

Administrative Review Report

City School, Inc. - 401776

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/31/2019	11/18/2019
On-Site Review	11/25/2019	11/26/2019
Site Selection Worksheet	N/A	N/A
Entrance Conference	11/25/2019	11/25/2019
Exit Conference	11/26/2019	11/26/2019

Commendations:

Thank you to the staff at The City School for the courtesies extended during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The staff members did an excellent job preparing for the review, and were readily available through the duration of the review to answer questions and have thoughtful discussions about aspects of the nutrition programs. The food service staff were welcoming, knowledgeable, and clearly dedicated to their work.

The 2019-20 school year is only the second year The City School has been in operation and offering the school nutrition programs. One year after implementing the NSLP and SBP, nearly all program requirements are being met perfectly and the programs are running extremely well. The school is already looking ahead at implementing Farm to School initiatives in the spring with a student garden. Great job!

The school puts significant effort into the wellness policy and has done an excellent job meeting the wellness policy requirements. One of the notable wellness initiatives at the school is long lunch periods which allow students adequate time to eat their meals. It is clear that the school values the wellness of the students and community.

The claim preparer takes great care to ensure that meal counts are recorded correctly daily at the point of service and reported accurately on the claim. The edit check process is detailed and takes into account the highly variable daily attendance. Additionally, there are excellent procedures in place for food service accounting that ensure that food service expenses/revenues are accurately tracked and separated. Keep up the good work!

Reminders:

As a reminder, all program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year.

There are additional record retention rules for CEP. LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition, documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP. Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

Recommendations:

Overall, the school nutrition staff members at The City School are doing an excellent job meeting program requirements. While minimum requirements are being met, it is highly encouraged to continue seeking ways to exceed the requirements by offering a more diverse menu with additional choices. The school may also consider adding additional programs in the future such as the Wisconsin School Day Milk Program (WSDMP) or the Afterschool Snack Program. Other advancements to consider may be serving reimbursable field trip meals, adding Farm to School initiatives, exploring USDA equipment grants, and possibly applying for the grant funding for the USDA Fresh Fruit and Vegetable Program.

For more information on the WSDMP, please visit the [WSDMP webpage](https://dpi.wi.gov/school-nutrition/programs/milk-programs/wisconsin-school-day-milk) (https://dpi.wi.gov/school-nutrition/programs/milk-programs/wisconsin-school-day-milk). The WSDMP FAQ and application agreement/policy statement provide crucial information needed to begin offering this program. Please note that the WSDMP is only for preK-5th grade and students must be individually approved for free/reduced-price benefits in order to be given free milk and be claimed through this program. A combination of direct certification matches and household income forms would be needed to establish this eligibility information. The ISP established for lunch and breakfast counting/claiming and reimbursement cannot be applied to the WSDMP. Other considerations surrounding this program include financial viability, point of service set up, and food safety. Please contact a nutrition program consultant with any other specific questions regarding implementation of the WSDMP.

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: In the 2018-19 school year, 100% of the operations director's salary was charged to the food service account despite the fact the only part of this employee's job duties are dedicated to food service. However, the school made a fund transfer into the food service account to cover operating losses. This transfer exceeded the amount of the improperly charged salary, therefore a chargeback is not required. Only the time this employee actually spends on food service tasks may be charged to food service. An annual time study of this employee's typical work week is needed to justify the portion of the salary that will be charged to food service (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/time-study-tool.xlsx).</p> <p>CA: Conduct a time study for at least one school week to determine what percentage of the operations director's salary can be charged to food service. Upload a copy of this study into SNACS, along with a statement describing how this salary will be appropriately allocated and charged going forward.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The public release that was distributed was not the correct version. There is a specific public release to be used for CEP schools (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc). This version is simplified and does not contain income eligibility guidelines.</p> <p>CA: Provide a statement of understanding that the public release template for CEP schools found on the DPI CEP website will be used moving forward.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The authorized representative did not complete the annual civil rights training (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training.pptx). Because this staff member is responsible for program oversight, annual civil rights training is required.</p> <p>CA: The authorized representative must complete this training. Upload a statement in SNACS confirming that the training was completed, including the date of completion for the authorized representative.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	

