

# Administrative Review Report

Wauwatosa School District

## Commendations:

From the Nutrition Program Consultant:

My sincere thanks to the entire staff of Wauwatosa School District. Everyone has been so welcoming! I appreciate your time and efforts spent preparing for and participating in the Administrative Review. This made the review a very smooth process.

I was impressed with how well administration and food service staff work as a team. They are supportive and recognize everyone's contribution to maintaining a high-quality lunch program. The food service staff at all schools we visited maintain a very clean and pleasant environment. They have friendly smiles for the students, greet them by name, and very obviously take a lot of pride in their work!

Awesome job and thank you for what you do for kids!

From the Public Health Nutritionists:

Thank you to all staff at Wauwatosa School District for the warm welcome and cooperation during this Administrative Review (AR).

A special thanks to the school nutrition site leads who go above and beyond with compassion and warmth for every student, every day. Thank you to the Food Service Director for working with us to obtain documentation and for the quick response to questions; this expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated.

Thank you for serving healthy, nutritious meals to your students!

## Recommendations:

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

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 offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/13/2022 10:53 AM	<p>Finding: The confirming official, verifying official and hearing official are incorrect on the contract.</p> <p>CA: Update the contract to reflect the correct staff responsible for each position and provide a statement that this has been corrected.</p>
	CAP Submitted 12/14/2022 08:18 PM	This has been corrected
	CAP Accepted 12/14/2022 08:33 PM	CAP Accepted NO FURTHER ACTION NEEDED
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/14/2022 05:56 PM	<p>Finding 1: On the Annual Financial Report, the expenses were not allocated correctly to labor, food, and equipment (7 CFR 210.19). In addition, an expense for equipment replacement for \$16,372 was not recorded on the Annual Financial Report.</p> <p>CA 1: Update/correct the Annual Financial Report (AFR) in Online Services before 12-31-22 and upload the corrected report into SNACS. Sodexo will need to provide the portion of the per meal cost (School Breakfast Program, National School Lunch Program, Non-Program Foods) that should be allocated to labor and food. Allocate these to labor and food on the AFR. The remainder of money paid to Sodexo should be recorded under Purchased Services.</p> <p>CA 2: Add \$16,372 to either 'equipment' or 'other' expenditures (see PI-1505 Equipment Replacement).</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>		

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<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 12/14/2022 06:38 PM</p>	<p>Finding: Currently, students who would like to purchase milk only or extra milk mark themselves on a sheet that is then entered into the POS. It was observed that several students took milk without checking their name or the mark was not clear as to which name it should be charged to. Therefore, the current method of counting and charging students for milk only or extra milk is not accurate to ensure all costs are covered.</p> <p>CA: Describe what changes were made to ensure all milks are counted and charged to students.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 12/14/2022 06:41 PM</p>	<p>Finding: The adult lunch meal price in the contract is \$4.65; however, the website indicates an adult lunch price is \$4.56.</p> <p>CA: Update the adult meal price on the website to \$4.65.</p>
<b>Site Name</b>		
<b>Form Name</b>	Indirect Costs (712)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged 12/14/2022 06:23 PM</p>	<p>Finding: Indirect costs of Waste Management are being charged to the nonprofit school food service account, which is unallowable in Wisconsin. All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs by using a weight study for waste, a time study for staff with job responsibilities for both food service and non-food service, separate meters for utilities, or separate billing for food service from a provider. If the indirect charge for Waste Management is discontinued, previously charged amounts will not need to be paid back to the food service account. If Wauwatosa SD wishes to determine a direct cost for Waste Management and continue to charge that direct cost to the food service account, the difference between the direct cost and the indirect cost previously charged will need to be refunded to the food service account.</p>

