

# Administrative Review Report

Horicon School District

Commendations from the NPC: Thank you to the staff at Horicon School District for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. All were very receptive to recommendations and guidance. The food service director and food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

Commendations from the PHN: Throughout the Administrative Review (AR) process, the Food Service Director (FSD) demonstrated exceptional openness to feedback and consistently responded promptly to questions and requests for information. The collaborative and positive approach taken by the FSD created a constructive working environment, which was much appreciated during the review process. Additionally, the FSD's cheerful disposition added a delightful dynamic to our interactions, making the collaboration not only productive but also enjoyable. The commitment of the FSD and the entire food service staff to providing students with a diverse and nutritious range of fruits, vegetables, and entrée options is commendable. This dedication contributes significantly to the overall well-being and satisfaction of your students. Thank you!

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## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: On the Annual Financial Report expenses were not broken out for the Afterschool Snack Program. (7 CFR 210.19).</p> <p>Corrective Action: Print a copy of the 2022-23 Annual Financial Report and notate the update required to show the amount of expenses broken for the Afterschool Snack Program. Upload this document into SNACS. Update the report in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
<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>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool but did not include all required information into the tool. (7 CFR 210.14).</p> <p>Corrective Action: Watch the Nonprogram Food Revenue webcast on the DPI website (<a href="https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html">https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html</a>). Update the Nonprogram Foods Revenue Tool, including missing information and upload the updated tool into SNACS.</p>
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Findings: 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 the DPI template policy, develop procedures for the SFA and upload into SNACS.</p>
<b>Site Name</b>		

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<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: Current Local Wellness Policy (LWP) does not include all the required content. The LWP checklist was provided and the content of what was needed for the LWP was discussed with FSD. (7 CFR 210.31).</p> <p>Corrective Action: 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>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	128	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with one income frequency were annualized.</p> <p>Corrective Action: Review the Income Conversions section of the Eligibility Manual (page 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	136	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The letter used for fee waivers was missing the non-discrimination statement.</p> <p>Corrective Action: Please add the non-discrimination statement to the letter used for fee waivers. Upload into SNACS.</p>
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	March 15, 2024	

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The correct non-discrimination statement was included in the newsletter and the handbook, but the format of the non-discrimination statement was not correct.</p> <p>Corrective Action: Update newsletter and the handbook to include the correct format for the non-discrimination statement. Upload into SNACS a copy of these materials that have been updated.</p>
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1403	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: During the AR, non-domestic products were identified in the SFA's storage area (listed below). It was observed that, at the time of the review, the SFA did not have a Buy American Noncompliant Product List in use.</p> <p>Green Peppers, Mexico            Black Olives, Morocco            Diced Pears, China            Edamame, China            Broccoli, Mexico            Fajita Onion Pepper blend, China</p> <p>Corrective Action: None required - corrected onsite.</p>
<b>Site Name</b>	Horicon High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	409	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The printed menu should list all components included with the reimbursable meal. Currently, the printed monthly menu does not list daily fruit and vegetables options.</p> <p>Corrective Action: Submit a copy of an updated menu that includes the daily vegetable and fruit options. Please see the associated technical assistance for further information on incorporating this information in limited space.</p>
<b>Site Name</b>	Horicon High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	

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<b>Question #</b>	430	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The production record templates currently in use lacks required information: planned/actual quantity prepared in bulk units, serving site, and serving sizes for items on the Garden Bar and Condiment Station. Some <i>A la carte</i> items are served as alternative entrée options and are not properly recorded on production records.</p> <p>Corrective Action: Submit one full week of completed Breakfast, Lunch, Garden Bar, and Condiment production records. Please review the Production Record Requirements provided in the technical assistance portion of this report. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
<b>Site Name</b>	Horicon High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	431	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: Required Production Record fields were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Details are captured in the technical assistance portion of this report.</p> <p>Corrective Action: The one week of production records submitted as corrective action for #430 will be reviewed for this corrective action item; no further action required.</p>
<b>Site Name</b>	Horicon High School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	435	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	March 15, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The current set of Standardized Recipes lacks required information, including specific ingredients, weight/volume/count of each ingredient, serving size, and/or</p>

