

# Administrative Review Report

408106 Milwaukee Academy of Science

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2019	11/05/2019
On-Site Review	11/06/2019	11/07/2019
Site Selection Worksheet	10/30/2019	10/31/2019
Entrance Conference	11/06/2019	11/07/2019
Exit Conference	11/07/2019	11/07/2019

## Commendations:

- The Authorized Representative, Food Service Director, and CFO are all new to their roles in food service. Staff have taken the initiative to connect with DPI SNT through trainings like Great Beginnings, webcasts, and consult directly through email and phone calls. Your efforts to learn and identify opportunities for program improvement are appreciated, and will be of great benefit to the students you serve. Keep up the good work!
- The agency participates in Community Eligibility Provision (CEP) SFA wide. All enrolled students have access to a free reimbursable breakfast and lunch each day school is in session.
- The agency has great Civil Rights Complaint Procedures. Continue to ensure that staff are trained on and aware of their role as it applies to the USDA School Meal Programs.
- The agency has a great Local Wellness Policy (LWP) that meets all the minimum content areas. As a reminder, the first triennial assessment must be completed by June 30, 2020. Document all efforts to review/update the policy and share the results of the assessment with the public. This might include meeting minutes, emails, and website/social media communications.
- The Food Service Director was quick to offer solutions and find answers to questions. Thanks for all your cooperation throughout this process!

## Recommendations:

- MAS is exempt from onsite monitoring as a one-site agency.
- MAS is exempt from having to complete the Verification Process. The Verification Collection Report (VCR) must still be completed annually by February 1st. Consider an electronic point of service system in the classrooms, at the grab-n' gos (offices), and the cafes to assist in improving the monthly claim consolidation process. The school currently uses a manual system that is more vulnerable to clerical errors. Furthermore, the agency has a high enrollment and 29 different points of service during breakfast, which make it difficult and inefficient for staff to manage.

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Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>		<p>Finding: On the Annual Financial Report, the revenues and expenses are not correctly allocated by program and expense category (7 CFR 210.19). Revenue is reported under the Operating Transfer column rather than the School Food Revenue excluding Transfers. Work with your Food Service Management Company (FSMC) to obtain a breakdown to properly allocate a portion of the fixed fee per meal expenses to labor, food, equipment, purchased services, and other by program.</p> <p>CA: Review the Annual Financial Report webcast or manual on the DPI website then update the 2018-19 Annual Financial Report with revenues and expenses broken out by program (NSLP, SBP-SN, and Nonprogram Foods) and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p>
<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>		<p>Finding: SFA did not submit documentation and/or responses requested to complete the comprehensive resource management review under the Nonprofit School Food Service Account and Revenue from Nonprogram Foods.</p> <p>CA: Continue to work with the Nutrition Program Consultant offsite to submit requested documentation. Completion of these review areas may result in follow-up corrective action if non-compliance is identified.</p>
<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>		<p>Finding: Improper FSMC invoicing of nonprogram food sales. The FSMC base year and amendment to renew contract did not establish an A la Carte equivalent. In addition to reimbursable meals and adult meals, the FSMC provides a la carte services (extra entrees, sides, extra milk), catering, and snacks. Nonprogram food sales (except adult meals) must be billed by converting total sales dollars into a meal equivalency X the A la carte equivalency fixed price. Furthermore, the FSMC contract needs to contain an amendment for operation of the Fresh Fruit and Vegetable Program (FFVP).</p> <p>CA: Work with the DPI SNT FSMC specialist, Deb Wollin (608-267-3724 or debra.wollin@dpi.wi.gov to amend the FSMC contract. The agency must establish a A la Carte equivalency fixed price and add a Fresh Fruit and Vegetable amendment.</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>Finding: SFA did not complete the Nonprogram Foods Revenue Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.                      CA: 1) Begin tracking Nonprogram Food sales at the point of service (Entrees, sides, extra milk, and adult meals). 2) Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. This tool will need to be completed in collaboration with the FSMC to obtain the food cost per serving and to set the selling price to ensure proper monthly billing by the FSMC and reimbursement from the district to the Food Service account for any items provided free of charge.</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>Finding: Adult meal prices are not set according to FNS Instruction 782-5 Rev. 1.                      CA: Increase the adult lunch and breakfast selling price. At a minimum, the adult lunch must be \$3.78. Consider \$3.80. The adult breakfast must be \$2.27 at a minimum. Consider \$2.30. Notify SFA staff and update prices by the corrective action due date. Update the online contract with the new adult meal prices. Revenue from the sale of adult meals must be recovered/deposited into the food service account in full through either direct customer payment, or a transfer from other non-federal funds. *This transaction will be reviewed as part of the corrective action to receive documents to complete the comprehensive reviews under the Nonprofit School Food Service Account and Nonprogram Foods.</p>
<b>Site Name</b>	
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	
<b>TA Log #</b>	
<b>Due Date</b>	
<b>Corrective Action Status</b>	
<b>Corrective Action History</b>	<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).                      CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
<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>	<p>Finding: Non-school nutrition staff (teachers) who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).                      CA: Provide a training plan for the current school year, for teaching staff, with school nutrition program responsibilities. Training should cover taking the point of service count and the annual WI Civil Rights PowerPoint.</p>
<b>Site Name</b>	

