

# Administrative Review Report

Menominee Indian School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/01/2024	04/05/2024
On-Site Review	04/15/2024	04/17/2024
Entrance Conference	04/15/2024	04/15/2024
Exit Conference	04/17/2024	04/17/2024

## Commendations:

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The lunch servers were very friendly during the review and provide excellent customer service to the students.

Thank you also to the food service director for being available for discussion all day during the on-site visit. It is clear that the director cares deeply for the students and puts in great effort to ensure they receive nutritious meals. The director has many responsibilities in the school and does a great job overall managing the school meals programs. Thank you for being receptive to suggestions and having a desire to keep learning and improving the programs.

## Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

Improve the quality of school meals and support your local community by incorporating Farm to School (F2S) activities in school meal programs. F2S activities can include the use and promotion of locally grown foods, taste testing, agriculture and nutrition education, and hands-on learning opportunities in a school garden. Schools can participate in their own capacity and there are no requirements for involvement. The goal of F2S is to meet the needs of your community. Visit the [DPI F2S webpage](#) or contact [DPIF2S@dpi.wi.gov](mailto:DPIF2S@dpi.wi.gov) for more information.

David Lee Schneider ([david.schneider@dpi.wi.gov](mailto:david.schneider@dpi.wi.gov) or 608-264-9332) would also a great contact for you. He is a farmer and school garden expert on the School Nutrition Team and he is based out of Oconto.

Be sure to check out the [DPI Traditional Foods website](#) for information and resources on incorporating American Indian traditional foods into the National School Lunch and School Breakfast programs at Menominee Indian School District.

Get Recognized for Innovation in School Meals!

[The Healthy Meals Incentives Recognition Awards](#) are a collection of awards designed to celebrate and share innovative practices taking place across the country!

[The Innovation in the Preparation of School Meals Award](#) recognizes school nutrition programs that plan and prepare scratch recipes for school breakfast and lunch. Utilization of local agricultural products or USDA Foods is encouraged.

## Award criteria:

Offering at least 3 new entrees and/or sides prepared from scratch using standardized recipes.

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Providing whole grain-rich items as defined by the [Grain Requirements for School Meals](#).  
Engagement of students in the marketing of the new menu items.

To learn more and access the application portal, visit the [Healthy Meals Incentives Webpage](#).  
For application assistance, please email: [awards@healthymealsincentives.org](mailto:awards@healthymealsincentives.org)

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	777	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/16/2024 05:20 PM	<p>Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The funds are not being tracked separately.</p> <p>Corrective Action: Provide a statement of the process that will be used to track how the funds are spent.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 05/01/2024 03:03 PM	<p>Finding: The SFA is providing a salad bar at no charge to school staff daily and making a transfer from their general fund to the non-profit food service account to cover the cost of the raw food cost. The 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>Corrective Action 1: Complete the <a href="#">DPI Nonprogram Foods Revenue Tool</a> and upload into SNACS using a 5-day reference period from the current school year.</p> <p>Corrective Action 2: Using the information from the Nonprogram Foods Revenue Tool determine the total cost of the salad bar for School Year 2023-24 and reimburse the difference in cost from what has already been reimbursed. Upload documentation into to SNACS that show the total amount transferred to the non-profit food service account to fully cover the cost of the salad bar.</p> <p>Corrective Action 3: 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.</p>
<b>Site Name</b>		

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<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	801	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/16/2024 05:21 PM</p>	<p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)).</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.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/16/2024 05:25 PM</p>	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">the DPI template policy</a> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 07:25 AM</p>	<p>Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31). SFA provided a LWP that they are not utilizing and does not contain any of the required elements.</p> <p>Corrective Action: Provide a detailed timeline for when the Local Wellness Policy will be implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>

