actually being charged.</p> <p>Corrective Action: The contract for 22-23 was updated on-site to remove ASP, remove the software program name, and upload the vended meals agreement for 22-23 with the vendor's food license.</p> <p>On the 23-24 contract, the SFA must ensure OVS and the POS methods are communicated accurately. The consultant that conducted the review will be responsible for approving the 23-24 contract, so these points will be checked in detail during the approval process. No further action required at this time.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2023 11:09 AM</p>	<p>Finding: The correct non-discrimination statement was not included on all program materials. Specifically, the statement posted on the school website is not the most updated version.</p> <p>Please also note the school website contains other outdated information pertaining to the Child Nutrition Programs. The agency has been in CEP for several years, but the website still contains language regarding meal benefit applications, negative meal account balances, and meal prices. This may be confusing to families and does not accurately represent how food service is handled at the school. This should be updated so it is accurate and clear for families, however it is not required as a corrective action item.</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	Professional Standards (1210 - 1219)	
Question #	1213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/25/2023 03:22 PM</p>	<p>Finding: The person designated as the Food Service Director on the online contract meets the minimum hiring standards for a new director based on their educational background (masters in education) plus three years' experience in university dining. However, they did not receive the required 8 hours of food safety training.</p> <p>The person designated as the Authorized Representative meets the minimum hiring standards for a new director as well based on their educational background (degrees in business and HR), but also has not received the required 8 hours of food safety training.</p> <p>The SFA may consider switching the roles of the currently designated Authorized Representative and Food Service Director (FSD). Typically, the Authorized Representative has oversight over the FSD (i.e. is their boss/superior). Please review the "definition of food service director" in the New Director Hiring Requirements In a Nutshell.</p> <p>Corrective Action: Determine who will be designated as the Authorized Representative and FSD going forward. Whoever will be considered the FSD must</p>

