

# Administrative Review Report

New Glarus School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/25/2023	11/24/2023
On-Site Review	11/29/2023	11/30/2023
Site Selection Worksheet	10/25/2023	10/25/2023
Entrance Conference	11/28/2023	11/28/2023
Exit Conference	11/30/2023	11/30/2023

## Commendations:

Thank you to all staff at New Glarus School District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director and Authorized Representative for their great organizational skills which helped expedite this AR. All standardized recipes, production records, and crediting documentation was well-organized and easy-to-follow. There were no meal pattern compliance errors during the week of review, or during the onsite review! In addition, thank you to the school nutrition professionals who brought great energy into the cafeteria. Thank you for all your work in SNACS to complete the offsite materials and upload documents prior to our onsite visit. It was great to see the high participation numbers at lunch. Lastly, thank you to the administrative staff for supporting such a great school nutrition program.

## Recommendations:

No Recommendations found for this review.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (300 - 311)	
<b>Question #</b>	305	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 10:54 AM	Finding 1: The Unpaid Meal Charge Policy references bundling costs for second meals instead of a la carte prices, even though the SFA does not sell second meals. Corrective Action: Remove the language referencing pricing bundles and second meals from the Unpaid Meal Charge Policy and upload a revised copy. Note, for policies that need approval from the School Board, include a timeline for when the updated policy will be sent to the School Board for approval. Finding 2: A copy of the communication that was sent to households at the beginning of the school year with the Unpaid Meal Charge Policy was not provided. Corrective Action: Upload a copy of the communication (email, newsletter, etc.) that was sent to households in SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	777	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 11:02 AM	Finding 1: The SFA is not tracking by individual food items on how the Supply Chain Assistance (SCA) funds are spent. Corrective Action: Submit a statement of understanding that individual food items must be tracked when spending down the SCA funds. Upload a copy of the SCA funds tracker moving forward with individual food items broken out. Finding 2: The SFA is using the SCA funds to cover the entire monthly milk order, including milk used in the Wisconsin School Day Milk Program (WSDMP) which is unallowable. Corrective Action 2: Submit a statement of understanding that milk used in WSDMP is ineligible for SCA funds and how the SFA will ensure SCA funds are not used for this moving forward.
<b>Site Name</b>		
<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>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 11:14 AM	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. Adult meals and extra entrees were not included. (7 CFR 210.14).  Corrective Action 1: 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> ).  Corrective Action 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	711	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 11:12 AM	Finding 1: The approved 2023-2024 school nutrition contract lists an adult lunch price of \$4.80 but onsite adults are charged \$4.80. Corrective Action: Confirm what the adult lunch price should be using the Wisconsin Adult Pricing Guide and upload a copy. Update the online school nutrition contract if that price is incorrect.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 10:47 AM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).  Corrective Action: Utilizing the DPI template policy ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a> ), develop procedures for the SFA and upload into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
<b>Question #</b>	1601	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 02:30 PM	Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).  Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 02:58 PM	Finding: SFA did not complete a confirmation review before verifying application(s).  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.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 09:59 AM	Finding 1: The correct non-discrimination statement was not included on all program materials. An outdated version of the NDS was on the district's free and reduced policy. Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. Finding 2: The non-discrimination statement was not included on all required program materials (insert detail here). The NDS was not included on the local wellness policy and unpaid meal charge policy. Corrective Action: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.
<b>Site Name</b>	New Glarus Elementary	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>	322	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/30/2023 11:08 AM	Finding 1: The highest student enrollment reported on the review period claim (425) was different than what the edit check report (Accuclaim) showed (486). Finding 2: The highest number of student approved free on the review period claim (62) was different than what the edit check report showed (64). Corrective Action: Submit a statement of understanding that the highest enrollment for the claim month and highest number of approved free students must be used and how the SFA will obtain these numbers. Upload a copy of the November edit check report for the elementary school.
<b>Site Name</b>	New Glarus Elementary	
<b>Form Name</b>	Dietary Specifications and Nutrient Analysis (603-605)	
<b>Question #</b>	603	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 01:19 PM	Finding: All foods served as part of a reimbursable meal must contain zero grams of trans fat per serving (less than 0.5 grams per serving). The Prairie Creek Beef Franks contains 0.5 grams of trans fat. If it is likely that trans fat appearing on a label is naturally occurring, the SFA must request documentation from the manufacturer that reports the source of the trans fat prior to continuing use of the product.  Corrective Action: Submit a nutrition facts label for a new hot dog product that will be served that contains 0 grams trans fat or submit documentation from the manufacturer citing the trans fat is naturally occurring.
<b>Site Name</b>	New Glarus Elementary	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1404	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 09:37 AM	Finding: Each school within the SFA must have a written site specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). The food safety plan was missing the following information: (add

