Darlington Community School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/05/2023	11/07/2023
On-Site Review	11/07/2023	11/08/2023
Site Selection Worksheet	10/25/2023	10/25/2023
Entrance Conference	10/09/2023	10/09/2023
Exit Conference	11/14/2023	11/28/2023

Commendations:

Thank you to all staff at Darlington Community School District for the warm welcome and cooperation during this Administrative Review (AR). Your time and patience in working through this review is greatly appreciated. The variety of menu options available to students is admirable and appreciated by your students. Administration staff is organized and conscientious. The kitchen and cafeteria are clean and orderly. The annual required public release is sent to many different community sites which shows a commitment to serving Darlington families. On the student benefit issuance list 230 records were reviewed and only 1 error found. Thank you for serving your students and community.

Recommendations:

Those involved with USDA School Meal Programs are encouraged to attend Wisconsin Department of Public Instruction (DPI) trainings. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. More information can be found on the Training webpage (<u>https://dpi.wi.gov/school-nutrition/training</u>). Additionally, webcasts and self-guided e-learning courses are available in the Online Learning Library (<u>https://dpi.wi.gov/school-nutrition/training</u>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the

year. A complete list of DPI SNT staff can be found on our website (<u>https://dpi.wi.gov/school-nutrition/directory</u>).

Darlington Community School District

Findings and Corrective Action:

Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016) A draft of an Unpaid Meal Policy is included in a draft Food Services policy (dated 10/20/23) which is scheduled to go to the school board for review. See the TA section for information about aligning semester exam waivers with negative student meal account balances as the supplemental draft section on Semester Exam Waiver Policy indicates. Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually. Please note that only posting the policy to the school website does not meet the requirement.
Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	700
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding 1: On the 22/23 Annual Financial Report, all of the revenues and expenses were not broken out correctly by program and expense category (7 CFR 210.19). The non-program foods category showed a year end loss; some non-program foods were listed as expenses rather than revenues. The non-program foods "program" line cannot show a negative balance; a transfer from Fund 50 must be made to cover all the costs of non-program foods. Corrective Action 1: Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the correct revenues and expenses broken out by program and category. Show any transfers in to Fund 50 based on the non-program foods balance. Upload this document into SNACS. 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.
Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	777
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	 Finding: The SFA has received Supply Chain Assistance Funds on 3/22/22, 11/9/22 and 1/24/23 (Round 1 and the Round 1 Reallocation, and Rounds 2 & amp; 3) and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, and the funds are not being tracked separately. Corrective Action 1: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. Corrective Action 2: Upload the document/spreadsheet/screen shot of the method you will use to track the spend down of all SCA funds received.
Site Name	
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. Corrective Action 1: The FSD will watch the Nonprogram Food Revenue webcast on the DPI website (<u>https://media.dpi.wi.gov/school-</u><u>nutrition/nonprogram-food-revenues/story.html</u>) and upload their certificate of completion into SNACS. Corrective Action 2: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. Corrective Action 3: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the name and position responsible for ensuring this is completed.
Site Name	
Form Name	Civil Rights (800 - 807)
Question #	803
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Findings: The SFA does not have procedures for handling discrimination complaints specific to the school meal program (FNS Instruction 113-1). Grievance Procedures for Title VI do not cover the NSLP, SBP or WSDMP. Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA. Share these with front office staff and program staff. Upload into SNACS. Submit a statement describing how/when you shared these procedures with staff.
Site Name	

Form Name	Civil Rights (800 - 807)
Question #	805
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The SFA has a draft Special Dietary Needs policy within the draft (dated 10/20/23) Food Services policy which is scheduled to go to the school board. However, the policy does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs. Corrective Action 1: Revise the draft Special Dietary Needs policy to include language which explains how parents and guardians may request the SFA meet their student's needs within school meals. See the suggested language in the TA section of this report or use the example policy on the SNT webpage: https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs. Upload the revised draft to SNACS. Corrective Action 2: Provide a timeline for when a Special Dietary Needs policy will be put in place. Provide the name and title of the SFA representative that will ensure compliance
Site Name	
Form Name	Local School Wellness (1000 - 1006)
Question #	1002
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) has been reviewed or updated. The LWP clearly states the policy will be "assessed and updated as indicated at least yearly." The provided copy of the LWP was last updated May 7, 2018. Corrective Action: Provide a plan on when the Wellness Committee will meet, review and update the policy (while still containing the required components of the policy). See the CA for Question 1003 below.
Site Name	
Form Name	Local School Wellness (1000 - 1006)
Question #	1003
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Finding : SFA did not include a diverse group of stakeholders to participate in the committee update and review the LWP per 7 CFR 210.31. This list of committee member positions (SFA's response to Q #1003) is directly from the LWP itself, however there is no indication this committee has ever met nor that these individuals are aware they are on the Wellness Committee.