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TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content as specified in 7 CFR 210.31. Content regarding updating/informing the public was not included.</p> <p>CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The shortened USDA non-discrimination statement was not included on the printed menus.</p> <p>CA: Add the shortened non-discrimination statement to printed menus and upload updated materials into SNACS. The statement must read, "This institution is an equal opportunity provider."</p>
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	Flagged	<p>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.</p> <p>CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS (https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards). Because the school wishes to utilize the two-year flexibility beginning at the start of 2018-19, it is highly encouraged to retroactively track any training hours completed in the last school year along with those completed in the current school year. Please reference the professional standards reference chart to determine how many annual training hours are required for each staff member (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf).</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The food safety plan does not contain a list of menu items categorized into HACCP process 1, 2, and 3.</p> <p>CA: Please complete the HACCP Process chart by categorizing all menu items into process 1, 2, or 3. Upload a copy of the completed chart in SNACS and include the completed chart in the food safety plan. The USDA has published a guide to assist SFAs in establishing a food safety plan based on HACCP, which may assist in the</p>

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	menu item categorization (https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf).	
Site Name	The City School	
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	Flagged	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. <i>Corrected on-site; no further action required.</i></p>
Site Name	The City School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Mandarin Oranges (China).</p> <p>CA: Complete and submit a Non-Compliant Product Form for the products listed above (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/25/2019	1060	1212	Administrative Review	ALL				
Comments								
						Created By		Created Date
<p>The school principal is currently designated as the authorized representative and food service director, and met the minimum hiring standards for a new director when hired at the start of the 2018-19 school year. However, on-site observations suggest that the school operations director or kitchen supervisor may more appropriately be designated as the food service director, as they each have more of a day-to-day hands-on role in meal program operation. Both of these staff members have the minimum of one year of relevant food service experience needed to be a new food service director. If the operations director is designated as the new food service director, this person must complete eight hours of food safety training within 30 days of the designation. If the kitchen supervisor is designated as the new food service director, all minimum hiring standards will be met as this person already has a valid food protection manager certification obtained within the last five years. The person designated as the director must complete 12 hours of professional standards training annually. It is encouraged to consider designating a new food service director instead of the school principal. If a new director will be designated, this must be updated on the online contract.</p>								11/25/2019 6:28:34 PM
11/25/2019	1059	1002	Administrative Review	ALL				
Comments								
						Created By		Created Date
<p>As meetings continue to occur surrounding wellness policy development and improvement, please ensure that documentation is retained to demonstrate dates, agenda topics, and attendees of the meetings.</p>								11/25/2019 6:02:08 PM

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11/25/2019	1056	314	Administrative Review	ALL				
Comments								
					Created By	Created Date		
Beginning in the 2020-21 school year, The City School may be eligible to receive severe need breakfast reimbursement. Severe need breakfast must be added to the annual online contract in the spring/summer of 2020 to be approved for this increased reimbursement. It is expected the school will also be automatically approved for the additional \$0.02 lunch reimbursement beginning in the 2020-21 school year.						11/25/2019 5:37:03 PM		
11/25/2019	1054	305	Administrative Review	ALL				
Comments								
					Created By	Created Date		
While the school does offer free meals to students on field trip days, these meals are not reimbursable and thus are paid for via a fund transfer from non-federal funds. It is highly encouraged to continue working towards offering reimbursable field trip meals. Please review the field trip meal resources posted on the Meal Planning webpage for more information (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).						11/25/2019 5:29:06 PM		
11/25/2019	1048	100	Administrative Review	ALL				
Comments								
					Created By	Created Date		
Because The City School operates CEP SFA-wide, there is no need to distribute direct certification (DC) approval letters to individual households. DC is run to obtain data needed to establish CEP claiming percentages and for other reporting purposes, but is not needed to establish individual eligibility for free meals since all students get free breakfast and lunch.						11/25/2019 2:39:31 PM		
11/25/2019	1045	1400	Administrative Review	ALL				
Comments								
					Created By	Created Date		
Please ensure that the food safety plan is reviewed at least annually, and updated as needed. This annual review should be documented to indicate that it has been completed. A new food safety plan does not need to be created each year, but the plan should be updated as needed to reflect all current procedures.						11/25/2019 1:42:20 PM		
11/25/2019	1043	1400	Administrative Review	ALL				
Comments								
					Created By	Created Date		
The food safety plan contains a standard operating procedure (SOP) for transporting food to satellite kitchens. This does not occur at the school, so this SOP should be removed. Additionally, if any meals will be served in the classroom in the future, an SOP for this service style must be added to the food safety plan. Finally, it is recommended to review and update the SOP for field trip meals to ensure it reflects current practices in the school.						11/25/2019 1:40:13 PM		
11/25/2019	1042	1408	Administrative Review	The City School				
Comments								
					Created By	Created Date		
The type of thermometer primarily used by the kitchen staff has a narrow temperature range from 130 to about 190 degrees. Because of this, the thermometer may not be able to be calibrated properly (the ice-point and boiling-point methods of calibration are outside the range of the thermometer). It is recommended to use a thermometer that can be easily and accurately calibrated. It is suggested to discuss thermometer types and calibration methods with the local sanitarian for more information.						11/25/2019 1:35:02 PM		
11/25/2019	1041	1408	Administrative Review	The City School				

