

Administrative Review Report

Waterloo School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/21/2023	04/29/2024
On-Site Review	04/30/2024	05/01/2024
Site Selection Worksheet	12/21/2023	12/28/2023
Entrance Conference	04/30/2024	04/30/2024
Exit Conference	05/01/2024	05/01/2024

Commendations:

From the Nutrition Program Consultant:

Thank you to the school staff members for being welcoming during the review. Thank you for sending documentation and completing the off-site questions in advance, it helps to expedite the on-site portion of the review. Thank you to the school nutrition staff for being available during the on-site review to answer questions and provide documentation when requested.

From the Public Health Nutritionist (PHN):

Thank you to all the staff at Waterloo School District for the warm welcome and cooperation during Waterloo's Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review and helping us to gather the needed meal pattern documentation and information prior to our visit. Thank you for serving healthy, nutritious meals to your students!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training (SNST) online and in person. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

Marketing refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. The goal of marketing is to match your products and services to the customers you aim to serve. The [Marketing Your Program webpage](#) provides tools and resources to market your program and show how Wisconsin School Meals Rock!

It is recommended that school staff seek out opportunities for additional training on the student information system. It seems like staff would greatly benefit from learning more about the features and codes in the system. It may also be a good idea to talk to other schools that use the same software to see if there are any tips to share on using the food service module. This may also help with finding ways to streamline the school nutrition processes.

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)
Question #	103
Corrective Action History	<p><u>Finding:</u> The SFA was not correctly using the 30-day carryover for students with an eligibility status from the previous school year. (7 CFR 245.6)</p> <p><u>Corrective Action:</u> Provide a corrective action plan on how the 30-day carryover will be provided to students.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	700
Corrective Action History	<p><u>Finding:</u> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p><u>Corrective Action:</u> Review the Annual Food Service Financial Report webcast on the DPI website. Using the Annual Financial Report Template notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS or email to Nutrition Program Consultant. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action History	<p><u>Finding:</u> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p>225 free and reduced price application determinations were reviewed, 14 errors were identified, 1 of which will be excluded from fiscal action. This is a 5.78% BI error rate, fiscal action will be assessed for errors over 3%.</p> <p><u>Corrective Action:</u> Utilizing the SFA-1 form or file "Apps Requiring Adverse Action" provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1 or specified file above, including all corrective action dates listed next to each error into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	133
Corrective Action History	<p><u>Finding:</u> Students directly certified were not receiving appropriate free or reduced meal benefits.</p> <p><u>Corrective Action:</u> Notify the household of the correct eligibility and upload a copy of the letter and documentation verifying your system has been updated with the correct eligibility into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	138

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Corrective Action History	<p><u>Finding:</u> The Benefit Issuance (BI) list did not accurately discontinue meal eligibility benefits for students that did not qualify after the 30-day carryover.</p> <p><u>Corrective Action 1:</u> Notify the household(s) of the reduction in benefits and upload a copy of the adverse action letter into SNACS.</p> <p><u>Corrective Action 2:</u> Provide documentation that shows the BI list and POS have been updated with the correct eligibility 10 days after the notification is sent.</p>
Form Name	Verification (207 - 215)
Question #	207
Corrective Action History	<p><u>Finding:</u> SFA did not complete the verification process per 7 CFR 245.2 and did not send the "We Have Checked" notification letters to the households communicating the result of verification.</p> <p><u>Corrective Action 1:</u> Send the "We Have Checked" notification letters to the appropriate households and upload all the completed verification documentation into SNACS.</p> <p><u>Corrective Action 2:</u> Submit a statement of understanding of the appropriate steps to completing verification.</p>
Form Name	Verification (207 - 215)
Question #	208
Corrective Action History	<p><u>Finding:</u> SFA did not complete a confirmation review before verifying application(s).</p> <p><u>Corrective Action:</u> Complete the The Verification Process and the Verification Collection Report (Part 2) online training, submit the certificate of completion 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	Meal Counting and Claiming (314 - 316)
Question #	314
Corrective Action History	<p><u>Finding:</u> It was observed that field trip meals are being counted before the students took the meal.</p> <p>Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served.</p> <p>Some meal count systems that are not acceptable include:</p> <ul style="list-style-type: none"> • Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served. • Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal. • Backout counts - Counting the number of leftover meals from the starting meal count do not account for dropped trays, or that each entrée was part of a reimbursable meal.

