

# Administrative Review Report

Johnson Creek School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/10/2023	11/27/2023
On-Site Review	11/28/2023	11/29/2023
Site Selection Worksheet	10/25/2023	11/24/2023
Entrance Conference	11/28/2023	11/28/2023
Exit Conference	11/29/2023	11/29/2023

## Commendations:

Thank you to Johnson Creek for being so welcoming and helpful. The Authorized Rep, the Food Service Director and the Determining Official have the food service department as a top priority. The breakfast and lunch offerings were fresh and nutritious. The garden bar had a large variety of fresh produce that the students really seemed to enjoy. It was also an added touch offering locally grown apples and lettuce. All prep areas, coolers, freezers and pantry were neatly organized and labeled. The food service staff were friendly with the students and were willing to answer the reviewers' questions. It was apparent that all those that play a part in the Food Service Department are dedicated, knowledgeable and willing. It was also much appreciated that all documents were readily available and there was a great workspace provided.

# Administrative Review Report

Johnson Creek School District

## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Verification (200 - 204)	
<b>Question #</b>	200	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 11/29/2023 01:43 PM</p>	<p>Finding: The Verification Collection Report (VCR) was not completed accurately. The Number of Students reported in Section 1-1 B did not correctly reflect the number of enrolled students as of the last operating day in October with access to school meals. The number reported was significantly higher as it was entered based on the third Friday counts.</p> <p>Corrective Action: Edit this section of the VCR to reflect the accurate number of enrolled students. Corrected on-site, no further action required.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/07/2023 09:47 AM</p>	<p>Finding: The Annual Financial Report (AFR) for the 2022-23 school year has errors in need of correction.</p> <p>The total revenues and ending fund balance reported on the AFR do not match the PI-1505 public school financial report for Fund 50. The total revenues on the AFR should be \$373,653.75, and thus the ending fund balance should come out to be \$48,013.48.</p> <p>Further, the allocations on the AFR for non-program foods do not appear to be accurate. The revenue allocated to non-program foods far exceeds the reported expenses for non-program foods. This is likely due to under allocation of expenses. Please assess and reallocate non-program food revenues and expenses on the report so the values accurately reflect these items.</p> <p>Please see corresponding technical assistance section of this report.</p> <p>Corrective Action: Print a copy of the 2022-23 Annual Financial Report and manually update the appropriate sections. Be sure the total revenues on the corrected report match the PI-1505 total revenues for 2022-23. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the Online Services portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
<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>	<p>Flagged 12/06/2023 03:46 PM</p>	<p>Finding: The SFA is tracking their Supply Chain Assistance (SCA) funds. However, the total SCA Funds on the tracker does not accurately represent all SCA Funds received to date. The SFA did not include SCA Funds received from Round 1, and the amount included for Round 4 was an estimation but not an actual amount since Round 4 has not yet been paid.</p>

# Administrative Review Report

Johnson Creek School District

		Corrective Action: After the Round 4 payment is received, update the total actual amount of SCA Funds received from Rounds 1-4 (including any reallocated funds received) in the tracker. Upload the updated tracker in SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	805	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	Flagged 11/29/2023 12:10 PM	<p>Finding: When an SFA offers a fluid milk substitution to students without a signed medical statement, the product must meet certain nutrition requirements. There is a required form SFAs must submit to DPI with details about the specific fluid milk substitution offered, even if the product is already on the List of Allowable Fluid Milk Substitutes. The SFA does not currently have a Fluid Milk Substitute Approval Form on file with DPI.</p> <p>Corrective Action: Submit the Fluid Milk Substitute Approval Form to DPI: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/fluid-milk-substitute-approval-form.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/fluid-milk-substitute-approval-form.pdf</a>.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 12:05 PM	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content. Specific language regarding the triennial assessment and updating/informing the public is lacking. (7 CFR 210.31). See the corresponding technical assistance portion of this report for further suggestions regarding the LWP.</p> <p>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.</p>
<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)	
<b>Question #</b>	314	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	Flagged 11/29/2023 12:14 PM	<p>Finding: The SFA participates in the Special Milk Program (SMP) and uses the non-pricing option. However, the SFA has \$0.40 listed on the contract for the SMP. It appears that the a la carte price for milk was entered in this space on the contract, but it should be listed as \$0.00.</p> <p>Corrective Action: Update the online contract and submit for approval.</p>
<b>Site Name</b>		
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1400	
<b>TA Log #</b>	No TA Log# found	