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	<p>total recipe yields.</p> <p>Corrective Action: Please submit standardized recipes for the listed menu items, ensuring they all Standardize Recipe Requirements are met, such as serving size, specific ingredients, and the weight/volume/count for each ingredient, along with the total recipe yield. Utilize templates and additional resources available on the <a href="#">Standardized Recipes</a>.</p> <p>Grab and Go Wraps and Sandwiches: Combo Wrap, Chicken Wrap, Combo Sub,</p> <p>Grab and Go Salads: Chicken Salad, Julienne Salad, Pecan Feta Salad</p> <p>Chicken Stir-fry Chicken Sandwich Sloppy Joe</p>
Site Name	Horicon High School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
TA Log #	TA Log# exists
Due Date	March 15, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Missing Vegetable Subgroups (Beans/Peas/Legumes and Starchy) During week of review, baked beans, potatoes, and fries, were served as hot vegetables paired exclusively with particular hot entrée options. Students selecting the grab-and-go entrees and students in hot entrée lines serving alternate vegetables did not have access to the weekly vegetable subgroup requirements. Further information is captured in the technical assistance portion of this report.</p> <p>Corrective Action : Submit a statement which describe how the week of review menu will be changed to meet the minimum vegetable subgroup grain requirements, Be specific and include planned serving sizes for any items that would be added to the menu.</p> <p><b>Please note that on future Administrative Reviews (AR), repeat violations of missing vegetable subgroup(s) may result in fiscal action.</b></p>
Site Name	Horicon Elementary School
Form Name	Afterschool Snack Program
Question #	6

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<b>TA Log #</b>	No TA Log# found		
<b>Due Date</b>	March 15, 2024		
<b>Corrective Action Status</b>	Flagged		
<b>Corrective Action History</b>	<p>Finding: Production Records for the Afterschool Snack Program were incomplete. (7 CFR 210.10) In addition only chocolate milk was offered. Technical assistance was provided to use another production record and to offer a variety of milk types. Technical assistance was also provided regarding acceptable methods for counting snacks.</p> <p>Corrective Action 1: Review the Afterschool Snack e-learning module and upload proof of completion into SNACS.</p> <p>Corrective Action 2: Provide two weeks of completed Afterschool Snack production records that include the milk types that will be offered.</p>		

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/17/2024	4226	1104	Administrative Review	Horicon High School	FSD			

Vending Machine: The vending machine located in the cafeteria area is currently non-operational during regular school hours, as noted during the recent AR. A friendly reminder: when multiple grades have access to beverage vending machines, products must meet Smart Snacks standards for the youngest grade group. For example, if a beverage vending machine is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 grade group. Therefore, items like caffeinated, low-calorie (=5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (<5 kcal/8 fluid oz; =10 kcal/20 fluid oz.) flat or carbonated beverages are not allowable. If the vending machine will be operational during the school day in the future, all products sold must meet Smart Snack requirements. More information is available on WI DPI's Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

01/17/2024	4225	501	Administrative Review	Horicon High School				
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As a reminder, it is crucial to distinguish between weight (ounces) and volume (fluid ounces). Spoodles, commonly labeled as a "4 oz spoodle," measure volume and correspond to 4 fluid ounces, not 4 ounces by weight. This distinction is significant due to the varying weight of contents within the spoodle (e.g., the difference between the weight of ½ cup of popped popcorn vs. ½ cup of peas). For efficiency, especially when serving items like Meat/Meat Alternates (MMA) that credit by weight, it is advisable to weigh a single MMA portion and then determine the volume spoodle that aligns with that specific weight. This approach ensures practicality during lunch service, where individually weighing each serving may not be feasible.

01/17/2024	4224	437	Administrative Review	Horicon High School				
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The meal pattern requires a minimum quantity of each food component for each age/grade group, irrespective of the student's entrée choice. Each service line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line," and therefore needs to meet the daily as well as the weekly requirements. During onsite observation, it was

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noted that students opting for grab-and-go alternate entrees did not have immediate access to the hot vegetables served with other entrée options (black beans, corn, and potatoes). For example, black beans and baked beans were exclusively paired with the entrees served on the hot lunch lines, necessitating students to choose those specific hot entrées for bean selection. If this serves as the sole Bean/Pea (Legume) options for the week, students selecting meals from the Grab'n'Go service line will miss out on the Bean/Pea (Legume) vegetable subgroup for the week. Although fruits and vegetables are technically unlimited, requiring a student to leave one line and navigate the Point of Service with a reimbursable meal in order to join another service line for vegetables is not truly unlimited access. Ensuring students have seamless and convenient access to all daily and weekly meal pattern requirements, regardless of their chosen entrée, is crucial. The SFA offers a robust, unlimited Garden Bar with access for all students across every serving line. To guarantee that all students meet their weekly vegetable subgroup requirements, a recommended approach is to offer all subgroups on the Garden Bar throughout the week. Some well-received Starchy Garden Bar selections are corn, peas, and jicama, while popular Beans/Peas (Legumes) options are edamame, garbanzo beans, and bean salad.

