

Administrative Review Report

School District of New Berlin

Commendations:

All foodservice staff displayed knowledge of the meal program requirements. Foodservice staff encouraged students to take reimbursable meals by adding fruits or vegetables to their trays. The staff provide excellent customer service to the students and engaged with them very positively!

Thank you for sending documentation and completing the off-site questions in advance. The school nutrition staff members were very welcoming to the review team and willing to answer questions.

The determining official does a great job managing meal benefits. Out of the 302 eligibility statuses reviewed, there were only two students certified incorrectly. The official keeps very detailed notes regarding benefits and does a very thorough job handling benefit extensions.

The food service director is operating an excellent lunch program. The director works hard to ensure all program requirements are met and that there are healthy, appealing meals served every day.

The students are offered a wide variety of meal items throughout the district. Students at every school level have many daily options to choose from and can truly customize their meal to fit their tastes. At each school, there are TVs that advertise the daily menus and even include photos of some of the food. This is a great way to entice students to choose a school lunch.

From the Public Health Nutritionist:

Thank you to all staff at the School District of New Berlin for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Production Manager who helped expedite the AR by providing crediting documentation and production records ahead of time and answering emails in a quick and timely fashion. In addition, thank you to the school nutrition professionals and administrative staff for supporting such a great school nutrition program. The variety of entree, fruit, and vegetable options give kids so many ways to access nutritious meals. Thank you for serving healthy, nutritious meals to your students and for going above and beyond to care for your students!

Recommendations/Notes:

Repeat meal pattern violations during subsequent Administrative Reviews may result in fiscal action.

Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged Kirsten Homstad 02/22/2023 09:01 AM</p>	<p>Finding: The nonprofit school food service account was charged for security cameras in the 2021-22 school year which is not an allowable expense to Fund 50 (2 CFR 200.303, 2 CFR 200.400).</p> <p>While the cameras are used to prevent theft in food service and in the event footage is needed related to workplace injuries and workman's compensation, security monitoring is considered a general district expense. This was determined based on discussions between the DPI School Nutrition Team, the DPI Financial Team, and the USDA Food and Nutrition Services over several years. Further, the district was denied the request to purchase security cameras for food service when an excess cash balance plan was submitted in the spring of 2018 that included security cameras.</p> <p>CA: The cost of the unallowable expenses which totals \$3255.00 charged to the nonprofit school food service account during SY 2021-22 must be refunded to Fund 50. Make a transfer using non-Federal sources, such as Fund 10, and upload a copy of the general ledger into SNACS showing the completed transfer.</p>

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 02/20/2023 02:52 PM</p>	<p>Finding: On the Annual Financial Report for 21-22, there were several items that require investigation and correction (7 CFR 210.19). There were no revenues or expenditures allocated to the School Breakfast Program, however the district did offer breakfast for July and August 2021. Additionally, there was a large negative</p>

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		<p>balance reported in the category of Non-Program Foods. This could be the result of over-allocating expenditures or under-allocating revenues for this category.</p> <p>CA: Review the Annual Financial Report webcast or manual on the DPI website. Then manually update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</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	CAP Submitted	
Corrective Action History	<p>Flagged</p> <p>01/31/2023 03:03 PM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA submitted a Nonprogram Foods Revenue Tool but did not include all required information into the tool. The tool did not reflect district-wide data for at least 5 days, it was missing the program foods section, and it was missing many types of non-program foods. Adult meals (and special entrees), "hump day" meals, meals vended to the three local private schools, and birthday treats must all be included in the tool as well. (7 CFR 210.14).</p> <p>CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website and/or review the instructions for tool completion. Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p> <p>CA 2: Submit a statement of understanding that the Nonprogram Foods Revenue Tool is required to be run annually and utilized to set nonprogram food pricing to ensure compliance with this requirement.</p> <p>The prices adjusted in the updated tool should be used to set prices in the following school year. Provide a written plan for how prices will be adjusted if the tool shows the required non-program food revenue ratio.</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	<p>Flagged</p> <p>01/27/2023 11:40 AM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: 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	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged</p> <p>01/31/2023 03:37 PM</p>	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). There was one application approved for a free benefit that should have been reduced-price. One of the reported incomes was calculated with an incorrect frequency resulting in the incorrect determination.</p>