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<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>		<p>Finding: No SOP for the use of an insulated bag to transport/serve TCS foods for BIC and the FFVP.</p> <p>CA: Submit copies of the of the SOPs the SFA will implement along with a staff sign-off to prove training was conducted. Review the template Use of Milk Bags: Monitoring Temperature Option ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx</a> ) and FFVP SOP, which can both be modified to your site's needs.</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>		
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>		<p>Finding: Meal counts totals are not correctly consolidated. 1) Systemic SBP-SN underclaim in October and September that is likely the result of a manual consolidation process more prone to clerical errors. 2) Non-systemic consolidation error in October for NSLP and SBP-SN resulting in a underclaim. Four operating days were omitted from the claim. All errors will be corrected through the fiscal action AR process.</p> <p>CA:</p> <ul style="list-style-type: none"> <li>-Correct the point of service in the classrooms by retraining all staff responsible for taking meal counts. Meals must be counted as the students receives the meal and cannot be based on attendance or the assumption that all students will eat.</li> <li>- Submit a statement in SNACS outlining how the point of service system will be corrected.</li> <li>- Upload a training attendance record in SNACS that includes staff signatures and date of re-training.</li> </ul>
<b>Site Name</b>	Milwaukee Academy of Science	
<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>		
<b>Corrective Action History</b>		<p>Finding: A milk variety was not offered to elementary students participating in Breakfast in the Classroom (BIC). Only 1% unflavored milk was offered. Grades K-5 must be offered a variety of milk, (at least two allowable milk types) at lunch and breakfast. Allowable milk types in Child Nutrition Programs include fat-free (skim) and low-fat (1 percent) flavored and unflavored milk, and lactose-free or lactose-reduced fat-free or low-fat milk. Please note that Pre-K students do not need to be offered a milk variety. Additionally, pre-K students were offered skim chocolate milk at lunch, but the pre-K meal pattern does not allow for flavored milk.</p> <p>Corrective Action: Please submit a current K-5 breakfast milk recipe to show that a milk variety is offered. Please submit a written statement confirming that pre-K students will not have access to flavored milk.</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	

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<b>Question #</b>	404	
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>		<p>Finding: Signage was not posted at breakfast for middle school students to show 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 in order to make a reimbursable meal. Signage examples can be found on our Signage webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a>).</p> <p>Corrective Action: Submit a picture of complete signage posted near the middle school breakfast service line.</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	500	
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>		<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for both breakfast and lunch. Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a>). The lunch meal pattern webcast may also be helpful (<a href="http://dpi.wi.gov/school-nutrition/training/webcasts#lunch">http://dpi.wi.gov/school-nutrition/training/webcasts#lunch</a>).</p> <p>Corrective Action: Have staff (including teachers) responsible for determining reimbursable meals attend training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1104	
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		
<b>Corrective Action History</b>		<p>Finding: Second entrees and side dishes are given away to students and paid for by the school. Per USDA guidance, these entrees and side dishes must meet the Smart Snacks standards even though they are not directly sold to students. Entrees that are part of the reimbursable meal are exempt from the Smart Snacks standards on the day of and day after service. Use the Smart Snacks calculator to evaluate side dishes for compliance (<a href="https://foodplanner.healthiergeneration.org/calculator/">https://foodplanner.healthiergeneration.org/calculator/</a>). Side dishes that are not compliant may not be served as seconds.</p> <p>Corrective Action: Submit a written plan detailing how you will ensure that all second side dishes are compliant with Smart Snacks.</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>		

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<b>Corrective Action History</b>		<p>Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent: • Grape Tomatoes</p> <p>Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a>).</p>
<b>Site Name</b>	Milwaukee Academy of Science	
<b>Form Name</b>	Special Provisions (2113-2117)	
<b>Question #</b>	2115	
<b>TA Log #</b>		
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>		<p>Finding: SFA did not retain records used in the development of the Community Eligibility Provision (CEP) ISP and claiming percentages. This packet is provided at the time of CEP application and approval. The State agency provided the SFA with an electronic version of the original approval packet. This is likely the result of recent staff turnover at the SFA.</p> <p>Corrective Action: Submit a statement of understanding agreeing to retain records that pertains to the development of the CEP ISP and claiming percentages as required. Retain the CEP application approval packet for the entire time the agency participates in the provision. In addition, for three years after the last claim is submitted under the provision or until any open audits are resolved. Records to approve any recalculations and annual CEP Intent Forms must also be retained.</p> <p><b>Corrective action received offsite. No further action required.</b></p>

