

Administrative Review Report

Marshall School District

Schedule Type	Start Date	End Date
Off-Site Review	12/18/2023	03/05/2024
On-Site Review	03/06/2024	03/07/2024
Site Selection Worksheet	12/18/2023	12/26/2023
Entrance Conference	03/06/2024	03/06/2024
Exit Conference	03/07/2024	03/07/2024

Commendations:

Our sincere thanks to the staff at Marshall Elementary School for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. All foodservice staff displayed knowledge of the meal program requirements. Food service staff encouraged students to take reimbursable meals by adding fruits or vegetables to their trays. The staff provide excellent customer service to the students and engaged with them very positively! We were also impressed with the administrative staff who are responsible for benefit eligibility and verification. Every effort was made to contact the household chosen for verification, including contacting the household after no response was received using a translation service to ensure the student continued receiving meal benefits, this was above and beyond, great job! Awesome job to all and thank you for what you do for the students!

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](#).

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

Administrative Review Report

Marshall School District

Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
Corrective Action History		<p><u>Finding 1:</u> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p><u>Corrective Action 1:</u> Review the Annual Food Service Financial Report Webcast on the DPI website and upload the certification of completion into SNACS. Using the Annual Financial Report Template, notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
Form Name	Civil Rights (800 - 807)	
Question #	801	
Corrective Action History		<p><u>Finding:</u> 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><u>Corrective Action:</u> Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year and who will be responsible for this task.</p>
Form Name	Civil Rights (800 - 807)	
Question #	803	
Corrective Action History		<p><u>Findings:</u> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p><u>Corrective Action:</u> Utilizing the DPI template policy (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>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action History		<p><u>Finding:</u> Current Local Wellness Policy (LWP) does not include all of the required content and is missing Other School-Based Strategies for Wellness and the full non-discrimination statement (7 CFR 210.31).</p> <p><u>Corrective Action:</u> Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action History		<p><u>Finding:</u> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need</p>

Administrative Review Report

Marshall School District

		to be corrected. <u>Corrective Action:</u> Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
Corrective Action History		<u>Finding:</u> Students directly certified were not receiving appropriate free or reduced meal benefits. <u>Corrective Action:</u> Notify the household of the correct eligibility and upload a copy of the letter and documentation verifying your system has been updated with the correct eligibility into SNACS.
Form Name	Verification (207 - 215)	
Question #	208	
Corrective Action History		<u>Finding:</u> SFA did not complete a confirmation review before verifying application(s). <u>Corrective Action:</u> Watch The Verification Process and the Verification Collection Report (Part 2) webcast, submit the certificate of completion and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action History		<u>Finding:</u> The correct non-discrimination statement (NDS) was not included on all required program materials, the school website has an incorrect NDS and the Unpaid meal charge policy, free and reduced price meals policy, food service management policy and the local wellness policy do not contain the NDS. <u>Corrective Action:</u> Add the correct non-discrimination statement to required program materials and upload updated materials into SNACS.
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
Corrective Action History		<u>Finding:</u> Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30), specifically the FRAM specialist who is tasked with keeping the benefit issuance list up to date and is the determining and verifying official, the business manager who is the authorized representative and tasked with the finances of the program and the business administrative assistant who is responsible for the claims preparation and submission. <u>Corrective Action:</u> Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition

