

Administrative Review Report

Nekoosa School District

Commendations:

Thank you to all staff at Nekoosa School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director (FSD) and Authorized Representative for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

The School Food Authority (SFA) has many new food service staff members, including the FSD. The staff are doing a great job in their new positions. The staff members were accepting of suggestions and were eager to learn and make improvements.

The kitchen at the review site was very clean and organized. It is clear that food safety and customer service are valued. The review site offers a nice variety of breakfast items including hot and cold entrees, and daily offering of both fruits and vegetables.

The district has a very well-established wellness policy and corresponding initiatives, including a dedicated team of community members that are involved. There is a specific "Nekoosa Wellness" webpage that includes a newsletter, wellness portal, challenges, and other resources. It is awesome to see the school district and community in partnership to support student and family wellness. Keep up the good work!

Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2023 01:49 PM</p>	<p>Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out correctly by each program and expense category (7 CFR 210.19).</p> <ul style="list-style-type: none"> There were no labor expenses allocated. For SFAs under a Food Service Management Company contract, the amount recorded as Purchased Services for a cost reimbursable account is the management fee only. The food expense allocations seem too low. It appears that some food expenses may be lumped under the Purchased Services category instead of Food. Purchased Services expenses may include (but is not limited to) equipment repair, pest control, garbage/recycling service, employee travel and/or training costs (registration fees, mileage costs, lodging costs, etc.), printing and copying expenditures, the management fee for a Food Service Management Company, and include processing and handling charges for receiving USDA donated foods as they are considered a payment to the state. The Non-Program Foods section (both revenues and expenditures) on the AFR do not include all of the non-program food amounts required. Non-program foods include a la carte, adult meals, extra milk, extra entrees, catering, meals sold to YMCA and Head Start, etc.). <p>CA: Review the Annual Financial Report webcast and/or manual on the DPI website. Submit a plan on how the revenues and expenditures for each program and category will be recorded correctly on the AFR going forward.</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 03/13/2023 01:07 PM</p>	<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. If the results of the tool indicate non-compliance with the required revenue ratio, please also provide a plan for how prices will be adjusted to ensure compliance for the next school year.</p>

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		CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2023 01:35 PM</p>	<p>Finding: The software program is setup to allow students to purchase a second bundled meal. These meals are sold for \$3.10 and are not claimed for reimbursement.</p> <p>A bundled second meal does not comply with the Smart Snacks requirements. Bundled foods may only be sold if the bundled unit meets the Smart Snacks general and nutrient standards.</p> <p>When meals/food are not reimbursable but are charged to the students, each item must be priced individually, each item must meet Smart Snacks requirements, and the item pricing is subject to the non-program foods regulation.</p> <p>CA: Modify the prices/POS setup for second meals so it meets USDA requirements. Provide a description of the change and upload any supporting documents.</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	<p>Flagged 03/13/2023 12:11 PM</p>	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The policy does not contain required language regarding food and beverage marketing.</p> <p>CA: 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. The policy builder resource may be helpful in finding template language the SFA can adopt to fulfill the content requirements.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	137	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2023 12:08 PM</p>	<p>Finding: The SFA did not effectively update student eligibility changes to the benefit issuance (BI) list or the point of service (POS). One benefit issuance error was identified.</p> <p>The student was receiving free meal benefits at beginning of 22-23 school year due to carryover. However, the student was approved for reduced-price benefits based on an income application submitted on 9/15/22. The application was correctly approved as Reduced, but the reduced-price status did not get entered into the software system to replace the carryover free status.</p> <p>CA: Notify the household of the reduction in benefits using the adverse action letter. Update the student's meal benefit status in the software system 10 days</p>

