

Administrative Review Report

Juda School District

Commendations:

From the Nutrition Program Consultant: Thank you to the staff at Juda 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 staff do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

From the Public Health Nutritionist: The food service department staff at Juda School District provide a wonderful eating environment for their students. The cafeteria is welcoming, clean, and seasonally decorated. The Administrative Review was conducted early in the school year, and students were clear on the routines and staff knew everyone's name. The pleasant cafeteria experience should be commended. Thank you also to the food service staff for their willingness to learn and operate the USDA school meals programs correctly.

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Findings and Corrective Action:

Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. The SFA does not sell non-program food items but does sell items to the Booster Club through food service monthly. It was noted that there were no labor costs charged. It was discussed with the business manager another option would be setting up a separate account for the Booster club outside of foodservice.</p> <p>Corrective Action: If the district plans to continue to sell non-program food items through fund 50 then complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS. Also submit a statement that if continuing this process charges for labor will be included in the billing. If this process is changing to the other option provide a statement on what the new process will be.</p>
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<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. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx)</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31).</p>

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		Corrective Action: Provide 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	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced-price meal applications manually.</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>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	136	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA has a practice in place that results in a child eligible for free or reduced-price school meals to receive fee waivers without parental consent. (7 CFR 245.8)</p> <p>Corrective Action: Provide a statement on how the practice will be corrected. The district has the option to use Sharing of Information Letter to obtain parental consent or have to</p>

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	households self-disclosure by providing their meal benefits notification letter to receive the fee waivers.
Form Name	Verification (207 - 215)
Question #	208
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not understand the confirmation review process for verifying application(s). The SFA was confirming all applications and signing them. The verifying official was signing all applications even though no verification was conducted. These actions were occurring at the time of determining applications. Technical assistance was provided on when a confirmation review is required.</p> <p>Corrective Action: Review the verification section of the Eligibility Manual 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.</p>
Form Name	Verification (207 - 215)
Question #	211
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The verification notification letter <i>We Have Checked Letter</i> was not sent out to alert the household of the results of the verification.</p> <p>Corrective Action: Submit a statement indicating that the SFA understands that this letter needs to be sent out to any household selected for verification providing the results of the verification.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct nondiscrimination statement was not included in the student handbook.</p> <p>Corrective Action: Update student handbook to include the correct nondiscrimination statement. Upload into SNACS a</p>

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	<p>copy of the updated handbook or provide a link to the updated handbook.</p> <p>Finding: The correct nondiscrimination statement was not listed on the menu and on the food service webpage.</p> <p>Corrective Action: Update the menu and webpage to include the current nondiscrimination statement. Upload a copy of the updated menu into SNACS. Provide a link to the webpage that shows the updated nondiscrimination statement.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1213
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v)).</p> <p>Corrective Action: Complete 8 hours of food safety training and provide documentation of completion.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	January 10, 2014
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Documentation of school food service staff training is not being tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1219
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>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). Staff handling the POS at lunch did not have training.</p>

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		Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. This plan must include a minimum of civil rights training and any training related to job duties.
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim. The wrong report was being used to submit the monthly claims.</p> <p>Corrective Action: Use the correct report and upload the monthly edit checks for breakfast and lunch for all school sites for September thru November into SNACS. Fiscal action will apply.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Four non-reimbursable meals were observed at Juda High School during lunch service. The meals did not contain three full components, required under Offer versus Serve. This is due to the 6 chicken nuggets not providing the full grain component. A bag of cheeze-it was offered with the entree but the intended bundling was not strictly enforced. Therefore, when students selected the chicken nuggets and a variety of vegetables from the salad bar, only two food components were chosen.</p> <p>Corrective Action: When an entree is planned for high school students and it does not provide the daily minimum to credit as a full component, please consider changing the portion size or bundling another food item with the entree. Please submit a statement of action as to how chicken nuggets at Juda High School will be planned the next time it is served.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	

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TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: During breakfast observation, Kindergarteners did not select their meals through the meal service line and instead sat at a table near the preschoolers where they were provided half portions, fed family style, and only provided 1% unflavored milk.</p> <p>Corrective Action: Kindergarteners must always follow the meal pattern for their grade level. This means meeting the minimum daily serving sizes for components and having access to a variety of milk flavors. Please submit a statement of understanding that Kindergarteners should go through the meal service line at breakfast.</p>
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	TA Log# exists	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Daily grain shortage at lunch for three meals during the week of review. The review site is Juda High School where the daily minimum portion size for the grain component is 2.0-ounce equivalents (oz eq) October 23: The only grain served with the tator tot casserole meal was a 1.0 oz eq dinner roll. October 24: The 8-inch taco shell served to 9-12 credits as 1.5 oz eq October 25: The only grain served with the JPC Bowl is 1.0 oz eq of breading from the popcorn chicken. All shortages were correctly documented on the production records.</p> <p>Corrective Action: Considering this is a systemic error and a repeat violation, please submit two weeks of completed lunch production records from December 2023. Fiscal action for these meals will be assessed.</p>
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	
TA Log #	No TA Log# found	
Due Date	January 10, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Daily grain shortage. A substitution to the planned menu was required prior to service. While onsite for the Administrative Review of Juda High School, the State Agency reviewed the planned menu for the day with the FSD. Six chicken nuggets provided 1.0 oz eq of breading and no other</p>

