Administrative Review Report

Fall Creek School District

Commendations:

Thank you to all staff at Fall Creek School District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director 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. Thank you for being available for answering questions and providing additional information when asked, all staff were very receptive to guidance and recommendations. To the front-line staff, it is evident that they enjoy what they are doing, serving these students healthy and nutritious meals with a big smile on their face and a great attitude. The interaction between the staff and the students was one of mutual respect and kindness, saying please and thank you and "Have a good day!" Keep up the great work!

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 in 2023. Find more information on these training opportunities on the DPI School Nutrition Training 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 and marketing. For more information go to the Wisconsin DPI School Nutrition GOALS Training Webpage.

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Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School	Food Service Account (700 - 705)				
Question #	700					
Corrective Action History		$\overline{\text{Finding 1:}}$ On the Annual Financial Report, the USDA foods entitlement value was not included in either expenses or revenues (7 CFR 210.19).				
		<u>Corrective Action 1:</u> Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.				
		<u>Finding 2:</u> The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.				
		Corrective Action 2: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent.				
Form Name	Civil Rights (800 - 807)					
Question #	803					
Corrective Action History		<u>Findings:</u> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).				
		<u>Corrective Action:</u> Provide a timeline for when a school meal program civil rights complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.				
Form Name	Civil Rights (800 - 807)					
Question #	805	805				
		<u>Finding:</u> All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).				
Corrective Action History		Corrective Action: Provide a detailed statement or policy indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. See the SNT Special Dietary Needs example policy for assistance. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-				
		accommodation-policy-template.docx)				
Form Name	Civil Rights (800 - 807)					
Question #	806					
Corrective Action History		<u>Finding:</u> Civil Rights training documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).				
·		<u>Corrective Action:</u> Upload the sign in sheet with the names and date(s) the training was provided.				
Form Name	Local School Wellness (1000 - 100	06)				
Question #	1000					
Corrective Action History		<u>Finding:</u> Current Local Wellness Policy (LWP) does not include all of the required content and is missing policy leadership, public involvement, school meals, foods sold outside of the school meal programs, food and beverage marketing, nutrition promotion (specifically strategies to increase the appeal of school meals), triennial assessment, update/inform the public and the full nondiscrimination statement. (7 CFR 210.31).				

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	For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A toolkit, a wellness policy builder, and wellness policy report card found on the Local Wellness Policy (LWP) webpage. Corrective Action: 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.				
Form Name	Certification and Benefit Issuance (124 - 142)				
Question #	126				
Corrective Action History	Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the excel spreadsheet provided entitled "Fall Creek Apps to Pull for Onsite" by the consultant for specific details on which applications need to be corrected. Corrective Action: Utilizing the excel spreadsheet uploaded entitled "Fall Creek Apps to Pull for Onsite" with the specific application and certification errors highlighted in red, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the excel spreadsheet, including all corrective action dates listed next to each error into SNACS.				
	Corrected onsite, no further action required.				
Form Name	Verification (207 - 215)				
Question #	213				
Corrective Action History	Finding: The SFA's notice of adverse action was not sent to the household chosen for verification, only an email was sent to the household. Corrective Action: Submit a statement that either the DPI template letter or the adverse action letter shown to consultant while onsite will be sent to the household moving forward.				
Form Name	Meal Counting and Claiming (314 - 316)				
Question #	314				
Corrective Action History	Finding: It was observed that the 4K lunch in the classroom and field trip meals were being counted before the students took the meal. Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served. Some meal count systems that are not acceptable include: • Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served. • Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal. • Backout counts - Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal. Corrective Action: Provide a statement of how this point of service will be corrected so that it accurately counts the meal as the meal is being served to the student.				
Form Name	Civil Rights (809 - 810)				
Question #	810				
Corrective Action History	Finding: The correct non-discrimination statement was not included on all program materials and was missing on the local wellness policy, procedure 760 and the food service website. Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.				