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<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1001	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 07:31 AM</p>	<p>Finding: The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.</p> <p>Corrective Action: Submit a detailed statement of how the public will be informed of the SFA's Local Wellness Policy.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1002	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 07:32 AM</p>	<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated.</p> <p>Corrective Action: Provide a plan on when and how the LWP will be reviewed and updated.</p>
<b>Site Name</b>		
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
<b>Question #</b>	1600	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 07:41 AM</p>	<p>Finding: The SFA did not adequately inform households of the availability of the School Breakfast Program. At the beginning of the school year, the SFA must notify households of the availability of the School Breakfast Program (SBP) (7 CFR 210.12).</p> <p>Corrective Action: Submit a statement describing how households will be informed of the availability of the SBP. Please include the method of communication and time frame for distributing breakfast promotion materials.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 07:48 AM</p>	<p>Finding: The non-discrimination statement was not included on all required program materials including the school menus posted by the front door and the Food Service Webpage.</p> <p>Corrective Action: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1217	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 08:12 AM</p>	<p>Finding: Documentation of school food service staff training is not being tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1219	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 04/17/2024 08:19 AM</p>	<p>Finding: Non-school nutrition staff who have responsibilities for the FFVP Program did not receive job specific training in the current school year (7 CFR 210.30).</p> <p>Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: The daily minimum requirement for fruit was not met for breakfast during the entire review period (March 2024).
	05/03/2024 09:27 AM	<p><b>The daily minimum requirement for fruit at breakfast is 1 cup and the production records indicated that 1/2 cup of fruit was offered daily.</b></p> <p>Additionally, during the on-site breakfast observation, the meal service started with a 2 fl oz spoodle for blueberries and 1/2 cup of apple juice. This was corrected and a 4 fl oz spoodle was used for the blueberries to ensure the daily minimum fruit requirement was met. However, towards the end of meal service, the blueberries and French toast ran out and breakfast breaks were provided which only offer 1/2 cup of juice. Three students were observed taking the breakfast break; while these students had 3 components, the meal offered did not provide a sufficient amount of fruit. During the previous AR, it was noted that only 1/2 cup of fruit was offered on two days during the week of review resulting in a daily fruit shortage at breakfast. Therefore, <b>this is a repeat violation and fiscal action will be assessed for all breakfast served during the month of March 2024 as well as the three breakfast observed during the on-site review that were not offered 1 cup of fruit.</b></p> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1. The Food Service Director and all staff at KPS should complete the <a href="#">Breakfast Meal Pattern training</a> (15 min) in the <a href="#">DPI Online Learning Library</a>.</li> </ol> <p>Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit the certificate of completion along with a signed training roster.</p> <ol style="list-style-type: none"> <li>2. Production records submitted for the corrective action related to production record requirements (question #430 below) will be reviewed for compliance with the daily fruit requirement.</li> <li>3. Submit a statement of understanding that students must be offered 1 cup of fruit daily at breakfast (however, under OVS, they only need to select 1/2 cup of fruit plus two other food items to have a reimbursable breakfast.)</li> </ol>

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<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	430	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2024 09:29 AM</p>	<p>Finding: Production records are not meeting all DPI <a href="#">Production Record Requirements</a>.</p> <p>The following information is missing, incomplete or completed incorrectly:</p> <ul style="list-style-type: none"> <li>• Menu item with recipe name/reference number or product name/description <ul style="list-style-type: none"> <li>○ Be more specific with brand name, accurate product number, form (canned, fresh, frozen/steamed, etc.).</li> <li>○ Actual variety of item/s offered must be documented (ex. cereal, juice)</li> </ul> </li> <li>• Planned/actual number of servings prepared <ul style="list-style-type: none"> <li>○ Planned number of servings based on planned number of meals. If you end up preparing more or less, record as planned #/actual #.</li> <li>○ If utilizing offer versus serve (OVS), it would be expected that the planned number of servings for each menu item would vary based on historical usage (ex. if you are planning 400 meals, it is unlikely that all 400 students will take a serving of celery therefore, the planned number of servings and amount prepared could be adjusted to reduce food cost and food waste.)</li> </ul> </li> <li>• Planned/actual quantity prepared in bulk units (example: # of cans, bags, boxes, pounds) <ul style="list-style-type: none"> <li>○ Recorded for some items, but the quantity prepared is not accurate based on the number of servings.</li> <li>○ Amount leftover (this can be recorded as number of servings or bulk units)</li> <li>○ If planned/actual number of servings is greater than the actual number of meals, I would expect to see leftovers.</li> </ul> </li> <li>• Milk usage is not documented by type at breakfast. At lunch, milk is documented as white/chocolate but fat type (1%) is not documented.</li> <li>• While not required, indicating the OVS policy is strongly recommended.</li> </ul> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1. Submit one full week of completed production</li> </ol>