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		after the letter is sent. Corrected on-site and copy of adverse action letter provided. No further action required.
Site Name		
Form Name	Verification (207 - 215)	
Question #	215	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2023 10:32 AM	Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6 a). CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/13/2023 12:17 PM	Finding: Documentation of the professional standards training for the Authorized Representative is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. The 12-hour annual training requirements for Food Service Directors also apply to the Authorized Representative from the School Food Authority (SFA) when a Food Service Management Company employee acts as the Food Service Director (FSD). CA: Include all training hours completed this school year for the Authorized Representative onto the USDA or DPI professional standards training tracking tool (or other equivalent tracker) and upload into SNACS. Please also ensure the Authorized Representative receives and tracks 12 hours of training annually.
Site Name	Alexander Mid	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/13/2023 12:25 PM	Finding: The number of operating days reported on the February claims for Alexander Middle School were not accurate. However, the meal counts were correct. There were 17 operating days during the month on which school was in session and meals were served. However, the claim showed 19 operating days. This was found to be an error related to snow days where there was no in-person class and no meal service. The number of operating days on claims must reflect the number of days the site served meals during the claiming month, which may vary by site and meal. CA: Please provide a statement explaining how it will be ensured that operating days are accurately reported on claims going forward.
Site Name	Alexander Mid	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	TA Log# exists	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 09:00 AM</p>	<p>Finding: Two non-reimbursable meals were observed at Alexander Middle School during breakfast service on 3/8/2023. The meals did not contain the required ½ cup fruit, vegetable, or combination under Offer versus Serve.</p> <p>CA: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how this error will be corrected and avoided in the future.</p>
Site Name	Alexander Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 01:40 PM</p>	<p>Finding: There was a daily fruit shortage for the middle school during the week of review on the following day: Friday, February 17th, 2023: 1/4 cup orange wedges (138 count) recorded as 1/2 cup (1 whole orange must be served in order to credit as 1/2 cup fruit).</p> <p>There was a daily breakfast fruit shortage finding during the last administrative review. The fruit shortage finding during this AR is not considered a repeat finding since the quantity shortage was during the lunch meal service. Future findings related to daily fruit shortages will result in fiscal action. TA was given on fruit portion sizes and PHN provided FSD with one of DPI's resources on crediting fruit.</p> <p>CA: Submit a statement of understanding of how to fulfill the meal pattern requirement in the future.</p>
Site Name	Alexander Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	435	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 01:54 PM</p>	<p>Finding: Although standardized recipes were in place for menu items during the week of review, a few of recipes were not accurately crediting ingredients toward the meal pattern:</p> <ul style="list-style-type: none"> The breakfast flatbread recipe indicates that it contributes 2.75 oz. eq. of m/ma, however it should only credit 2.5 oz. eq. The recipe has 0.5 oz. of shredded cheese which is equal to 0.5 oz. eq. m/ma. There are 25# of liquid eggs (400 oz.) in the recipe for 160 portions. According to the product formulation statement, 1.62 oz. of liquid eggs is equal to 1.5 oz. eq. m/ma. Therefore, 400 ounces of liquid eggs would be equal to 370.37 oz. eq. The 370.37 oz. eq. would be divided by the 160 portion to equal 2.31 (round down to 2.25 oz. eq.). The 0.5 oz. eq. from the cheese plus the 2.25 oz. eq. from the liquid eggs contributes 2.5 oz. eq. m/ma to the meal pattern. The chocolate banana bread overnight oats recipe indicates that it contributes 1.25 oz. eq. of grains, however it should only credit as 1 oz. eq. The recipe indicates that there are 53.33 cups of oats in the recipe for 160 servings. ½ cup of oats (from the product picture provided by FSD) = 45 grams (1.607 oz. eq.), therefore 1 cup of oats = 3.214 oz. eq. 3.214 oz. eq. multiplied by the 53.33 cups in the recipe = 171.42 oz. eq. Divide the 171.42 oz. eq. by 160 servings, which would equal 1.07 oz. eq. (rounded down to 1 oz. eq.) per serving of oats. The bacon, egg and cheese on English muffin recipe indicates that it contributes 2 oz. eq. of m/ma, however it should only credit as 1.5 oz. m/ma (1 oz. eq. for the egg patty and 0.5 oz. eq. for 1 slice of cheese). Pork bacon is not a creditable meat/meat alternate in the NSLP. <p>CA: Submit an updated standardized recipe for the breakfast flatbread, the bacon, egg and cheese on English muffin, and the chocolate banana overnight oats. Be sure to include the correct crediting information for each recipe.</p>