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		CA: Provide a statement that Wauwatosa School District will no longer charge Waste Management to the food service account. If Wauwatosa decides they would like to turn the indirect cost of Waste Management to a direct cost to be charged to the food service account, contact the DPI Nutrition Program Consultant for approval.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/14/2022 06:48 PM	<p>Finding: The Public Release was not distributed to the local media.</p> <p>CA: Provide the name of the local media outlet, such as a local newspaper, where the SFA will request the Public Release will be published.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/14/2022 06:45 PM	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: Provide a timeline for when a school meal program civil rights complaint policy/procedure will be put in place or included in an existing district policy. It is recommended to use the Civil Rights Policy Template provided on the DPI School Nutrition Website. Provide the name and title of the SFA representative that will ensure compliance.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/14/2022 07:38 PM	<p>Finding: The information provided on the Wauwatosa SD website regarding special dietary requests should be updated to accurately reflect the definition of a disability as it</p>

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		<p>pertains to food. Particularly, Food Allergy Management and Other Special Dietary Needs. Information in the Rehabilitation Act of 1973 and the Americans with Disabilities Act Under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act Amendments Act (ADAAA) of 2008 state: a person with a disability means any person who has a physical or mental impairment which substantially limits one or more major life activities or major bodily functions, has a record of such an impairment, or is regarded as having such an impairment. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. A major life activity also includes the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.</p> <p>Two good options are:</p> <ol style="list-style-type: none"> <li>1. Use the Special Dietary Needs Policy Template to create a clear policy for your district.</li> <li>2. Use the information as it is written on the DPI Medical Statement Form.</li> </ol> <p>CA: Provide a statement of how the Special Dietary Accommodations policy/procedure will be updated and a timeline when this will be updated on the website.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>12/20/2022 10:39 AM</p>	<p>Finding : Gwen, Cindy, Keith, and any other non-food service staff with responsibilities in the child nutrition program, need to complete Civil Rights Training and complete the Attendance Record.</p> <p>CA : Upload the attendance record in SNACS and submit "uploaded to SNACS" in the CA box.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		

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Corrective Action Status		
Corrective Action History	<p>Flagged 12/14/2022 07:01 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all the required content (7 CFR 210.31). The following areas must be added (italicized sentences are suggestions to fulfill the requirement).</p> <ol style="list-style-type: none"> <li>1. <b>Food and Beverage Marketing:</b> <i>Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule .</i></li> <li>2. <b>Triennial Assessment:</b> <i>The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school follows the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.</i></li> <li>3. <b>Update/Inform the Public:</b> <i>The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.</i></li> </ol> <p>CA: Submit a detailed timeline for when the Local Wellness Policy will be in compliance and provided to the public. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #		
TA Log #		
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 12/14/2022 06:52 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>CA: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #		
TA Log #		
Due Date		
Corrective Action Status		
Corrective Action History	<p>Flagged 12/14/2022 07:09 PM</p>	<p>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). SFAs can inform families of summer meals by promoting the following:</p>

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		<ul style="list-style-type: none"> <li>• Access the Summer Meals Site Finder on the Find a Summer Meals Site webpage</li> <li>• Call 211 to locate meals in the area</li> <li>• Text "food" (in English or Spanish) to 304-304</li> <li>• Visit the Summer Food Service Program webpage</li> </ul> <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>12/13/2022 04:42 PM</p>	<p>Finding: The total income used for determination was not noted on the back of the application, this is necessary to ensure the correct income conversion factor was used.</p> <p>CA: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding that the income used for determination will be written on the back of the application and the correct income conversion factor will be used.</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	<p>Flagged</p> <p>12/13/2022 03:06 PM</p>	<p>Finding: The verifying official did not sign the applications chosen for verification.</p> <p>CA. View the verification webcast (The Verification Process and the Verification Collection Report) and submit a statement of understanding.</p>
	<p>CAP Submitted</p> <p>12/14/2022 08:18 PM</p>	<p>This has been corrected onsite</p>
	<p>CAP Accepted</p> <p>12/14/2022 08:33 PM</p>	<p>CAP Accepted NO FURTHER ACTION REQUIRED</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	