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		complete the required 8 hours of food safety training and submit documentation of completion.
Site Name		
Form Name	Reporting and Recordkeeping (1500 - 1501)	
Question #	1501	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/26/2023 09:54 AM</p>	<p>Finding: SFA is not maintaining program records and documentation for three years plus the current school year (7 CFR 210.23(c)). Of particular note was the SFA not having copies of the previous year's vended meals agreement, including the base year agreement with the vendor.</p> <p>Corrective Action: Provide a statement of how the record retention requirements will be met moving forward.</p>
Site Name	21st Century Preparatory School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/11/2023 10:24 AM</p>	<p>Finding: During lunch observation, there was no point of service (POS). Meal counts were obtained only by tray counts and how many kids ordered a lunch in the morning. An accurate POS is required for all meals. The point of service is defined as "the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid lunch has been served to an eligible child." Please refer the permanent agreement that is attested to at the time of online contract submission, as well as 7 CFR 210.7 and 7 CFR 210.11. Further, in vended meals agreements, the vendor's employees may not operate the POS, cannot count claims, and cannot submit claims.</p> <p>Corrective Action: Implement an acceptable POS at lunch that will yield an accurate count of reimbursable meals served to eligible students. Ensure the point of service is located after all components of a reimbursable meal have been offered. A school employee must operate the POS. The meal counts obtained at the POS are what must be used for the reimbursement claims. There are template CEP meal count sheets available that are recommended to be used at the POS. The designated school employee should use the count sheet to individually check off each student as they leave the line with their full reimbursable meals. Please note, the SFA has elected not to use Offer vs Serve (OVS). This means students must have all five meal components, including milk, on their tray for the meal to be counted as reimbursable. The POS operator must ensure students have a complete meal before being checked off and leaving the line.</p> <p>Inform the reviewer of the details of the new lunch POS plan to ensure it is fully acceptable. Once it is confirmed the new POS is acceptable and the SFA has implemented it, submit 30 consecutive operating days of meal counts (all of the completed daily check off sheets from the POS) and corresponding edit check reports. The "clean counts" will be used to calculate fiscal action back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	21st Century Preparatory School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	320	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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<p>Corrective Action History</p>	<p>Flagged 04/11/2023 10:26 AM</p>	<p>Finding: During breakfast observation, there was not a sufficient point of service (POS).</p> <ul style="list-style-type: none"> In the cafeteria, there was a school staff member tasked with marking off the students as they came through the line to select a reimbursable breakfast. However, many students came through the line with only 1 or 2 breakfast items which does not constitute a reimbursable meal. It was unclear if these students were marked off as receiving a reimbursable meal or not. The staff member was not closely monitoring and recording the breakfasts served. Check marks were recorded on the meal count sheet in small batches after kids left the line. Based on observation, this process did not result in an accurate total of reimbursable breakfasts served. There are breakfast items delivered to the gym, two 4K classrooms, and one other classroom each morning. There is no POS in any of these locations. Students grab the food items they want in these locations, and any unserved food is returned to the kitchen. The lead cook records the number of meals sent to each of these locations daily on the meal count sheet. Those meals are counted in the claim for reimbursement despite the lack of POS to determine how many reimbursable breakfasts were actually served to eligible students. <p>The point of service is defined as "the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid meal has been served to an eligible child." Please refer the permanent agreement that is attested to at the time of online contract submission, as well as 7 CFR 210.7 and 7 CFR 210.11. Further, in vended meals agreements, the vendor's employees may not operate the POS, cannot count claims, and cannot submit claims.</p> <p>Corrective Action: Implement an acceptable POS at breakfast that will yield an accurate count of reimbursable meals served to eligible students. Ensure the point of service is located after all components of a reimbursable meal have been offered. A school employee must operate the POS. The meal counts obtained at the POS are what must be used for the reimbursement claims. There are template CEP meal count sheets available that are recommended to be used at the POS. The designated school employee should use the count sheet to individually check off each student as they leave the line with their full reimbursable meals. Please note, the SFA has elected not to use Offer vs Serve (OVS). This means students must have all four breakfast items, including milk, on their tray for the meal to be counted as reimbursable. The POS operator must ensure students have a complete meal before being checked off and leaving the line.</p> <p>Inform the reviewer of the details of the new breakfast POS plan to ensure it is fully acceptable. The breakfast POS plan must address how the POS will be handled in the cafeteria, each 4K classroom, the extra classroom, and the gym. Every place where meals are served must have a POS that meets the requirements specified. Minimizing the number of locations where breakfast is served would help streamline the POS, would help reduce the risk of errors, and would improve program integrity.</p> <p>Once it is confirmed the new POS is acceptable and the SFA has implemented it, submit 30 consecutive operating days of meal counts and corresponding edit check reports. The "clean counts" will be used to calculate fiscal action back to the beginning of the school year and may result in a fiscal reclaim.</p>
<p>Site Name</p>	<p>21st Century Preparatory School</p>	
<p>Form Name</p>	<p>Meal Counting and Claiming - Review Period (322-325)</p>	
<p>Question #</p>	<p>322</p>	
<p>TA Log #</p>	<p>No TA Log# found</p>	
<p>Due Date</p>	<p></p>	
<p>Corrective Action Status</p>	<p>Flagged</p>	
<p>Corrective Action History</p>	<p>Flagged 04/25/2023 02:13 PM</p>	<p>Finding: SFA did not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The SFA is not completing monthly edit checks for each school prior to claim submission. A school staff member (not a vendor employee) must complete a monthly edit check for breakfast and lunch.</p> <p>Corrective Action: Immediately begin using the required edit check process prior to submitting claims for reimbursement. Upload monthly edit checks for lunch and breakfast for March and April 2023. Fiscal action may be calculated if meal counting and claiming errors are identified.</p>
<p>Site Name</p>	<p>21st Century Preparatory School</p>	