	 Corrective Action 1: Invite the public to be on the Wellness committee. Upload proof of this announcement/invitation into SNACS. Corrective Action 2: Identify and Designate all members of the Wellness Committee. Upload a list into SNACS of Wellness Committee members full names and positions.
	Corrective Action 3 : Hold a Wellness committee meeting. Upload into SNACS the minutes of the Wellness Committee meeting.
Site Name	
Form Name	Local School Wellness (1000 - 1006)
Question #	1006
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The SFA could not provide documentation of sharing the results of the Local Wellness Policy (LWP) triennial assessment with the public per 7 CFR 210.31. Corrective Action 1: Upload documentation that "Assessment of the Local Wellness Policy" was a school board agenda item from anytime in the last 3 years OR Notify the public of the results of the last LWP triennial including the WellSAT scores and the completed Report Card. Then upload documentation to demonstrate this method of notifying the public.
Site Name	
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). See the TA section of this report for access to SFSP outreach information. Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Include the method of communication and time frame for distributing SFSP outreach materials.
Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	136
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA has a practice in place which discloses student eligibilities to more non-program school staff than necessary. Overt identification of student's

	Corrective Action 2: Identify the names and positions of any additional staff who may need access to student eligibility information throughout the school year. Have them complete a Disclosure Agreement each year. Upload	
	completed disclosure agreements for 23/24 into SNACS.	
	Corrective Action 3: Require all staff identified in CA 1 and 2 to complete the DPI Civil Rights webcast prior to the school year and prior to any work related to student eligibilities. Keep a roster of this training including each individual's training date and signature. Submit a statement in SNACS about how you will manage this requirement and who at your SFA will oversee this process.	
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	 Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. Corrective Action: Include all training hours completed this school year for each school food service employee and the food service director onto a DPI 	
	professional standards training tracking tool and upload each into SNACS.	
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date	Flagged	
Due Date Corrective Action Status		

Darlington Hi	
Meal Counting and Claiming - Day of Review (317-321)	
318	
No TA Log# found	
Flagged	
 Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7) because the point of service (POS) did not provide a reliable meal count due to students being allowed to enter the PIN of another student who is not present. Corrective Action 1: Cease immediately the practice of allowing any student to use another student's PIN or to pick-up a meal for another student. Understand that this practice makes your SFA out of compliance with program requirements. Submit a statement describing how you will inform food service staff and students that this is not allowable. Corrective Action 2: Require all staff working at the POS (for both breakfast and lunch) to complete the Counting, Claiming and Point of Service training. Upload their certificates of completion into SNACS. Record this 45 minutes of training time on their individual trackers. 	
Darlington Hi	
Meal Components and Quantities - Day of Review (400-408)	
404	
No TA Log# found	
Flagged	
Adequate signage helps ensure that students select reimbursable meals. Signage was posted for breakfast and lunch. However, breakfast signage stated, "Breakfast consists of two grains and one fruit to meet requirement." The lunch menu, while posted on a larger board, was not clear how to build a reimbursable meal. Additionally, no signage contained the statement that students must select at least 1/2 cup fruit and/or vegetable, or combination. There was one sign that stated, "Breakfast - 3 is good, 4 is best and Lunch - 3 is good, 4 is better, 5 is best," but this was behind the POS, at the beginning of the meal service line. Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch- program/menu-planning/signage). Corrective Action: Submit a picture of completed signage posted near the	

	lunch and breakfast service line, including the requirement to select at least $\frac{1}{2}$	
	cup fruit and/or vegetable, or a combination.	
Site Name	Darlington Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
ΓA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	 Finding: On Thursday, October 5, 2023, the scalloped potatoes and ham entrée choice was missing the grain component. A grain was not recorded on the production records that day, nor was a grain for this entrée printed on the monthly menu. Fiscal action is required for a missing component. Corrective Action: Submit a statement explaining how this missing component will be fixed during the week of review for the scalloped potatoes and ham entrée. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. 	
Site Name	Darlington Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Finding: The planned menu for the week of review did not meet daily and weekly meal pattern requirements. Production records, standardized recipes, and crediting documentation are evaluated to determine how meals planned and served meet meal pattern requirements. Due to inconsistencies between documentation (e.g. production records, standardized recipes, temperature logs, etc.), discussion with school nutrition professionals, and observations, meal pattern requirements for grains, MMA, vegetables, and vegetable subgroups were not met.	
	 The insufficient quantities include: Insufficient daily grain quantity on Tuesday, Thursday, and Friday of the week of review for the PBJ and Chef salad entrees. Other grains were not accessible to students selected these entrees. The Chef Salad recipe was not followed, and the salads were offered with 0.45 oz of croutons (0.5 oz eq, enriched) and Goldfish (0.75 oz eq, WGR), totaling 1.25 oz eq. The PBJ credited as 1.0 oz eq WGR, and there was no documentation to support the sandwich was served with Goldfish. Each entrée is short of the daily minimum requirement of 2.0 oz eq grains for the 9-12 age/grade group. Insufficient weekly grain quantity offered during the week of review. This was a finding on the previous Administrative Review and is subject to fiscal action. Monday: 4.0 oz eq grains (all entrees meet minimum grain requirements) Tuesday: 1.0 oz eq grains (PBJ and Cheese entrée) 	