**Technical Assistance Entries:**

Comments							Created By	Created Date
11/08/2019	902	2110	Administrative Review	ALL	*			
<p>It is acceptable to use Time as a Public Health Control for holding TCS foods rather than temperature control. Since the agency serves a high-risk population (PreK), you may wish to consult your local sanitarian. Examples of TCS foods are cut leafy greens, cut melons, and cut tomatoes. When holding cold food w/o temperature control, ensure all extras are served or thrown out within 6 hrs. or that the temperature does not exceeds 70 F. Consider using temperature control (e.g., cooler or insulated bag) during delivery and service to ensure quality and acceptance by students.</p>								
<p>Transferring Students: If a student from MAS transfers to another district that offers the USDA Meal Programs, but requires the collection of F/R meal applications, consider initiating communication (with parents and the new school) that the student came from a CEP school. The student is automatically eligible for 30 days of free meals (or until or new determination is made). This will provide time for the new school to process a application, run DC, and reduce meal charges to the household.</p>								11/8/2019 1:55:48 PM
11/08/2019	901	2110	Administrative Review	ALL	*			
<p>Visiting students from another SFA: If the agency hosts school aged students from an outside school, MAS may offer the students a free unit meal and include that meal in the total daily count for reimbursement. Ensure the home school for visiting students do not also claim those meals.</p>								11/8/2019 1:46:43 PM
11/08/2019	899	801	Administrative Review	ALL				
<p>CEP SFAs are required to distribute a simplified Public Release before the start of the school year. The purpose is to inform the public that free meals are available at MAS. In addition to distributing the PR to a local news media, the SFA must also send it to a couple</p>								11/8/2019 1:17:04 PM

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of grassroots organizations (e.g., medical/dental clinic, food pantry, library, church, Post Office, etc.).									
11/07/2019	914	404	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
Because the vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx</a> ).									11/11/2019 8:06:59 PM
11/07/2019	913	401	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
Pre-K students at Milwaukee Academy of Science are not co-mingled with other grades when coming through the line for breakfast or lunch. Therefore, they must be served meals that meet the Infant and Pre-K Meal Pattern. Please refer to the Infants and Preschool in NSLP and SBP webpage for more information ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool</a> ).									11/11/2019 12:54:21 PM
11/07/2019	912	403	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
Only unflavored milk is allowable under the pre-K meal pattern. Flavored milk may not be served. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk ( <a href="https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk">https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk</a> ).									11/11/2019 12:51:52 PM
11/07/2019	910	1905	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
The Fresh Fruit and Vegetable Program (FFVP) should be promoted throughout the school and to parents at various points throughout the school year. A parent letter can be found on our FFVP webpage ( <a href="https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable">https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable</a> ). There are resources on our FFVP Promotion webpage that may be used for nutrition education and program promotion ( <a href="https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable/promotion">https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable/promotion</a> ).									11/11/2019 12:19:20 PM
11/07/2019	909	500	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
Pre-K students may not be served using Offer versus Serve (OVS); they must take all items offered. At breakfast and lunch, there was confusion over the grades that use OVS and those that do not. Staff training is needed to clarify that grades K-12 use OVS but pre-K does not.									11/11/2019 12:07:10 PM
11/07/2019	908	406	Administrative Review	Milwaukee Academy of Science	FSD				
<b>Comments</b>									
								<b>Created By</b>	<b>Created Date</b>
There is no overlap in calorie requirements for grades 6-8 and grades 9-12. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. There are currently small menu differences between these two grade groups and both groups are meeting meal pattern requirements, but remember to continue to offer different portion sizes.									11/11/2019 11:38:52 AM
11/01/2019	907	1219	Administrative Review	ALL					

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Comments									
					Created By			Created Date	
Ensure the required content areas are tracked on the staff's Professional Standards excel spreadsheet. The agency was missing Position, Date of Hire, and required hours of training. This was clarified and updated during the offsite review.								11/8/2019 4:19:02 PM	
11/01/2019	906	1219	Administrative Review	ALL					
Comments									
					Created By			Created Date	
Annual Professional Standards Training hours at the Food Service Director level (12 hrs. / SY) must be maintained by the FSMC FSD as well as a district staff member. This is currently the Authorized Representative at MAS.								11/8/2019 4:15:31 PM	
11/01/2019	905	806	Administrative Review	ALL					
Comments									
					Created By			Created Date	
The WI Civil rights training PowerPoint must be reviewed on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood service staff.								11/8/2019 3:36:49 PM	
11/01/2019	904	805	Administrative Review	ALL	*				
Comments									
					Created By			Created Date	
SFA may choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.								11/8/2019 3:32:50 PM	
11/01/2019	903	805	Administrative Review	ALL	*				
Comments									
					Created By			Created Date	
A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website.								11/8/2019 3:27:52 PM	