# Administrative Review Report

Johnson Creek School District

<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Flagged 12/06/2023 03:39 PM</p> <p>Finding: The SFA does not have an SOP in the food safety plan for sharing tables, but sharing tables are operated in both the elementary and middle/high school areas.</p> <p>When creating the SOP, consider the following:</p> <ul style="list-style-type: none"> <li>• How will oversight of the tables be achieved to ensure items students place on the tables are wholesome?</li> <li>• How will fruits/vegetables with edible peels (like apples) be handled to minimize risk of contamination?</li> <li>• How will TCS foods be handled during and after meal service?</li> <li>• Will any items left on the tables be re-served in the meal programs? This is allowable for non-TCS food items in wholesome condition and could be simple to do for shelf-stable pre-packaged items like graham crackers.</li> </ul> <p>Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian must be made. Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state. The local regulatory authority should approve the school's SOP prior to implementation to ensure compliance with all local and state health and food safety codes.</p> <p>Corrective Action: Update the food safety plan to include an SOP for sharing tables. Please review the Sharing Table Toolkit when doing this: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-no-thank-you-toolkit.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-no-thank-you-toolkit.docx</a>. The toolkit contains detailed guidance on sharing tables, a template SOP, and a template log for tracking food leftover on sharing tables.</p>
<b>Site Name</b>	Johnson Creek Public School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	410
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Flagged 12/12/2023 12:51 PM</p> <p>Finding: A sunbutter sandwich crediting as 1.5 oz eq meat/meat alternate (M/MA) and 1 oz eq grain is offered daily as an alternate entrée option at the elementary (K-4). This resulted in a weekly grain shortage (8 oz eq required, 5 oz eq offered) and a weekly M/MA shortage (8 oz eq required, 7.5 oz eq offered).</p> <p>Corrective action: Fiscal action is required for any repeat weekly component shortage violations from the previous Administrative Review. During the 17-18 SY Administrative Review, a weekly grain and meat/meat alternate shortage was found at lunch. Therefore, due to an insufficient weekly quantity of M/MA during the week of October 9, 2023, fiscal action will be assessed. As the shortage was a result of the sunbutter sandwich entrée, fiscal action will be limited to the number of sunbutter sandwich meals served on Monday, the day during the week of review with the lowest participation, resulting in 2 meals being reclaimed.</p> <p>Additionally, please submit a statement describing how the planned menu will be adjusted to ensure compliance with weekly component requirements. If additional items will be offered with the sunbutter sandwich meal, upload any necessary crediting documentation into SNACS.</p>
<b>Site Name</b>	Johnson Creek Public School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	430
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged

# Administrative Review Report

Johnson Creek School District

<b>Corrective Action History</b>	<p>Flagged 12/12/2023 12:52 PM</p>	<p>Finding: The production record requirements were not met daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (<a href="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</a>).</p> <p>Specifically, be sure to document the planned/actual number of servings prepared AND planned/actual quantity prepared in purchase units for EACH item and be specific with the menu item name/recipe number (e.g. document specific cereal type offered, include fat percentage for chocolate milk). The number of reimbursable and non-reimbursable meals planned and served at each meal service must also be documented. Production records are the SFA's way of proving that reimbursable meals were served; therefore, every item offered as part of the reimbursable meal, including items added that were not on the planned menu, must be recorded separately on the production record and have all required information documented.</p> <p>Corrective Action: Submit one full week of completed production records for breakfast and lunch that fulfill all production record requirements. Choose a week (Monday-Friday) that occurs after the completion of the on-site Administrative Review (AR), but before the corrective action due date.</p> <p>Additionally, all staff responsible for completing production records must complete the <a href="#">Production Records training</a> found in the <a href="#">DPI Online Learning Library</a>. Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit the certificate of completion along with a signed training roster.</p>
<b>Site Name</b>	Johnson Creek Public School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	434	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/12/2023 12:49 PM</p>	<p>Finding: Standardized recipes were available but some errors were found during the menu review.</p> <ul style="list-style-type: none"> <li>Stromboli - the ingredients say 10oz mozzarella, but per the instructions, 10oz of mozzarella is added twice for a total of 20oz cheese.</li> <li>Hot turkey and cheese sandwich - the amount of cheese and turkey needed are swapped.</li> <li>Grilled cheese - the recipes says 2oz (2 slices), but commodity cheese slices are 0.5 oz each. Per the head cook, 4 slices of cheese are used for a total of 2oz.</li> <li>BYO Sub bar - currently, the recipe calls for 1.5 oz of meat (ham or turkey), which only credits as 1 oz eq meat/meat alternate (M/MA) plus one slice of cheese (commodity American cheese slices are 0.5 oz, provolone slices are 0.75oz). The recipe and production records indicates that the subs credit as 2oz eq M/MA and 2oz eq grain. Note that since each item is documented separately on the production record and the subs are assembled on the line, a recipe would not be required. However, if the sub is intended to credit as 2 oz eq M/MA either the amount of meat or cheese should be increased. This was not a shortage for 9-12 as additional M/MA items are available on the salad bar.</li> <li>Pop tart + string cheese - these items are bundled, but when written in on the production record, the string cheese was not documented. Either a recipe should be developed or both items should be documented on the production record with all required information.</li> </ul> <p>Corrective action: Correct the recipes as outlined above and submit via the documents tab in SNACS.</p>
<b>Site Name</b>	Johnson Creek Public School	
<b>Form Name</b>	Offer vs Serve (500-502)	