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Site Name					
Form Name	Professional Standards (1210 - 1219)				
Ouestion #	Professional Standards (1210 - 1219) 1219				
Corrective Action History	Finding: 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 4K teachers who serve breakfast and lunch in the classroom, these teachers are required to have civil rights training and would recommend preschool meal pattern, offer versus serve and serving in the classroom. 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.				
	Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.				
Site Name					
Form Name	Food Safety & Buy American (1400 - 1403)				
Question #	1400				
Corrective Action History	Finding: Employee reporting agreements were not signed and kept on file. All food service employees must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information. Corrective Action: Have all employees involved in the Child Nutrition Program sign an employee reporting agreement, upload them to SNACS and keep on file in either employee files or HACCP binder.				
Site Name	Fall Creek Elementary				
Form Name	Meal Counting and Claiming - Review Period (322-325)				
Question #	325				
Corrective Action History	Finding: Meal counts by eligibility category were not correctly reported on the monthly NSLP claim. Corrective Action: (Non-systemic) Upload the April monthly NSLP edit check into SNACS for verification after submitting April NSLP claim.				
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Day of Review (400-408)				
Question #	401				
Corrective Action History	Finding: One pre-k student only selected cereal and milk at breakfast, which is not a reimbursable meal. Corrective action: Describe the training that pre-k teachers will receive to ensure they are accurately determining if students have selected a reimbursable breakfast. Include the date or dates that the training will be provided.	-			
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Day of Review (400-408)				
Question #	402				
Corrective Action History	<u>Finding:</u> The field trip meals provided on the day of on-site only included 1/2 cup of baby carrots for the vegetable which does not meet the daily minimum vegetable requirement of 3/4 cup for K-5 students.	-			

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	w	orrective Action: The 44 field trip meals served will be disallowed. Submit a ritten statement indicating how the field trip meals will be changed to meet all heal pattern requirements.			
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Day of Review (400-408)				
Question #	406				
Corrective Action History	to th	nding: During the on-site review, cocoa puffs were available for pre-k students of select at breakfast. The cocoa puffs contain 8g of added sugar which exceeds the allowable amount for the preschool meal pattern. OUTPOINT OF THE PROPERTY			
		not an allowable option for the pre-k students.			
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - I	Day of Review (400-408)			
Question #	407				
Corrective Action History	I —	nding: The documentation for the field trip meals did not include any portion zes. This is necessary to ensure compliance with meal pattern requirements.			
		orrective action: Update the sheet used to document field trip meals to include I necessary information and upload into SNACS.			
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)				
Question #	410				
Corrective Action History	ve of	nding: On 3/31/23, the planned vegetables included romaine lettuce (1c = 1/2c eg) and tater tots (1/2 c). However, the romaine wasn't served, so only 1/2 cup f vegetable was offered resulting in a daily vegetable shortage at lunch. orrective action: Provide a written statement describing how this menu would be			
	A	dditionally describe your process for ensuring meal pattern requirements are still then the menu changes occur due to product availability.			
a		net when menu changes occur due to product availability.			
Site Name	Fall Creek Elementary				
	Meal Components and Quantities - I	Review Period (409-412, 430-437)			
Question #	411				
	Hi cu or	nding: The production record says to serve 4 wedges (1 whole orange). owever, oranges are sliced into 6 and 3 wedges are served which provides 1/4 up of fruit. If multiple fruit choices are offered, students are only able to select ne fruit option. This resulted in a daily fruit shortage at lunch on 3/28/23. orrective action: Submit a written statement describing the plan for serving ranges going forward and if they will continue to be served in a 1/4 cup serving			
Corrective Action History	Ac sh D cc is	dditionally, the menu planner and all food service staff involved meal service nould complete the Lunch Meal Pattern and Offer versus Serve trainings in the PI School Nutrition Team Online Learning Library. If completed individually, ompile, and upload the certificates of completion in to SNACS. If a group training conducted, submit a signed and dated training roster. https://dpi.wi.gov/school-nutrition/training/online-learning)			
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)				
Question #	430				
Corrective Action History	ar po	<u>Finding:</u> Pre-K students eat breakfast and lunch in their classrooms and therefore are following the infant and preschool meal pattern. However, the specific items, portions sizes, number of servings/reimbursable meals provided for lunch are not being documented on the production record.			