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Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 10:58 AM</p>	<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for breakfast. The SFA's contract currently lists 21st Century Prep as not participating in OVS. This means students must take all planned food items at breakfast, including the grain item, 1 cup fruit and 1 cup milk. Meals were being tallied as reimbursable despite the students not having a full meal; some students walked away with only one item.</p> <p>Corrective Action: All food service staff involved with the breakfast meal service need further training on reimbursable meals at breakfast. Regardless of if the SFA changes the contract to participate in OVS in the future, please submit the training plan, including staff who attended and the date.</p>
Site Name	21st Century Preparatory School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 11:35 AM</p>	<p>Finding: Students at 21st Century Prep were only offered unflavored low-fat milk at breakfast. Students must be offered a variety of milk, (at least two allowable milk types) at lunch and breakfast.</p> <p>Corrective Action: Typically, corrective action is to submit a week of breakfast production records documenting milk usage. Per the documentation from the week of review February 6-10, 2023, a milk variety is offered and all students take a milk, which is not an actual practice based on conversation and observation. Once staff are trained on OVS, please submit a new week of production records indicating the actual milk varieties served.</p>
Site Name	21st Century Preparatory School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/27/2023 02:49 PM</p>	<p>Finding: Racine Charter One does not utilize Offer versus Serve and instead requires all students to take the planned portion size of all components in order to be deemed a reimbursable meal. This was supported in the submitted documentation for the week of review. However, on the day of meal service observation, it was evident that all students do not regularly take the milk component and there was no SFA staff member checking trays at a point of service (POS).</p> <p>Corrective Action: The SFA has two options moving forward:</p> <ol style="list-style-type: none"> 1. To change their service model to OVS which would allow student to decline up to two components, or 2. Have a SFA staff member at the point of service confirming that all trays are reimbursable. <p>Based on the conversation at the exit conference, the SFA will likely remain having pre-plated meals with the Serve model and instate a proper POS. Please submit a statement to confirm the SFA's decision.</p> <p>Regardless of whether the SFA decides to use OVS or the "Serve" model (where all students must take all meal components), a proper POS is still required as described in the other corrective action items.</p>

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Site Name	21st Century Preparatory Schoo	
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 05/02/2023 08:23 AM</p>	<p>Finding 1: The Administrative Review was expanded to all of February and March 2023. On March 23, 2023, Easy Egg Bake entree was served at lunch with tater tots, peas, carrots, strawberries, and a milk choice. There was no grain served that day; this is a missing component.</p> <p>Corrective Action 1: Meals with missing components are subject to fiscal action. Per the production records, 351 student meals were served on 3/23/2023. Also, please submit a statement on how this will be resolved in the future when Easy Egg Bake is on the menu.</p> <p>Finding 2: Upon expanding the review to February and March, it was determined that there was a component shortage on three days in February. The breakfast meals on 2/13, 2/15, and 2/28 contained only ½ cup juice instead of the required 1 cup of fruit. Future instances of this component shortage may lead to fiscal action.</p> <p>Corrective Action 2: Please submit completed production records from 5/1/23-5/5/23.</p>
Site Name	21st Century Preparatory Schoo	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/26/2023 07:42 PM</p>	<p>Finding 1: Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components. Without production records, there is no way to prove that reimbursable meals were served.</p> <p>Despite production records being uploaded in SNACS for the week of review (February 2-6, 2023) there were no production records kept onsite. During the day of observation in April, DPI asked to see January, February, or March 2023 production records as a result of discrepancies from what was observed vs documented on the day of review.</p> <p>Corrective Action 1: Please submit two months of completed production records from February 2023 and March 2023. Failure to produce this documentation by the deadline may result in fiscal action. Thank you for completing this. Please see Finding 2.</p> <p>Finding 2: Upon expanded review of the production records, it was handwritten on a blank production record template that no meals were served on Friday, March 17 due to early release for teacher conferences. Through their vended meals agreement, the SFA does provide bagged lunches on early release days. Since the meals were not documented, these must be disallowed and not claimed for reimbursement.</p> <p>Corrective Action 2: Please cooperate with DPI to ensure the Friday, March 17 meals are not claimed for reimbursement. Also please submit the lunch production records for May 22-26th, 2023.</p>
Site Name	21st Century Preparatory Schoo	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/11/2023 10:42 AM	<p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete. The kitchen staff have not been sufficiently monitoring and recording the temperatures of the milk cooler that is stationed in the lunch service line.</p> <p>Corrective Action: Immediately begin taking and recording the temperature of the milk cooler. Upload one month of completed temperature logs for the milk cooler in the meal service line into SNACS. Provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.</p>
Site Name	21st Century Preparatory School	
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)	
Question #	1910	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 10:44 AM	<p>Finding: FFVP schools need to have a FFVP Standard Operating Procedure (SOP) in their food safety plan.</p> <p>Corrective Action: A sample FFVP SOP is available on the food safety webpage, https://dpi.wi.gov/school-nutrition/program-requirements/food-safety. Please implement this SOP, train staff and teachers on all applicable aspects of food safety, and submit via SNACS written assurance that staff administering the FFVP understand these requirements, and 21st Century Prep's plan to ensure future compliance.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/02/2023	3542		Administrative Review		AR			
Comments								
Annual Financial Report (AFR)					Created By		Created Date	
<p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program--this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. All federal Child Nutrition Programs the SFA participates in must be included on the AFR, including the CACFP.</p> <p>The ending balance on June 30 from the previous year needs to be the same as the beginning balance on July 1 for the current year. 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.</p> <p>The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. 'Food' is expenses for edible food items and beverages. 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. <p>When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.</p>							5/2/2023 11:13:14 AM	