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Site Name	Alexander Mid	
Form Name	Offer vs Serve (500-502)	
Question #	502	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2023 01:23 PM	Finding: Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Lunch signage currently says this, but the breakfast signage does not. CA: Submit a picture of the supplementary breakfast signage that includes the ½ cup fruit and/or vegetable statement. Signage examples can be found on our Signage webpage .
Site Name	Alexander Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2023 01:36 PM	Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Corrected on-site. No further action required. During the on-site visit, the most recent food safety inspection report was moved from the dry storage/office bulletin board to a publicly visible location in the cafeteria next to the monthly menu display and cashier station.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/14/2023	3148		Administrative Review		AR			
Comments								
Non-Program Foods Revenue						Created By		Created Date
<p>Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by establishing requirements related to the revenue from the sale of nonprogram foods. Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:</p> <ul style="list-style-type: none"> • All revenue from the sale of nonprogram foods accrues to the non-profit school food service account; and • Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. <p>Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account. This includes adult meals, a la carte, extra entrees, extra milks, vended meals (such as those for Head Start and the YMCA), catering, and food service operated vending machines.</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.</p> <p>Compliance with the nonprogram food revenue requirement is measured by determining if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs of nonprogram foods.</p> <p>For example, if the costs of nonprogram food are 25 percent of the SFA's total food costs, then the amount of revenue generated from the sale of these nonprogram foods must be at least 25 percent of the total revenue in the school food service account.</p> <p>USDA Food and Nutrition Service (FNS) understands there is wide variation in the capabilities of systems and mechanisms SFAs employ to maintain and monitor their school food service accounts. Separating out the SFA's costs for nonprogram foods from the costs</p>								3/14/2023 8:27:39 AM

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<p>for program food may be particularly difficult. In recognition of the current variations in system capabilities, FNS has provided a simplified approach for SFAs to assess compliance. The simplified approach, while still requiring SFAs to separate their nonprogram food costs from their program food costs, allows SFAs to select a reference period by which compliance will be assessed. Rather than separating all costs for the entire year, SFAs will separate their nonprogram food costs from their program food costs for a period of at least 5 consecutive operating days. SFAs with the capacity to obtain separate nonprogram and program food cost and revenue data for a period longer than 5 consecutive days (e.g., monthly, annual, biweekly) are strongly encouraged to do so.</p> <p>If the SFA can show that the percentage of nonprogram revenue generated is at least as great as the percentage of nonprogram food costs incurred during the reference period (e.g., 5 consecutive days, monthly, annual, biweekly), the SFA is in compliance with federal requirements.</p> <p>To assist SFAs in meeting this requirement, the School Nutrition Team (SNT) has created a Nonprogram Food Revenue Tool/Price Calculator. This tool can assist SFAs in pricing nonprogram foods and calculating total nonprogram expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA Nonprogram Food Revenue Tool and compares revenue and food cost ratios to measure compliance.</p> <p>SFAs must use the non-program food revenue tool 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 plus nonprogram food cost. Please refer to the corresponding "In a Nutshell" resource as for more details on these requirements. The tool contains instructions and there is also a webcast that walks through the tool.</p> <p>The USDA Policy Memorandum SP 20-2016 includes a Q&A section to better define these nonprogram food requirements.</p>								
03/14/2023	3147		Administrative Review		AR			
Comments								
Annual Financial Report (AFR)				Created By		Created Date		
<p>The Annual Financial Report Manual, AFR webcast, and AFR In a Nutshell are located on the DPI website to assist 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.</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 the account. As noted on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from the revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.</p> <p>Because of the Nonprogram Revenue Rule for Food Service Management Company (FSMC), expenses must be allocated to actual labor, food, purchased services, equipment, or other, not all placed into Purchased Services as was previously done for SFAs with FSMC contracts. SFAs must be provided with annual food costs and revenues from the FSMC. The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.</p>						3/14/2023 7:57:23 AM		
03/14/2023	3146		Administrative Review		AR			