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<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/13/2022 02:57 PM	Finding: SFA did not complete a confirmation review before verifying application(s).  CA: View/watch the verification webcast (The Verification Process and the Verification Collection Report) and submit a statement that a confirmation review will be done before reaching out to households.
	CAP Submitted 12/14/2022 08:35 PM	Corrected onsite
	CAP Accepted 12/14/2022 08:36 PM	CAP Accepted NO FURTHER ACTION REQUIRED
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/13/2022 03:03 PM	Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a)  CA: Provide a statement that verification will be completed within the required time frame.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/13/2022 10:44 AM	Finding: The 2019 non-discrimination statement was on the following materials; 'August Parent Email, Meal Application Reminder, DC Notification Letter, Pending Status Meal Eligibility, Paper Application Notification, October Email Non-participation and Unpaid Meal Charge Policy'.  CA: Update program materials to include the correct 2022 non-discrimination statement. Provide a statement that all documentation has been updated with the correct statement included.



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	CAP Submitted 12/14/2022 08:20 PM	All letters listed have been corrected onsite and uploaded to SNACS
	CAP Accepted 12/14/2022 08:34 PM	CAP Accepted NO FURTHER ACTION REQUIRED
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/20/2022 10:36 AM	<p>Finding : A professional standards tracking tool has not been completed for non-school nutrition staff. There are three tracking tool options:</p> <ul style="list-style-type: none"> <li>• USDA Professional Standards Tracking Tool Version 2.0</li> <li>• DPI-developed Professional Standards Tracking Tool</li> <li>• Your own spreadsheet which includes a trainee's: Name, date of hire, position/role, required hours of training</li> </ul> <p>CA : Upload a copy of the professional standards tracking tool you will be using in SNACS and submit "uploaded to SNACS" in the CA box.</p>
<b>Site Name</b>		
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>	Flagged 12/14/2022 08:05 PM	<p>Finding: At all three schools reviewed, the food safety inspection was posted inside the kitchen which does not allow the public to view it.</p> <p>CA: Post the most recent food safety inspection in a place where the public can view it such as the cafeteria. Provide a statement that this has been completed.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		

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<b>Corrective Action History</b>	Flagged 12/15/2022 11:13 AM	<p>Finding: Acceptable crediting documentation was not available for the fajita chicken strips in the Chicken Caesar Salad served on Tuesday, December 13th, 2022 at lunch at Eisenhower Elementary. Meat products with fillers must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. After further investigation, the fajita strips product does not have a CN label or PFS and therefore exact crediting cannot be determined. DPI was able to determine that meat/meat alternate (M/MA) was present in the Chicken Caesar Salad from chicken and cheese so this did not result in a missing component, rather, an insufficient quantity.</p> <p>Corrective Action: Submit an updated recipe for the Chicken Caesar Salad with a new M/MA product that has crediting information and submit that crediting documentation (e.g. CN label or PFS).</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	401	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/13/2022 04:31 PM	<p>Finding: One non-reimbursable meal was observed at Eisenhower during breakfast service. The meal did not contain three items, required under Offer versus Serve at breakfast. The meal contained one piece of French toast and ½ cup juice. One non-reimbursable meal was served at Eisenhower during lunch service. The meal did not contain three full components, required under Offer versus Serve at lunch. The meal contained ¼ cup baby carrots, ½ cup tater tots, and 1 drumstick.</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full items at breakfast and three full components at lunch, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	402	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged 12/13/2022 04:40 PM	<p>Finding: On the day of review, all components in their minimum portion sizes were available on the line at the start of lunch meal service. However, the cold vegetable offerings (1/4 cup baby carrots, 1/2 cup peas) ran out near the end of the last meal service period. Therefore, students only had access to 1/2 cup of vegetable (from the tater tots) instead of the full 3/4 cup vegetable that is required to be available at lunch. A total of 15 meals did not have access to the full 3/4 cup vegetable at lunch.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for the vegetable component will be met for lunch during the future meal services (e.g. portion sizes increased or decreased, additional menu items, product replacement, etc.).</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	404	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/13/2022 09:18 AM	<p>Finding: Signage must be posted in a visible area near the meal service line that shows students how to select a reimbursable meal. School Food Authorities using Offer vs Serve (OVS) must include the required wording to select at least 1/2 cup of fruit, vegetable, or a combination. Currently, breakfast signage is for a "serve" meal service model; however, OVS is used for breakfast. Please update signage to reflect the OVS model, including that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Template signage can be found on the DPI Signage webpage: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage</a>.</p> <p>Corrective Action: Submit a picture of completed signage posted near the breakfast service line.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/15/2022 11:00 AM	<p>Finding: Preschool students are allowed to be served the K-5 meal pattern when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in</p>

