

Administrative Review Report

Colby School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/31/2020	03/09/2020
On-Site Review	03/09/2020	03/11/2020
Site Selection Worksheet	01/30/2020	02/04/2020
Entrance Conference	03/09/2020	03/09/2020
Exit Conference	03/11/2020	03/11/2020

Commendations:

Thank you to Colby School District for their friendly, cooperative and professional manner during the Administrative Review. Both administrative staff and food service staff work well together and support each other's efforts. Colby School District is commended for taking advantage of multiple USDA Child Nutrition Programs to feed your students, assuring they have the nutrition they need each school day. Observation of meals at the High School showed students ate well, and fully enjoyed the variety offered, and the homemade breads! Staff were willing to implement necessary changes immediately, and happy to discuss alternatives for situations that were not ideal. Claims for NSLP, SBP, and WMMP were all verified as correct. All Free & Reduced meal applications were correctly determined. Student eligibility information is protected and accessed only by the person who needs it. Information disclosure is only done with parental consent. Colby consciously meets the needs of their students and families by offering important materials in Spanish and English. Colby is adhering to all parts of their contract with DPI, and proceeds as indicated on their contract. Colby has responsible financial management procedures; their non-profit school food service account is in order, the costs allowable. Commendations for continuing to use the 5-day non-program foods revenue tool each year, as required, in order to fully understand appropriate pricing of a la carte foods, and to aid in a complete and accurate annual financial report. Colby does a solid job of communicating to families and the community regarding Free & Reduced meal availability in the annual Public Release, and through School Breakfast and Summer Food Service Program outreach: Kudos!

Recommendations:

No Recommendations found for this review.

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Findings and Corrective Action:

Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. See the Calendar of Requirements for all reporting deadlines to assist newer staff in meeting these requirements: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf</p>	
Site Name	Colby High School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding 1: two non-reimbursable meals observed at breakfast. These meals did not have the required 3 items on their tray.</p> <p>Corrective Action 1: Submit a statement indicating an understanding that students must select three items, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Explain how this error will be corrected and avoided in the future.</p> <p>Finding 2: four non-reimbursable meals observed at lunch. Refer to the TA section for more details.</p> <p>Corrective Action 2: Submit a statement indicating an understanding that students must select at least three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Explain how this error will be corrected and avoided in the future.</p>	
Site Name	Colby High School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding 1: Unacceptable crediting documentation supplied for the sweet potato fries and the Hangry Bear pizza. Processed products not listed in the USDA Food Buying Guide (FBG) require a Child Nutrition (CN) label or a product formulation statement (PFS) 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.</p> <p>Corrective Action 1: Submit crediting documentation for the products listed above in the documents tab.</p> <p>Finding 2: WG buns recipe missing key pieces of information, including the number of portions, age/grade groups served and the baked weight of one bun.</p>	