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Comments					Created By	Created Date
<p>The school keeps good temperature logs for the milk cooler, freezer, and cooler. However, no log is kept for the dish machine. It is recommended to begin logging the chemical sanitizer concentration (or temperature of the sanitizer cycle if using a high-temp dish machine) daily. It is suggested to discuss dishwasher sanitizing logs with the local sanitarian during the next food safety inspection. Additionally, when batch cooking, each pan of hot food must be temped to ensure the minimum internal cooking temperature has been reached prior to service.</p>						11/25/2019 1:31:19 PM
11/25/2019	1040	500	Administrative Review	The City School		
Comments					Created By	Created Date
<p>While Offer Versus Serve (OVS) is not required for grades K-8, it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. If it is desired to continue with the SERVE style, the SFA may consider offering an alternate entrée choice that students may choose from. Students would still need to take all 5 components, but they could have the option between two entrees. The same could be done for any of the other components.</p> <p>If in the future the SFA decides to try OVS, then students can choose three of the five components offered, including ½ cup of fruit and/or vegetable, to create a reimbursable meal. More information is found on the Menu Planning webpage by clicking the Offer versus Serve dropdown (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p>						11/25/2019 1:21:25 PM
11/25/2019	1039		Administrative Review	The City School		
Comments					Created By	Created Date
<p>According to the Smarter Lunchrooms Movement, a flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors (https://www.smarterlunchrooms.org/). Calorie-free and sodium-free spices and flavors are recommended. Consider lemon juice, parsley flakes, garlic powder, cinnamon, pumpkin pie spice, chives, vinegar, or hot sauces.</p>						11/25/2019 12:51:48 PM
11/25/2019	1037	1411	Administrative Review	The City School		
Comments					Created By	Created Date
<p>The SFA maintains documentation that proves many of their food items are domestic. However, the SFA does not have documentation supporting their choice to purchase non-domestic food items. The following information must be recorded for non-domestic food items: date, name of product, country of origin, reason, cost analysis, seasonality, availability, substitution, distribution, and other.</p> <p>The Buy American - Non Compliant Product List template may be used. This is found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).</p> <p>For domestic products without country of origin labeling, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor. By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision. Visit the Buy American webpage for more details (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>						11/25/2019 12:43:35 PM
11/25/2019	1035	901	Administrative Review	The City School		
Comments					Created By	Created Date
<p>On-site monitoring is only required for SFAs with more than one serving location. The City School is a single site and thus annual completion of the on-site monitoring forms is not required. The school completed these forms for NSLP and SBP for the SY 2019-20 even though it was not required. The school may continue completing annual on-site monitoring, if desired, however this is not a requirement.</p>						11/25/2019 11:53:41 AM