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		<p>records for breakfast and lunch that fulfill all DPI production record requirements. Choose a week (Monday-Friday) that occurs after the completion of the on-site Administrative Review (AR), but before the corrective action due date.</p> <ol style="list-style-type: none"> <li>The Food Service Director and any staff responsible for completing production records at KPS must complete the <a href="#">Production Records training</a> (45 minutes) found in the <a href="#">DPI Online Learning Library</a>. Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit the certificate of completion along with a signed training roster.</li> <li>Submit a statement of understanding that milk usage must be documented by type on the production record daily. Include who will be responsible for completing this at breakfast and lunch.</li> </ol> <p>Note: Multiple documents are being completed daily. <a href="#">Production record templates</a> that provide space for all required information are available on <a href="#">the DPI Production Record webpage</a>. While this template is not required, it is recommended to aid in streamlining the documentation process and ensure all requirements are met. Templates are available in both excel (editable) and PDF versions.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	433	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>05/03/2024 09:25 AM</p>	<p>Finding: Acceptable crediting documentation was not available for the majority of items served during the week of review. Processed foods that are not listed in the <a href="#">Food Buying Guide</a> (FBG) must be accompanied by a <a href="#">Product Formulation Statement</a> (PFS) or <a href="#">Child Nutrition</a> (CN) label to sufficiently document meal component crediting.</p> <p>Corrective action: Submit crediting documentation for the following items:</p> <ul style="list-style-type: none"> <li>Grilled chicken patty - CN label or PFS;</li> <li>Tomato soup - PFS;</li> <li>Ground beef - if raw, what % fat; if cooked, PFS or CN unless commodity;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Nacho chips - nutrition fact label with ingredients and weight;</li> <li>• Hot dog bun - nutrition fact label with ingredients and weight;</li> <li>• Biscuit - nutrition fact label with ingredients and weight;</li> <li>• Diced Ham - label and PFS (if not creditable using FBG) (Tuesday, 3/5);</li> <li>• Pita/tortilla for hambit - nutrition fact label with ingredients and weight;</li> <li>• Cinnamon Roll - nutrition fact label with ingredients and weight OR PFS;</li> <li>• Egg patties with cheese - CN label or PFS;</li> <li>• Yogurt - nutrition fact label;</li> <li>• Sliced ham (Thursday, 3/7 breakfast);</li> <li>• Cookie</li> </ul> <p><i>Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.</i></p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	435	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 05/03/2024 09:26 AM	Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. Any recipes on file had not been standardized to the operation and did not reflect the actual products and/or procedures used. There was no standardized recipe for the following: <ul style="list-style-type: none"> <li>• BBQ Chicken (not following recipe exactly. Using grilled chicken patty rather than bone-in chicken);</li> <li>• Grilled cheese;</li> <li>• Tomato soup;</li> <li>• Nachos (if all ingredients are documented separately on the production record, a recipe is not required);</li> <li>• Hot dog on a bun (not necessary if hot dog and bun are documented separately on the PR);</li> <li>• Mashed potatoes;</li> <li>• Salisbury Steak;</li> <li>• Orange smoothie</li> </ul>