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		Corrective Action 2: Submit a revised recipe for the WG Buns in the documents tab.
Site Name	Colby High School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Missing beans/peas/legumes vegetable subgroup on the salad bar.</p> <p>Corrective Action: Submit a statement that explains how you will ensure that at least ½ cup of beans/peas/legumes will be offered on the salad bar every week.</p>
Site Name	Colby High School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: non-reimbursable meals observed at both breakfast and lunch during onsite meal observation. A refresher is recommended for staff determining reimbursable meals to ensure that students are taking the correct amounts of foods in order to be considered a reimbursable meal.</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals watch the OVS webcasts listed below. Please submit details regarding when and where the training was held, and who attended.. https://dpi.wi.gov/school-nutrition/training/webcasts#ovs</p> <p>Offer vs. Serve (60 minutes) Offer vs serve lesson and game (30 minutes)</p>
Site Name	Colby High School	
Form Name	Offer vs Serve (500-502)	
Question #	502	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Lunch signage missing language about how to build a reimbursable meal. The lunch signage did not have the verbiage about how many components the students have to select nor the ½ cup fruit/vegetable requirement. Find signage resources on our Signage webpage https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage .</p> <p>Corrective Action: Please add a statement to your current lunch signage that states students must select as least three full components, one of which is at least ½ cup fruit and/or vegetable, or a combination. Submit a picture in the documents tab of the updated signage.</p>
Site Name	Colby High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.</p>
Site Name	Colby High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: items on the floor in walk-in cooler and freezer.</p> <p>CA: Submit documentation indicating that food safety violations have been corrected.</p>
Site Name	Colby High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<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"> •Sugar snap peas - Mexico •Cucumber - Mexico •Tomatoes (Roma and cherry tomatoes) - Mexico <p>Refer to the Buy American in a Nutshell summary page for more information on how to fill out a non-compliant product sheet. Also visit the Buy American webpage for more information https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american</p> <p>Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>
Site Name	Colby High School	
Form Name	Fresh Fruit and Vegetable Program - Review Period (1900-1902)	
Question #	1901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding: The 10-14-19 invoice showed a cost of 235.69 (13 units @ 18.13) for Honeydew, while 253.82 (14 units @ 18.13) was claimed on the October claim. This results in an overclaim of \$18.13.</p> <p>CA: Please submit a written statement confirming how you will ensure that all costs claimed match the invoices.</p>
Site Name	Colby High School	

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Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)	
Question #	1906	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: Another snack was being offered at the same time as the FFVP snack. Serving additional snacks and treats from home goes against the intent of encouraging the consumption of fresh fruits and vegetables.</p> <p>Corrective Action: Provide a written statement detailing the steps Colby Elementary will take to correct this practice and include a timeline for when the issue will be corrected.</p>	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/10/2020	2021	6	Administrative Review	Colby High School				
Comments								
						Created By	Created Date	
Afterschool Snack Program Production Records for the Afterschool Snack Program did not contain the planned portion size for each menu item. Please review the Afterschool Snack production record resources on the Afterschool Snack webpage at www.dpi.wi.gov/school-nutrition/programs/afterschool-snack .							3/24/2020 4:04:06 PM	
03/10/2020	2020	1219	Administrative Review	ALL				
Comments								
						Created By	Created Date	
Civil Rights Training The reviewer recommends that non-nutrition staff who are involved in child nutrition programs, especially those at the POS, receive annual civil rights training. These school staff persons would also benefit from training on the basics of the programs which they help administer (ASP, SBP) on an annual basis. Please access the SNT website for webcasts and look for our SNSDC trainings this summer.							3/24/2020 3:44:51 PM	
03/10/2020	2029	700	Administrative Review	ALL				
Comments								
						Created By	Created Date	
Annual Financial Report (AFR) <ul style="list-style-type: none"> • 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 actually 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 in excess of 3 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: 							3/25/2020 11:47:59 AM	

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<ul style="list-style-type: none"> o 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. o 'Food' is expenses for edible food items and beverages. o 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. o 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. o '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. o When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools. <p>• 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.</p>								
03/10/2020	2028	709	Administrative Review	ALL				
Comments								
					Created By		Created Date	
Non-program foods								
Colby does a great job of using a Non-program foods revenue tool to balance their non-program revenue and program revenue. For this year's reporting please begin to use the updated 5-day non-program foods revenue tool found on the SNT website: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/non-program-food-price-calculator.xlsx							3/25/2020 11:35:42 AM	
03/10/2020	2027	305	Administrative Review	ALL				
Comments								
					Created By		Created Date	
Unpaid Meal Charges								
USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. Colby has a policy posted on the district's website and shares the policy with households through a district newsletter, however the current procedure may not match those written policies. Consider a revision of your publicized policy to match current practice. Consider adding a link to the policy from the main food service webpage, or the page where you post the menus, to truly make the policy accessible to households.							3/25/2020 11:25:46 AM	
03/10/2020	2009	1411	Administrative Review	Colby High School				
Comments								
					Created By		Created Date	
Buy American								
The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).								
The following information must be recorded on a Buy American Non-Compliant Product List: Date Name of product Country of origin Reason: Cost analysis, Seasonality, Availability, Substitution, Distribution, Other							3/20/2020 11:14:03 AM	
A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).								
For domestic products without country of origin labeling, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx).By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision.								
Refer to the Buy American in a Nutshell summary page for more information on how to fill out a non-compliant product sheet. Also visit the Buy American webpage for more								