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	<p><u>Corrective Action:</u> Provide a statement of how this point of service will be corrected so that it accurately counts the meal as the meal is being served to the student.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action History	<p><u>Finding:</u> The correct non-discrimination statement was not included on all program materials and was missing from the Local Wellness Policy, Food Service policy 760 and District School Food Service Account Collection policy 761.</p> <p><u>Corrective Action:</u> Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1219
Corrective Action History	<p><u>Finding:</u> Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30), specifically the determining official.</p> <p><u>Corrective Action:</u> Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties, the determining official already has civil rights for this school year.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action History	<p><u>Finding:</u> The SFA did all of the required food safety standard operating procedures and is missing field trip meals. 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).</p> <p><u>Corrective Action:</u> Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	400
Corrective Action History	<p><u>Finding:</u> The salad bar is located beyond the point of service (POS). Prior approval is required from the DPI before locating a salad bar beyond the POS. In order to locate the salad bar beyond the POS, the following requirements must be met:</p> <ul style="list-style-type: none"> a) All students leave the service line and POS with three full components, including ½ c fruit/veg (if OVS is implemented) to ensure reimbursable meals are served, b) Salad bar signage is used to demonstrate proper portion sizes, and

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	<p>c) Proper portion control utensils and/or pre-portioned servings are included on salad bar.</p> <p>Since the salad bar was located beyond the POS during the week of review, and students were being marked off as having a reimbursable meal prior to having access to the items on the salad bar, the salad bar items were not included when evaluating the menu served during the week of review. This contributed to the daily and weekly vegetable shortages cited under Finding #410.</p> <p><u>Corrective Action:</u> Submit a statement including logistics and timeline of how the food service department will arrange the cafeteria to have the salad bar located before the POS or describe specifically how the SFA will ensure that the above salad bar requirements are met for a salad bar located beyond the POS.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	402
Corrective Action History	<p><u>Finding:</u> Due to the location of the salad bar being after the POS, and therefore not being included in meeting the daily meal pattern requirements, the menu that was planned to be served to the students during the day of on-site lunch observation would not have met the daily vegetable requirement.</p> <ul style="list-style-type: none"> • Hashbrown Patty, 1 patty, ¼ cup vegetable <p>The daily minimum requirement for the vegetable component for K-8 is ¾ cup vegetable.</p> <p>DPI encouraged food service staff and administration to rearrange the meal service line to relocate the salad bar to before the POS, but it was determined that communication must first be sent out notifying teachers of the change. Prior to meal service, the FSD made a menu change to hashbrowns, and increased the serving size to ensure students had access to ¾ cup vegetable prior to the POS. Therefore, all students going through the meal service line had access to all menu components, in at least their minimum required serving size.</p> <p><u>Corrective Action:</u> The location of the salad bar will be addressed in Finding #400. Since the lunch menu was updated prior to meal service, no further corrective action is required.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
Corrective Action History	<p><u>Finding:</u> The same meal pattern is used for grades K-12 at lunch. Because there is no overlap with the dietary specifications for these age/grade groups under the NSLP, a separate K-8 and 9-12 meal pattern must be followed.</p> <p><u>Corrective Action:</u> Submit a statement explaining how a separate K-8 and 9-12 meal pattern will be followed going forward.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)