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	<p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1. Submit the standardized recipes listed above. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the <a href="#">Standardized Recipes webpage</a>.</li> <li>2. The Food Service Director and any other staff responsible for standardizing recipes at KPS should complete the <a href="#">What's the Yield on Standardized Recipes</a> training from the DPI online learning library (<a href="https://media.dpi.wi.gov/school-nutrition/whats-yield-with-standardized-recipes/story_html5.html">https://media.dpi.wi.gov/school-nutrition/whats-yield-with-standardized-recipes/story_html5.html</a>).</li> </ol> <p>Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit the certificate of completion along with a signed training roster.</p> <p><i>Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.</i></p>	
Site Name	Keshena Primary School	
Form Name	Offer vs Serve (500-502)	
Question #	502	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/03/2024 09:28 AM</p>	<p>Finding: Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, signage does not list this.</p> <p>Corrective Action: Submit a picture of the supplementary signage.</p>
Site Name	Keshena Primary School	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/16/2024 10:38 AM	<p>Finding: The SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1.</p> <p>Corrective Action: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1404	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/16/2024 01:03 PM	<p>Finding: Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). The food safety plan was missing the following information: Standard Operating Procedures for Field Trips and not site specific.</p> <p>Corrective Action: Update the food safety plan to include the missing information and upload the updated portions of the food safety plan into SNACS.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 04/16/2024 12:53 PM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p> <p><b>No Further Action Needed Corrected on Site</b></p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2024 09:31 AM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> <li>• grapes (Chile)</li> <li>• guacamole (Mexico)</li> <li>• GFS black olives (Spain)</li> <li>• balsamic vinaigrette (Italy)</li> </ul> <p>Additionally, the following products did not have a clear country of origin on the product packaging:</p> <ul style="list-style-type: none"> <li>• celery</li> <li>• GFS canned peaches</li> <li>• Campbell's cream of chicken</li> <li>• T. Marzetti Ranch dressing</li> <li>• Tony's smart pizza 78674</li> </ul> <p>Corrective Action: Complete and submit <a href="#">a Noncompliant Product List Form</a> for the non-domestic products listed above. Noncompliant Product List templates can be found on the <a href="#">DPI Buy American webpage</a>.</p> <p>For items without clear country of origin labeling, either submit proof that the product is domestic or include them on the noncompliant product list.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Afterschool Snack Program (1700)	
<b>Question #</b>	1700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/02/2024 11:34 AM</p>	<p>Finding: The SFA has 3 sites that are listed as "In Program" for Area Eligible After School Snack Program and has not submitted claims during School Year 2023-24.</p> <p>Corrective Action 1: Update the 2023-24 School Nutrition contract to remove participation in Area Eligible After School Snack Program. Upload a statement that this has been completed.</p> <p>Corrective Action 2: If the SFA elects to provide snack outside of participation in the Area Eligible After School Snack Program use the nonprogram food revenue tool to determine the full cost of snacks served and upload a copy of the nonprogram food revenue tool used</p>

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		to determine the cost of snacks. The costs of snacks provided after school for the duration of the 2023-24 school year will need to be fully covered by the SFA's general fund.
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Fresh Fruit and Vegetable Program - Review Period (1900-1902)	
<b>Question #</b>	1901	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 05/07/2024 03:07 PM	<p>Finding: As part of the AR, the November claim was validated. The invoice provided showed one 24 pk of cauliflower and one 24 pk of kiwi was ordered on 11-29-23. However, two cases of each were claimed for reimbursement on the November claim. This results in an overclaim of \$61.30 and is subject to fiscal reclaim.</p> <p>Corrective Action Required: Please provide a statement of how you will ensure that all FFVP costs that are claimed are accurate and match the amount on the supplier invoice.</p>
<b>Site Name</b>	Keshena Primary School	
<b>Form Name</b>	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)	
<b>Question #</b>	1905	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 05/07/2024 11:30 AM	<p>Finding: The FFVP was not publicized to students and families.</p> <p>Corrective Action: Provide a statement of how the FFVP will be publicized or promoted to students and families.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
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- Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines.
- 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. Non-program Food Revenue Tool
- SFAs are required to annually complete the [DPI Non-program Food Revenue Tool](#) or the [USDA Non-program](#)

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[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](#)

- A non-program foods deficit must receive a transfer of non-federal funds into the nonprofit food service account.
- SFAs that sell only non-program milk and adult meals are exempt from completing the Nonprogram Food Revenue Tool.
- Adult Meals 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.

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## Public Release

All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)
- Local employment office
- Major employers contemplating or experiencing large layoffs

SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed

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## Afterschool Snack Program

- Each site participating in the Afterschool Snack Program (ASP) is required to conduct an onsite monitoring review within the first four weeks of operation and a second review within the school year. The [onsite monitoring form](#) is found on the [Afterschool Snack Program](#) webpage.
- Area Eligible Afterschool Snacks are claimed at the free rate. No students should be charged for snacks served in the Area Eligible Afterschool Snack Program.
- Each afterschool snack location is required to provide educational or enrichment activities in an organized, structured, and supervised environment. It is required to maintain documentation supporting reimbursable snacks are provided to students, including production records with snack items, and serving size. Menus are not required but encouraged. Production record templates and snack count sheets are on the [Afterschool Snack Program](#) webpage.