Darlington Community School District

Due Date		
Corrective Action Status	Flagged	
Corrective Action History	 Finding: The daily and weekly minimum requirement for grain was not met for K-12 at breakfast during the review period and onsite review. There was a misunderstanding of breakfast meal pattern requirements and crediting grains. Students were instructed to take two grain options and one fruit. However, not all grain options from the wide variety credited as 1.0 oz eq, and it was possible to choose two that did not credit as 1.0 oz eq or count as food items. When crediting documentation was not available, Exhibit A was used to credit grain options, which lead to quantity shortages. For example, with a PFS, Cinnamon Toast Crunch Bars credit as 1.0 oz eq; however, using Exhibit A Group D (cereal bars without nuts, chocolate pieces and/or dried fruit) 40 gm cereal bar divided by 55 gm/oz eq equals 0.72 oz eq, rounded down to 0.5 oz eq. Additionally, not all breakfast menu items offered were creditable (e.g. Chex Mix [non-whole grain and non-enriched], Veggie Straws, cookies). The following items were credited as less than 1.0 oz eq: Oatmeal bar (0.5 oz eq) Chewy Chocolate Chip Granola bar (0.25 oz eq) Chewy S'mores Granola bar (0.25 oz eq) Cereal bars (Cinnamon Toast Crunch, Cocoa Puffs, Trix, Golden Grahams) (0.5 oz eq) Mutri-Grain bars (Apple and Strawberry) (0.5 oz eq) Graham crackers (0.5 oz eq) Cokies (not allowable at breakfast) Chex Mix (first ingredient degermed yellow corn meal) Veggie Straws (not creditable) The minimum grain offered daily was 0.5 oz eq, and weekly was 2.5 oz eq. The daily minimum requirement is 1.0 oz eq, and 9 oz eq weekly. Corrective Action: Submit a menu planning worksheet (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheets.breakfast.doc) for breakfast for the week of review that meets all daily and weekly meal pattern requirements. Food items that do no credit should not be offere	
Site Name	Darlington Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Finding: Menu items with names/reference numbers /descriptions, planned/actual number of servings prepared, planned/actual quantity prepared in bulk units, amounts leftover, and milk types and actual usage by type were not consistently filled in on breakfast production records during the week of review (10/2-10/6/23). Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-	

	record-requirements.pdf).
	Corrective Action: The FSD and school nutrition professionals responsible for completing production records must complete the Production Records webcast from the School Nutrition Online Learning Library (<u>https://dpi.wi.gov/school-nutrition/training/online-learning#production-records-standardized-recipes</u>). Complete the training individually or as a group. Submit a certificate of completion for each individual or a meeting agenda detailing date, time, attendees, and agenda items, including the required training. Submit two full weeks of completed lunch and breakfast production records, including all required information recorded daily. Choose two weeks for each meal (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
Site Name	Darlington Hi
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The weekly juice limit was exceeded at breakfast. No more than half (50 percent) of the total fruit offerings may be in the form of juice. A total of 5 cups of fruit (including whole fruit and juice) were offered during the week of review and of that students were able to select 1 cup of juice daily for 5 cups over the week. This means students were able to select 100% of the fruit component in the form of juice. This exceeds the 50% juice limit. Corrective Action: Submit a statement that explains what changes will be made to the breakfast menu for the week of review to decrease the amount of juice offered and to be compliant with the weekly juice limit.
Site Name	Darlington Hi
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: Product specification sheets were submitted as crediting documentation, however, these are not acceptable meal pattern documents. Technical assistance was provided before and during the onsite review about types of acceptable crediting documentation. At the end of the onsite review, acceptable crediting documentation was not available for the products (listed below) served the week of review and day of onsite review. WG Goldfish [PFS available; PHN granted 1.0 oz eq grains for goldfish bundled with the Chef salad and PBJ entrees, thus crediting documentation required] Diced ham Sliced ham Sliced turkey Beef crumbles, a watermarked CN label was provided