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Question #	409
Corrective Action History	<p><u>Finding:</u> If meals are provided to children on a field trip and claimed for reimbursement, they must meet daily meal pattern requirements. Based on conversations with the FSD and staff on-site, the current bagged lunch provided to students includes a turkey sandwich, crackers, applesauce cup, carrots, and a bottle of water. The field trip meal is missing the milk component, and therefore may not be considered a reimbursable meal.</p> <p>Fiscal action is required for any missing components. Per the business manager, zero field trip meals were served to elementary students during the review week or month (March), and therefore no fiscal action will be taken. The menu served to students on field trips must be updated to include all components.</p> <p><u>Corrective Action:</u> Submit a statement of understanding that all bagged lunches provided to students on a field trip and being claimed for reimbursement must contain all meal pattern components.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action History	<p><u>Finding 1:</u> The daily and weekly minimum requirement for the vegetable component was not met for K-8 for lunch during the week of review. During the day of on-site lunch observation, it was noted that the salad bar has been located beyond the POS, and students were being marked off as having a reimbursable meal prior to having access to the items on the salad bar. Therefore, the salad bar items could not be included when evaluating the menu served during the week of review. The following represents the planned portion size of vegetables served on the main hot entrée line:</p> <ul style="list-style-type: none"> • Monday, 3/18/24: Curly Fries, ½ cup, ½ cup vegetable • Tuesday, 3/19/24: Hashbrown, 1, ¼cup vegetable • Wednesday, 3/20/24: Carrots ½ cup, ½ cup vegetable • Thursday, 3/21/24: Corn, ½ cup, ½ cup vegetable • Friday, 3/22/24: Marinara Sauce ¼ cup, ¼ cup vegetable <ul style="list-style-type: none"> ○ On this day, Riviera Blend was handwritten on the production record, however there was no planned serving size, no number of servings prepared, and no amount prepared in bulk units. The production record does not indicate that this menu item was served. <p>The daily minimum requirement for K-8 is ¾ cup vegetable. The weekly minimum requirement is 3 ¾ cup.</p> <p><u>Finding 2:</u> The daily and weekly minimum requirement for grain was not met for K-8 for lunch during the week of review. The following represents the planned portion size:</p> <ul style="list-style-type: none"> • Thursday, March 21: Popcorn Chicken, 8 pieces, 0.5 oz eq grain <ul style="list-style-type: none"> ○ Per the crediting documentation for this product, 12 pieces = 2 oz eq M/MA and 1 oz eq grain. <p>The daily minimum requirement for K-8 at lunch is 1 oz eq grain. The weekly minimum requirement for K-8 for lunch is 8 oz eq grain.</p>

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Finding 3: The weekly minimum requirement for M/MA was not met for K-8 for lunch during the week of review. The following represented the planned portion sizes:

- Monday, 3/18/24: Brat, 1.5 oz eq M/MA
- Tuesday, 3/19/24: French Toast (4), 1.25 oz eq M/MA and Sausage (1), 0.75 oz eq M/MA
- Wednesday, 3/20/24: Mini Corn Dogs (6), 1.5 oz eq M/MA
- Thursday, 3/21/24: Popcorn Chicken (8), 1.25 oz eq M/MA
- Friday, 3/22/24: Pizza Dippers (2), 2 oz eq M/MA

8.25 oz eq M/MA was offered over the course of the week, and 9 oz eq M/MA is required for the K-8 lunch meal pattern.

As a reminder, if a repeat component shortage is found during the next Administrative Review, fiscal action will be required.

Corrective Action 1: Submit verification that the FSD has completed additional Lunch meal pattern training (e.g. Lunch Meal Pattern webcast on the DPI Online Learning Library <https://dpi.wi.gov/school-nutrition/training/online-learning>).

Corrective Action 2: Submit a menu planning worksheet for Lunch for the K-8 age/grade group for the week of review (March 18-22, 2024), showing that all components and quantities will be met (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning>). Please complete menu planning worksheets to reflect the changes to the originally served menu. Refer to the Lunch Meal Pattern Table for daily and weekly requirements (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning>).

Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	411
Corrective Action History	<p>Finding: The daily and weekly minimum requirement for fruit was not met for K-8 at breakfast during the week of review. The following represents the planned portion sizes:</p> <ul style="list-style-type: none">• Monday, March 18: Fruit Cup, ½ cup= ½ cup fruit• Thursday, March 21: Fruit Cup, ½ cup= ½ cup fruit• Friday, March 22: Fruit Cup, ½ cup= ½ cup fruit <p>The daily minimum requirement for grades K-12 at breakfast is 1 cup of fruit. The weekly minimum requirement for grades K-12 at breakfast is 5 cups of fruit.</p> <p>Corrective Action 1: Submit verification that the FSD and any other staff with menu planning responsibilities have completed additional Breakfast meal pattern training (e.g. Breakfast Meal Pattern webcast on the DPI Online Learning Library https://dpi.wi.gov/school-nutrition/training/online-learning).</p> <p>Corrective Action 2: Describe specifically how the daily minimum requirement for fruit will be met at breakfast during the days containing the shortage during the week of review (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>