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Comments					Created By	Created Date
Professional Standards Please see below for a few reminders regarding professional standards requirements. Additional details and resources are available on the corresponding webpage . <ul style="list-style-type: none"> Food Service Directors are required to completed 12 hours of job-specific professional standards training each year. These training requirements also apply to the Authorized Representative from the School Food Authority (SFA) when a Food Service Management Company acts as the Food Service Director (FSD). ARs do not need to meet the minimum hiring standards for directors or the 8 hour food safety training requirement. 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. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.). 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. 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. It is recommended that the professional standards tracking tool used by the FSD be updated to include additional detail. A brief list of duties for each staff member and a clear indication of their position (director, manager, staff) should be added. The FSD should also double check and update staff "full time" vs "part time" status on the tracker based on the definitions above. The AR should retain records that document that the new FSD (and any other new FSDs the district may have in the future) meets the minimum hiring standards for new directors. While this may be something the FSMC has or has checked, the SFA should also retain documentation that the standards are met as the SFA is responsible for program oversight. 						3/14/2023 7:49:27 AM
03/13/2023	3145		Administrative Review	AR		
Comments						
Special Dietary Needs 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. Policy Requirements - At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information. 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: <ol style="list-style-type: none"> an explanation of how the child's physical or mental impairment restricts the child's diet the food(s) to be avoided the food or choice of foods that must be substituted 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 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. 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						3/13/2023 3:07:54 PM

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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.

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.

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.

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.

When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.

USDA FNS does not require SFAs to obtain updated medical statements on a regular basis. When SFAs receive updated medical information, they must ensure that medical statements on file reflect the current dietary needs of participating children. SFAs may require updates as necessary to meet their responsibilities, but should carefully consider the burden obtaining additional medical statements could create for parents and guardians when establishing such requirements.

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

03/13/2023	3144		Administrative Review	AR		
Comments						
Local Wellness Policy			Created By		Created Date	
The district does an excellent job on Local Wellness Policy requirements, including documentation and tracking of wellness meetings and activities. It clear that collaboration between the school district and the local community is valued and is leveraged to offer a variety of wellness-focused initiatives.					3/13/2023 3:02:33 PM	
It is recommended to continually review and update the written wellness policy to reduce any duplicative content and increase the number and specificity of wellness goals. There is a wellness policy builder tool available on the Local Wellness Policy webpage to assist in updating policy content.						
03/13/2023	3143		Administrative Review	FSD		
Comments						
Food Safety Plan			Created By		Created Date	

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<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.</p>										3/13/2023 2:57:31 PM	
<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. 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.</p>											
<p>A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. 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 continue to regularly review and update the food safety plans in the district to ensure they are comprehensive and site-specific.</p>											
03/13/2023	3142		Administrative Review		AR						
Comments											
Food Safety Inspections				Created By				Created Date			
<p>During the review, only one food safety inspection report from the 21-22 school year could be provided. The SFA did not have another report to provide, and the online Health Space portal did not indicate that the school was inspected twice in 21-22. Only 1 inspection was obtained so far in 22-23, but the Food Service Director has already been in contact with the local sanitarian to get a second inspection in the 22-23 school year.</p>											
<p>Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's food safety plan. The most recent food safety inspection report must be posted in public view. If you request a food safety inspection but are not able to obtain one, document the request date and retain any correspondence (email, letters, phone call details) with the local regulatory authority that conducts inspections. SFAs are responsible for requesting food safety inspections from the local regulatory authority and documenting their efforts.</p>								3/13/2023 2:54:54 PM			
03/13/2023	3141		Administrative Review		AR						
Comments											
Homeless Students				Created By				Created Date			
<p>As a reminder, there are specific documents that are acceptable for determining if a student is eligible for free meals based on homeless or runaway status. As stated in the Eligibility Manual pages 39-40, "Acceptable documentation [7 CFR 245.2] to establish eligibility based on homelessness includes:</p> <ul style="list-style-type: none"> • A list of names of homeless children; • The effective dates and the signature of a homeless liaison; or • A letter from a homeless liaison provided by the household to the school confirming the child is currently homeless." 								3/13/2023 2:51:24 PM			
03/13/2023	3140		Administrative Review		AR						
Comments											
Application Notes				Created By				Created Date			
<p>Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.</p>								3/13/2023 2:48:57 PM			
<p>It is recommended that the Determining Official keep more detailed notes on the application when additional clarification is obtained from a household, including a date, initials, and notes regarding the communication.</p>											
03/13/2023	3139		Administrative Review		FSD						
Comments											
Second Breakfasts				Created By				Created Date			
<p>Please be reminded of the intent and requirements surrounding the allowability of second breakfasts. Per 7 CFR 220.9, "School Food Authorities shall plan for and prepare breakfasts on the basis of participation trends, with the objective of providing one breakfast per child per day. Production and participation records shall be maintained to demonstrate positive action toward this objective. In recognition of the fluctuation in participation levels which</p>								3/13/2023 2:41:57 PM			