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		CA: Send the household the adverse action letter notifying them of the benefit change that is required. Change the benefit status in the software 10 days after the notice is sent. It is recommended to check if the student matches on direct certification as free or encourage the family to complete a new application if their household income or size has changed since the application was submitted. Upload the adverse action sent to the household in SNACS, and any additional explanation needed related to this correction.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/31/2023 02:23 PM	<p>Finding: SFA is using an internal professional standards tracker that does not contain the minimum required components as outlined in the USDA Professional Standards Training Tracking Tool 2.0:</p> <ul style="list-style-type: none"> • Trainees name • Date of hire • Position/role • Required hours of training <p>CA: Update the SFA's internal professional standards tracker to include employees' date of hire and required hours of training and upload into SNACS.</p>
Site Name		
Form Name	Reporting and Recordkeeping (1500 - 1501)	
Question #	1500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/31/2023 03:11 PM	<p>Finding: There was a minor error on the Verification Collection Report. The number of students for each of the two types of verified applications were switched.</p> <p>CA: Please resubmit the VCR with the correction.</p>
Site Name	New Berlin West Middle/High School	
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	CAP Accepted	
Corrective Action History	Flagged 02/02/2023 09:30 AM	<p>Finding: The daily and weekly minimum requirements for meat/meat alternate were not met for grade group 9-12 for lunch during the review period at New Berlin West Middle/High School. The following represents the planned portion sizes:</p> <ol style="list-style-type: none"> Sriracha chicken (1.75 oz eq) offered Tues through Fri Chicken stir fry (1.75 oz eq) offered on Wed and Thurs <p>The daily minimum requirement for grades 9-12 is 2 oz eq meat/meat alternate daily and the weekly minimum requirement is 10 oz eq.</p> <p>CA: Describe specifically how the daily and weekly minimum requirements for meat/meat alternate will be met for lunch during the days containing the shortage in each of the service areas (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>

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Site Name	Poplar Creek Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 02/02/2023 07:50 AM</p>	<p>Finding: The weekly minimum requirement for grains was not met at Poplar Creek Elementary (K-8 meal pattern) during the review period (12/12-12/16/22). The following represents the planned portion sizes:</p> <ul style="list-style-type: none"> a. Monday: BBQ pork (2 oz eq)/Yogurt Parfait w/Gripz (2.25 oz eq)/Chicken sticks (1.0 oz eq), minimum grain 1.0 oz eq b. Tues: Beef nachos (1.25 oz eq)/Chicken stir fry (1 oz eq)/Yogurt parfait (1.25 oz eq), minimum grain 1.0 oz eq c. Wed: Pizza (2 oz eq)/Ham and cheese (2 oz eq)/Yogurt parfait w/Gripz (2.25 oz eq), minimum grain 2.0 oz eq d. Thurs: Cheeseburger (2 oz eq)/Chicken nachos (1.25 oz eq)/Yogurt parfait w/Gripz (2.25 oz eq), minimum grain 1.25 oz eq e. Fri: Cheese filled dippers w/goldfish (2.5 oz eq)/Ravioli w/goldfish (2 oz eq)/Yogurt parfait with goldfish (2.25 oz eq), minimum 2.0 oz eq <p>The minimum grain provided was 7.25 oz eq and the weekly minimum requirement for grade group K-8 is 8 oz eq.</p> <p>CA: Describe specifically how the weekly minimum requirement for grains will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	New Berlin West Middle/High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 02/02/2023 09:28 AM</p>	<p>Finding: The daily and weekly minimum requirements for grains was not met for grade group 9-12 for lunch during the review period at New Berlin West Middle/High School. The following represents the planned portion sizes:</p> <ul style="list-style-type: none"> a. Sriracha chicken and ½ c. rice (1 oz eq grain) offered on Tues through Fri b. Nachos with meat (1.75 oz eq grain) offered on Mon, Wed, Thurs, Fri c. Chef salad with roll (1 oz eq grain), daily d. Chicken nachos (1.75 oz eq grain), Thursday (12/15) e. Yogurt parfait without additional grain, 1.25 oz eq grain, Tuesday (12/13) f. PBJ with string cheese, 1.0 oz eq grain, daily in Commons Cafe <p>The daily minimum requirement for grades 9-12 is 2 oz eq grain daily and the weekly minimum requirement is 10 oz eq.</p> <p>CA: Describe specifically how the daily and thus weekly minimum requirements for grains will be met for lunch during the days containing the shortage in each of the service areas (e.g. portion sizes increased or decreased, additional menu items, product replacements, reviewing standardized recipes for product and crediting accuracy, etc.).</p>