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## Supply Chain Assistance (SCA) Funds

- 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.
- 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

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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.

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## Offer versus Serve (OVS)

OVS is not required for grades K-8, but it is encouraged in order to reduce food waste/food cost and develop skills in making healthy meal choices. Without OVS in place, students in grades K-8 must be served  $\frac{3}{4}$  cup vegetable and  $\frac{1}{2}$  cup fruit to create a reimbursable meal, in addition to the other full components. If OVS is implemented, then students can choose three of the five components offered, including  $\frac{1}{2}$  cup of fruit and/or vegetable, to create a reimbursable meal.

While students had the option to decline a milk, for the most part, all other components were put on the students tray automatically. Providing 1 cup of fruit to all student at lunch and breakfast resulted in significant food waste.

It is recommended that students have more choice in what is put on their tray. For example, a 4 fl oz spoodle (1/2 cup) could be used for fruit and students could choose if they wanted 1 or 2 scoops. For each component, students could be asked "do you want this?" It may slow down the line a bit in the beginning as students and staff adjust, but it is common practice in many schools across the state. It is important for staff to understand OVS requirements. Visit our [Online Learning Library](#) for training resources.

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## Weight versus Volume

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or  $\frac{1}{2}$  cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between  $\frac{1}{2}$  cup of popped popcorn vs.  $\frac{1}{2}$  cup of peas). Be sure that this is clear and done correctly when completing planned serving sizes on your production records. It is recommended that all staff review the 7 minute [Weight versus Volume training](#) available in the School Nutrition Online Learning Library.

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## Comingling Flexibility

Preschool students are allowed to be served the K-5 meal pattern when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine, during meal service if a child is in preschool or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns.

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## Field Trip Meals

If meals are provided to children on a field trip, they must meet daily meal pattern requirements; for K-8 students, this



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means a minimum of 3/4 cup of vegetable, 1/2 cup of fruit, 1 oz eq meat/meat alternate, 1 oz eq grain and 1 cup milk. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food items, offering students the ability to choose their milk variety and ensuring meal counts are taken at the time the students receives the meal.

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## Fresh Fruit and Vegetable Program (FFVP)

- As a reminder, nutrition education is essential to the success of the FFVP. Funding is not available through the FFVP grant for nutrition education material purchases. The [FFVP webpage](#) links to free resources found on the [Promoting Fresh Fruits and Vegetables in Schools](#) sub-page. Additional materials can be ordered through the Wisconsin Team Nutrition webpage.
- FFVP must be provided during the day outside of mealtimes and FFVP may not be taken offsite.
- FFVP must be provided to all enrolled elementary students two times per week. The school site and the FFVP application determines who is considered an elementary student.
- One adult per class is allowed to participate with the students in the FFVP snack and are the only adults allowed to participate. Teachers can model healthy eating behaviors while consuming the FFVP snack alongside students. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. See page 10 of the [USDA's FFVP Handbook](#) for more information.
- Offering a cooked vegetable is allowable when criteria are met:
  - o The vegetable must be purchased fresh and cooked in house.
  - o Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable.
  - o The vegetable that is cooked should be one that is not normally eaten raw, and it must be offered as part of a nutrition education lesson.
  - o Cooked vegetables are limited to one time per week.
- Dip may be served with vegetables and must be low fat or fat free with 3 grams or less of fat per serving.

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## Point of Service (POS) For CEP

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**.

**Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served.** Only one meal per student per meal service may be claimed for reimbursement. Since all students are claimed at the free rate the SFA may elect to use the DPI School Nutrition Team's [POS Breakfast Meal Counts form](#) and the [POS Lunch Counts Form](#) instead of recording by name. Utilizing the POS Meal Count Forms may help the SFA save time when moving students through the line. Keep in mind that the POS Meal Count Forms must be saved for 3 years plus current year.