# Administrative Review Report

Johnson Creek School District

<b>Question #</b>	500	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/12/2023 01:43 PM</p>	<p>Finding: Three non-reimbursable meals were observed during elementary lunch meal service on November 28, 2023. The meals did not contain the required ½ cup fruit, vegetable, or combination under Offer versus Serve (OVS).</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, all staff working the point of service should complete the <a href="#">OVS training</a> in the DPI Online Learning Library.</p> <p>Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit the certificate of completion along with a signed training roster.</p>
<b>Site Name</b>	Johnson Creek Public School	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1106	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/12/2023 12:52 PM</p>	<p>The Wisconsin Department of Public Instruction 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 this may not occur in the meal service area during meal service times. The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.</p> <p>Information that must be tracked for any fundraisers that occur during the school day (defined as midnight through 30 minutes after the end of the instructional day) includes: the time of the fundraiser, description of items sold and the specific location of the fundraiser (e.g. if occurring in the school, will it be in the cafeteria, the hallway, the gym, etc.). If it is a non-exempt fundraiser selling Smart Snacks compliant items, product labels and/or recipes must be provided to confirm compliance. It is recommended that the Student Fundraising Request form be updated to provide the additional information needed. Additionally, while not required, the use of the <a href="#">fundraiser tracking tools on the Smart Snacks webpage</a> is encouraged.</p> <p>Finding: Fundraisers are currently being tracked but the tracking form does not request some required information. The Art Club chocolate bar fundraiser lists the proposed dates of sale as "ASAP until sold out." As described above, an exempt fundraiser may not exceed two consecutive weeks.</p> <p>Corrective Action: The fundraiser request form should be updated to ensure that all information required for tracking compliance is provided by the organization requesting to host the fundraiser. Please upload the updated copy in the documents tab in SNACS. Additionally, submit a statement indicating your understanding of the requirements of an exempt fundraiser and how compliance will be ensured going forward.</p>
<b>Site Name</b>	Johnson Creek Public School	
<b>Form Name</b>	Special Milk Program	
<b>Question #</b>	3	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		

# Administrative Review Report

Johnson Creek School District

<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/29/2023 08:04 AM	<p>Finding: Milks are being claimed based on which children indicate at the start of their school day that they want milk during "snack" rather than an appropriate point of service count. Point of service counts (POS) for the Special Milk Program (SMP) must be recorded as the students receive a milk. Recording milk counts based on who wants a milk and adjusting the list if they later change their mind or are absent at milk service is not a sufficient POS.</p> <p>Corrective Action 1: Submit a detailed statement, outlining how the school has changed the accountability system for claiming milk to include an approved POS. Please included details on any training the teachers/aides receive on milk POS.</p> <p>Corrective Action 2: Provide two weeks of SMP counts with the corrected counting system. Upload in SNACS.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/07/2023	3864		Administrative Review		FSD			

