

# Administrative Review Report

Gibraltar School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/14/2019	04/15/2019
On-Site Review	05/15/2019	05/16/2019
Site Selection Worksheet	03/14/2019	03/14/2019
Entrance Conference	05/15/2019	05/15/2019
Exit Conference	05/16/2019	05/16/2019

## Commendations:

Sincere thanks to the food service director and school nutrition professionals of the Gibraltar School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. Additionally, we appreciate your flexibility in using the new SNACS software for the audit process

The food service director shared recent program accomplishments and highlights, including a grant award for sampling day initiatives, a National Unicorn Day celebration, and a visit from the Compost Monster. We enjoyed learning about these efforts to promote school meals programs and increase participation.

The harvest bar is a great way to offer fruits and vegetables to students, including delicious kale chips! There were many salt-free options at the flavor station.

Please do not hesitate to contact the School Nutrition Team (SNT) with questions or concerns related to the School Breakfast Program (SBP). Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success.

Awesome job and thank you for what you do for kids!

## Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, and many other topics. More information along with other upcoming trainings and webinars can be found on the DPI School Nutrition Webpage.

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications & marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

Find more information on these training opportunities on the [DPI School Nutrition Training Website](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>)

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## Technical Assistance:

### Summer Meals Programs

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Gibraltar School District, they did inform families of where students can receive a free meal in the summer months. Great Job!! SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

#### Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

### Sharing of Information and Disclosure

Free and reduced price eligibility information is to be used only for determining eligibility for meal benefits. The SFA must seek written consent to use the information for non-program purposes, such as fee waivers. SFAs must allow households to limit consent to only those specific programs they wish to share information. SFAs may not use a blanket fee waiver. Nonfood service staff receiving eligibility information must sign the [Disclosure Agreement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) form (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>).

### Benefit Issuance

It is recommended the SFA encourage families to apply for Free/Reduced benefits mid year. This may help families with seasonal income as well as increase your F/R percentages to help the SFA qualify for additional funding and grant opportunities. We encourage SFAs keep the lines of communication open between the homeless/migrant liaison and the determining official to ensure eligible students are receiving benefits.

### Household Refunds

When student funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. All funds left in any student meal account, which cannot be contacted, must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property.

### Food Safety Plan

Update the food safety binder with additional [SOPs for Field Trip Meals](https://dpi.wi.gov/school-nutrition/food-safety) and Time as a Public Health Control (<https://dpi.wi.gov/school-nutrition/food-safety>). The SOP for Time as a Public Health Control was also indicated to be added on your October 2018 inspection. We recommend that new SOPs are reviewed by your sanitarian.

### Special Dietary Requests

A signed medical statement from a licensed medical professional or an approved IEP must support all food substitutions not meeting meal pattern requirements. SFAs may make food substitutions, without a signed medical statement from a licensed medical practitioner; however, these must meet the USDA meal pattern requirements in order for the meals to be reimbursable. Additional information on [special dietary needs](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) can be found on the DPI School Nutrition Team website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

### School Breakfast

Children of all ages do better in school when they start the day with a good breakfast. Research has shown time and again that students who eat breakfast are ready to learn. Schools that implement breakfast programs see improvements in attendance and behavior. A school breakfast program can also help the school nutrition department financially.

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Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.

Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) contains a wealth of information about starting a breakfast program and the different breakfast service and financial models.

## Findings:

<b>Site Name</b>	
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126
<b>Corrective Action History</b>	<p><b>Finding:</b> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). Five student benefits were not determined correctly due to benefit issuance errors. Four student benefits were not removed after carryover and one student was incorrectly determined on direct certification. See the SFA-1 form provided by the consultant for details.</p> <p><b>CA:</b> Send the households a letter indicating their benefit will change to paid status in 10 days. Upload the letters to documents in SNACS.</p>
<b>Site Name</b>	
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	128
<b>Corrective Action History</b>	<p><b>Finding:</b> Applications with one income frequency were annualized. If a household has only one source of income or if all sources have the same frequency, the income should not be annualized.</p> <p><b>CA:</b> Review the Income Conversions section of the Eligibility Manual (pg. 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>Site Name</b>	
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)
<b>Question #</b>	314
<b>Corrective Action History</b>	<p><b>Finding:</b> Field trip meals are being charged to student accounts from the morning roster. Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.</p> <p><b>CA:</b> Submit a statement as to how students will be marked as taking a meal at the time they receive a reimbursable meal and only entered in the system after this has been verified.</p>