	 Pork taco filling, a watermarked CN label was provided Arrezzi brand meatballs Sysco scalloped potato mix Bagel pizza Sunchips Diced chicken Croutons (nutrition facts label) Items that credit as less than 1.0 oz eq grains using Exhibit A, and require additional documentation to credit as food items. Cinnamon roll Chocolate Chip Oatmeal Bar Chewy granola bars (chocolate chip, peanut butter, smores)[Bundled] Cereal bars Nutrigrain bars [Bundled] Poptarts Corrective Action: Submit acceptable crediting documentation for the products listed above. If proper documentation cannot be obtained, discontinue using these products for school meals and submit crediting documentation for replacement products.
Site Name	Darlington Hi
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. The following recipes were provided but not followed as written and are missing information. Sub Sandwich (turkey and ham) Turkey and Ham Sandwich Chef Salad Scalloped Potatoes and Ham Taco Meat Tuna Salad Sub Meatballs and Sauce Chicken and Gravy Corrective Action: Submit a standardized recipe for each of the recipes above, making sure to include: All sub and sandwich varieties (turkey,ham, and tuna) as separate recipes, Specific and current product information on all recipes, Revisions to actual weights and measurements of ingredients to reflect current preparation, and Accurate number of portions, portion sizes, and total yields.
Site Name	Darlington Hi

Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	436
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: At least 80% of the grains offered weekly on each serving line must be whole grain-rich. At breakfast, a non-whole grain breakfast pizza bagel was offered up to two days per week, and non-whole grain Ritz Bitz (1.25 oz eq), Cheez-Its (1.75 oz eq), 4 oz non-whole grain chocolate muffins (2.0 oz eq) were offered daily. It was possible for students to select up to 100% non-whole grain options. Corrective Action: The FSD must complete The Grain Component webcast (<u>https://media.dpi.wi.gov/school-nutrition/grains-component/index.html#/</u>). Upload the certificate of completion. Please submit 2 to 3 sentences describing how to determine if a grain is whole-grain rich. Describe changes to the menu to comply with the 80% whole grain-rich requirement. Be specific and include serving sizes, nutrition facts labels, ingredient statements, and/or crediting documentation for food items to replace enriched grain items.
Site Name	Darlington Hi
Form Name	Offer vs Serve (500-502)
Question #	500
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The School Nutrition Professionals were unclear about the Offer versus Serve (OVS) requirements for breakfast and though great efforts were made by the State Agency prior to meal service to provide technical assistance and remove non-reimbursable meal items from the line, due to missing crediting documentation and misunderstanding of meal pattern some meals served were non reimbursable. This highlights the importance for staff to have access to an accurate production record, and to understand the difference between the planned menu and OVS requirements when serving and determining reimbursable meals. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning). The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns). Non-reimbursable meals consisted of: One-ounce cereal cup and 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items) Bagel breakfast pizza (no crediting documentation provided) + 1/2 cup juice (less than three items)

	Corrective Action: The FSD and school nutrition professionals responsible for determining reimbursable meals must complete the Breakfast Meal Pattern, Lunch Meal Pattern, and Offer versus Serve webcast s from the School Nutrition Online Learning Library (<u>https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns</u> , <u>https://dpi.wi.gov/school-nutrition/training/online-learning#offer-versus-serve</u>). Complete the trainings individually or as a group. Submit certificates of completion for each individual or a meeting agenda detailing date, time, attendees, and agenda items, including the required training. The FSD must submit 2-3sentences describing the breakfast meal pattern and how reimbursable meals will be determined using OVS at breakfast.
Site Name	Darlington Hi
Form Name	Smart Snacks (1104 - 1107)
Question #	1104
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 During onsite review, it was observed that students were able to purchase a second full meal (with the same components as a reimbursable meal) for a single unit price. This is not an allowable practice at breakfast or lunch; when these foods are bundled, this exceeds the Smart Snacks nutrient standards. Finding: Second entrees at breakfast and lunch were bundled together with sides and milk and sold at one unit price, exceeding nutrient standards. Bundled foods may only be sold if the bundled unit meets the Smart Snacks general and nutrient standards. Corrective Action: Please submit a written statement confirming that you will no longer sell the bundled unit that was found to be noncompliant. Price out each meal component separately to establish an a la carte price. These are non-program foods and need to be accounted for as non-program foods.
Site Name	Darlington Hi
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: Many snacks sold in the vending machine in the cafeteria do not meet Smart Snacks standards. A food must first meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. Once a general standard is met, a food must then meet the dietary standards for sodium, calories, fat, and sugar. The following foods are not compliant: Goldfish; 35gm, (>200 mg sodium) Cheez-It - Cheddar Sour Cream and Onion and Double Cheese; 21 gm, (not whole-grain rich) Nature Valley Protein Bar (Peanut Butter Dark Chocolate, 40 gm): (>35% of total calories from fat, >10% of total calories from saturated fat)