### Comments

Annual Financial Report and Non-Program Foods	Created By	Created Date
<p>SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Non-program foods include any non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, etc.) purchased using funds from the non-profit school food service account. Extra entrées and adult meals are non-program foods. Please refer to the <a href="#">Non-Program Foods In a Nutshell</a>. Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. SFAs are required to separate non-program food costs from program food costs and food revenues from program food revenues.</p> <p>On the AFR, the non-program foods revenue must reflect all revenue from the sale of non-program foods which includes a la carte, adult meals, extra entrees, and extra/cold lunch milk. Revenue from the sale of reduced-price or paid student meals is not a non-program food revenue but rather would be lunch or breakfast revenue depending on the meal purchased.</p> <p>As a reminder, when a student deposits funds in their lunch account, which will be used for food purchases, the amount received is not treated as revenue until the food has been sold/served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the food is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your AFR.</p> <p>On the AFR, the actual expenditures for non-program foods must be reported, including allocations across the different expense categories (labor, food, purchased services, etc.). Food expenditures must be the actual food costs associated with the sale of the non-program foods. This must be determined from sales reports, food cost data, and invoices. Labor expenditures must be determined based on actual labor time spent by food service staff on preparing and serving non-program foods. Ideally, labor allocations would be determined through an annual <a href="#">time study</a> of staff time. For correcting the AFR, it is allowable as a one-time use to utilize the <a href="#">Expense Allocation Tool</a> to reallocate some labor expenses to the category of non-program foods. This tool may always be used to help allocate purchased services, equipment, and "other" expenses that are shared between NSLP, SBP and non-program foods.</p> <p>Going forward, please ensure the district has sufficient procedures in place for allocating all categories of Fund 50 expenses to the appropriate programs on the AFR (i.e. NSLP, SBP, SMP, non-program foods). Please review the AFR and non-program food resources found on the <a href="#">Financial Management webpage</a> for more details and assistance on these requirements.</p> <p>The <a href="#">Annual Financial Report Manual</a> is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year. The ending balance, on June 30, can never be a negative balance. A transfer must be made from non-federal funds to bring the ending balance to \$0.00. The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p>		12/7/2023 10:22:41 AM

# Administrative Review Report

Johnson Creek School District

<ul style="list-style-type: none"> <li>'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs.</li> <li>'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.</li> <li>'Food' is expenses for edible food items and beverages.</li> <li>'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.</li> <li>'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.</li> <li>'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.</li> </ul> <p>When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools</p>			
12/07/2023	3860	Administrative Review	AR
<b>Comments</b>			
<b>Fund Transfer and Ending Fund Balance</b>		<b>Created By</b>	<b>Created Date</b>
<p>Review of the AFR, PI-1505, and other financial documents indicated that the SFA made a fund transfer into Fund 50 for 2022-23 when it was not necessary. The SFA had a fund balance at the end of 2021-22 that was enough to cover the 2022-23 expenditures in combination with the 2022-23 revenues earned before the transfer was made. Once funds are transferred into Fund 50, they may not be transferred out so this erroneous fund transfer is permanent. Fund 50 may have a balance at the end of the year that carries into the next school year. If assistance is needed in properly documenting this in the SFA's financial software program, please work with the software vendor, school finance staff at DPI, and/or the financial auditors. A transfer into Fund 50 is only required when the ending fund balance as of June 30 is negative (after accounting for any beginning fund balance amount, total revenues, and total expenditures).</p>			12/7/2023 9:54:16 AM
12/07/2023	3859	Administrative Review	FSD
<b>Comments</b>			
<b>Breakfast Participation</b>		<b>Created By</b>	<b>Created Date</b>
<p>Breakfast participation in the district is low compared to the number of students attending and compared to lunch. Increased participation in the School Breakfast Program (SBP) will enable the SFA to help students start their school day with good nutrition and for the school to earn reimbursement for breakfasts served.</p> <p>The breakfast menu each day has one entrée offering only. The SFA may consider expanding the breakfast offerings in the future to have more than one entrée available to cater to more students' preferences. For example, on yogurt parfait day, perhaps there could also be a cereal with string cheese option as well for students that do not want the parfait.</p> <p>Currently, breakfast is served before school only with service stations set up in both the middle/high school wing and elementary school wing. Students have to choose to stay outside for recess before school or come in for breakfast. The FSD indicated that some alternative breakfast models have been used in the past in the district. The SFA is encouraged to explore options for altering the SBP service models (and possibly menus) to increase participation.</p> <p>In addition to the traditional, cafeteria-based breakfast model, schools may also consider an alternative breakfast model. For example, "Breakfast in the Classroom" involves serving the breakfast meal to children during a morning class, often while the teacher is taking attendance or giving classroom announcements. Schools operating "Grab &amp; Go Breakfast" serve children a breakfast "to go," often in a paper or plastic bag, before school or during a morning break. Consider offering a second-chance breakfast during late morning for students who are not hungry first thing in the morning.</p> <p>When exploring different breakfast service models, be sure to consider who will retain responsibility for the point of service (POS). It may be a simpler option to have food service staff operate the POS at one more central locations and then allow students to take their meals to their classrooms to eat, as opposed to having teachers responsible for POS in their classrooms.</p> <p>To learn more about these and other breakfast service options, please see the <a href="#">USDA School Breakfast Program webpage</a>. Additional breakfast resources and contact</p>			12/7/2023 9:27:18 AM