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Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action History	<p><b>Finding:</b> The following items do not contain the correct nondiscrimination statement (NDS): 'we must check' and 'we have checked' verification letters, notice of denial of benefits, policy 8000 operations-food service.</p> <p><b>CA:</b> Upload a copy of the corrected documents in SNACS. If a copy cannot be provided, submit a statement of when the change will be completed.</p>
Site Name	
Form Name	Local School Wellness (1007)
Question #	1007
Corrective Action History	<p><b>Finding:</b> The SFA's Local Wellness Policy (LWP) is missing three required elements. See the <a href="https://dpi.wi.gov/school-nutrition/wellness-policy">Wellness Policy</a> webpage for more information along with a LWP checklist (<a href="https://dpi.wi.gov/school-nutrition/wellness-policy">https://dpi.wi.gov/school-nutrition/wellness-policy</a>).  <u>Foods Provided But Not Sold</u> (e.g., class parties, class snacks, and rewards) – USDA has not defined specific guidelines. The SFA is responsible for defining guidelines to include in their written policy such as, <i>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 incentives and celebrations will be promoted and a list of ideas is available to staff and family members.</i></p> <p><u>Food and Beverage Marketing</u>-SFA's may only market products that adhere to Smart Snacks guidelines during the school day and include language related to this in the written policy. For example, <i>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.</i></p> <p><u>Triennial Assessment</u> – LWPs must include language regarding the completion of a triennial assessment such as, <i>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 is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.</i></p> <p><b>CA:</b> Provide a timeline for updating your policy to become compliant with the final rule.</p>
Site Name	Gibraltar Middle School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1409

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<p><b>Corrective Action History</b></p>	<p><b>Finding:</b> 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 storage areas were reviewed. The SFA is not following SOP #10 storing food. There were items being stored on the floor in the freezer and dry storage areas.</p> <p><b>CA:</b> Submit a statement of how these areas of food safety have been corrected.</p>
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## Technical Assistance

### Salt Shaker

Making a salt shaker available to students is an outdated practice and does not align with the intention of Child Nutrition Programs in helping students develop healthy eating habits. Sodium-free spices or a spice station are great alternatives to salt.

### Production Records

The current lunch and harvest bar production record templates do not meet the production record requirements per the ["Must Haves and Nice to Haves" list](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Production records submitted for the review period were not filled in completely nor consistently.

The following information must be corrected on the lunch production record to meet the production record requirements:

- Menu item with recipe name/reference number or product name/description
- Planned number of servings prepared
- Planned quantity prepared in purchase units
- Actual usage by milk type
- Planned serving size for condiments and any extra menu items

A harvest bar production record template (Microsoft Excel file and PDF file) was emailed to the food service director for consideration.

Be specific about the identity, brand, and description of the items served. Instead of "hamburger," "WG stuffed crust pizza," or "WG mini turkey corn dogs" list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

### Vegetable Subgroup

Produce on the harvest bar can credit toward the meal pattern each day that it is offered to students. Even with the harvest bar, the menu planner must plan specific portion sizes that she intends students to take. If the fruits or vegetables on the harvest bar are used to meet the weekly requirements, then portion sizes of at least 1/8 cup each should be communicated to students with signage. Keep in mind that raw, leafy green vegetables (spinach, romaine, etc.) credit as half the volume served.

### Condiments

Planned portion sizes are required for every meal component and menu item, including condiments. Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium target remains in effect. Condiment portion sizes must be communicated to students.

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## Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by food service. It produces a consistent quality and yield every time, when the exact procedures, equipment, and ingredients are used. Recipes must be updated to reflect current practices and products. Standardized recipes exist but do not accurately reflect what happens in the kitchen.

Use the resources on the [Standardized Recipes webpage](#), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The Public Health Nutritionist (PHN) also encourages viewing the webcast, "[What's the Yield with Standardized Recipes?](#)" which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

## Grain-Based Desserts

No more than 2.0 ounce equivalents (oz eq) of grain-based desserts can be offered per week at lunch. Grain-based desserts are designated with a superscript 3 or 4 on [Exhibit A](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). They must be whole grain-rich to credit towards the grain component. If a grain-based dessert is not whole grain-rich (made with more than 50 percent enriched grains), then it cannot credit towards the grain component. However, grain-based desserts count towards the weekly grain-based dessert limit regardless of whether or not they are whole grain-rich. Keebler Grahams Bug Bites (1 oz eq) were planned, offered, and served during the review period, exceeding the 2.0 oz eq of grain-based dessert limit.