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	<p>grain item was planned. It was decided to add a 1.0 oz eq bag of cheez-its crackers to the planned menu.</p> <p>Corrective Action: Please address in a statement how this menu will meet meal pattern going forward. The menu planner could alter the portion size, find a new product, or bundle the chicken nuggets with an additional grain.</p>
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	434
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. The standardized recipe for Tater Tot Casserole contains ingredients that are not actually used in production and requires more detailed information.</p> <p>Corrective Action: Submit a revised standardized recipe for the tater tot casserole. Be sure to include all requirements of a standardized recipe, including accurate depiction of ingredients used, serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
TA Log #	No TA Log# found
Due Date	January 10, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Nutrition information was sent prior to the onsite review and at least 10% of the products were reviewed. For example, the Lay's Potato Chips and Pringles Snack Stacks were deemed noncompliant due to the calories from total fat exceeding 35%. Noncompliant beverages were also found onsite during the Administrative Review including Cool Blue Gatorade and regular Pepsi. Photographs of each were documented.</p> <p>Corrective Action: Submit a statement of understanding regarding the regulations surrounding All Foods Sold in Schools, also known as Smart Snacks. Please also submit an invoice from the vending machine supplier showing what products are now being ordered.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407

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TA Log #	No TA Log# found		
Due Date	January 10, 2024		
Corrective Action Status	Flagged		
Corrective Action History		<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). There was no SOP for sharing or “no thank you” tables.</p> <p>Corrective Action: Submit a statement describing what option will be used and provide an SOP for the option chosen.</p>	
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Question #	1411		
TA Log #	No TA Log# found		
Due Date	January 10, 2024		
Corrective Action Status	Flagged		
Corrective Action History		<p>Finding: Products were identified in the SFA's storage area as non-domestic and not documented.</p> <p>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 (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>	
Site Name	Juda El		
Form Name	Wisconsin School Day Milk Program		
Question #	7		
TA Log #	No TA Log# found		
Due Date	January 10, 2024		
Corrective Action Status	Flagged		
Corrective Action History		<p>Finding: SFA did not accurately determine the cost per half pint of milk for the Wisconsin School Day Milk Program (WSDMP).</p> <p>Corrective Action: Provide a statement on how the cost of milk for the WSDMP will be determined moving forward. Corrected onsite by providing the Milk calculator tool. No further action is needed.</p>	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/27/2023	3778	410	Administrative Review	Juda Hi				

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During the onsite review, the concept of weight and volume were discussed when it comes to deciding the correct portion utensil. For example, a 4 fl oz scoop is meant to measure volume, and it does not necessarily indicate that the food items weighs 4 ounces. When planning items such as taco meat, food service staff will need to experiment with different volumes of scoop sizes in order to serve the correct weight of product. The meat/meat alternate component, for example taco meat, is measured in weight. Next time this is on the menu determine the best scoop size that provide at least 3.17 ounces per serving.

11/21/2023

3757

603

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Juda Hi

Prior to the onsite visit, the Public Health Nutritionist provided technical assistance on smoothies and offered the USDA Memo SP 40-2019 and its corresponding Q&A. The discussion was continued onsite, reminding the FSD that all pureed fruit must be counted as juice. Please have clear signage when offering smoothies that students can select juice or smoothie, but not both in the same day as that would result in more than 50% of fruit offerings being in the form of juice. If an entire serving of meat/meat alterante, such as yogurt, is provided in each smoothie serving, do know that it credits as an additional item. The Offering Smoothies as Part of the Reimbursable Meal resource (<https://fns-prod.azureedge.us/sites/default/files/resource-files/smoothies%20-guide.pdf>) further describes how smoothies can be incorporated in a complete breakfast.

11/21/2023

3755

502

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Juda Hi

The signage at Juda School District was large, clear, and visually appealing. It is displayed on a screen near the front of the line and is updated each day with the menu offerings. During onsite observation, all required aspects of signage were included at lunch. When advertising a reimbursable meal at breakfast the signage indicated to take a least 1 fruit item. The menu planner does plan all fruit items as 1/2 cup, but the exact verbiage was missing from the signage. The purpose of mentioning the portion size is partially for students to be aware of proper serving sizes for food components. This was discussed onsite and was agreed it is easy to fix to add the language of "must select 1/2 cup fruit". Thank you.

11/21/2023

3753

407

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Juda Hi

As observed onsite on November 15, the lunch meal was planned with a grain shortage. At the High School, 6 chicken nuggets contained 1.0 oz eq of grain from the breading and no other additional grain item was offered. The State Agency found this error and worked with the FSD to correct the error and serve 1.0 oz eq of crackers with the meal for the 9-12 graders. Multiple meals during the week of review also contained grain shortages for Juda High School, which will be addressed in a separate Corrective Action.