Administrative Review Report

Racine Charter One, Inc.

Please review the AFR webcast , manual , and In a Nutshell resource before the next AFR is submitted								
05/02/2023	3541		Administrative Review		AR			
Comments								
Vended Meals Invoicing				Created By		Created Date		
<p>The SFA should conduct their own internal audit of the billing and invoices from the vendor. The SFA may be being overcharged by the vendor. Once the SFA is billed by the vendor for the meals, the meal itself, all meal components including the milk (if meal includes milk in fixed price) becomes the property of the SFA and should be segregated from the other inventory that the SFA has not yet purchased from the vendor. There needs to be a delineation on-site between what inventory belongs to the vendor and what belongs to the SFA; inventory should not be commingled in any kind of way. The SFA should have a way to handle any leftovers. Any leftovers should not be returned to the vendor's inventory. Handling of any leftovers not served to students should follow health and safety procedures and if possible, be incorporated into future meal service to help manage food costs and food waste.</p> <p>Based on the on-site conversations with vendor staff, the vendor is billing the SFA for breakfasts that are put out on the serving line, sent to classrooms, or sent to the gym. This breakfast count for billing is based on the number of meals set out each day and not based on what is used. The unserved food from these service locations is returned to kitchen and used in future breakfast service by the vendor. With the vendor creating the invoice for the SFA based on the number of breakfasts put out in these service locations, it appears that the SFA may be billed multiple times for the same food items.</p> <p>For example, the SFA is billed for 100 breakfasts because the vendor put out 100 full breakfasts on a school day. If 50 of those milks and 50 of those granola bars were unserved, returned to the kitchen, put out for breakfast the next day, and the SFA is billed the next day for the 100 breakfasts put out that next day then the SFA would be paying the vendor twice for those 50 milks and 50 granola bars. In this example, those 50 milks and granola bars are the property of the SFA and should not be returned to the vendor's inventory. This SFA inventory could have been used for the following day meal service. The SFA should have a way to handle these leftover items that they purchased from the vendor and factor these leftovers, if possible, into future orders communicated to the vendor. The SFA should be reviewing its inventory prior to submitting meal count orders to the vendor. The vendor should never be accessing SFA inventory without SFA permission. Any inventory removed by the vendor or handed over by the SFA should be documented for SFA records. The SFA should closely review program records and current service and billing practices.</p> <p>Vended meals agreements (VMA) should include established procedures regarding how the school will communicate to the vendor each day how many lunches and breakfasts are needed. The SFA should be dictating to the vendor each day how many lunches and breakfasts to prepare. That is then what the SFA should be billed for. The SFA and the vendor could modify the VMA so that the school is billed for the amount of food actually used each day, but this must be spelled out in the agreement. As the VMA template is currently written, the vendor is supposed to invoice the SFA for the unitized meals in accordance with the number of meals requested by the SFA. The SFA must retain the management responsibilities for the school nutrition operations. The vendor should be following the SFA's directions. The vendor has a contract to provide meals to the SFA but should not be involved in any aspect of managing the Child Nutrition Programs. Any vendor management of Child Nutrition Programs requires a Food Service Management Company (FSMC) contract. If the SFA wishes, DPI School Nutrition Team specialists are available to discuss these types of contracts which are more robust due to the incorporation of delegated management responsibilities.</p> <p>The SFA should carefully review the full base year VMA that it has with the vendor and assess if it is being adhered to.</p>						5/2/2023 11:09:29 AM		
04/28/2023	3540		Administrative Review		AR			
Comments								
Edit Checks				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</p>						4/28/2023 3:57:10 PM		