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Site Name	New Berlin West Middle/High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 02/02/2023 09:47 AM</p>	<p>Finding: The weekly minimum requirements for grains was not met for grade group 6-8 for lunch during the review period at New Berlin West Middle/High School. The following represents the planned minimum portion sizes available:</p> <ul style="list-style-type: none"> a. Sriracha chicken and ½ c. rice (1 oz eq grain) daily b. Meatballs with marinara (1 oz eq grain), Tues and Wed c. Chicken sticks (1 oz eq grain), Mon-Thursday d. Chef salad w/roll (1 oz eq grain), Mon-Thursday e. PBJ w/string cheese (1.0 oz eq grain), Mon-Thursday f. Chicken stir fry (1.0 oz eq grain), Mon-Thursday <p>A total of 5.0 oz eq grains was offered minimum over the week of review. The weekly minimum requirement for grade group 6-8 is 8 oz eq.</p> <p>CA: Describe specifically how the weekly minimum requirement for grains will be met for lunch during the review period in the main service area and the build a meal area (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	New Berlin West Middle/High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	432	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 02/02/2023 09:50 AM</p>	<p>Finding: The weekly minimum requirement for meat/meat alternate was not met for grade group 6-8 at New Berlin West Middle/High School during the review period in the Build Your Meal service area. The following represents the planned minimum portion sizes as all other options provided at least 2.0 oz eq:</p> <ul style="list-style-type: none"> a) Monday, Wednesday, Thursday, Friday: Nachos, 1.5 oz eq M/MA b) Tuesday: Sriracha chicken, 1.75 oz eq M/MA <p>The minimum meat/meat alternate provided was 7.75 oz eq M/MA. The weekly minimum requirement for grades 6-8 is 9 oz eq.</p> <p>CA: Describe specifically how the weekly minimum requirement for meat/meat alternate in the a la carte service area will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc).</p>
Site Name	Poplar Creek Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	

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Corrective Action History	Flagged 02/02/2023 08:52 AM	<p>Finding: For grades K-12, up to 2 oz eq of grain-based desserts per week are allowed in the NSLP. The menu for the week of review exceeded the grain-based dessert limit. On the cycle menu for both Elementary and MS/HS, the Gripz cinnamon graham crackers are offered with the yogurt parfait three times over the week leading to a total of 3.0 oz eq of grain-based desserts.</p> <p>CA: Submit a statement that explains the plan to reduce the amount of grain-based desserts offered at lunch for both schools.</p>
Site Name	New Berlin West Middle/High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 02/02/2023 09:15 AM	<p>Finding: During the week of review (12/12-12/16/22), there were missing vegetable subgroups in the Commons Café for 9-12 meal pattern. Dark green, beans/peas/legumes, and other vegetables (i.e. celery, cucumbers, radishes, etc) were not offered according to production records. In the 9-12 meal pattern, ½ cup beans/peas/legumes, ½ cup dark green, and ¾ cup other vegetable needs to be offered throughout the week.</p> <p>CA: Submit a week's worth of production records for the Commons Café detailing the planned vegetables offered in order to meet weekly vegetable subgroup requirements.</p>
Site Name	New Berlin West Middle/High School	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/31/2023 02:22 PM	<p>Finding: The nondiscrimination "And Justice for All" poster is not located in the meal service area and/or not visible to students (FNS Instruction 113).</p> <p>CA: Corrected on-site, no further action needed.</p>
Site Name	New Berlin West Middle/High School	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/30/2023 03:16 PM	<p>Finding: Several items in Vern's Café, do not meet Smart Snacks standards:</p> <p><u>Beverages:</u></p> <ul style="list-style-type: none"> The Tropicana Juice Beverage (Cranberry Cocktail; 20% juice) Bai (18 fl oz; 10 cal) Gatorade Fit (16.9 fl oz; 10 cal) <p>For the Tropicana Juice Beverage, the ingredient list includes the following in this order: Filtered water, <u>sugar</u>, cranberry juice concentrate, etc. This product does not meet criteria for being a 100% juice (can be diluted with water) and does not meet criteria for being a low or no-calorie beverage and thus is a non-compliant product.</p> <p>For the Bai and Gatorade Fit, no calorie beverages are defined as </= 10 calories per 20 fl oz, and the Bai and Gatorade Fit do not meet this standard.</p> <p><u>Food:</u></p>