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Site Name	Waterloo El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	430
Corrective Action History	<p><u>Finding:</u> Breakfast and lunch production records are missing the following information, including:</p> <p>Breakfast</p> <ul style="list-style-type: none"> • Menu item with recipe name or reference number or product name/description - More detail should be added to the menu items listed on the production record. • In addition, when serving a variety of cereal bowls, cereal bars, or fruit cups, each specific flavor must be listed on the production record, unless a variety item recipe is on file for these menu items. • All menu items (e.g. mini pancakes and UBR breakfast round) need to be written on separate lines, and all production record requirements must be completed for each individual menu item. • Serving Site • Number of reimbursable and non-reimbursable (adult) meals planned and served • Planned/actual quantity prepared in bulk units (e.g. # of cans, bags, boxes, pounds) <p>Lunch</p> <ul style="list-style-type: none"> • Serving site (Waterloo Elementary) • Number of reimbursable and non-reimbursable (adult) meals planned • Planned/actual quantity prepared in bulk units (e.g. # of cans, bags, boxes, pounds) • Condiment usage <p>While there is no required production record template, examples are posted on the Production Records webpage (http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/productionrecords).</p> <p>In addition, it was observed that production record information is being filled out entirely after meal service. Production records are intended to be useful tools to record information prior to production, during production, and following production. They should be available for staff to reference when preparing breakfast and lunch and are essential for knowing the menu items that will be served, the planned serving size(s), and the meal component contribution of each menu item.</p> <p>Please refer to the Production Record Requirements list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p><u>Corrective Action 1:</u> Submit verification that the FSD has completed additional Production Record training (e.g. SNT Production Records webcast on the DPI Online Learning Library https://dpi.wi.gov/school-nutrition/training/online-learning).</p> <p><u>Corrective Action 2:</u> Submit one full week of completed breakfast and lunch production records, including all requirements recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Waterloo El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)

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Question #	431
Corrective Action History	<p><u>Finding:</u> There were no planned serving sizes on the salad bar production records, and some days were missing the amount prepared and/or leftover amounts. Salad bar production records must meet the same criteria as production records used to record main line items. Please refer to the Production Record Requirements list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Technical assistance provided on-site regarding production record requirements.</p> <p><u>Corrective Action:</u> Submit one week of updated salad bar production records with serving sizes, amount prepared, and amounts leftover for each menu item. Although not required, DPI's Salad Bar Production Records may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/salad-bar-production-record.xlsx).</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	434
Corrective Action History	<p><u>Finding:</u> Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the turkey sandwich, served as the entrée option available for field-trip bagged meals.</p> <p><u>Corrective Action:</u> Submit a standardized recipe for the turkey sandwich. Be sure to include all requirements of a standardized recipe, including 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). Please upload a copy of the crediting documents and/or product information for all ingredients used to make the sandwich.</p>
Site Name	Waterloo EI
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action History	<p><u>Finding:</u> The K-8 meal pattern requires the menu planner to offer students a certain amount of vegetables from the five vegetable subgroups over the course of the week. During the day of on-site lunch observation, it was noted that the salad bar has been located beyond the POS, and students were being marked off as having a reimbursable meal prior to having access to the items on the salad bar. Therefore, the salad bar items could not be included when evaluating the menu served during the week of review.</p> <p>Based on the production records provided and the vegetables available on the hot entrée line, the following vegetable subgroups were missing or did not meet the weekly requirement.</p> <ul style="list-style-type: none"> • Zero cups of dark green vegetables served; ½ cup required • 5/8 cups of red/orange vegetables served; ¾ cup required • Zero cups of beans/peas/legumes served; ½ cup required