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Racine Charter One, Inc.

problems with the meal counting and claiming procedures so that necessary corrections are made.							
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.							
A school employee must review and confirm the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.							
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 .							
04/28/2023	3539		Administrative Review		AR		
Comments							
Point of Service				Created By		Created Date	
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 milk or meal. The school staff responsible for the point of service must mark students off as they receive their reimbursable meals each day. Breakfast and lunch must be counted separately. These daily records showing how many reimbursable breakfasts and lunches were served to eligible students each day must be used to compile the monthly reimbursement claim. Only one meal per student per meal service may be claimed for reimbursement.						4/28/2023 3:56:46 PM	
Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students. Additionally, the number of meals served and claimed for reimbursement must have adequate documentation on file to support the claim.							
All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students.							
Some meal count systems that are not acceptable include:							
<ul style="list-style-type: none"> Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served. Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal. Backout counts - Counting the number of leftover meals from the starting meal count as this does not account for dropped trays, or that each entrée was part of a reimbursable meal. 							
04/28/2023	3538		Administrative Review		AR		
Comments							
Excess Cash Balance				Created By		Created Date	
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". An ending fund balance greater than 3 months' operating expenses, exceeds the net cash resource limitation. If the three-month net cash resource limit is exceeded, a spend-down plan may be required.						4/28/2023 3:56:21 PM	
The SFA should have received a notification from DPI in the springtime regarding the excess cash balance status, including any necessary next steps. It is understandable that the school may temporarily have an excess due to the increased school nutrition funding available within the last few school years related to the COVID-19 public health emergency.							
As a reminder, funds cannot be transferred out of the food service fund to be used for non-food service purposes, even if the food service fund has an excess cash balance. Some ways to spend down an excess cash balance include:							
<ul style="list-style-type: none"> Increase marketing of the school meal program to increase participation. Purchase additional or updated kitchen equipment. Provide additional training to staff members 							
04/28/2023	3537		Administrative Review		AR		

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Racine Charter One, Inc.

Comments	Created By	Created Date
<p>Special Dietary Needs</p> <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, it is highly recommended that agencies 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 the school 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> <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</p>		<p>4/28/2023 3:55:53 PM</p>

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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>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>								
04/28/2023	3536		Administrative Review		AR			
Comments								
Summer Food Service Program Promotion				Created By		Created Date		
<p>USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months through the Summer Food Service Program (SFSP). This is true even when the SFA itself may not participate in SFSP. Each year SFAs must retain documentation supporting that this outreach has been completed.</p> <p>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 304-304 to locate meals in the area • Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks) 						4/28/2023 3:54:59 PM		
04/28/2023	3535		Administrative Review		AR			
Comments								
Supply Chain Assistance Funds				Created By		Created Date		
<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. 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 received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. 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. The school's vendor may be able to assist with this tracking process.</p> <p>SCA funds are recorded under WUFAR code 717 Revenue Source - federal reimbursement and 547 Program/Project Code - National School Lunch (NSL) . Record the entire amount into NSL revenue on the AFR during the year it is received and expense it to NSL "food" as it is used. The NSL food expense may carry over into future AFR reporting year.</p> <p>Please work with the vendor representatives to ensure the SFA's supply chain assistance fund usage is being tracked properly. The SFA should retain the tracker and ensure it is accurate, since the SFA has a contract with DPI to operate the Child Nutrition Programs and fulfill all program requirements.</p>						4/28/2023 3:54:15 PM		
04/28/2023	3534		Administrative Review		AR			
Comments								
Non-Discrimination Statement				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. 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. 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.</p>						4/28/2023 3:53:45 PM		
04/28/2023	3533		Administrative Review		AR			