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information https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american							
The food service director did maintain some documentation for the Buy American provision, however, not all non-domestic food items were being tracked. Sugar snap peas from Mexico, Cucumbers from Mexico and Tomatoes (Roma and cherry tomatoes) from Mexico need to be documented.							
03/10/2020	2026	1001	Administrative Review	ALL			
Comments							
				Created By	Created Date		
<p>Local Wellness Policy Colby's Local Wellness Policy (LWP) is available on the district's website in the section for policies, however for the average family this location is far from helpful. Consider highlighting your Wellness policy and practices prominently on the district website, or adding a link to the policy on the main food service webpage, health webpage or athletics webpage.</p> <p>LWP Triennial Assessment</p> <ul style="list-style-type: none"> • 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. • The assessment must measure the SFA's compliance with their LWP, contain a description of the SFA's progress toward meeting policy goals, and how the policy compares to a model policy. • A report must be developed and released to the public. There is no mandatory template for this report. • FNS recommends the WellSAT Tool as a resource to conduct the LWP triennial assessment. <p>For further assistance on the triennial assessment see the SNT webpage for our Local Wellness Policy Report Card Online Tool - School Food Authorities (SFAs) must develop a triennial assessment report. The School Nutrition Team encourages using this tool to assess the extent to which schools comply with the wellness policy and provide a description of progress made in attaining the goals of the wellness policy.</p> <p>In addition, SFAs are encouraged to complete the WellSAT to assess how your policy compares to a model policy. There is a section at the end of this tool to include your WellSAT results. Once the Local Wellness Policy Report Card form is submitted, a report will be generated and emailed to you. This report can be used to communicate the triennial assessment results to the public.</p>					3/25/2020 11:13:12 AM		
03/10/2020	2008	1104	Administrative Review	Colby High School			
Comments							
				Created By	Created Date		
<p>Smart Snacks The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</p> <p>While onsite the reviewer spoke with a staff person involved in the FFA student organization. They currently sell juice and milk in a vending machine in the front entryway; the current sizes offered are compliant (8 fl oz bottles of milk and juice).</p> <p>There was a question about whether they could offer different types of milk-fat and bottle sizes. The Smart Snack regulations were reviewed and it was explained that only low-fat or fat-free milk is allowed and only in bottles of 12 fl oz or less. This is to communicate appropriate portion sizes to students, as full-fat milk can be a significant source of calories and saturated fat.</p> <p>It was also discussed that the vendor of their milk products does not supply a 12 fl. oz bottle size, only 8 fl oz or 16 fl oz. The question was asked as to whether the vendor could fill a 16 fl oz bottle size with only 12 fl oz of milk. While this is a novel idea, there is too much room for error and will likely result in confused and unhappy students (why isn't the bottle full?).</p> <p>Reviews strongly recommend that the SFA continue to communicate the federal Smart Snacks regulations and their school's needs with their milk supplier. These questions are not unique to this SFA and the vendor may be able to accommodate your requests if multiple schools voice their concerns. https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</p> <p>Non-compliant fundraisers are being tracked adequately and abiding by the state-defined limit.</p>					3/20/2020 11:09:30 AM		