	 Nutri-Grain bars, apple cinnamon and blueberry; 37 gm (>35% of weight from total sugar) Chewy granola bar, chocolate chip; 24 gm, (>10% of total calories from saturated fat) Rice Crisps, cheddar; 19 gm, (>200 mg sodium) Oreos, Ritz Bitz, Mini Chips Ahoy, and Nutter Butter; 22 gm, (not whole-grain rich) Corrective Action: Specify steps that will be taken with the vending machine to comply with the Smart Snack regulations. Replace all non-compliant food items or shut off the vending machine during the school day, defined as midnight the day of through 30 minutes after the end of the school day. If the SFA intends to keep the vending machine turned on during the school day, please submit products labels and Smart Snacks product calculator printouts for
	each product to be sold in the machine (<u>https://foodplanner.healthiergeneration.org/calculator/</u>).
Site Name	Darlington Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: The most recent food safety inspection report for each site was not posted in a publicly visible location but was instead behind the serving line and not visible or accessible to program participants or the visiting public. Corrective Action: Provide two photos, (one close up and one of a 10 ft. area) of where the most recent food safety inspection report is posted and visible to the public.
Site Name	Darlington Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	 Finding: 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 #2 Employee Health, etc. Corrective Action 1) Adjust practices to align with the SOP as written: Wear hairnets, hats, scarves, beard nets or other designated hair restraints that are designed and worn to effectively keep hair under control. Corrective Action 2) Submit a statement describing how practices will be adjusted to be compliant with the established SOP. Corrective Action 3) Have each food service employee, and the food service director complete the E-learning on Food Safety on DPI's School Nutrition Online Learning webpage. Upload a certificate of completion for each food service employee into SNACS.
Site Name	Darlington Hi

Form Name	Food Safety, Storage and Buy American (1404-1411)						
Question #	1408						
TA Log #	No TA Log# found						
Due Date							
Corrective Action Status	Flagged						
Corrective Action History	 Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were incomplete. No temps were entered for several pieces of equipment on September 29. No temperature logs are kept for milk coolers in the elementary wing. Prepared food temperatures are only taken on a few items each day and recorded in a log. Staff is recording the temperature of the cooler when removing the food from refrigeration rather than the food temperature. Corrective Action 1: Upload the entire month of December's completed temperature logs into SNACS. Corrective Action 2: Provide a statement indicating how temperatures will be monitored, who will be responsible for monitoring and recording temperatures, and how logs will be retained going forward. 						
Site Name	Darlington Hi						
Form Name	Food Safety, Storage and Buy American (1404-1411)						
Question #	1411						
TA Log #	No TA Log# found						
Due Date							
Corrective Action Status	Flagged						
Corrective Action History	 Finding: The following products were identified in the SFA's storage area as non-domestic/not containing a country of origin and not documented: Canned Pineapple Tidbits (Thailand) Canned Mandarin Oranges (China) Sysco canned sliced pears (No Country of Origin identified) Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier. Provide a copy of the form(s) that will be used and include any noncompliant products. 						
Site Name	Darlington Elementary						
Form Name	Wisconsin School Day Milk Program						
Question #	1						
TA Log #	No TA Log# found						
Due Date							
Corrective Action Status	Flagged						
Corrective Action History	Finding 1 : SFA is not operating the Wisconsin School Day Milk Program (WSDMP) as indicated on Schedule A of the School Nutrition contract. Holy Rosary is not listed as a site on Darlington's on-line contract and cannot be because it is a separate School Food Authority (SFA). Community Based 4K is not a recognized school on the DPI Directory.						

Finding 2: SFA is not meeting the requirements of the WSDMP Permanent Agreement including the following excerpts:
2. Offer full strength fruit or vegetable juice as a milk substitute when a child is allergic to milk or has metabolic disorders or other conditions which prohibit him or her from drinking milk.
4. Submit an annual claim for reimbursement in accordance with procedures established by the Department.
5. Maintain full and accurate records for this milk program, including, but not limited to program income and expenditures, the total number of half-pints of milk purchased, and the number of half-pints served free to eligible children, and maintain such records for a period of three years after the fiscal year to which they pertain.
6. Upon request, make all records pertaining to the Wisconsin School Day Milk Program available to the Department for audit and Administrative Review, at any reasonable time and place.
7. Provide adequate milk storage and proper refrigeration within a temperature range of 35° to 40° F, from delivery until it is served.
 Corrective Action1: Darlington must cease operation of WSDMP. Update the School Nutrition contract to indicate that Darlington is no longer participating in the WSDMP. Corrective Action 2: Update the School Nutrition contract to accurately reflect the schools recognized by the DPI Directory, eliminating the Community Based 4K site listed on Schedule A. If 4K students are enrolled in Darlington Elementary then include the 4K in the grades served by Darlington Elementary on Schedule A. Corrective Action 3: Sever ties with Holy Rosary related to WSDMP. Corrective Action 4: Any milks served to students outside of the reimbursable meals offered in NSLP and SBP must be sold as nonprogram foods, and all costs must be covered by revenues received from the sale of those nonprogram foods.
Darlington Elementary
Wisconsin School Day Milk Program
4
No TA Log# found
Flagged
 Finding 1: Wisconsin School Day Milk Program (WSDMP) source documents (point of service rosters) are not kept for the minimum timeframe of 3 years plus the current year. This is a repeat violation from the previous Administrative Review. Finding 2: Milks are being claimed based on inaccurate counting, excessive overrides, or by using attendance counts 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. Counts are taken and consolidated on a live Google doc shared by multiple classrooms and staff which is not secured after each day's counts are entered in.