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Comments				
New Food Service Director Hiring Requirements			Created By	Created Date
<p>Each SFA must designate one staff member as the "Food Service Director" (FSD). The Food Service Director performs and/or oversees areas such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and day-to-day program management.</p> <p>The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the NSLP and SBP, with further flexibilities for directors hired after April 29, 2019, in SFAs with under 2500 enrollment.</p> <p>The Hiring Standards for new SFA directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food safety training. These requirements are listed in a summary document called "In a Nutshell- Hiring Requirements".</p> <p>Per SP 38-2016, SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet the hiring standards.</p> <p>Additional resources may be found on the Professional Standards webpage, including a helpful USDA Q&A resource which is recommended to review.</p> <p>While it is acceptable for the Authorized Representative (AR) and Food Service Director (FSD) to be the same person, it is recommended to enter two different people into this field, so that in the event of a staffing change or other unforeseen circumstance, DPI still has valid contact information for your SFA.</p>				4/28/2023 3:53:08 PM
04/28/2023	3532		Administrative Review	AR

Comments				
Professional Standards Training Requirements			Created By	Created Date
<p>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.</p> <p>Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell- Training" document.</p> <p>Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.).</p> <p>SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required.</p> <p>The SFA did not have a training tracker for the on-site kitchen lead who is an employee of the meal vendor (not the school). The USDA Q&A resource regarding professional standards from January 2020 specifies the information below in #40. This question does not fully apply to the SFA since the kitchen lead from the vended meal provider is working on-site daily preparing and serving bulk meals. The SFA must ensure this staff member has the knowledge and training needed to provide the meals in the Child Nutrition Programs. It is recommended that the SFA keep a training tracker for this person as well, collaborating with supervisors from the vended meal provider if necessary.</p> <p>40. Do the training standards apply to the staff of a vended meal provider (e.g., a commercial entity off-site from the school food service that provides pre-plated meals)? If so, who is responsible for tracking the annual training hours of such staff?</p> <p>No. However, the SFA director must ensure that vendors providing meals for the school nutrition programs have the knowledge and skills to supply safe and nutritious meals that meet the meal patterns and dietary specifications.</p>				4/28/2023 3:52:46 PM
04/28/2023	3531		Administrative Review	AR

Comments				
Civil Rights Complaint Procedures			Created By	Created Date

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<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: <ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> o Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 o Fax: (608) 267-0363 o Email: jessica.sharkus@dpi.wi.gov 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. 						4/28/2023 3:51:46 PM	
04/28/2023	3530		Administrative Review		AR		
Comments							
Unpaid Meal Charge Policy				Created By		Created Date	
<p>In schools operating the Community Eligibility Provision (CEP), an unpaid meal charge policy is not required. This is because students do not have individual meal benefit eligibility statuses and all students eat for free. However, the SFA may still choose to create policies pertaining to non-program foods (such as extra entrée purchases) and distribute to households so they know the expectations for food purchases outside of the free reimbursable meals.</p>						4/28/2023 3:51:23 PM	
04/28/2023	3529		Administrative Review		AR		
Comments							
Food Safety Plan				Created By		Created Date	
<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>						4/28/2023 3:50:56 PM	
04/28/2023	3528		Administrative Review		AR		
Comments							
Civil Rights Training				Created By		Created Date	
<p>Civil rights training, such as the Civil Rights webcast, must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including non-food service staff. The DPI Civil Rights webcast is 30 minutes long and participants are able to take a short quiz at the end to receive and email confirmation of completion. This training should be completed before the start of the school year (or upon hire for new staff hired mid-year) to ensure staff are trained on the topics before they begin working with the school nutrition program and with participants.</p>						4/28/2023 3:50:28 PM	