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makes it difficult to precisely estimate the number of breakfasts needed and to reduce the resultant waste, any excess breakfasts that are prepared may be served to eligible children and may be claimed for reimbursement unless the State agency, or FNSRO where applicable, determines that the School Food Authority has failed to plan and prepare breakfasts with the objective of providing one breakfast per child per day. In no event shall the School Food Authority claim reimbursement for free and reduced-price breakfasts in excess of the number of children approved for free and reduced price meals."									
03/13/2023	3138		Administrative Review		FSD				
Comments									
Overt Identification					Created By		Created Date		
During meal observation, it was observed that meal prices by eligibility (\$0.00, \$0.40, \$3.10) showed on the computer screen very briefly when students entered in their PINs. The screen is only visible to the POS operator and is not visible to students. While this may not necessarily constitute " overt identification ," the SFA should work towards removing this information from the screen. These prices allow the POS operator/cashier to discern student's eligibility statuses and they likely do not really need to know this information. Work with the software provider and staff members to modify how these prices appear on the computer screens.							3/13/2023 2:37:10 PM		
03/13/2023	3137		Administrative Review		AR				
Comments									
On-Site Monitoring					Created By		Created Date		
There are certain responsibilities that SFA's that contract with Food Service Management Companies (FSMCs) may not delegate to the FSMC. This includes the annually required on-site monitoring of NSLP and SBP. The Authorized Representative (AR) of the district should complete these visits and corresponding forms. A collaborative visit with the AR and the Food Service Director (FSD) may be beneficial.							3/13/2023 2:28:14 PM		
For the 22-23 school year, all on-site monitoring visits and forms were completed by the FSMC FSD and signed off on by the AR (though the AR did not visit the sites). Please visit the On-Site Monitoring webpage and look at the FSMC webcast for more details.									
03/13/2023	3136	317	Administrative Review	Alexander Mid	FSD				
Comments									
POS Oversight					Created By		Created Date		
As a reminder, a food service staff member must keep a close watch on the POS during meal service. During breakfast observation, the server was not consistently monitoring student's meal choices and the POS station during the entire service time. Conversations indicated the POS process was somewhat modified on the day of the review due to the FSD being present for the service and their ability to help monitor the line. Please ensure that on a typical day that the breakfast server is stationed at the end of the line at the POS and can adequately monitor students' meals and PIN entry into the computer.							3/13/2023 2:14:03 PM		
03/13/2023	3135		Administrative Review		AR				
Comments									
Allowable Lunch Times					Created By		Created Date		
The district has AM and PM 4K students. Currently, AM 4K have access to breakfast and are provided meals according to their eligibility, counted, and claimed under SBP. The PM 4K are provided lunches according to their eligibility, they are not counted and claimed under NSLP, and the district pays the difference. The PM 4K have not been claimed in NSLP due to confusion on allowable times to serve NSLP meals. Please note that NSLP lunches must be offered between 10am -2pm. The SFA can claim the PM 4K meals in NSLP if the lunches are provided during that time frame. Please refer to 7 CFR 210.10 (I) (1) .							3/13/2023 2:08:34 PM		
03/13/2023	3134		Administrative Review		AR				
Comments									
CEP					Created By		Created Date		
The Community Eligibility Provision (CEP) may be a good fit for the SFA. The SFA is encouraged to assess student data as of April 1, 2023 to see if CEP is something the district would like to pursue. SFAs must apply for CEP and be approved by DPI. Applications are accepted from May 1 - June 30, 2023. Please visit the CEP webpage for more details. Questions on CEP can be directed to the reviewer/CEP specialist .							3/13/2023 2:02:18 PM		
03/13/2023	3133	305	Administrative Review	ALL	AR				