01/17/2024	4223	435	Administrative Review	Horicon High School				
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A Standardized Recipe is required for any menu item with more than one ingredient. Technical assistance was provided onsite for the recipe standardization process. Recipes used during the review week lacked pieces of information necessary for standardized recipes such as ingredient specificity, yield, and appropriate weight or volume measures. Technical assistance was provided on-site to analyze submitted recipes. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

01/17/2024	4222	431	Administrative Review	Horicon High School				
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Some items, such as a la carte/alternate entrees, planned/actual number of meals served, and serving sizes are not consistently filled in on Production Records. As a reminder, all items sold as part of a reimbursable meal must be accounted for on production records. All a la carte sales must also be tracked in a manner that allows for tracking, forecasting, and ordering. Some menu items lack specificity about brand, recipe, or description. Be specific on production records about the identity, brand, portion size, and description of items served. Instead of "Spicy Strips," list both the product and brand (i.e., Tyson Hot & Spicy Tenders) to clearly indicate what was served. Technical assistance was given on using volume measures to record portion sizes of fruits and vegetables and using weight measures to record portion sizes of M/MA and grains. Please continue to work with staff to record thorough and accurate information.

01/17/2024	4221	430	Administrative Review	Horicon High School				
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Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes, serving as valuable tools for documenting food production details. The production record templates currently in use lacks required information: planned/actual quantity prepared in bulk units, serving site, and serving sizes for items on the Garden Bar and Condiment Station. Additionally, please note that all food items sold as part of a reimbursable meal must be captured on production records. This include items such as wraps and salads which can be purchased a la carte or as an alternative NSLP entrée. A copy of the Production Record Requirements and Production Record templates may be found on our webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>).

01/17/2024	4220	409	Administrative Review	Horicon High School				
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Technical Assistance: The printed menu should list all components included with the reimbursable meal, including those items that are offered daily such as milk, fruit, and Garden Bar items. These items may either be listed daily or, if space is limited, may be listed in one place on the menu including a statement indicating, for example, that "a variety of fruit and vegetables are offered daily on the Garden Bar" as part of the reimbursable meal.

01/17/2024	4219	404	Administrative Review	Horicon High School				
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Daily Menu Signage: Presently, the daily menu is showcased on digital displays positioned above each meal service line entrance, specifying the entrée available at each line. Outside of meal periods, these displays serve to advertise other school activities and upcoming events. However, during the onsite observation for the Administrative Review (AR), a deviation in meal service schedule occurred due to standardized testing, highlighting a limitation in the digital displays' programming: displays are currently set exclusively for the regular school day. To ensure ongoing compliance, it is recommended that the digital displays featuring daily menu offerings remain active throughout both breakfast and lunch, irrespective of any alterations to the daily schedule. This adjustment will enhance visibility and adherence to meal pattern requirements regardless of scheduling variations. Garden Bar Signage: When using vegetables on a Garden Bar to meet the weekly vegetable requirements, it is generally advised that portion sizes of at least 1/2 cup each should be communicated to students with signage. Notably, the Garden Bar at this school is designed to offer unlimited vegetables, allowing students the flexibility to select as many as desired. During onsite observation, this was evident as some students were observed building built full-tray salads while many other students selected multiple vegetable options. In light of the previously reported adverse impact of portion signage on vegetable selection, it is recommended to convey on the signage that the fruit and vegetables on the Garden Bar are unlimited. This adjustment aims to continue encouraging a more diverse and expansive vegetable selection among students without restricting selection via portion labeling. Condiment Signage: Condiment portion sizes are not communicated to students. While condiments and "extras" do not credit towards the meal pattern, but they significantly impact dietary specifications such as calories, fat, and sodium. To ensure compliance with dietary specifications and to minimize excessive condiment use and waste, it is recommended to implement clear signage detailing appropriate portion sizes for condiments on the condiment station. The addition of such signage will not only guide students in adhering to appropriate portions, but also contribute to the efficient and mindful utilization of condiments to reduce unnecessary waste and food cost.

01/17/2024	4218	1403	Administrative Review	ALL				
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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). School Food Authorities (SFA) are required to monitor any product that does not comply with Buy American requirements. These products should be documented on a Buy American Non-Compliant Product Tracking List. The following information must be recorded: Date Name of product Country of origin Reason Cost analysis Seasonality Availability Substitution Distribution Other 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>)