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03/10/2020	2007	1906	Administrative Review	Colby High School							
Comments											
					Created By	Created Date					
<p>Fresh Fruit and Vegetable Program</p> <p>During the onsite observation of FFVP service in some of the fourth and fifth grade classrooms , it was noted that one teacher was distributing another snack immediately after the vegetable snack was distributed (students were eating the FFVP snack at the same time as this additional snack).</p> <p>The intent of FFVP is to get students to sample new fresh fruits and vegetables and anything that undermines that effort should be prevented. FFVP must be offered at a dedicated time separate from another snack time, this increases the likelihood that more kids will try the day's FFVP offering.</p> <p>Teachers may take part in eating the FFVP snack with the students. It is a great way for teachers to model healthful eating habits and can prompt more conversation about the day's snack.</p> <p>Please note, only the teachers who are directly responsible for serving the fruit or vegetable to their students in a classroom setting may partake of the fruit and/or vegetable. If the teachers' aides are the only ones serving (and not the teacher too) then that would be acceptable." Administrators, secretaries, food service staff, janitors, volunteers, and other adults in the school setting are not eligible to participate.</p>							3/20/2020 11:06:03 AM				
03/10/2020	2006	1909	Administrative Review	Colby High School							
Comments											
					Created By	Created Date					
<p>Standardized Recipes</p> <p>Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. For more information on what essential information must be on a standardized recipe, review the Standardized Recipe Checklist (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).</p> <ul style="list-style-type: none"> ○ WG Buns - missing key pieces of information. The weight of one bun should be documented in order to determine the crediting. The number of portions per recipe should be added. The age/grade groups should be added. ○ Chili - a USDA recipe was used, however, the SFA was adjusting the amounts of ground beef that the recipe called for and adding beef crumbles. This has the potential to change the crediting per serving, and therefore, the recipe must be updated and standardized to your operation. Upon review of the recipe, the crediting remained the same at 2 oz eq meat/meat alternate despite the changes made by the SFA. <p>Update these and other recipes, as needed.</p>							3/20/2020 11:00:17 AM				
03/10/2020	2004	409	Administrative Review	Colby High School							
Comments											
					Created By	Created Date					
<p>Production records</p> <p>Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take.</p> <p>Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Sometimes planned serving sizes for some food items were missing on production records. Be sure to include one for every item offered as part of the reimbursable meal. A copy of the Production Record Requirements and templates may be found on our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p>							3/20/2020 10:59:28 AM				

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03/10/2020	2003	409	Administrative Review	Colby High School			
Comments				Created By	Created Date		
<p>Lunch Crediting Documentation</p> <p>The documentation supplied for sweet potato fries and hangry bear pizza is not acceptable crediting documentation, they are only product spec sheets and do not contain the required information.</p> <p>Processed products not listed in the USDA Food Buying Guide (FBG) require a Child Nutrition (CN) label or a product formulation statement (PFS) 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.</p> <p>Refer to the crediting decision making tree for guidance on how to determine what type of documentation is needed for a particular product. This sheet can be found on the Menu Planning page by clicking the crediting dropdown. https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</p>					3/20/2020 10:58:49 AM		
03/10/2020	2025	1407	Administrative Review	Colby High School			
Comments				Created By	Created Date		
<p>Sharing and No Thank You Tables</p> <p>Please consider whether you will implement either of these options, especially during Middle school breakfast where students were unofficially practicing a sharing table. If you do decide to implement, add an SOP to your food safety manual and educate your staff and students. If you decide not to, you will want to educate your students to stop their practice.</p> <ul style="list-style-type: none"> Definitions: <ul style="list-style-type: none"> A sharing table is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service. A no thank you table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover. <p>Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) to address regulations that must be followed to safely and responsibly implement each type of table.</p> <p>Refer to the Sharing and No Thank You Tables Toolkit on our website for a comprehensive guide including standard operating procedures.</p> <ul style="list-style-type: none"> Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state. Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness. 					3/25/2020 10:41:51 AM		
03/10/2020	2002	502	Administrative Review	Colby High School			
Comments				Created By	Created Date		
<p>Breakfast and Lunch Signage</p> <p>The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced</p>					3/20/2020 10:41:14 AM		