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11/25/2019	1033		Administrative Review	The City School						
Comments										
					Created By	Created Date				
<p>School Breakfast Challenge Join schools throughout Wisconsin to increase breakfast participation or to start a new breakfast program. The challenge begins December 2nd, 2019. Schools with the highest increase in breakfast participation will win up to \$1,000! New this year, participate in the Big Cheese bonus round for a chance to win an additional \$1,000 for your program. Prizes are provided by No Kid Hungry (NKH). Visit http://bit.ly/SchoolBreakfastChallenge for details.</p> <p>In addition, all schools participating in the Challenge are eligible to apply for NKH's breakfast grants. For these grants, there is no free and/or reduced-price meal percentage requirement. Grants will support schools with the purchase of approved equipment, materials and program initiatives. Deadline is December 6, 2019. Visit the Hunger Task Force (http://bit.ly/SchoolBreakfastChallenge) website for details.</p>									11/25/2019 11:52:06 AM	
11/25/2019	1032		Administrative Review	The City School						
Comments										
					Created By	Created Date				
<p>Around the World in 80 Trays Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays. Take the pledge and use the week of January 21-24, 2020 to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students. Visit the NSLP webpage for event information. Document the event (pictures, video, sound clips etc) and send to DPIFNS@dpi.wi.gov so we can share your success on social media! Visit the National School Lunch Page for more details and a helpful tip sheet (https://dpi.wi.gov/school-nutrition/programs/national-school-lunch).</p>									11/25/2019 11:51:18 AM	
11/19/2019	978	1000	Administrative Review	ALL						
Comments										
					Created By	Created Date				
<p>It is recommended to review the wellness policy content regarding food for parties/celebrations and classroom snacks. The policy currently states that food for these events "shall meet or exceed" Smart Snacks standards, and also that the district "encourages" the food at these events to meet Smart Snacks. It is recommended to revise this language so that it is clear if food for these events is required to meet Smart Snacks, or if it is simply encouraged to do so.</p>									11/19/2019 10:00:01 AM	
11/19/2019	977	1005	Administrative Review	ALL						
Comments										
					Created By	Created Date				
<p>The school met the wellness policy assessment requirements in a timely fashion. The form used to complete the assessment is acceptable. However, it is encouraged to review the assessment tools available on the DPI website as well (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy). These additional tools and assessment templates may be useful going forward as the wellness policy continues to develop.</p>									11/19/2019 9:48:45 AM	
11/19/2019	976	1006	Administrative Review	ALL						
Comments										
					Created By	Created Date				
<p>Once the school website is up and running, it is strongly encouraged to post the most recent assessment of the school's wellness policy on the site. This is an excellent way to ensure the assessment is made available to the public. In the meantime, the school has made great effort in making the policy and the assessment available to the public through other means.</p>									11/19/2019 9:44:22 AM	

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11/14/2019	941	805	Administrative Review	ALL					
Comments					Created By	Created Date			
<p>The medical statement the school uses for special dietary needs requests is comprehensive and adequately addresses the requirements for making such accommodations. However, it is recommended to update the statement with the Wisconsin definition of "licensed medical practitioner," as this is slightly different than the "recognized medical authorities" referenced in the current form. Please review the DPI Medical Statement for Special Dietary Needs template and other corresponding resources (https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs).</p>						11/14/2019 10:55:08 AM			
11/14/2019	940	700	Administrative Review	ALL					
Comments					Created By	Created Date			
<p>On the Annual Financial Report when revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is actually deposited into the account. On the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. This amount deducted from the revenue should be reported as an NSLP food expenditure.</p> <p>Additionally, the cash/entitlement value of USDA Foods should be reported as an NSLP revenue. This value is on the Commodity Allocation and Receipt (CARS) Report in the USDA Foods tab of online services. The amount next to the line, "Total Value Received: Entitlement, Bonus, DoD, UNPFV and Raw Product" on the CARS Report is the total value of USDA Foods received for the specified school year. The cash/entitlement value of USDA Foods should also be reported as an NSLP expenditure on the AFR. The AFR instructions provide additional details on report completion (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-instructions.pdf).</p>						11/14/2019 10:04:11 AM			