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		detail). Corrective Action: Update the food safety plan to include the missing information and upload the updated portions of the food safety plan into SNACS.
<b>Site Name</b>	New Glarus Elementary	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 01:10 PM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <p>Canned pineapples (Indonesia) Canned mandarin oranges (China) Frozen broccoli (Mexico) Fresh cucumbers (Mexico)</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products; canned pineapples and mandarin oranges, fresh cucumbers, and frozen broccoli. Noncompliant Product List templates can be found on the Buy American webpage. <i>This was completed during the onsite visit. No further action required.</i></p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/30/2023	3821		Administrative Review		Food Service Director			

## Comments

	Created By	Created Date
<p><u>Unpaid Meal Charge Policy</u></p> <ul style="list-style-type: none"> <li>Per USDA policy memo SP 46-2016, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).</li> <li>Funds in student meal accounts are considered a liability until a meal is purchased. When the 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. Funds remaining in a reduced student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as unclaimed property.</li> <li>FNS recommends keeping low or negative account balances confidential to minimize student distress and embarrassment. Direct communications to the adult in the household privately (and ahead of time) via mail, phone, or email. If low balance reminders and/or F/R applications are sent home with the student, communicate this in a discrete manner (e.g. white paper and envelope). Consider re-evaluating current practices and centralizing communications through the determining official and/or food service director. Resources: <ul style="list-style-type: none"> <li>For a snapshot of what the policy should include, see the Unpaid Meal Charges In a "Nutshell". For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the Financial Management Webpage or the USDA Unpaid Meal Charges Webpage.</li> </ul> </li> </ul>		11/30/2023 12:10:10 PM

	Created By	Created Date
<p><u>Point of Service (POS)</u></p> <p>Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. All meals served in the National school Lunch and School</p>		11/30/2023 11:28:35 AM

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Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students. Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served. Only one meal per student per meal service may be claimed for reimbursement. It is strongly encouraged that the POS be at the end of line after students have selected all offered components. New Glarus Elementary marks students at the beginning of the line with a trained food service employee at the end of the line ensuring students select a reimbursable meal. Due to the current cafeteria space and that no non-reimbursable meals were identified; the current POS is allowable. However, since New Glarus Elementary is updating the kitchen and cafeteria space, it is recommended that the POS is changed to the end of the line when the cafeteria remodel is complete.									
11/30/2023	3819		Administrative Review		Food Service Director				
<b>Comments</b>									
					<b>Created By</b>		<b>Created Date</b>		
The SFA has a detailed special dietary needs policy, however, the language does not clearly inform households on where to access the required medical statement form.							11/30/2023 11:20:34 AM		
11/30/2023	3818		Administrative Review		Authorized Representative				
<b>Comments</b>									
					<b>Created By</b>		<b>Created Date</b>		
The SFA must collect racial/ethnic data on an annual basis. The district enrollment racial/ethnic data must be filled out on the Civil Rights Compliance Self Evaluation Form (PI-1441) as a way to ensure compliance with civil rights compliance.							11/30/2023 11:17:53 AM		
11/30/2023	3817		Administrative Review		Authorized Representative				
<b>Comments</b>									
					<b>Created By</b>		<b>Created Date</b>		
All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 5 days. SFAs are strongly encouraged to adopt the DPI SNT template civil rights complaint procedures.							11/30/2023 11:16:25 AM		
11/29/2023	3800	435	Administrative Review	New Glarus Elementary	FSD				
<b>Comments</b>									
					<b>Created By</b>		<b>Created Date</b>		
Recipes should be updated to reflect current practices and products within the kitchen in which it is made. For example, the fish sandwich recipe called for a 1.25 oz fish patty, but a 3.6 oz patty is currently being used, affecting the dietary specifications and the crediting. For more information on what essential information must be on a standardized recipe, review the Standardized Recipes in a Nutshell document ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf</a> ).							11/29/2023 2:09:31 PM		
11/29/2023	3799	404	Administrative Review	New Glarus Elementary	FSD				
<b>Comments</b>									
					<b>Created By</b>		<b>Created Date</b>		
The salad bar is positioned at the front of the line and is self-serve. Fruits and vegetables options; cucumber slices, orange slices, and romaine lettuce, were served using tongs. There was not signage for each fruit and vegetable to communicate what a portion of each fruit and vegetable is. If students did not take enough fruit or vegetable from the salad bar, they were served the hot vegetable (baked beans) to ensure their 1/2 cup requirement of fruit and/or vegetable under offer versus serve. Because the vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/2 cup each should be communicated to students with signage. This would also assist in honoring student preferences by having them select larger portions from the garden bar rather than forcing them to take the hot vegetable, which may be preferable to students. Salad Bar Signage Template can be found on our Signage webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx</a> ). These signs could be laminated and velcroed to the sneeze guard of the garden bar and changed out with the daily vegetable and fruits. There are a few ways to determine the half cup sizes of fruits and vegetables. First, for common fruits and							11/29/2023 2:05:02 PM		