## USDA Lunch Meal Pattern

Rather than serving a K-5 lunch meal pattern and a 6-8 lunch meal pattern, it may be beneficial to simplify to a K-8 lunch meal pattern for all K-8 students. A K-8 lunch meal pattern makes menu planning easier for school nutrition professionals, and Offer versus Serve (OVS) is in place to minimize food waste.

## Portion Control

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches children good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Proper portion control also ensures a reimbursable meal is served, so students receive the planned quantity of the food component (e.g. 1/2 cup of a fruit or a vegetable) or nutrients. Food costs are controlled with portioning by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

## Popcorn

Previously, popcorn could not contribute to any component; updated food crediting guidance now allows popcorn to credit as a whole grain. According to USDA guidance memorandum [SP23 CACFP10 SFSP09-2019](#) (<https://www.fns.usda.gov/school-meals/crediting-popcorn-child-nutrition-programs>), operators may now credit ¾ cup popped popcorn (7 grams) as 0.25 oz eq of grains in a reimbursable meal or snack. Likewise, 1 ½ cups popped popcorn (14 grams) will credit as 0.5 oz eq of grains and 3 cups popped popcorn (28 grams) will credit as 1.0 oz eq of grain. Due to the volume needed to contribute 1 serving of grain, program operators are encouraged to pair popcorn with another creditable grain. Like all other grains, popcorn must be present in the minimum creditable quantity to credit (i.e. the minimum portion size of popcorn is ¾ cup). The dietary specifications of calories, saturated fat, and sodium are monitored in the NSLP and SBP, and any oil or fat used to pop the popcorn or added as a topping must be included in the nutrient profile.

## Smart Snacks

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## Exempt Fundraisers

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

## Beverages Sales to Multiple Age/Grade Groups

As a reminder, if multiple grades have access to a beverage vending machine, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a beverage vending machine in the cafeteria is available to kindergarten through twelfth graders, beverages must meet Smart Snacks standards for the K-5 age/grade group. Only plain water (flat or carbonated), milk (less than 8 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]), or 100% juice (less than 8 fluid ounces) may be sold to students in the K-5 age/grade group. Sales of non-compliant beverages may not begin until 30 minutes after the end of the instructional school day.

## Findings and Corrective Action:

Site Name	Gibraltar Middle School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Corrective Action History	<p>Flagged 05/15/2019 03:33 PM</p>	<p><b>Finding #1:</b> Weekly vegetable subgroup requirement was not met for beans/peas (legumes) during the review period due to 1/2 cup of Cowboy Caviar (1/4 cup of black, kidney, and great northern beans) and 1/8 cup of chickpeas planned, offered, and served. The weekly minimum requirement for the beans and peas (legumes) subgroup is 1/2 cup. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.</p> <p><b>Required Corrective Action:</b> Describe <b>specifically</b> how the weekly vegetable subgroup requirement for beans and peas (legumes) will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address Cowboy Caviar and chickpeas in your reply.</p> <p><b>Finding #2:</b> No more than 2.0 oz eq of grain-based desserts can be offered per week at lunch.</p> <p><b>Required Corrective Action:</b> Please submit a statement describing how you will comply with the weekly grain-based dessert limit going forward.</p> <p><b>Finding #3:</b> Recipes for Tuna Salad (000011) and Cowboy Caviar (000006) are not standardized to Gibraltar Middle School.</p> <p><b>Required Corrective Action:</b> Submit updated standardized recipes for these menu items, which reflects corrected ingredients, portion sizes, yields, and crediting towards daily and weekly meal pattern requirements, as applicable.</p> <p><b>Finding #4:</b> Insufficient crediting documentation for State Fair® Crisпитos® Fully Cooked Chicken and Chili Flour</p>

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Tortillas, 72/3.25 oz (LEGACY PRODUCT CODE 007870-0821), offered during the review period on Wednesday, April 10, 2019.

**Required Corrective Action:** Submit a PFS documenting grain for this menu item. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

**Finding #5:** Current lunch and harvest bar production record templates do not meet the production record requirements. Production records submitted for the review period were not filled in completely.

**Required Corrective Action:** Update production records to include the following missing and/or incomplete information: menu item with recipe name/reference number or product name/description; planned number of servings prepared; planned quantity prepared in purchase units; actual usage by milk type; planned serving size for condiments and any extra menu items.

A harvest bar production record template (Microsoft Excel file and PDF file) was emailed to the food service director for consideration. **Please submit three full days of completed production records, updated to reflect these requirements.** Select production records you are confident are filled in accurately and completely.