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	Fail Creek School District				
	Additionally, the breakfast items are stored in the kitchenette between the two pre-k rooms and available options and daily usage are not being tracked.				
	Corrective Action: Submit a week of breakfast and lunch production records for the pre-k students so that compliance with the preschool meal pattern can be assessed. The week should occur after the on-site review and before the corrective action due date. Any crediting documentation not submitted as part of the pre-review material should be provided along with the production records.				
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)				
Question #	431				
Corrective Action History	Finding: One student is offered a muffin and string cheese as an alternate entrée option depending on the planned menu. This student does not have a special dietary needs form signed by a licensed medical practitioner on file, therefore any accommodations must be made within the meal pattern requirements. During the week of review, this occurred twice which resulted in a weekly meat/meat alternate shortage at lunch. Corrective Action: Describe how this student will be accommodated in the future to ensure the weekly requirements are still met for the planned menu. Please note that repeat violations involving insufficient daily or weekly quantities may result in fiscal action on the next Administrative Review.				
Site Name	Fall Creek Elementary				
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)				
Question #	435				
Corrective Action History	Finding: Standardized recipes were on file, but the ingredients in the recipes didn't always match the actual product being used. For example, there was not enough 10-inch tortillas delivered for the chicken quesadilla, so 2- 6" tortillas were used during the on-site review, USDA diced chicken was used rather than Tyson chicken, the beef nachos recipe calls for JTM CP5250 but JTM CP5249. Corrective action: Submit updated recipes for the chicken quesadilla and beef nachos.				
Site Name	Fall Creek Elementary				
Form Name	Civil Rights (811-812)				
Question #	811				
Corrective Action History	Finding: The nondiscrimination "And Justice for All" poster was posted and in the meal service area, however, the poster that was displayed is the "FNS ONLY" version, which is the incorrect version to be posted. Corrective Action: Provide an image of the correct 2019 nondiscrimination "And Justice for All" poster when it has been posted. The correct version can be found				
	here: 2019 "And Justice for All" poster. Corrected onsite, no further action required				
Site Name	Fall Creek Elementary				
Form Name	Smart Snacks (1104 - 1107)				
Question #	1104				
Corrective Action History	Finding: The Gatorade Zero, Splash water and Sparkling Ice beverages are not allowable at the elementary (or middle school) level. Only plain water, 100% juice, or milk are allowable Smart Snack beverages in elementary and middle schools. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks). Corrective Action: Indicate what will be done with this vending machine to comply with the Smart Snack regulations. This could include turning the machine off during the school day (midnight until 30 minutes after the end of the instructional day), only including beverages that are allowable for all grade groups that have				
Site Name	access to the machine or removing the machine. Fall Creek Elementary				
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Form Name	Food Safety, Storage and Buy American (1404-1411)				
Question #	1409				
Corrective Action History	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. While onsite, it was observed in dry storage that tortillas were being stored next to chemicals. Corrective Action: 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. Corrected onsite, no further action required				
Site Name	Fall Creek Elementary				
Form Name	Food Safety, Storage and Buy American (1404-1411)				
Question #	1410				
Corrective Action History	Finding: The following products were identified in the SFA's storage area as non-domestic/not containing a Country-of-Origin label (COOL) and not documented: Non-domestic: dole fruit cups - peaches, tropical fruit, pears No COOL: Santiago refried beans, barilla elbow macaroni, apple juice cups, Heinz tartar, beef taco filling, mini corn dogs. 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). Note: 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. Note that a label indicating a product is distributed, processed, or packaged in the US is not sufficient to document compliance with the Buy American provision as it does not indicate where the product was grown/produced. Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage. If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier.				