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	<p>Please note that even if the salad bar had been located prior to the POS, there still would have been zero cups of the beans/peas/legumes subgroup served to students during this week.</p> <p>As a reminder, if a repeat missing vegetable subgroup violation is found during the next Administrative Review, fiscal action will be required.</p> <p><u>Corrective Action:</u> Please refer to the corrective action for Finding #410 and include on the menu planning worksheet how the missing vegetable subgroups and shortages will be fixed for the menu served during the week of review.</p>
Site Name	Waterloo EI
Form Name	Offer vs Serve (500-502)
Question #	500
Corrective Action History	<p><u>Finding:</u> Food service staff were unclear about the Offer versus Serve (OVS) requirements for lunch. There was confusion over the difference between the lunch meal pattern requirements, the planned menu, and OVS. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#menuplanningtools). OVS occurs solely during meal service and allows students to decline some of the menu items.</p> <p>All students observed took a reimbursable meal during the day of on-site lunch observation, however it is important for staff to fully understand the OVS requirements. Some students were observed having to take more than what was required.</p> <p><u>Corrective Action:</u> The FSD and all staff responsible for determining reimbursable meals should attend training on the Lunch Meal Pattern and OVS. The e-learning courses available on our webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns~:text=GOALS%3A%20Elective-,Lunch%20Meal%20Pattern,-Learn%20about%20the; https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns~:text=Standards%20and%20GOALS-.,Offer%20versus%20Serve.-Offer%20versus%20Serve). Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Waterloo EI
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action History	<p><u>Finding:</u> The nondiscrimination “And Justice for All” poster was located in the meal service area and visible to students (FNS Instruction 113), however was not the correct size.</p> <p><u>Corrective Action:</u> Hang the correct size and in color USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Corrected while onsite, no further action required.</p>
Site Name	Waterloo EI

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Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1404
Corrective Action History	<p><u>Finding:</u> Time-temperature control for safety (TCS) food (specifically milk) was held outside of temperature control during breakfast service. The milk is served from a crate set on the table without the use of any cold holding equipment. The food service worker uses a small bottle of water that sits in the crate of milks and checks the temperature before and after service, however, milk is a different viscosity than water and may not be the same temperature. This practice would constitute "Using Time Alone as a Public Health Control for TCS Foods" (TPHC) since the temperature control is not being used. The unserved milk is saved for future service if the temperature of the water is below 41 degrees F--this is not allowable under TPHC.</p> <p><u>Corrective Action:</u> Submit a plan describing how the procedures will be modified and the food safety plan updates. In SNACS, upload any corresponding SOPs that will be added to the food safety plan. The SFA could:</p> <ul style="list-style-type: none"> • Utilize ice blocks under the crate of milk OR ice-lined containers (such as milk barrels or milk bags with frozen inserts) on the serving line to provide temperature control for cold TCS food items. With this plan, the temperature of the items should be taken and recorded at the end of service before returning to the cooler. The items should be at 41 degrees or below. • Utilize time as a public health control (TPHC) procedures. With this option, temperature does not dictate and TCS foods held outside of temperature control are discarded at the end of service regardless of temperature. A corresponding SOP is needed. DPI has SOPs for these procedures encompassed in Site-Specific Food Safety Plan Template for Wisconsin School Food Authorities, they are labeled as SOP 34 & 35 in this document. <p>Work with local regulatory authority/sanitarian to develop an acceptable alternative method for serving TCS foods outside of temperature control. For example, developing an approved process for serving TCS items outside of temperature control, temping the items at end of service, and reserving if cold items are below 41 degrees F and hot items are above 135 degrees F. An SOP should be developed and discussed with the local sanitarian.</p>
Site Name	Waterloo El
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action History	<p><u>Finding:</u> The most recent food safety inspection report was not posted in a publicly visible location.</p> <p><u>Corrective Action:</u> Provide a photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected onsite, no further action required.</p>
Site Name	Waterloo El
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407

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Corrective Action History	<p><u>Finding:</u> Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP's for hairnet usage and glove usage. The following violations were observed:</p> <ul style="list-style-type: none"> • Not all employees within the kitchen were wearing hairnets • A staff member pulled a pan of tator tots out of a warmer using a visibly dirty hot pad with gloved hands and then served the tator tots using their gloved hands without changing gloves • A staff member with gloves on scratched ears and did not change gloves before serving food to students <p><u>Corrective Action:</u> Modify the SOP so that it aligns with actual practices, or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.</p>
Site Name	Waterloo EI
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	<p><u>Finding:</u> The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> • Broccoli Florets- Product of Mexico • Blueberries- Product of Mexico • Cucumbers- Product of Mexico • Green Pepper- Product of Mexico • Yellow Peppers- Product of Mexico • Red Pepper- Product of Canada <p><u>Corrective Action:</u> Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. 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	Waterloo EI
Form Name	Wisconsin School Day Milk Program
Question #	4
Corrective Action History	<p><u>Finding:</u> Milks are being claimed based on attendance counts or another counting system rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receives a milk. "Classroom counts" prior to service are important for production purposes but do not provide an accurate count of which students actually took a milk.</p> <p><u>Corrective Action 1:</u> Submit a detailed statement, outlining how the school has changed the accountability system for claiming milk to include an approved POS.</p> <p><u>Corrective Action 2:</u> Retrain staff on the new POS procedures. Upload documentation to support the training that was completed and staff sign in sheet into SNACS.</p>