Administrative Review Report

Marshall School District

		program responsibilities. This must include a minimum of civil rights training and training related to job duties.
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
Corrective Action History		<p><u>Finding:</u> The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> • Canned nacho jalapeños (Product of Mexico) • Fresh bananas (Product of Honduras) • Fresh cucumbers (Product of Mexico) <p><u>Corrective Action:</u> Complete and submit a Noncompliant Product List Form for the non-domestic products (e.g. canned nachojalapeños, fresh bananas, fresh cucumbers).</p> <p>Noncompliant Product List templates can be found on the Buy American webpage.</p>
Site Name	Marshall Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
Corrective Action History		<p><u>Finding:</u> One student left the meal service line with WGR pancakes with syrup (2 oz eq grain), a sausage patty (0.75 oz eq MMA), bell peppers (less than 1/2 cup), and a carton of milk (1 cup). The meal contained less than 1/2 cup of fruit and/or vegetable.</p> <p><u>Corrective Action:</u> Submit a statement of understanding that students must select three full components, including 1/2 cup fruit, vegetable, or combination under Offer versus Serve. Additionally, explain how this error will be corrected and avoided in the future.</p>
Site Name	Marshall Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	434	
Corrective Action History		<p><u>Finding:</u> Standardized recipes are required for all menu items made in-house with more than one ingredient. There was an inaccurate standardized recipe for Cheesy Scrambled Eggs.</p> <p>Ingredients: Egg, Liquid Whl w/ Citric Acid (6.25 Container); Cheese, Cheddar Mild Shrd Yel (3.875 pound); and Spice, Pepper Black Ground (1 Tbsp 1/8 tsp)</p> <p>Per the Food Service Director, the standardized recipe is prepared with Pasteurized Cook-In-Bag Scrambled Egg Mix.</p> <p>According to the manufacturer, a 4.37 ounce serving contains 3.5-ounce equivalent meat/meat alternate.</p> <p>6.25 container X 5 pounds (80 ounces) per container = 500 ounces 500 ounces ÷ 300 servings = 1.667 ounces per serving 1.667 oz / x oz eq MMA = 4.37 oz / 3.5 oz eq MMA, solve for x oz eq x oz eq = 1.33485 oz eq MMA, rounded down to 1.25 oz eq MMA</p>

Administrative Review Report

Marshall School District

		<p><u>Corrective Action:</u> Submit an accurate standardized recipe for Cheesy Scrambled Eggs. Be sure to include all requirements of a standardized recipe, including ingredients, serving size, yield, and meal contribution.</p>
Site Name	Marshall Elementary	
Form Name	Civil Rights (811-812)	
Question #	811	
Corrective Action History		<p><u>Finding:</u> The nondiscrimination "And Justice for All" poster is located in the meal service area and visible to students, however, is not in the required 11x17 size (FNS Instruction 113).</p> <p><u>Corrective Action:</u> Hang the appropriate color printed 14-point font, 11x17 size USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide an image of how this requirement will be met.</p>
Site Name	Marshall Elementary	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
Corrective Action History		<p><u>Finding:</u> The SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1.</p> <p><u>Corrective Action:</u> 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>
Site Name	Marshall Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
Corrective Action History		<p><u>Finding:</u> The most recent food safety inspection report was not posted in a publicly visible location, was in the kitchen next to the food service directors office.</p> <p><u>Corrective Action:</u> 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>
Site Name	Marshall Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
Corrective Action History		<p><u>Finding:</u> 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.</p> <p>The following food storage violations were observed, in the freezer there were several boxes that were on the floor instead of the required 6 inches off the floor and in the back hallway there were cases of canned fruit on the floor instead of the required 6 inches off the floor.</p>

Administrative Review Report

Marshall School District

		<p><u>Corrective Action:</u> If possible, correct all observed storage violations during the on-site review. If the violation cannot be corrected during the on-site review, submit documentation indicating that food safety violations have been corrected.</p>
--	--	---

Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
03/21/2024	4597	435	Administrative Review	Marshall Elementary	Food Service Director
Comments					
<p>Standardized recipes are required for all menu items that have more than one ingredient (e.g. Cheesy Scrambled Eggs). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>					
03/21/2024	4596		Administrative Review		Food Service Director
Comments					
<p>Marshall Elementary offers a self-serve nutrition bar. Tongs were used as the serving utensil for all foods, except canned fruit. Without signage or proper portioning utensils (e.g. spoodles), students are unable to determine how much to select to meet the 1/2 cup requirement under Offer versus Serve. Salad bar signage templates are available on the Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). In-house yield studies are an ideal way to determine quantities to complete the signage.</p>					
03/21/2024	4595	410	Administrative Review	Marshall Elementary	Food Service Director
Comments					
<p>If meals are provided to children on a field trip, they must meet daily meal pattern requirements. Please update order forms to reflect the daily requirement for vegetables to 3/4 cup and 1 cup for K-8 and 9-12 age/grade groups, respectively. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food items, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), it must continue to be implemented, to the extent possible, during field trip meals.</p>					
03/21/2024	4594	433	Administrative Review	Marshall Elementary	Food Service Director
Comments					
<p>In-house yield may be used to credit foods towards meal pattern requirements. Original documentation of procedures used to determine yield must be completed and maintained. An in-house yield study may be warranted if yields are consistently higher or lower than specified in the USDA Food Buying Guide (FBG), or for foods or sizes not currently listed. In-House Yield Study Procedures are available on the Menu Planning webpage, under the Crediting tab. (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy).</p>					
03/21/2024	4593	433	Administrative Review	Marshall Elementary	Food Service Director
Comments					
<p>Maintain crediting information by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging.</p>					
03/20/2024	4574	433	Administrative Review	Marshall Elementary	Food Service Director