		whe milk and day rece Fine clain reco Cor viol clain	ding 3: While or en staff indicated (a photo of this the consolidated of onsite service eived milk. No so ding 4: Count sp m was based do ords which can vo rective Action: ation from the pr m for SY22-23 is rent SY 23-24 wi	accurately on POS count wa total milks se was complete ource documen preadsheets re not indicate st erify the count Fiscal action v revious Admini disallowed an	a paper rost s taken). Ho rved were p e, classroom t of the POS tained from udent eligibi s by eligibilit vill be applie strative Rev	ter that 5 bowever, who count sho was retain SY 22-23 ilities. The ty. d for this n iew. The S	students receiv nen classroom reviewers afte wed 13 studer ned by the SFA from which the SFA does not repeat FA's submittee	ved a counts er the hts A. e annual have d WSDMP	
Technical Assistance Entries:									
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name	
11/06/2023	3752	436	Administrative Review	Darlington Hi	FSD				

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product is w whole grain the product i	hole gra (and any is whole g	i in-rich . A other grain grain-rich.	n whole grains" o lways check the n ingredients in t Use the Whole G sites/default/file	ingredient list he list are enr irain Resource	to confirm th iched, if not to identify w	he first ingi whole), wh vhole grain	redient is a nich means s		
11/06/2023	3751	433	Administrative Review	Darlington Hi	FSD				
	Comments								

	Created Bv	Created Date
Processed foods that are not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. Importantly, there may be discrepancies between the nutrition facts labels and ingredients statements from the online order guide of distributors and vendors and information on product packaging. Evaluating products received and served is the most accurate way to track dietary specifications and ingredients statements. The PHN found a product formulation statement for the WG Goldfish. The 0.75 oz package of WG Goldfish credits as 1.0 oz eq. This crediting was granted during the onsite visit to prevent a daily grain shortage on the chef salad entrée option. A WG Goldfish crediting statement will be required as part of the corrective action. Lastly, multiple meal pattern and OVS issues were observed due to a misunderstanding of how the planned menu counted towards the breakfast meal pattern. The menu planner needs to decide how the variety of grain and meat/meat alternate items count towards the breakfast meal pattern and communicate to staff what students are allowed to take as part of a reimbursable meal.		
11/06/2023 3750 430 Administrative Review Darlington Hi ESD		

11/06/2023	3750	430	Administrative Review	Darlington Hi	FSD						
	Comments										
							C	reated By	Created Date		
students m one key pie	eet meal p ece of supp	pattern req	documentation Juirements. Accur cumentation that	rate and comp show that mea	lete product als planned	ion records and served	are	U y	Date		

Production Records webpage (https://dpi.wi.gov/school-nutrition/program- requirements/menu-planning/production-records). While production records were available for breakfast and lunch, they were missing required information and were not being used as intended. Production records were written on the day of meal service and not easily accessible or available to production kitchen staff. Instead, staff were following the monthly menu for meal preparation, causing discrepancies in the planned serving sizes, bulk amounts prepared, and menu items served. Be specific on production records about the identity, brand, and description of the items served. The production records about the identity, brand, and description of the items served. The production records about the identity, brand, and description of the items served. The production records about the identity, brand, and description of the supporting meal pattern compliance documentation, such as CN labels, product formulation statements, standardized recipes, or the Food Buying Guide. Additionally, leftovers were not clearly documented on production records, nor were condiment and milk usage by type. Breakfast production records should list each flavor or variety of cereal, crackers, cereal bar, and breakfast bar offered. This will ensure what the menu planner plans to offer each day is followed. This practice will also help with forecasting, controlling waste, and controlling food costs. If it becomes too time- or labor-intensive to record breakfast item usage by type, consider using variety item recipes. Individual recipes document average cereal, muffin, juice, or other breakfast item usage by meal and grade group. When a variety item recipe is on file, you may then continue to document total cereal usage on the production record. Variety item recipes must be updated twice per year or when students' preferences change. The variety item recipes. Individual recipes on standardized for use in your own kitchen (https://dpi.wi.gov/sites/default/files/imce/school		
again not documented on the production record. Overall, condiment usage is not		
documented on the production records.		
11/06/2023 3749 402 Administrative Review Darlington Hi FSD		
Comments		
	Created By	Created Date
The chef salad was prepared during the onsite review, and through observation, the reviewer confirmed both turkey and ham as ingredients and credited the smallest amounts (e.g. 0.25 oz eq) rather than considered missing meal pattern components. Again, through observation, the recipe credited as 1 1/8 cup vegetable (1/2 cup dark green and 1/2 cup other), 2.0 oz eq meat/meat alternate (0.25 oz eq ham, 0.25 oz eq turkey, 0.5 oz eq cheese, 1.0 oz eq string cheese), and 1.5 oz eq grains (0.5 oz eq croutons, 1.0 oz eq Goldfish). Technical assistance was provided to increase the amount of croutons to avoid a grain		
shortage, as other grains were not accessible to these students.		