# Administrative Review Report

Johnson Creek School District

information for School Breakfast Program specialists is available on the <a href="#">DPI School Breakfast webpage</a> .									
12/07/2023	3857		Administrative Review		FSD				
<b>Comments</b>									
<b>Fluid Milk Substitutes</b>					<b>Created By</b>			<b>Created Date</b>	
The SFA offers soymilk to students that would like it instead of the regularly offered cow's milk, regardless of if a medical statement is on file or not. There are only a few students that utilize this option. SFAs may offer students a <a href="#">fluid milk substitute</a> that is nutritionally equivalent to cow's milk without a signed medical statement. SFAs wishing to do so must submit an approval form to DPI to ensure the product meets the nutrition requirements. For more details on fluid milk substitutions, please refer to pages 30-31 of the USDA resource " <a href="#">Accommodating Children with Disabilities in the School Meals Programs</a> ."								12/7/2023 9:13:46 AM	
12/07/2023	3856		Administrative Review		FSD				
<b>Comments</b>									
<b>Service Fee for Non-Program Food Ordering</b>					<b>Created By</b>			<b>Created Date</b>	
The FSD occasionally purchases food for other school events using the specific accounts the other school groups have setup with the food distributor (so Fund 50 is not being used for these non-program purchases). In this setup, there is not a need for Fund 50 to be reimbursed for the food items since it is not billed for the items. However, the labor time it takes the FSD to place these orders should technically not accrue to Fund 50. It is recommended to bill the school groups a service fee for the FSD placing the orders since this labor time is being spent on non-program purposes. This comes from the fact that all costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals.								12/7/2023 9:08:26 AM	
3854			Administrative Review		FSD				
12/07/2023	3853		Administrative Review		FSD				
<b>Comments</b>									
<b>Unpaid Meal Charge Policy</b>					<b>Created By</b>			<b>Created Date</b>	
Per USDA policy memo <a href="#">SP 46-2016</a> , 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.									
The unpaid meal charge policy must specifically explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intends to use the money to purchase that day's meal. The SFA's current policy does not explicitly include this information and it should be updated to include it.									
The unpaid meal charge policy should be implemented and enforced SFA-wide. The SFA may exercise local discretion to vary the policy based on student grade level. The policy 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. It also must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts. Procedures regarding the collection of unpaid meal charges should be included in the written unpaid meal policy. SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).								12/7/2023 9:02:29 AM	
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. When a child leaves the district or graduates, SFAs MUST attempt to return remaining student account funds. However, SFAs may allow families that are not approved for free or reduced-price meals to donate their remaining funds to cover other unpaid meal charges that were uncollectable. Households approved for reduced-price meal benefits MUST receive a refund. There is a federal requirement that children eligible									