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Comments									
Unpaid Meal Charges					Created By			Created Date	
The meal charge information communicated on the district's food service page should be re-assessed. It states that, "If the family balance does not have enough money to cover purchases, charges will not be allowed on the account until a payment is made." However, the district allows students to charge reimbursable meals and will not be denied meals due to low balances. This should be communicated more clearly on this webpage, so families are clear on the rules and expectations for meal payments.								3/13/2023 1:58:53 PM	
03/13/2023	3132	101	Administrative Review	ALL	AR				
Comments									
Civil Rights Training					Created By			Created Date	
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-foodservice staff. This should be completed at the beginning of the school year. Each SFA must maintain documentation of the training and an attendance record of participants that attended, such as a sign-in sheet for the training.								3/13/2023 1:55:39 PM	
03/13/2023	3131	803	Administrative Review	ALL	AR				
Comments									
Civil Rights Complaints					Created By			Created Date	
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.									
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.									
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.									
If a complaint of discrimination is received at your district, the following procedures should be followed:									
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.								3/13/2023 1:51:22 PM	
03/08/2023	3092	402	Administrative Review	Alexander Mid	FSD				
Comments									
Fruit Portions					Created By			Created Date	
TA was given to FSD and Head Cook at Alexander Middle School that a 4 oz. souffle portion cup of fruit does not equal a ½ cup serving of fruit. To provide students with a full ½ cup serving of fruit, a larger portion cup must be used to contain the full scoop.								3/8/2023 9:09:30 AM	
03/08/2023	3088	402	Administrative Review	Alexander Mid	FSD				
Comments									
Serving Utensils					Created By			Created Date	
Proper portion size utensils must be used and are very important for self-service foods. This helps to encourage students to take the planned amount, and ensure the amount needed for a reimbursable meal is taken.									
Tongs were provided as the serving utensil for cauliflower florets (planned portion size of ½ cup) on the day of review, so TA was given to the FSD to provide signage to students to indicate the number of florets to equal ½ cup vegetables.								3/8/2023 8:58:01 AM	
03/08/2023	3087	401	Administrative Review	Alexander Mid	FSD				

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Comments							Created By	Created Date
OVS								
<p>It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. OVS is being utilized, however a refresher training may be beneficial for staff.</p> <p>Several students had to be reminded to take ½ cup fruit/vegetable, and two students were able to go through the line without a reimbursable meal. OVS resources on WI DPI's Menu Planning webpage may be used as training resources.</p>								3/8/2023 8:54:04 AM
03/07/2023	3053	410	Administrative Review	Alexander Mid	FSD			
Comments							Created By	Created Date
Breakfast Dietary Specifications								
<p>The breakfast menu consistently offers more grains than the 10 oz eq weekly recommended maximum. During the week of review, students could select up to 15.25 oz eq grains for the week. When the amount of grains offered exceeds the recommended maximum, it is more likely that the dietary specifications for saturated fat, sodium, calories, and trans fat are also exceeded. This practice may also contribute to higher food costs and more food waste for the SFA.</p>								3/7/2023 1:56:24 PM
03/07/2023	3051	431	Administrative Review	Alexander Mid	FSD			
Comments							Created By	Created Date
Production Records								
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. On Monday during the week of review, the production record indicates that chef salads get 1 roll. However, the recipe for chef salads indicates that they get 2 rolls. Production records should be updated to reflect that each salad gets 2 rolls to credit as 2 oz. eq. of grains.</p>								3/7/2023 1:47:37 PM
03/07/2023	3050	1411	Administrative Review	Alexander Mid	FSD			
Comments							Created By	Created Date
Buy American								
<p>A Buy American noncompliant tracker exists, however TA was given to the FSD to routinely check inventory for compliance. Canned jalapeno peppers (product of Peru) were not logged on the tracker.</p>								3/7/2023 1:27:21 PM