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		<p>which it would be a challenge for staff to determine, during meal service, if a child is in preschool or older. During Eisenhower lunch service, preschool students eat at the same time and in the same place as older students. It was observed that preschool students were not allowed to go through the service line. The 4K teacher selected and served meals to them that contained a chicken drumstick, pears, and baby carrots. The meals did not contain all other items on the line, i.e. tater tots, dinner roll, and milk. DPI intervened to make sure that milk, a dinner roll, and tater tots were provided to make complete meals. If meals are served to preschool students, all components must be served. DPI recommends allowing preschool students to go through the line and select components under Offer vs Serve (OVS) as children of this age are capable of selecting components. If preschool students continue to be served, all components must be served.</p> <p>Corrective Action: Submit a statement describing the specific changes to meal service for the preschool students to ensure reimbursable meals are provided.</p>
<b>Site Name</b>	Lincoln EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/15/2022 03:58 PM</p>	<p>Finding: The preschool students at Lincoln and Jefferson Elementary were served the K-5 meal pattern at lunch but were not served at the same time and in the same place as the older students. Preschool students eat in their classrooms. Children who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals. Refer to the preschool meal pattern one-page summary for the preschool meal pattern requirements (<a href="https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_MealBP.pdf">https://www.fns.usda.gov/sites/default/files/cacfp/CACFP_MealBP.pdf</a>)</p> <p>Corrective Action: Submit a statement describing what changes will be made to the preschool meals at Jefferson and Lincoln to meet the preschool meal pattern requirements.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged 12/15/2022 11:36 AM	<p>Finding: The daily minimum requirement for the fruit component was not met for K-5 students at Eisenhower for breakfast during the review period. A full cup serving of fruit was planned but only ½ cup was prepared on Thursday (11/17/22) and Friday (11/18/22). The following represent what was served: Thursday (11/17/22): Orange Juice, 4 fluid ounces. Mixed fruit (1/2 cup) was planned but not prepared. Friday (11/18/22): Apple juice, 4 fluid ounces. A fresh apple was planned but was not prepared. The daily minimum requirement for the K-12 age/grade group at breakfast is 1 cup fruit.</p> <p>Corrective Action: Submit a plan to educate food service staff on making substitutions to meet meal pattern requirements (I.e. using school inventory such as canned peaches) when planned products are not available.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/15/2022 11:49 AM	<p>Finding: The weekly juice limit was exceeded at breakfast at Eisenhower during the week of review. No more than half (50 percent) of the total fruit offerings may be in the form of juice. A total of 4 cups of fruit (including whole fruit and juice) were offered during the week of review and 2.5 cups were juice. This means 62.5% of the fruit offered was in the form of juice. This exceeds the 50% juice limit.</p> <p>Corrective Action: Submit a statement that explains what changes will be made to the breakfast menu for the week of review to be compliant with the weekly juice limit.</p>
<b>Site Name</b>	Eisenhower EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	434	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/15/2022 12:33 PM	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the Chef Salad, Antipasto Salad, Chicken Caesar Salad, Ham and Cheese Sandwich, Turkey and Cheese Sandwich, and American Sandwich. In addition, recipes such as the Cheeseburger Recipe were not updated with the current product used.</p>