# Administrative Review Report

Johnson Creek School District

<p>for reduced-price meals pay a maximum of 40 cents per lunch meal and 30 cents per breakfast meal. Retaining the unused funds would result in the per meal price exceeding the federal maximums. Funds remaining in a reduced-price eligible 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.</p> <p>On the school food services webpage, there is language suggesting that only account balances over \$5.00 will be refunded if the student leaves the district. The FSD indicated that there is not actually a lower cut-off for refunds and that the district does issue refund checks for even a few cents if necessary. The district should ensure that refunds are handled in accordance with the guidance above and that the communications about this are also clear and accurate.</p> <p>The USDA 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).</p> <p>Finally, the SFA's unpaid meal charge policy contains language regarding service of an alternate meal when student's balances are a specific amount in the negative. The FSD stated that no alternate meals have been served this school year or last school year. It was also stated that the alternate meal would meet the meal pattern, would be charged according to that student's eligibility status, and would be claimed for reimbursement. However, the description of the alternate meal in the policy does not include vegetables so it is not clear from the policy that the meal would be reimbursable. Please refer to the Alternate Meals section of the <a href="#">Unpaid Meal Charges In a Nutshell resource</a> for more details on this offering. Please also ensure that the policy accurately reflects the district's practices.</p> <p>Resources: For a snapshot of what the policy should include, see <a href="#">the Unpaid Meal Charges In a "Nutshell"</a>. For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the <a href="#">Financial Management Webpage</a> or the <a href="#">USDA Unpaid Meal Charges Webpage</a>.</p>								
12/07/2023	3852		Administrative Review		FSD			
Comments								
Sharing Tables				Created By			Created Date	
<p>Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) that must be followed to safely and responsibly implement each type of table. Refer to the <a href="#">Sharing and No Thank You Tables Toolkit</a> for a comprehensive guide including standard operating procedures.</p> <p>Definitions:</p> <ul style="list-style-type: none"> <li>A sharing table is a designated table for food and beverage items that students do not intend to consume. Students <b>may</b> pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.</li> <li>A no thank you table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students <b>may not</b> pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.</li> </ul> <p>Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state. Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.</p>							12/7/2023 8:47:09 AM	
12/07/2023	3851		Administrative Review		DO			
Comments								
Declining a Meal Benefit				Created By			Created Date	
<p>When a household is eligible to receive a meal benefit but wishes to decline and pay full-price for meals instead, the SFA must honor this request. When this occurs the SFA should retain documentation of the request (preferably in writing) and should set that student's meal eligibility status to "paid" the day the request is received. In these cases, the student should no longer be part of the benefit issuance (BI) list since they are not receiving a free or reduced-price meal benefit even though they would be eligible to. The</p>							12/7/2023 8:46:20 AM	

# Administrative Review Report

Johnson Creek School District

BI list should only reflect currently enrolled students with access to breakfast and/or lunch that are receiving a free or reduced-price meal benefit as of the date the list/report is run.							
12/07/2023	3850		Administrative Review		FSD		
<b>Comments</b>							
<b>Sharing Eligibility Information</b>					<b>Created By</b>	<b>Created Date</b>	
The Determining Official (DO) does not share lists of student eligibility information for other program purpose, such as athletic fee waivers, registration fee waivers, etc. However, it was mentioned that occasionally school counselors or social workers may ask the DO if a specific student is eligible for free or reduced-price meals. The DO should exercise caution when disclosing this information as it is confidential and may only be shared with others under specific circumstances, some of which required explicit parental consent. It is recommended that the DO review the " <a href="#">Disclosure In a Nutshell</a> " resource and the Confidentiality and Disclosure section of the <a href="#">USDA Eligibility Manual</a> to ensure all requirements are adhered to.						12/7/2023 8:42:57 AM	
12/07/2023	3849		Administrative Review		FSD		
<b>Comments</b>							
<b>Posting Local Wellness Policy</b>					<b>Created By</b>	<b>Created Date</b>	
During the preparation for the review, the FSD worked with other district staff to update the Local Wellness Policy content. The updated version is not yet posted on the district webpage or made publicly available. This is due to upcoming board meetings that will approve and finalize the policy updates. After the board approves the LWP updates, please ensure the new updated LWP is posted on the district page and replaces the older version. Please consider notifying households of the updated LWP in other ways as well, such as through a newsletter.						12/7/2023 8:36:04 AM	
12/07/2023	3848		Administrative Review		FSD		
<b>Comments</b>							
<b>Local Wellness Policy Content</b>					<b>Created By</b>	<b>Created Date</b>	
The district's Local Wellness Policy (LWP) contains content in the required areas of nutrition promotion, nutrition education, and physical activity but these areas could use improvement. These content areas were minimally incorporated into the policy. As the wellness committee continues to meet and the district modifies the policy, please focus on elaborating on these areas and strive to include specific goals the district has for these topics. Resources on the <a href="#">DPI LWP webpage</a> can assist, specifically the <a href="#">LWP Policy Builder</a> .						12/7/2023 8:33:12 AM	
12/07/2023	3847		Administrative Review		FSD		
<b>Comments</b>							
<b>Civil Rights Complaint Procedures</b>					<b>Created By</b>	<b>Created Date</b>	
The SFA has adopted the DPI template for civil rights complaints procedures and has posted this file on the district webpage. While this is allowable, it is not required to post this procedure or distribute it to households. The procedures are intended for internal reference in the district to guide actions to be taken if a child or household wishes to file a civil rights complaint in the school meals programs.						12/7/2023 8:29:29 AM	
11/29/2023	3886		Administrative Review		FSD		
<b>Comments</b>							
<b>Fruits and Veggies at Point of Service</b>					<b>Created By</b>	<b>Created Date</b>	
Many students were sent back to select additional fruit or vegetable in order to ensure they had selected a reimbursable meal. Consider keeping a fruit or vegetable option at the point of service to help avoid sending students back and keep the line moving smoothly. An easy option may be whole apples, applesauce cups, or packets of craisins.						12/12/2023 12:47:19 PM	
11/29/2023	3885		Administrative Review		FSD		
<b>Comments</b>							
<b>Flavor Stations</b>					<b>Created By</b>	<b>Created Date</b>	