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Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
05/01/2024	4970		Administrative Review		AR
Comments					
<p>The Wisconsin School Day Milk Program (WSDMP) reimburses schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced-price meals. One half-pint of milk may be claimed per eligible student each school day for students identified as free or reduced-price status. Milk served to students with paid eligibility status is counted as a non-program food cost and revenue.</p>					
05/01/2024	4969		Administrative Review		FSD/AR
Comments					
<p>SFAs are required to inform families where to find free summer meals. It is recommended to share the following in an end of year newsletter and on the SFA website: To find free summer meal locations:</p> <ul style="list-style-type: none"> • Call 211 to locate meals in the area • Text 'food' (in English or Spanish) to 304-304 • Check the Site Finder Map <ul style="list-style-type: none"> ○ Summer Meals Site Finder – English ○ Summer Meals Site Finder – Spanish • Visit the Summer Food Service Program webpage 					
05/01/2024	4968		Administrative Review		FSD/AR
Comments					
<p>Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell- Training" document.</p>					
05/01/2024	4891	433	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Crediting Documentation:</u> Processed products not listed in the USDA Food Buying Guide (FBG) require a Child Nutrition (CN) label, product formulation statement (PFS), or USDA Product Information Sheet to credit toward the meal pattern. There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing information. Product specification sheets are not acceptable forms of crediting documentation. A PFS is considered acceptable crediting documentation and it shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label or USDA Product Information Sheet.</p> <p>A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. The crediting decision-making tree (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-decision-making-tree.pdf) helps staff determine what types of documentation are needed.</p>					
05/01/2024	4966	409	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Field Trips:</u> If meals are provided to children on a field trip, they must contain all components and meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food items, establishing a way to collect meal payments, and obtaining a</p>					

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count by eligibility category. If your school implements Offer versus Serve (OVS), it must continue to be implemented, to the extent possible, during field trip meals.

05/01/2024	4965		Administrative Review	Food Service Director
Comments				
<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 Sharing and No Thank You Tables Toolkit for a comprehensive guide including standard operating procedures.</p> <p>Definitions:</p> <ul style="list-style-type: none"> • A sharing table is a designated table for food and beverage items that students do not intend to consume. Students may 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. • 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 may not 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. <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>				
05/01/2024	4964		Administrative Review	Food Service Director
Comments				
<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs. Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.</p>				
05/01/2024	4963		Administrative Review	Food Service Director
Comments				
<p>Staff must record temperatures daily using temperature logs. For cooling equipment, posting temperature logs directly on the equipment can make recording convenient and routine. Records from the food safety program must be kept for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year.</p>				
05/01/2024	4962		Administrative Review	Food Service Director
Comments				
<p>Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's food safety plan. The most recent food safety inspection report must be posted in public view.</p>				
05/01/2024	4876	208	Administrative Review	ALL Authorized Representative/Verification Official