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Technical Assistance En	tries:				
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
04/26/2023	3605		Administrative Review		FSD
			Comments		
There was confusion over the difference between Offer Versus Serve (OVS) and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#menuplanningtools). OVS occurs during meal service. Therefore, the printed menu, recipes, portion sizes on production records, etc. should reflect the menu and portion sizes as planned.					
04/26/2023	3601		Administrative Review		FSD
			Comments		
roper portion size utensils mu nsure the amount needed for			or self-service foods. This helps to enc	ourage stude	ents to take the planned amount, and
04/26/2023	3600		Administrative Review		FSD
			Comments		
day). However, if that changes, keep in mind that it is the responsibility of the SFA to track fundraiser involving the sale of food to students to ensure compliance with Smart Snacks regulations. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two exempt fundraisers, and ensuring that each fundraiser is not more than two consecutive weeks. Tracking templates and additional information are available on the Smart Snacks webpage, (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).					
04/26/2023	3599		Administrative Review		FSD
			Comments		
Food manufacturers continuously reformulate products used in schools. Additionally, Wisconsin Processed USDA Food items change annually, and only some of the USDA Brown Box items are available to Wisconsin schools. It is important to stay current with these changes and be confident that the documentation on file (and included in standardized recipes/on the production records) matches the products in stock. Maintain and organize this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased.					
04/26/2023	3598		Administrative Review		FSD
			Comments		
Currently, there are some small differences in meal service for K-3 and 4-5. For example, K-3 can only select one fruit but 4-5 can take both fruit options. Since the meal pattern is designed for K-5, it is recommended that they have access to the same planned menu and portion sizes. If the planned menu varies between grade groups, then that should be documented clearly on the production record. This will allow compliance with daily and weekly meal pattern requirements to be evaluated.					
04/26/2023	3597		Administrative Review		FSD
			Comments		
The SFA's software used for developing recipes and preparing production records aids in ensuring meal pattern compliance. However, it is important to be mindful of any changes to the planned menu. Additionally, the Uncrustable and muffin/string cheese options are currently being handwritten in on the production records. These entree options must be considered when evaluating the weekly grain and meat/meat alternate requirements. It is recommended that a recipe be developed, and these entree options are included in the planned production record. However, the menu planner also must ensure that the correct products and recipes are entered into the production record and should always double check the compliance of the planned menu.					
04/26/2023	3595		Administrative Review		FSD
Comments					
Even if a food is not listed as a grain-based dessert, it can still be high in added sugars. As a best practice, compare grains and choose those that are lower in sugars. For instance, the amount of added sugars in a muffin can vary from recipe to recipe. Some muffins are as sweet as cupcakes and include ingredients such as candy and chocolate pieces or cinnamon-sugar toppings.					
04/26/2023	3507		Administrative Review		FSD
			1		

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Fall Creek School District

Comments

It is recommended that there be multiple staff members completing the administrative duties associated within the Child Nutrition Programs. Many districts across the state have several staff who assist their Food Service Director (FSD) with these tasks. This helps alleviate the administrative burden and allows the FSD to have more time to manage a successful kitchen and food service program.

	ost to Fund 50, fo	or more informatio	n on allowable costs please refe		ibilities for the time used to assist with re Categories for Food Service AFR	
04/26/2023	3594		Administrative Review		FSD	
			Comments			
measuring utensil (ex. grape to	omatoes, baby ca	rrots, cucumber s	,	-	,	
requirements/menu-planning#		on the Menu Planni	ng webpage, under the Creditin	g tab. (<u>nttps://dpi.</u>	wi.gov/school-nutrition/program-	
04/26/2023	3593		Administrative Review		FSD	
			Comments			
	Full, level scoops should always be used to ensure the proper portion size is being provided. When providing a 1/4 cup serving for the 4k students, a scant or half full 4 fl. oz spoodle was used. This practice should be changed and a 2 fl. oz spoodle should be used to provide a 1/4 cup serving going forward.					
04/26/2023	3504		Administrative Review		FSD	
			Comments			
	SFAs are required to annually complete the <u>DPI Non-program Food Revenue Tool</u> or the <u>USDA Non-program Food Revenue Tool</u> . The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in <u>Non-program Foods</u> <u>Revenue Rule SP-20-2016</u>					
04/25/2023	3502	1217	Administrative Review	ALL	FSD	
			Comments	·		
	essional Standard	<u>ls Tracking Tool</u> or	des the name of staff person, ti the <u>USDA Professional Standar</u>		st of core duties/responsibilities, and e encouraged but not required	
04/25/2023	3501	1000	Administrative Review	ALL	FSD	
	Comments					
It is recommended that in the 'Pyramid in 2011.	'Nutrition Guideli	nes" section of the	wellness policy it is updated to	include the USDA	MyPlate, which replaced the Food Guide	
04/25/2023	3500		Administrative Review		FSD	
	Comments					
					rs who administer any portion of a o Civil Rights in the USDA Child	