# Administrative Review Report

Johnson Creek School District

A flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors. Calorie-free and sodium-free spices and flavors are recommended. Consider lemon juice, parsley flakes, garlic powder, cinnamon, pumpkin pie spice, chives, vinegar, hot sauces, red pepper flakes or other sodium-free spice mixes.					12/12/2023 12:46:53 PM
11/29/2023	3884		Administrative Review	FSD	
<b>Comments</b>					
<b>Volume vs. Weight Measurements</b>			<b>Created By</b>		<b>Created Date</b>
<p>As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).</p> <p>During the on-site review, the quesadillas were intended to be made with 2 oz of cheese, and credit as 2 oz eq meat/meat alternate (M/MA). However, they were prepared using a 1/8 cup of cheese (2 fl oz = 1/8 cup), and therefore only credited as 1 oz eq. Note: this did not result in a shortage as students had access to additional meat/meat alternate options on the salad bar. It is recommended that the <a href="#">Weight vs. Volume online learning module</a> be reviewed by all food service staff.</p> <p>Additionally, there is a difference between how much a product weighs and how it credits. For example, while 1 oz of cheese (by weight) credits as 1 oz eq meat/meat alternate, a 2 oz muffin (by weight) credits as 1 oz eq of grain. For deli meats, USDA deli turkey breast 110554 credits as 1.43 oz = 1 oz eq M/MA and USDA sliced ham 100187 credits as 1.22 oz = 1 oz eq M/MA.</p>					12/12/2023 12:46:24 PM
11/29/2023	3883		Administrative Review	FSD	
<b>Comments</b>					
<b>Packaged Oranges</b>			<b>Created By</b>		<b>Created Date</b>
Pre-sliced and packaged oranges are provided in a 4 oz serving size. A 4 oz serving by weight credits as 3/8 cup of fruit. It is important that POS staff is aware of this as it does not meet the full 1/2 cup fruit/vegetable requirement under OVS.					12/12/2023 12:45:50 PM
11/29/2023	3882		Administrative Review	FSD	
<b>Comments</b>					
<b>Yield Studies</b>			<b>Created By</b>		<b>Created Date</b>
<p>In-house yield studies have been conducted to determine the portion size needed for items on the garden bar/salad bar and that information was provided to students on the salad bar signage. However, these studies should be documented and kept on file. Resources and templates are available on the DPI Menu Planning page under Crediting (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a>). Proper portioning utensils should be used for any salad bar items that are served by volume rather than the number of pieces. This would include anything that students are told to take "1 scoop."</p>					12/12/2023 12:45:29 PM
11/29/2023	3881		Administrative Review	FSD	
<b>Comments</b>					
<b>Ham on Salad Bar</b>			<b>Created By</b>		<b>Created Date</b>
Ham is offered on the salad bar as a meat/meat alternate option some days. Next time ham is offered, confirm the weight of the pre-portioned serving size to accurately determine crediting.					12/12/2023 12:45:10 PM
11/29/2023	3880		Administrative Review	FSD	
<b>Comments</b>					
<b>Salad Bar and Dietary Specs</b>			<b>Created By</b>		<b>Created Date</b>
Middle and High school students have access to grain and meat/meat alternate options on the salad bar in addition to the planned menu. These foods must be taken into account when determining the dietary specifications (calories, saturated fat, trans fat, and sodium), so this should be considered when analyzing planned menus. However, current usage of the salad bar items does not seem excessive based on production records submitted and on-site observation.					12/12/2023 12:44:51 PM

# Administrative Review Report

Johnson Creek School District