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reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our Signage web page (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).								
The lunch signage did not have the verbiage about how many components the students have to select nor the ½ cup fruit/vegetable requirement. Additionally, the lunch signage was posted inside the door of the main hot lunch line. Students had to step inside the door in order to see what was offered for that day's menu. Reviewers noted a few students inquiring about the menu of the day. There is some open wall space on the wall just outside of the hot lunch line that could be utilized for the lunch menu board. While there was breakfast reimbursable meal signage, students were not understanding what they needed to select.								
Additionally, there was concern that the native Spanish-speaking students did not understand the requirements. The DPI school nutrition team does have Spanish language signage that schools are able to use. Visit our Signage webpage for more information. https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage								
03/10/2020	2001	500	Administrative Review	Colby High School				
Comments								
				Created By		Created Date		
Offer vs Serve It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. OVS resources are located on WI DPI's Menu Planning webpage (scroll down to the OVS dropdown) and may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ovs).						3/20/2020 10:37:37 AM		
03/10/2020	2000		Administrative Review	Colby High School				
Comments								
				Created By		Created Date		
Dietary Specifications - Sodium It was noted that salt shakers were put out at both breakfast and lunch for student use. While the body needs some sodium, almost everyone eats more than the body needs. Too much sodium plays a role in high blood pressure, which makes it harder for the heart to do its job. Schools are an important player in overall national efforts to reduce the amount of salt that people eat. As such, schools participating in the National School Lunch and School Breakfast Programs will continue to reduce the amount of salt in meals by choosing lower sodium versions of foods and flavoring foods with spices and herbs. Putting out a salt shaker undermines this mission. This was discussed with the food service director onsite and the shakers were removed from service.						3/20/2020 10:29:26 AM		
03/10/2020	1999	401	Administrative Review	Colby High School				
Comments								
				Created By		Created Date		
Onsite observation - Salad bar Lunch Four non-reimbursable meals were observed. The four meals contained the following: <ul style="list-style-type: none"> • 1 cup lettuce salad (½ cup vegetable), ½ cup pasta (1 oz eq grain), ½ cup pears and soup (extra). This student only selected 1 full component. • ½ cup pears, 1 cup lettuce salad (½ cup vegetable), 1 cup milk and soup (extra). This student only selected 2 full components. • 2 dinner rolls (2 oz eq grain), 1 cup lettuce salad (½ cup vegetable), and soup (extra). This student only selected 2 full components. • Ham (2 oz eq meat), ½ cup corn, ½ cup grapes. This student only selected 2 full components. Under Offer vs Serve at lunch, in order to be considered reimbursable the selected meal must contain at least three full components, one of which is a ½ cup fruit, vegetable or a combination. High School students must select at least 2 oz eq grains or 2 oz eq meat/meat alternate in order to consider that food item a full component. If two of their components are fruits and/or vegetables then one of them has to be in the full minimum amount of 1 cup. For example, if a student selects meat, fruit and a vegetable then the meat would have to be 2 oz eq, the fruit could be ½ cup to comply with the Offer vs. Serve requirement and the vegetable would have to be 1 cup or vice versa (if the student selected ½ cup vegetable then they would have to take at least 1 cup of fruit).						3/20/2020 10:27:24 AM		