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<p>vegetables the handout Half-Cup Crediting of Fruits and Vegetables Handout can be a useful tool. Second, the SFA can take the vegetable and fill a 4 oz spoodle to determine how many pieces of vegetable make a half cup. For difficult to measure with a spoodle vegetables (e.g. baby carrots, cauliflower, etc), the SFA can use the Food Buying Guide to determine how many half cup servings are in a pound of the vegetable. Be sure to select the FBG option that matches the "Serving Size per Meal Contribution" column. This column communicates how the student will consume the vegetable (e.g. raw or cooked; sliced or diced or in strips; etc). Example: Baby carrots, read-to-eat. Serving Size per Meal Contribution: 1/4 cup raw vegetable. There are 6.45 (1/2 cup) servings per pound of baby carrots. One pound, or 16 oz, divided by 6.45 (1/2 cup servings) is 2.48 oz. Thus, 1/2 cup serving of baby carrots weighs 2.48 oz. Have two separate staff members weigh out 2.48 oz of baby carrots three times each and take the average number of baby carrots. This is how many baby carrots are needed to make a 1/2 cup serving. Communicate this number via signage on the garden bar. Complete yield studies any time the size of the fruit and/or vegetable is changed (e.g. thicker baby carrots or grapes, thin carrots or small grapes). Update signage as needed.</p>									
11/29/2023	3798	406	Administrative Review	New Glarus Elementary	FSD				
<b>Comments</b>									
					<b>Created By</b>	<b>Created Date</b>			
<p>Preschool students are allowed to be served the K-5 meal pattern when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine, during meal service if a child is in preschool or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. When the preschool students are not comingled and following the preschool meal pattern, Offer Versus Serve (OVS) is not an appropriate service style for preschool students. It may interfere with the nutrition goals of the preschool meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. Prior to the onsite visit, preschool students were not comingled with the older grade groups; however, were receiving the K-5 meal pattern. Technical assistance was provided over the phone and email. During the onsite visit, it was observed that the preschool students are now provided the preschool meal pattern and served all components, as is required for this meal pattern.</p>									11/29/2023 1:33:46 PM
11/29/2023	3797	1005	Administrative Review	ALL	LWP Coordinator				
<b>Comments</b>									
					<b>Created By</b>	<b>Created Date</b>			
<p>The next triennial assessment must be completed during the 2023-2024 school year since the last one was done in SY 2020-2021.</p>									11/29/2023 1:31:43 PM
11/29/2023	3816	208	Administrative Review	ALL	Verifying Official				
<b>Comments</b>									
					<b>Created By</b>	<b>Created Date</b>			
<p>Confirmation reviews are the first step in verification after the application(s) have been selected. The purpose of the confirmation review is to ensure that the original determination made the determining official is correct.</p>									11/30/2023 10:17:03 AM
11/29/2023	3795	900	Administrative Review	ALL	Business Manager				
<b>Comments</b>									
					<b>Created By</b>	<b>Created Date</b>			
<p>Onsite monitoring forms for NSLP &amp; SBP were completed for all sites in November 2023. The day of review meal counts were not filled out for all forms and should be done to ensure accurate counting and claiming.</p>									11/29/2023 8:58:27 AM
11/29/2023	3802	431	Administrative Review	New Glarus Elementary	FSD				
<b>Comments</b>									
					<b>Created By</b>	<b>Created Date</b>			
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Production records currently have all the requirements; however, the purchase unit prepared is being documented in the number of servings prepared for fruits and vegetables (i.e. the total number of pounds prepared is</p>									11/30/2023 8:25:10 AM

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<p>documented in the number of servings prepared column and the unit "lbs" is being documented in the total bulk quantity prepared column). · The prepared quantity in bulk units column communicates how many cases, bags, pounds, or items are needed to prepare the planned number of portions. For example, if the plan is to serve 280 half cup servings of baked beans, documenting in the bulk quantity column that school production staff need to pull 12 - #10 cans communicates how much bulk needs to be pulled to prepare the intended number of total servings. · The unit to document leftovers is up to the discretion of the SFA and what makes sense for the production and forecasting; whether this is documented in bulk quantity, or the number of portions. Lastly, it is important that staff continue to document any items added to the menu the day of service, e.g. use of leftover vegetables from the day before, and to document any substitutions, e.g. the use of an enriched hot dog bun rather than the alpha baking whole grain bun documented on the recipe. Production records communicate the plan of the day, and how that plan was carried out on the day of meal service.</p>		
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