11/06/2023 3	3748	603	Administrative Review	Darlington Hi	FSD			
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The SFA must plan meals to meet the meal pattern , including the dietary specification targets for calories, sodium, saturated and trans fats. During the onsite review, the SA observed many condiments being provided in their full fat versions, regular sodium canned products, and condiments being provided at a condiment station with minimal oversite for portion control. Full fat and regular sodium varieties of products should be closely monitored and limited to meet the dietary specifications in this and upcoming school years.11/06/202337471105Administrative Review Darlington HiAR												
Comments												
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The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks). A coffee shop spotlighting health, and wellness, operated by a teacher was closed by the SFA prior to the onsite review for concerns of non-compliance with Smart Snacks. A few labels were provided for protein powder, peanut butter, and creamer; however, recipes were not provided. Technical assistance was emailed to the teacher and included links to the Coffee as a Smart Snack flowchart (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/Coffee Flow Chart.pdf), Smoothies as Smart Snacks flowchart (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smoothies-smart-snacks.pdf), and Smart Snacks in a Nutshell (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smoothies-smart-snacks.pdf), and Smart Snacks during the school day. Items are purchased at a local store, and compliance with Smart Snacks regulations is not monitored. Tools, such as the Alliance for a Healthier Generation Smart Snacks Product Calculator, are recommended to assess compliance of products sold outside the reimbursable meals (https://foodplanner.healthiergeneration.org/calculator/). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.												
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Excess Cash Balance – An ending fund balance greater than 3 months' operating expenses, exceeds the net cash resource limitation. If the three-month net cash resource limit is exceeded, a spenddown plan is required. Some spend-down plan examples are: 1) Increase the nutritional quality of the foods in school meals by reducing added sugar and sodium, increasing and promoting a variety of protein sources, whole grains, milk, fruits and vegetables, or cooking more foods from scratch and reducing the number of highly processed foods served. 2) Provide reduced eligible students with free meals. See USDA Memo SP 17-2014. 3) Increase marketing of the school meal program to increase participation (currently High School participation is less than 70%). 4) Purchase additional or updated kitchen equipment.AR												
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Professiona establish anr										agers and		