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<p>Visit the Menu Planning website, scroll down and select the Offer vs. Serve dropdown to learn more about Offer vs. Serve. https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</p> <p>To help facilitate students selecting all the required components for a reimbursable meal more signage should be added to the salad bar area. Additionally, a plan for better surveillance of the salad bar should be created. Currently there is one point of service person who must watch trays coming from both the main line and the salad bar line. As it gets busy during service, it can be challenging to ensure that everyone has selected the required components and in the required amounts. There is a runner stationed at the salad bar that can assist with watching trays, however, if that person needs to run to get more food, then trays might be missed.</p>							
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<p>Verification Thank you for using the verification tracking form for each application you verified. For a refresher on Verification, please watch the "Verification Process" webcast on the DPI website each fall before beginning the process. You also may find helpful the SNT's Verification Forms packet which can be found at https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms-packet.docx.</p> <p>The packet includes many helpful tools on acceptable types of income proof. Our consultants are available during the Verification period to answer questions or work through the process with you.</p>						3/25/2020 10:27:17 AM	
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<p>Onsite observation - Lunch The lunch menu for the day of onsite observation was fajitas. A tortilla that credited as 1.75 oz eq grain was menued. Students could also select up to two slices of bread. While the planned menu did offer more than enough grain to comply with the daily minimum of 2 oz eq grain for High School students, this combination could present some issues under Offer vs. Serve.</p> <p>For example, if a student selects the tortilla (1.75 oz eq grain), fajita meat (2 oz eq meat) and ½ cup fruit they would not have a reimbursable meal because the tortilla is not considered a full component. The student would have to select another grain option to make it a full component or they would have to select a different full component in order to make it reimbursable.</p> <p>To make it easy on students and point of service staff it is strongly recommended that a 2 oz eq grain tortilla be used. Or students should be offered two, 6 inch tortillas.</p> <p>Prior to meal service the tortilla was switched out to a 2 oz eq grain tortilla.</p>						3/20/2020 10:26:43 AM	
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<p>Breakfast onsite observation Two non-reimbursable meals observed at breakfast. These meals did not have the required 3 items on their tray. Under Offer vs. Serve regulations, students must select 3 items, one of which is a ½ cup fruit or vegetable. Students do not have to take the entree in order to have a reimbursable meal. For example, a student could select a juice (one item), a fruit (one item) and a milk (one item) and this would be considered a reimbursable meal at breakfast. Visit the Menu Planning website, scroll down and select the Offer vs. Serve dropdown to learn more about Offer vs. Serve. https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</p> <p>Currently half of the food is on the inside wall of the kitchen and half on the outside next to the point of service. There is no clear line for students to walk through to select a meal and it makes service unnecessarily confusing.</p> <p>Reviewers suggest moving all food into the cafeteria so that students can see all their choices before reaching the point of service. This will also make it more clear where the start and end of the meal service line is.</p> <p>In order to make food options more appealing, remove strawberries and any other items from the cardboard box and put into clear plastic serving bins or other more attractive</p>						3/20/2020 10:23:25 AM	

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serving bowls. This allows students to see the color, shape, size of the item and they may be more likely to select it.							
Additionally, more signage in the meal service area can help guide students in their selections. There is currently reimbursable meal signage, but perhaps more targeted signs on the service line itself will help to convey the requirements of a reimbursable meal.							
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Week Of Review Missing vegetable subgroup (beans/peas/legumes) on the salad bar line. Students selecting the salad bar do not have access to the main line and no beans/peas/legumes were menued on the salad bar during the week of review, February 10-14, 2020. This is not considered a repeat violation. 1/2 cup of beans/peas/legumes must be offered every week for all students. Since students who select the salad bar do not have access to the main line vegetables, a vegetable from the beans/peas/legumes subgroup must be offered to them. Review the Vegetable Subgroup handout to identify vegetables that are considered beans/peas/legumes. Please note, green peas, snow peas and snap peas are not considered a part of this category (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).						3/20/2020 10:19:09 AM	
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"And Justice for All" The "And Justice for All" posters need to be posted where the program is offered and where the student and public can easily view the poster. The "And Justice for All" poster was updated in January 2020. Posters can be placed on food carts or on other moveable equipment, as well as on the door or walls of public areas of the school						3/25/2020 10:08:47 AM	
03/10/2020	2022	3	Administrative Review	Colby High School			
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Afterschool Snack Program Colby ASP is area eligible, so that snack counts by eligibility are not necessary, however total tally numbers are. The POS observed at the Middle school/High school ASP may result in inaccurate counting and claiming. Counts are not taken as each student receives a snack. Also, snack counts are not indicated on the provided production sheet, but separately. Best practice is to develop consistent records by using the same production/count sheet for all grade groups. All students are capable of serving themselves, and snack distribution could be streamlined to not unnecessarily use time available for enrichment & educational activities. As indicated in other TA, training for all staff administering ASP in the program basics and in Civil Rights is encouraged.						3/25/2020 9:34:19 AM	