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04/28/2023	3527	Administrative Review	AR		
Comments					
Afterschool Snack Program			Created By	Created Date	
<p>The SFA had the Afterschool Snack Program (ASP) on its contract, however it has not been operating the program. Only programs that the SFA is operating may be listed on the contract. As part of a corrective action item, the ASP was removed from the 2022-23 contract. If the SFA would like to offer the ASP in the future, it may do so if it can meet all of the program requirements. The program needs to be added to the online contract before it can be offered at the school. Please reach out to a DPI school nutrition program consultant if there is future interest in operating the ASP. Information about the program can be found on the ASP webpage.</p>				4/28/2023 3:50:05 PM	
04/28/2023	3526	Administrative Review	AR		
Comments					
Records Retention			Created By	Created Date	
<p>All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents.</p> <p>Proper records retention is a crucial step in showing that the SFA is meeting program requirements.</p> <p>The SFA must also be sure to retain copies of the vended meals agreements and any renewals. These agreements are binding agreements and should be referenced as needed to ensure both parties are upholding their duties identified in the agreement.</p> <p>Other examples of program records that must be kept for three years plus the current year are:</p> <ul style="list-style-type: none"> • Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters); • Meal count participation data by school; • Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data; • If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities, • Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established • Agreements and free and reduced price policy statements; • Approved and denied free and reduced price meal applications; • Procedures and documentation for direct certification for free meals, if applicable; • Procedures for alternate point-of-service meal counts, if applicable; • Menu and food production records and, if applicable, nutrient analysis records; • All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements); • Documentation associated with the local school wellness policy; • Number of food safety inspections obtained per school year by each school; • Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year • Records from the most recent food safety inspection; • Documents demonstrating compliance with Civil Rights requirements; • Audit reports and written responses and any related corrective action. <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 <ul style="list-style-type: none"> ◦ 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 				4/28/2023 3:49:41 PM	

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<ul style="list-style-type: none"> School-level information provided to the State agency for publication 							
04/28/2023	3525		Administrative Review	AR			
Comments							
Procurement of Vended Meals Agreement				Created By	Created Date		
<p>As mentioned during the review and email from 4/10/23, your school is due to go out for bid for a vended meals agreement (VMA) for the 2023-24 school year. You may not simply renew your current agreement again. This process is ideally completed earlier in the school year so a contract can be awarded by the end of March. Earlier than that is typically more desirable as well since USDA Foods Ordering happens mid-February. Please begin the bidding process as soon as possible. It is required for vended meals agreements to be competitively procured.</p> <p>Please refer to the Vended Meals Agreement webpage for information. You can use our Example Bid Solicitation Cover Letter template and Evaluation Matrix as you go through the process. Let the Procurement Team know if you have any questions—they can review your cover letter before you send out to all contacts on the List of Known Vended Meal companies. Given the shorter timeline to try and align with the USDA Foods Annual Order, it is sufficient to allow less than 30 days for bid responses, say 2-2.5 weeks—but just know this could result in failed procurement. You would then re-do the process and offer a longer timeframe to respond, closer to 30 days.</p> <p>On the new vended meals agreement, it is recommended to have all vendor labor costs built into the fixed per meal price. This is opposed to having a separate line-item labor charge on the monthly invoices. The school should utilize the Modifications page of the VMA to specifically detail how on-site vendor labor will be handled. This should include details as to the duties that the on-site vendor staff would be expected to perform. These labor expectations set forth by the school will assist the vendor in determining how to factor labor cost into the final fixed per meal price. The detailed breakdown of any on-site vendor labor expectations should also be included in the bid letter. Prospective vendors must know what specific expectations the school has from the vendor so that they can effectively bid on the contract.</p> <p>Here is the link to the Base Year Vended Meal Agreement. Once in place, you have the option of having the contract in place for a total of 5 years—the Base Year (SY 23-24) and 4 optional renewal years (SY 24-25, 25-26, 26-27, and 27-28). The next time you would need to go back out to bid and re-do the competitive process would be in fall/early winter of SY 27-28 for the start of the 28-29 SY.</p> <p>As mentioned above, please reach out to the Procurement Team with any questions on this process</p>					4/28/2023 3:49:17 PM		
04/27/2023	3524	400	Administrative Review	21st Century Preparatory Schoo	Malinda Wright		
Comments							
Breakfast Production Records				Created By	Created Date		
<p>During breakfast observation on April 5, the food items being served were a nutrigrain bar, orange slices, orange juice, and milk. When reviewing the completed production record at the end of the day, a cheese stick was noted with amounts written in the prepared and reimbursable meals column, including temperatures that were supposedly taken. When attending DPI sponsored training and hosting in-service days amongst the staff, it is highly recommended that all staff feel comfortable maintaining accurate production records. Additional discrepancies occurred with the milk. It is the policy of the SFA that flavored milk is not served during breakfast service. This policy has been in place all 2022-2023 school year. Production records that were later requested for February and March showed daily offerings of skim chocolate milk despite this not happening in actual practice.</p>					4/27/2023 2:43:07 PM		
04/27/2023	3523	431	Administrative Review	21st Century Preparatory Schoo	Malinda Wright		
Comments							
Production Records				Created By	Created Date		
<p>Based on discrepancies between what was observed on the day of review and documented production records that day, the reviewer asked to see February and March 2023 production records. These were not available onsite. When given time to acquire them, the two months of production records were submitted to DPI. While all required aspects of the production records are fully completed, the amounts and values written in the bulk quantity prepared and leftover columns indicates there is room for improvement. It is recommended that food service staff responsible for completing the production records at Racine Charter One attend School Nutrition Summer Training this August. It is also</p>					4/27/2023 2:37:39 PM		