Administrative Review Report

Marshall School District

Comments					
Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are purchased.					
03/20/2024	4573	433	Administrative Review	Marshall Elementary	Food Service Director
Comments					
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. The manufacturer may provide two PFSs for Documenting Grains based on ounce equivalent or grains/breads servings. Maintain one of two copies that align with the menu planner's intention for meal pattern contributions and food items in the School Breakfast Program (SBP), as applicable.					
03/20/2024	4570	411	Administrative Review	Marshall Elementary	Food Service Director
Comments					
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. Complete all required information on production records and ensure planned serving sizes and meal pattern contributions are applicable and appropriate to the substitution.					
03/07/2024	4545		Administrative Review		Authorized Representative
Comments					
Technical assistance was provided to include the special dietary needs and unpaid meal charge policy to each school's handbook that goes out to each household and is required to be signed as proof of acknowledgement every year.					
03/07/2024	4544		Administrative Review		Authorized Representative
Comments					
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:					
<ul style="list-style-type: none"> • 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 					
03/07/2024	4543		Administrative Review		Authorized Representative
Comments					
All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.					
03/07/2024	4542		Administrative Review		FSD/AR
Comments					
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) that must be followed to safely and responsibly implement each type of table. Refer to the Sharing and No Thank You Tables Toolkit for a comprehensive guide including standard operating procedures.					
03/07/2024	4541		Administrative Review		Authorized Representative

Administrative Review Report

Marshall School District

Comments				
<p>The following duties may not be delegated to the FSMC:</p> <ul style="list-style-type: none"> The annual on-site monitoring requirement for SFAs with more than one site must be completed by the School Food Authority (SFA). A FSMC employee can serve as the Food Service Director under a vended meal agreement but not under a joint agreement. A representative of the SFA must sign all contracts, acting as the signature authority. An SFA employee must review and confirm the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software. 				
03/07/2024	4540		Administrative Review	FSD/AR
Comments				
<p>Marketing refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. The goal of marketing is to match your products and services to the customers you aim to serve. The Marketing Your Program webpage provides tools and resources to market your program and show how Wisconsin School Meals Rock!</p>				
03/07/2024	4539		Administrative Review	AR/FSD
Comments				
<p>SFAs are required to annually complete the DPI Non-program Food Revenue Tool or the USDA Non-program Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Non-program Foods Revenue Rule SP-20-2016</p>				
03/07/2024	4538		Administrative Review	Authorized Representative
Comments				
<p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance.</p>				
03/07/2024	4537		Administrative Review	Authorized Representative
Comments				
<p>SFAs must be provided with annual food costs and revenues from the FSMC. The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements. Because of the Nonprogram Revenue Rule, expenses must be allocated to actual labor, food, purchased services, equipment, or other, not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.</p>				
03/07/2024	4536		Administrative Review	Authorized Representative
Comments				
<p>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 every school year and does not need to be submitted but should be kept on file at the SFA.</p>				
03/07/2024	4535		Administrative Review	Authorized Representative
Comments				
<p>When an application(s) is chosen for verification, the person designated as the <i>Confirming Official</i> must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the <i>Confirming Official</i> to sign and date on the back of the application.</p>				
03/07/2024	4453		Administrative Review	FSD

Administrative Review Report

Marshall School District

Comments					
<p>Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell- Training" document. SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. It is best practice to enter training hours into the training tracker as the trainings occur.</p>					
03/07/2024	4452		Administrative Review		Authorized Representative
Comments					
<p>The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> • 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. • 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. • 'Food' is expenses for edible food items and beverages. • 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. • 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. • 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. • When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools. 					
03/07/2024	4450	404	Administrative Review	Marshall Elementary	Food Service Director
Comments					
<p>Adequate signage helps ensure students select reimbursable meals. Signage was posted stage right; consider repositioning this lower and closer to the meal service area. For the SBP, complete the fields for "_ item(s)" and "May select _ items."</p>					
03/06/2024	4445	1005	Administrative Review	ALL	Authorized Representative
Comments					
<p>Marshall SD completed the last triennial assessment in July 2021. 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)).</p>					
03/06/2024	4441	1403	Administrative Review	ALL	Food Service Director
Comments					
<p>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.</p>					