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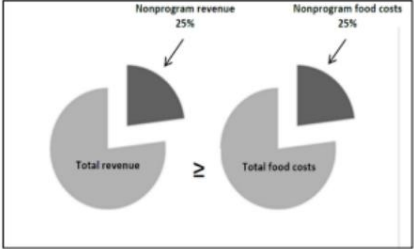
		<p>The Fruit Roll Ups and GoGo Squeez Almond Milk Pudding do not meet Smart Snacks standards. A food must meet one of the general standards: be whole grain rich; have a fruit, vegetable, dairy product, or protein food as the first ingredient; or be a combination food with at least ¼ cup fruit and/or vegetable and the dietary specifications.</p> <p>The Fruit Roll Ups do not meet general standards as corn syrup is the first ingredient on the label. The GoGo Squeez does not meet dietary standards with >35% of its calories being from fat.</p> <p>CA: Submit a statement of what will be done with these beverages and foods to comply with the Smart Snack Regulations.</p>
Site Name	New Berlin West Middle/High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 01/31/2023 02:23 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Corrected onsite, no further action required.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/21/2023	2958		Administrative Review		FSD			
Comments								
						Created By		Created Date
<p>The district has cafes in located in the libraries of the secondary schools where reimbursable lunches are served each day. It would be possible to charge Fund 50 a portion of the cost required for custodial labor to clean the library where the meals are consumed. To do this, an annual time study assessing the amount of custodial labor required for cleaning up the eating space in the library after lunch would be needed. The time study should cover at least one week and should involve the use of timecards. There is a DPI template tool (found on the Financial Management page under "Budgeting and Cost Control") that could help with an annual time study. The district must ensure that adequate documentation is kept supporting the amount of the shared costs that are billed to food service. It is important that only the portion of the library cleaning labor cost that can be determined is from cleaning up the dining area after lunch be charged to food service.</p>								2/21/2023 9:00:55 AM
02/21/2023	2956		Administrative Review		FSD			
Comments								
						Created By		Created Date
<p>If community members would like to donate money to food service to help families who are in need, the donation can be receipted into food service (Fund 50 for public schools, Source 291, Gifts). Since the donation has a specific purpose of helping families who are in need, the school can decide how much of the donation can be added to particular family accounts. The school should develop written criteria for deciding which families would qualify for assistance. Please refer to pages 45-46 in the USDA resource, "Overcoming the Unpaid Meal Challenge" and DPI SNT Financial Q&A.</p>								2/21/2023 8:41:35 AM
02/20/2023	2954		Administrative Review		FSD			
Comments								
						Created By		Created Date
<p>The school food and nutrition services offer a large amount of non-program food items including a la carte items, items for staff, catering, etc. Non-program food sales can be a great way for food service to generate revenue and draw positive attention to the department. However, it is important to also remember that the primary purpose of participation in the Child Nutrition Programs is to provide nutritionally balanced, low-cost or free meals to children each school day.</p>								2/20/2023 3:03:28 PM

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02/20/2023	2953		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>The district has a cafe area in each of the middle/high schools. Fund 50 was used to pay for a large portion of the installation of the cafes. Reimbursable lunches and a la carte items are offered daily in the cafes. There are some other groups that use the cafe space for other purposes throughout the day or week. The district is encouraged to consider what other non-school nutrition groups use the cafe space and equipment and how often. Fund 50 investments in the cafes should not be offsetting the costs associated with other groups using the cafe. Consider developing procedures for how potential equipment repairs might be handled in the future knowing that the equipment is shared outside of food service on a regular basis.</p>									2/20/2023 2:57:24 PM		
02/20/2023	2952		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Non-program foods include any non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, etc.) purchased using funds from the non-profit school food service account.</p> <p>All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals. SFAs are required to annually complete the DPI Non-program Food Revenue Tool or the USDA Non-program Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Non-program Foods Revenue Rule SP-20-2016.</p> <p>Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. Use the USDA Nonprogram Food Revenue Tool (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/xls/usda-nonprogram-food-revenue-tool.xlsx) annually, at a minimum, to determine if the proportion of nonprogram food revenue to total food service revenue is equal to or greater than the proportion of nonprogram food cost to total reimbursable meal food costs + nonprogram food cost.</p>									2/20/2023 12:48:08 PM		
											