Some meal count systems that are not acceptable include:

- 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.

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- Backout counts –Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal.

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## On-site Monitoring

- Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP.
- Monitoring is due by February 1.
- The [NSLP On-Site Monitoring Form](#) and the [SBP On-Site Monitoring Form](#) forms are on the [Onsite Monitoring](#) section of the DPI SNT website.

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## Non-profit School Food Service Account Reporting

- 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.
- When a student deposits funds in their lunch account, which will be used for meal purchases, the amount received is not treated as revenue until the meal has been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your AFR.
- The ending balance on June 30 from the previous year needs to be 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.
- 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”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - ‘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.
  - 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

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purchased service for public schools.

- Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.

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## LWP Requirements

- SFAs are required to have language in their LWP that relates to all the content areas listed in the [LWP Checklist](#) found on the [Local Wellness Policy section](#) of the DPI SNT website.
- Sample LWP language is listed below.
  - **Policy Leadership:** *The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy.*
  - **Public Involvement:** *The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy.*
  - **School Meals:** *All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010.*
  - **Foods sold outside of school meals program:** *All food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
  - **Foods provided but not sold (e.g., class parties, class snacks, rewards):** *The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations are promoted, and a list of ideas is available to staff and family members.*
  - **Food and Beverage Marketing:** *Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
  - **Nutrition Education:** *Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects.*
  - **Nutrition Promotion:** *School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school.*
  - **Physical Activity:** *The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education.*
  - **Other School-Based Strategies for Wellness:** *The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year.*
  - **Triennial Assessment:** *The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school follows the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.*
  - **Update/Inform the Public:** *The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.*

## LWP Triennial Assessment

- SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)).
- The SFA's first triennial assessment must be completed by June 30, 2020 (for SFAs that were participating in 2016-2017 school year).
- The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy.

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- FNS recommends the WellSAT Tool as a resource to conduct the LWP triennial assessment.
- Assessment results and findings must be released to the public as a written report. There is no required template for this report.

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## Meal Substitutions

Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. It is always better to substitute something creditable, rather than have a missing component.

**To ensure meal pattern requirements are met, any menu changes made should be discussed with and approved by the Food Service Director prior to meal service.**

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## Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. To ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the [Vegetable Subgroups handout](#) to identify vegetables in each subgroup.

Note the following vegetables and the correct subgroup:

- green beans – other
- black beans - beans/peas/legumes
- celery – other

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## Crediting Documentation/Record Retention

More information on product formulation statements (PFS) and Child Nutrition (CN) labels can be found on the [USDA FNS CN Labeling and PFS Guidance webpage](#). A webcast on PFS is also available in the [DPI Online Learning Library](#), and the Minnesota Department of Education offers a [Labels and Menu Documentation tip sheet](#).

The [USDA Food Buying Guide](#) (FBG) contains yield and crediting information for foods with a standard of identity. Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight.

If the product is not listed in the FBG, additional crediting documentation is required. Processed products not listed in the FBG require a CN Label, PFS, or USDA Product Information Sheet to credit toward the meal pattern. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. Documentation should be printed on company letterhead and signed.

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these

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changes and be confident that the documentation on file matches the products in stock. Maintain and organize this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased. Any outdated documents can be stored separately but should follow record retention requirements and be kept for 3 years plus the current school year.

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## Standardized Recipes

A recipe binder was available on site, but contained quantity recipes from USDA that had not been standardized to the operation. The recipes did not reflect actual products and practices used by the SFA.

Quantity recipes, such as those available from the [Institute of Child Nutrition Recipe Box](#) are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Please be aware that even though these may be referred to as standardized recipes, they are quantity recipes until they have been tried, tested, and adapted to your food service operation.

The recipe binder should be reviewed at least twice per year. Only recipes that are used in the planned menu should be kept together and undergo the recipe standardization process. Recipes that have been used in the past but are no longer current can be removed from the binder but should be kept on file for three years plus the current school year to meet record retention requirements.

Standardized recipe guides to help in this process are available:

- [USDA/ICN](#)
- [Minnesota Dept of Education](#)