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Comments					
<p>When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.</p>					
05/01/2024	4924		Administrative Review		Authorized Representative
Comments					
<p>LEAs that have a 5% or more error rate during the certification review of the Administrative Review will be required to conduct a second independent review of applications in the following school year. More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed from DPI during the summer following the year the review occurred with more information for those SFAs that are required to conduct an independent review of applications.</p>					
05/01/2024	4874	700	Administrative Review	ALL	Authorized Representative
Comments					
<p>The Annual Financial Report Manual 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.</p>					
04/30/2024	4894	410	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Dietary Specifications:</u> During the week of review, extra salads left from a foodservice fundraiser (not previously served) were served to students on the salad bar. While serving extra menu items that are not intended to credit towards meal pattern is allowable, these items must be included in the dietary specifications over the course of the week (calories, saturated fat, trans fat, and sodium). Technical assistance provided to FSD on menu planning, dietary specifications, and food safety practices.</p>					
04/30/2024	4893	430	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Production Records:</u> Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Production records submitted for the week of review were missing information (See finding #430 for additional details and required corrective action). Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Production record templates for breakfast and lunch can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p>					
<p>During on-site observations, it was observed that the current system for completing production records includes recording all menu information after meal service. Technical assistance was provided on-site regarding production record requirements and suggestions going forward. Production records are intended to be useful tools to record information prior to production, during production, and following production. Continue to work with staff to ensure all requirements are being met.</p>					
04/30/2024	4892	430	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Condiment Usage:</u> Condiment usage was not monitored nor were portion sizes communicated to students. Please monitor your school’s condiment usage and communicate appropriate portion sizes to students, as condiments can be a significant source of calories, saturated fat, and sodium. Promote appropriate serving sizes by adding signage at the condiment station and/or photos of the planned portion size of the condiments.</p>					
04/30/2024	4890	410	Administrative Review	Waterloo EI	FSD

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Comments					
<p><u>Fruit Juice</u>: No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. This requirement was met at both breakfast and lunch during the week of review, but technical assistance was provided on-site regarding future menu planning questions. It is possible to offer juice daily and still meet the 50 percent juice limit, as long as it is offered along with fruit (fresh, frozen, dried, or canned). The total amount of juice available at all meals over the course of the week (separately for breakfast and lunch) is divided by this total fruit offering to determine the weekly juice offering.</p>					
04/30/2024	4889	404	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Breakfast Signage</u>: Breakfast signage was posted, however it did not specify how to count each food item, nor did it communicate what students need to select in order to have a reimbursable meal. Technical assistance was provided on-site including posting the daily menu items. Reminder, the menu planner must determine in advance whether items crediting as 2 oz eq count as one or two food items, and this information should be communicated to staff via the production record. For example, the mini pancakes served on the day of observation were 2 oz eq, so they could be counted as either one or two food items.</p>					
04/30/2024	4888	404	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Salad Bar Signage</u>: When using the vegetables on the salad bar to meet the daily and weekly vegetable requirements, including the vegetable subgroup requirements, portion sizes of at least 1/2 cup each should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).</p>					
04/30/2024	4918		Administrative Review		Authorized Representative & Determining Official
Comments					
<p>Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial. It is recommended to use a different color pen to mark up clarifications on an application. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.</p>					
04/30/2024	4917		Administrative Review		Authorized Representative & Determining Official
Comments					
<p>The total household member size box includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.</p>					
04/30/2024	4915		Administrative Review		Authorized Representative/Determining Official
Comments					
<p>A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which a student(s) is approved and sign or initial and date the application.</p>					
04/30/2024	4887	501	Administrative Review	Waterloo EI	FSD

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Comments					
<p><u>Offer versus Serve (OVS)</u>: It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. The school must offer the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offerings, students must select at least three full, different, food components, one of which is ½ cup fruit and/or vegetable. Use the OVS In a Nutshell for guidance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-in-a-nutshell.pdf).</p>					
04/30/2024	4886	500	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Offer versus Serve (OVS) versus Planned Menu</u>: There is confusion over the difference between Offer Versus Serve (OVS) and the planned menu. The planned menu must be in compliance with all meal pattern requirements, both daily and weekly (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#menuplanningtools). OVS occurs solely during meal service. Therefore, the printed menu, recipes, portion sizes on production records, etc. should reflect the menu and portion sizes as planned.</p>					
04/30/2024	4885	410	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Menu Planning Worksheets</u>: Menu planning worksheets are helpful tools to ensure meal pattern requirements are met at both breakfast and lunch. These can be found on the NSLP Menu Planning webpage, under the Menu Planning Tools heading (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p>					
04/30/2024	4856	811	Administrative Review	Waterloo EI	Authorized Representative/Food Service Director
Comments					
<p>The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf. All “And Justice for All” posters must be printed at 11” width x 17” height. The minimum text size to be used on the posters is 14-point.</p>					
04/30/2024	4884	437	Administrative Review	Waterloo EI	FSD
Comments					
<p><u>Vegetable Subgroups</u>: The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) to identify vegetables in each subgroup.</p>					