<p>Regarding catering costs, it is recommended to regularly assess the charges for catering services provide. Like with all other non-program foods, the charges for catering must fully cover the costs associated with providing the service which includes food, labor, supplies, etc.</p>											
02/20/2023	2951		Administrative Review		FSD						
Comments											
						Created By	Created Date				
<p>For allowable costs criteria, reference 2 CFR 200.403 allowable cost criteria (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/sp-60-2016-attachment.pdf).</p> <p>To be allowable, costs must be:</p> <ul style="list-style-type: none"> • Necessary - establish that the nonprofit school food service cannot be operated without incurring the cost. • Reasonable - cost must be the result of sound business practice and competitive prices. • Allocable - cost must be direct and assigned solely to the food service program(s), function(s), activities, or other cost objective(s). If used for other programs, must be prorated per all program usage. • Otherwise compliant with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity. 									2/20/2023 12:36:49 PM		

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<ul style="list-style-type: none"> Adequately Documented – records must stand independently and not rely on interpretation by the program operator to support the source and use of funds. The State of Wisconsin uses WUFAR (Wisconsin Uniform Financial Accounting Requirements) or GAAP (generally accepted accounting principles) 					
<p>Internal Controls are required to maintain effective oversight over federal funds and ensure all charges to the nonprofit school food service account are allowable 2 CFR 200.303 (https://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-sec200-303.pdf).</p>					
02/20/2023	2949		Administrative Review		FSD
Comments					
			Created By	Created Date	
<p>Indirect Costs cannot be applied to the non-profit food service account by using the Indirect Cost Ratio in Wisconsin. Indirect costs are incurred for the benefit of multiple programs, functions, or other cost objectives and therefore cannot be identified readily and specifically with a particular program or other cost objective. Indirect costs typically support administrative overhead functions, accounting, payroll, purchasing, facilities management, utilities, etc.</p> <p>All costs that are being charged to the non-profit school food service account must be converted to direct costs. Examples include:</p> <ul style="list-style-type: none"> Trash removal – Count or weigh bags of trash that are generated from food service operations only and calculate the ratio of the sanitation bill that applies to that number. Non-food service labor, such as custodial, must be calculated via time study with only hours spent directly on food service charged to food service. Rent – consultation with knowledgeable resource person on appropriate charges (i.e., local reality broker with knowledge of current rates for rent of similar facilities). Utility charges - separately metered or current usage study by the local utility company. Extermination services documentation of actual costs based on volume. <p>It is allowable to charge Fund 50 for applicable utilities if they are separately metered or a current usage study is conducted by the local utility company. Fund 50 may be charged for the cost of installing a separate meter that would specifically monitor the use of the utility in the kitchen/school nutrition programs. Depending on the value of the purchase, certain procurement procedures may need to be followed. It is recommended to discuss with the DPI Procurement team if such a meter will be purchased.</p> <p>In order to charge Fund 50 at the peak rate for electricity, the district would need to be able to accurately determine the electricity usage by food service during the different demand hours. Peak demand hours and non-peak demand hours would need to be broken out, and the rates must be assessed monthly since utility rates can vary month to month. It is recommended to consult with the district's building and grounds director to determine if it is possible to obtain and track this information. The key to determining whether a chosen methodology is appropriate and acceptable is to make certain that, if audited, the process/documentation used to assess and verify costs charged to school food service would be considered reasonable.</p>					
02/20/2023	2948		Administrative Review		FSD
Comments					
			Created By	Created Date	
<p>Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand to diminish any language barriers to participation for individuals with LEP.</p> <p>To assist SFAs in reaching households with LEP, the SNT provides the Wisconsinized version of the USDA Free and Reduced-Price Meal application materials in English, Spanish, and Hmong.</p> <p>The USDA Food and Nutrition Service (FNS) website offers many other foreign language translations of the Application for Free and Reduced-Price School Meals. The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.</p>					
02/20/2023	2947		Administrative Review		FSD