		nnual continuing education ram(s): Annual Training Re		d on each ei	mployee's	role in the		
 Food Service Directors: 12 hours Managers: 10 hours 								
• Sta • Sta Use the <u>DP</u> ensure you the training	off who wo off who wo <u>PI Professio</u> of are recor of requirem	rk in school nutrition more rk in school nutrition less th onal Standards Training Tra ding the required information nents. See the <u>SNT training</u> jects and types of training a	han 20 hours p <u>cker</u> for each o on to show ho <u>webpage</u> and	oer week: 4 employee, e w each food	hours ach year, i service em	ployee meets		
11/06/2023		Administrative Review	Darlington Hi	AR				
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		od Safety resources includ for each application, please						
11/06/2023		Administrative Review	Darlington Hi	AR				
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Non-prog	ram Food	s Revenue Tool – use the 	OPI 5-day non-	program for	ods revenu	e tool each	Бу	Date
year to be	st record a	nd adjust non-program foo						
the comple 11/06/2023		offering them. Administrative Review	Darlington Hi	AR				
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For a simp	le, ready-r	nade tool to <u>track SCA fun</u>	d expenditure	s use the DP	I tool.			
11/06/2023		Administrative Review	-	AR				
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		ree and Reduced Meal A						
		he Verification Process, Spe						
		ning page. These include in applications, using only the						
when recei	ving only	partial information back from						
11/06/2023		Administrative Review	Darlington Hi	AR				
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-		e the <u>DPI Identifying Migra</u>			certify stu	dent's	Ву	Date
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SFA currently is in guaranteed reimbu the meal is entered serving line needs	contract to h rsable meals before the to monitor e cceptable fo	e end of the meal service line i have the POS at the beginning s are being served, counted ar student passes through the se each meal to ensure the studer or the monitor to turn away fro	of the line, t ad claimed. In rving line. An at has all the	his system n the curre n adult at t required co	has not nt situation he end of the omponents on		
11/06/2023		Administrative Review Darlington Hi	AR				
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used at your schoo modified to fit the reflect your school(or district. needs of you s) or district	created an example Special I Please note, this template sho ur school or district. All highligh t. <u>xample Policy</u>	uld be thorou	ughly revie	wed and		
		pecial dietary accommodations ad. This form provides guidance					
Sample language s A parent/guardian restricts the diet m authorized medical • An explanat • The food(s)	 Medical Statement - English (Spanish) (Hmong) Sample language specific to letting parents and guardians know what to do: A parent/guardian requesting special dietary accommodations for a student with a disability that restricts the diet must provide the Medical Statement for Special Dietary Needs signed by a state authorized medical authority. The request must contain the following information: An explanation of how the student's physical or mental impairment restricts the diet The food(s) to be avoided The food(s) to be substituted 						
write medical prese	medical auth riptions und	prity hority is a licensed health care ler state law. This could includ or nurse practitioner.					
dietary accommoda	ent for Spec ition coordin	s cial Dietary Needs is unclear o nator or school district's health Jardian or the healthcare pract	care team m	ay seek ap	propriate		
Where to Submit A special dietary accommodation for a student who has a disability that restricts the student's diet must be supported by a Medical Statement for Special Dietary Needs, which should be submitted to the Special Dietary Accommodation Coordinator: [insert name, address, phone, email address].							
or accommodation contains the same	sability may related to th nformation	IEP) or 504 Plan have an IEP or 504 plan that he student's nutritional needs. that is required on a Medical S in and submit a separate Med	If a student's statement for	s IEP or 50 ⁻ Special Di	4 plan etary Needs,		
11/06/2023		Administrative Review Darlington Hi	AR				

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Unpaid Meal Charge Policy – In establishing policies regarding the collection of delinquent debt, SFAs should ensure their efforts do not have a negative impact on the children involved, and instead focus primarily on adults in the household responsible for providing funds for meal purchases. Consider whether student meal account balances should be considered unpaid fees and subject students to the same restrictions as other unpaid school costs.11/06/2023Administrative Review Darlington HiAR					
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Best practices in handling student eligibility information: Disclosure in a Nutshell document.	Ву	Date			
 Sharing Information If a SFA offers the opportunity to waive or subsidize district fees (e.g. registration, athletic fees, technology fees, etc.) based on a student's free or reduced price meal status, the SFA must provide the <i>Sharing Information with Other Programs</i> form to <u>all</u> students with a free or reduced price status. These waivers or subsidies cannot be provided until a signed Sharing Information form is not required if: Parents/guardians self-disclose eligibility information by providing a copy of their application approval letter The fee waivers and subsidies are handled outside of the food service department by an alternate data collection method Sharing Information with Other Programs Form (Spanish) (Hmong) Disclosure Agreements If a SFA distributes the <i>Sharing Information with Other Programs</i> form, it must also distribute a <i>Disclosure Agreement</i> form. This disclosure must be signed by any individual, or organization, 					
that is receiving individual student free and reduced price information for purposes other than school meal benefits.					
 Any individual that is provided with individual student eligibility information for state reporting purposes or local program fee waivers should complete the <u>Disclosure Agreement</u> for School Staff (Spanish) and retain a copy on file at the district. Any agency that is receiving free and reduced price meal benefit information for individual students should complete this <u>Disclosure Agreement</u> (Spanish) form and retain a copy on file. 					
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SFSP Outreach All SFAs are required to inform households before the end of the school year of the availability and location of meals offered through the SFSP. Outreach for SFSP must be completed by all SFAs regardless of whether SFSP is offered by the SFA itself.					
Acceptable outreach activities inform families about the availability and location of summer meals prior to the end of the school year. SFAs distribute information through means normally used to					

communicate with households of enrolled children. This may include newsletters, automatic calling and texting services, email, or mailings.	
 SFAs can inform families of summer meals by promoting the following: Access the <u>Summer Meals Site Finder</u> on the <u>Find a Summer Meals Site</u> webpage Call 211 to locate meals in the area Text "food" (in English or Spanish) to 304-304 Visit the <u>Summer Food Service Program</u> webpage Additional information can be found on the <u>Administrative Review</u> webpage and the <u>SFSP</u> <u>Outreach Materials</u> webpage. SFAs may also use ready-made promotional materials found within the <u>Summer Meals Outreach Toolkit</u> developed by No Kid Hungry. 	