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		Corrective Action: Submit a standardized recipe for the Chef Salad, Antipasto Salad, Chicken Caesar Salad, Ham and Cheese Sandwich, Turkey and Cheese Sandwich, American Sandwich and update the Cheeseburger Recipe. 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 ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a> ).
Site Name	Eisenhower El	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/15/2022 12:34 PM</p>	<p>Finding: The daily minimum requirement for the vegetable component was not met for K-5 students at Eisenhower, Lincoln, and Jefferson for lunch during the review period. The following represent the planned portion sizes: Monday (11/14/22): Corn, ½ cup (Eisenhower &amp; Jefferson); Baby Carrots, ½ cup (Lincoln) Tuesday (11/15/22): Mixed Vegetables, 1/2 cup (Eisenhower, Lincoln &amp; Jefferson) Wednesday (11/16/22): Baked Beans, ½ cup (Lincoln &amp; Jefferson) Thursday (11/17/22): Peas, ½ cup (Eisenhower, Lincoln &amp; Jefferson) Friday (11/18/22): Carrots, ½ cup (Eisenhower &amp; Jefferson) The daily minimum requirement for K-5 age/grade group at lunch is ¾ cup vegetable.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for vegetable component will be met for lunch at Eisenhower, Lincoln, and Jefferson during the days containing the shortage? (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.).?</p>
Site Name	Jefferson El	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/15/2022 03:12 PM</p>	<p>Finding: The weekly minimum requirement for the dark green and other vegetable subgroups was not met for the K-5 age/grade group at lunch during the review period at Eisenhower, Lincoln, and Jefferson. The red/orange subgroup was also not met at Jefferson. The weekly minimum requirement for the K-5 age/grade group at lunch for the</p>

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		<p>dark green subgroup is <math>\frac{1}{2}</math> cup, the red/orange subgroup is <math>\frac{3}{4}</math> cup, and the other subgroup is <math>\frac{1}{2}</math> cup.</p> <p>Corrective Action: Describe specifically how the weekly minimum requirement for dark green and other subgroups will be met for lunch during the review period (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.) at Eisenhower, Lincoln, and Jefferson. Describe specifically how the weekly minimum requirement for the red/orange subgroup will be met during the week of review at Jefferson.</p>
Site Name	Eisenhower El	
Form Name	Water (1300)	
Question #	1300	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>12/14/2022 08:02 PM</p>	<p>Finding: Free, potable water was not accessible to students during breakfast and/or lunch meal service (7 CFR 220.8 and 7 CFR 210.10). There is a water fountain available in the cafeteria; however, there was a garbage can leaning against it and buckets in front of it limiting access. It is also recommended this fountain be cleaned.</p> <p>CA: Submit a statement explaining how free access to water will be made available to all students during breakfast and lunch meal service.</p>
Site Name	Eisenhower El	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>12/14/2022 08:15 PM</p>	<p>Finding: The food safety plan at Eisenhower EL was not site specific. The plan shown to DPI consultants did not contain required SOPs and instead pertained to general safety. In addition, this was on a computer, was difficult to read and not easily accessible to staff, particularly new staff.</p> <p>CA: A food safety plan like the one that is in a binder at Lincoln EL should be available at each site and should be site specific.</p>
Site Name	Eisenhower El	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/15/2022 02:29 PM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic or not containing a Country of Origin and not documented: Apple Juice (Argentina, Chile, Brazil, Poland, Turkey, Ukraine) Baked Beans, Refried Beans, Vegetarian Beans ("Distributed by")</p> <p>Corrective Action: Contact vendor/sales distributor to find out if each of the bean products were produced in the USA. Complete and submit a Noncompliant Product List Form for the non-domestic products; apple juice, and beans (if applicable). Noncompliant Product List templates can be found on the Buy American webpage (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american">https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american</a>). Keep documentation on file (i.e. emails with vendor, communications) regarding substitutions made to products ordered that are not Buy American compliant.</p>

## Technical Assistance Entries:

### Comments

One application had a household number that was inconsistent with the number of persons listed on the application. The benefit given was not affected by the household number; therefore, students have been receiving the correct benefit. 475 free and reduced-price meal application determinations were reviewed, one error was identified. This is below the 3% threshold for fiscal action; therefore, no fiscal action will be accessed due to meal eligibility.