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Comments							Created By	Created Date
During review of the benefit issuance sections with the Determining Official, it appeared that some ELP children were not showing up as expected in the software system. It is recommended that the Determining Official look into this further to confirm ELP students are entered correctly.								2/20/2023 12:31:35 PM
02/20/2023	2946		Administrative Review		FSD			
Comments							Created By	Created Date
The written unpaid meal charge policy should always reflect the current practices implemented in the district. It is recommended that the district review and update the unpaid meal charge policy to align with current practices. The policy submitted during the review discusses the provision of alternate meals when a certain negative balance is reached, but in reality, alternate meals are not being offered.								2/20/2023 12:23:42 PM
02/20/2023	2944		Administrative Review		FSD			
Comments							Created By	Created Date
The district may consider using some of the Fund 50 excess cash balance to eliminate the meal charge for the reduced-price category . This may be especially helpful if reduced-price eligible students often have significant unpaid meal charges. Under this option, reduced-price eligible students are charged \$0.00 for their reimbursable meal and they are claimed in the reduced category. Fund 50 then absorbs the \$0.40 per lunch instead of the household paying it. Other ideas for using the excess cash balance may include staff recruitment, staff raises, trainings, and increasing food quality.								2/20/2023 12:16:32 PM
01/31/2023	2795		Administrative Review		Food Service			
Comments							Created By	Created Date
It is recommended the SFA utilize USDA's Professional Standards Training Tracking Tool 2.0 or the DPI-developed Professional Standards Tracking Tool . If the SFA prefers using their internal tracker, it is recommended to add the total training hours completed to date and remaining hours needed to their tracker.								1/31/2023 2:28:56 PM
01/31/2023	2794		Administrative Review		FSD			
Comments							Created By	Created Date
<p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> 1. Document the complaint using the USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> ○ Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 ○ Fax: (608) 267-0363 ○ Email: jessica.sharkus@dpi.wi.gov 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. 								1/31/2023 2:03:59 PM
01/30/2023	2807	430	Administrative Review	New Berlin West Middle/High School	Production Manager			

Administrative Review Report

School District of New Berlin

Comments							Created By	Created Date
<p>Be specific on production records about the identity, brand, and description of the items served. Instead of "chicken pieces" or "pizza", list out the specific menu item as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories.</p> <p>A list of production record "must-haves" and "nice-to-haves" can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf. Other production record templates and information can be found here: http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/production-records.</p> <p>Milk is a required component as part of the National School Lunch Program (NSLP). You must record daily usage by milk type on your production records (e.g., skim chocolate milk, 1 percent white milk). On all production records list out the planned vegetables to be served in each service area. Keeping it consistent among all areas will aid in preventing subgroup shortages. Consider a separate garden bar production record for each garden bar. See samples on the DPI website, (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p>								2/2/2023 1:09:19 PM
01/30/2023	2805	435	Administrative Review	New Berlin West Middle/High School	Production Manager			
Comments							Created By	Created Date
<p>It was observed during food prep that standardized recipes were not necessarily being used, or were altered as needed for product availability.</p> <p>For example, a different chicken product was grabbed for the chicken stir fry recipe before DPI intervened to ask about the product in the standardized recipe and one chicken stir fry was drained after mixing to reduce the water content and another batch was not drained. Draining was not indicated on the recipe.</p> <p>Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>								2/2/2023 9:57:20 AM
01/30/2023	2803	402	Administrative Review	New Berlin West Middle/High School	FSD/Production Mgr			
Comments							Created By	Created Date
<p>While all meals served were reimbursable, it was observed that some entree items did not meet the 2.0 oz eq grain at the high school level per the transport sheets and what was being prepared. With DPI intervention, entree options were clarified and rolls were added as needed (ex: pasta option needed a roll, chef salad needed an additional roll, PBJ with string cheese needed an additional roll). Additional TA was provided on production and transport records and documented under Review Period Questions 430-437.</p>								2/1/2023 9:36:43 AM
01/30/2023	2802	404	Administrative Review	New Berlin West Middle/High School	FSD/Production Mgr			
Comments							Created By	Created Date
<p>Because the vegetables on the garden bars at all schools (West and Poplar Creek) are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage.</p> <p>Salad Bar Signage Template can be found on our Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).</p>								2/1/2023 9:30:54 AM
01/26/2023	2767		Administrative Review		Food Service Director			

Administrative Review Report

School District of New Berlin

Comments	Created By	Created Date
The Local Wellness Policy (LWP) should identify a specific person or position at the district who is responsible for overseeing the LWP. The current policy states the "District Wellness Coordinator" oversees the policy. Consider naming the individual or providing their job title (superintendent, food service director).		1/26/2023 10:19:59 AM