Administrative Review Report

Racine Charter One, Inc.

recommended that food service staff determine if it is necessary to record temperature three separate instances in one meal service. There are temperature recordings for each menu item at breakfast despite one hour in time passing. Additionally, there are three temperature recordings for all lunch items, but the last recorded temperature is consistently around Noon, despite lunch service continuing until 1:25pm.																			
04/26/2023	3512	434	Administrative Review	21st Century Preparatory School	Malinda Wright														
Comments																			
Standardized Recipes				Created By		Created Date													
During the onsite review, it was determined that food service staff have a difficult time determining and locating the correct standardized recipe to follow. This discovery occurred when the discrepancy between the planned menu (Ham and Cheese Bake on Monday, April 3) and production record (Mac and Cheese with Ham) was pointed out. It is in the best interest of all involved to retrain those involved in preparing meals at 21st Century Prep school to acquire and follow recipes.						4/26/2023 9:06:33 PM													
04/05/2023	3366	1402	Administrative Review	ALL	Shebaniah Muhammad														
Comments																			
Buy American				Created By		Created Date													
The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands). Please continue to track the following information on a Buy American Non-Compliant Product List: Date, Name of product, Country of origin, and reason you could not purchase American grown products.						4/5/2023 9:45:49 AM													
05/2/2023			Administrative Review	ALL	AR														
Comments																			
Adult Meal Prices				Created By		Created Date													
Food service programs must price adult meals above the overall cost of the student meals. Adult meal pricing must follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5. A Wisconsin Adult Meal Pricing Worksheet has been developed to assist the SFA in pricing adult meals.																			
Here is the completed adult meal pricing worksheet for the non-pricing SFA that participates in NSLP and severe need breakfast. The reimbursement rates used for adult meal pricing calculations come from the prior school year (2021-22).																			
<table border="1"> <thead> <tr> <th>Category</th> <th>Amount (\$)</th> </tr> </thead> <tbody> <tr> <td>Federal free lunch reimbursement + \$.08 PBR</td> <td>\$3.73</td> </tr> <tr> <td>Add \$.02 lunch differential (if applicable)³</td> <td>\$0.02</td> </tr> <tr> <td>Add USDA Foods entitlement value received (if applicable)⁴</td> <td>\$0.26</td> </tr> <tr> <td>Add State lunch aid</td> <td>\$0.07</td> </tr> <tr> <td>Minimum Adult Lunch Price</td> <td>\$4.08</td> </tr> </tbody> </table> <p>3. include if the SFA receives the two-cent lunch differential 4. exclude this amount if the SFA receives no USDA Foods (commodities)</p>				Category	Amount (\$)	Federal free lunch reimbursement + \$.08 PBR	\$3.73	Add \$.02 lunch differential (if applicable) ³	\$0.02	Add USDA Foods entitlement value received (if applicable) ⁴	\$0.26	Add State lunch aid	\$0.07	Minimum Adult Lunch Price	\$4.08				
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05/2/2023			Administrative Review	ALL	AR														
Comments																			
Local Wellness Policy				Created By		Created Date													
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																			

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[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.

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). 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:

- sending a letter to parents/families;
- providing status updates in teacher/staff trainings;
- posting a call for volunteers on the school website;
- partnering with community organizations to spread the information; and
- posting information about the process on social media.

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).

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.

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.

For additional ideas on the "public notification" requirements surrounding the local wellness policy, please refer to questions 29-33 in the [USDA LWP Q&A](#) found on the [LWP webpage](#).