### Comments

The 2022 version of the And Justice For All Poster that is marked "For FNS Use Only" is not yet authorized to be used. The 2019 version must be posted in a public place, where meals are served. This poster must be printed in color and 11 x 17 in size.

### Comments

Please complete onsite monitoring at all lunch sites and 50% of breakfast sites prior to February 1, 2023. Note: This responsibility cannot be completed by food service management company staff.

### Comments

The school food service fund may not have an ending fund balance more than three-month operating expenses to retain a non-profit status. However, the USDA and DPI will not require a spend down plan for excess cash balance, for the 22-23 school year due to extra meal reimbursements and supply chain assistance funds awarded. It is likely SFAs will need to use the excess fund balance to offset rising food and labor costs.

### Comments

During meal service at Lincoln Elementary, three students were provided OJ in place of milk due to a milk allergy. Medical statements are required to be on file when substitutions are made outside of the meal pattern requirements. Medical documentation must clearly define the exact substitution required. In this case, if the medical statements do not explicitly state that OJ is a required substitution for milk, then the SFA may not provide OJ as a milk substitution as it is not nutritionally equivalent to cow's milk.



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## Comments

Document on the application, all clarifications received from the family to confirm that the proper eligibility is given.

## Comments

Finding: Vegetables are credited by volume (cups). On day of review, food service staff portioned baby carrots by guestimate versus using a standardized measurement tool. For items that are difficult to portion, such as baby carrots, please utilize spoodles or weigh the items comparing the weight to the USDA Food Buying Guide, to determine the correct portion. For example, a ½ cup portion of baby carrots weighs 2.48 oz per the USDA Food Buying Guide. This did not result in shortage on the day of review. Corrective Action: Submit a written statement outlining how vegetables will be portioned and served in a standardized form of measurement. Consider purchasing a scale for each kitchen as they do not currently have scales.

## Comments

Technical Assistance: 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>). Food service staff required students to take a graham cracker with the cereal bowl, even when the student had two additional items at breakfast. Because the graham cracker and cereal bowl each count as 1 oz eq. grain, they do not need to be paired together to be a full item. Also, there was some confusion of whether milk was a required component at breakfast. Milk is not required as long as students take three other items, one of which is a ½ cup fruit, vegetable, or combination. At lunch, food service staff were reminded that no components should be automatically given to students when using OVS. For example, food service staff wanted to give every student tater tots but were reminded to ask each student before serving them.

## Comments

Please submit the verification collection report by February 1st, 2023.

## Comments

Technical Assistance: Acceptable crediting documentation is vital to ensuring that processed products not found in the USDA Food Buying Guide (FBG) meet Child Nutrition Program meal pattern requirements. Acceptable crediting documentation includes Child Nutrition (CN) labels, Product Formulation Statements (PFS), and USDA Product Information Sheets. Product specification sheets are not acceptable crediting documentation and cannot be used to document meal pattern requirements. Use the Tips for Accepting Processed Product Documentation for more information ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet\\_processedproduct.pdf](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf)) to determine if documentation you obtain meets crediting standards. This crediting information must be readily available and accessible and must be updated any time a new product is used. DPI recommends the SFA collect crediting information for all processed products (i.e. chicken patty, taco filling, breakfast pizza, etc) and meat products with fillers (i.e. deli meats, fajita chicken strips, etc.) and establish an organization system (i.e. binder, box, electronically) to store this information.

## Comments

Technical Assistance: Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Recording leftovers on the production records aids the menu planner with future forecasting, ordering, menu planning, and reducing food waste. Currently, the SFA maintains production records electronically with edited access granted to a few key staff at Central Kitchen. Each individual school does not have the authority to edit production records based on the cost of individual logins. Therefore, each school is instructed to report daily leftovers and substitutions to Central Kitchen staff to edit the electronic production record. It is evident that information such as leftovers and substitutions are not consistently entered and/or reported on the final production

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record. DPI suggests increasing the number of staff that have access to entering information on the electronic production records or increasing oversight of the completion of production records.