

Administrative Review Report

Carter's Christian Academy, Inc

Commendations:

Thank you to the staff at Carte's Christian Academy, Inc. for the courtesies extended to us 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. There were many documents prepared when we arrived at the SFA; all were in an organized manner. The staff was interested in learning to complete tasks correctly and look for more training opportunities.

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person in 2023. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin [DPI School Nutrition GOALS Training Webpage](#).

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Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action History	<p><u>Finding 1:</u> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19), specifically USDA commodities were not included as expense and revenue.</p> <p><u>Corrective Action 1:</u> Review the Annual Financial Report webcast or manual on the DPI website then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS or email to nutrition program consultant for approval. Once approved, the DPI accountant will make adjustments after December 31.</p> <p><u>Finding 2:</u> The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not tracking the funds separately.</p> <p><u>Corrective Action 2:</u> 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.</p>
Site Name	
Form Name	Indirect Costs (712)
Question #	712
Corrective Action History	<p><u>Finding:</u> Indirect costs of trash removal and pest control 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.</p> <p>If the indirect charge for trash removal and pest control is discontinued, previously charged amounts will not need to be paid back to the food service account.</p> <p>If Carter's Christian Academy wishes to determine a direct cost for trash removal and pest control 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> <p><u>Corrective Action:</u> Provide a statement that Carter's Christian Academy will no longer charge trash removal and pest control to the food service account.</p> <p>If Carter's Christian Academy decides they would like to turn the indirect cost of trash removal and pest control into direct cost to be charged to the food service account, contact the DPI Nutrition Program Consultant for approval.</p>
Site Name	
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action History	<p><u>Finding:</u> Current Local Wellness Policy (LWP) does not include all of the required content, SFA is missing non-discrimination statement and nutrition promotion, specifically strategies to increase the appeal of school meals (7 CFR 210.31).</p> <p><u>Corrective Action:</u> Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website.</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1219
Corrective Action History	<p><u>Finding:</u> Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year, specially the individual checking off the students as they are receiving a meal (7 CFR 210.30). This person has civil rights training, however, should also have POS and meal pattern training.</p>

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		<u>Corrective Action:</u> Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities and upload to SNACS.
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
Corrective Action History		<p><u>Finding:</u> The SFA did not have a completed copy of a site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p><u>Corrective Action:</u> Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.</p>
Site Name	Carter Lower Campus	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
Corrective Action History		<p><u>Finding:</u> SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.</p> <p><u>Corrective Action:</u> (Non-systemic) Upload the April 2023 monthly edit check and daily count sheets into SNACS.</p>
Site Name	Carter Lower Campus	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
Corrective Action History		<p><u>Finding:</u> Daily grain shortage at breakfast on one day during the week of review (Wednesday March 15th). The Nutrigrain bar offered on the breakfast menu credited as less than 1.0-ounce equivalent (oz eq) of grain and students did not have access to another grain option.</p> <p><u>Corrective Action:</u> Submit a statement explaining what will be done to the menu on the week of review so that there is no daily grain shortage when the Nutrigrain bar is offered.</p>
Site Name	Carter Lower Campus	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	
Corrective Action History		<p><u>Finding:</u> Second servings and bonus items are given free of charge to students above and beyond their reimbursable meals. Offering seconds complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly dietary specifications. If students are still hungry, additional servings of fruit and non-starchy vegetables may be provided.</p> <p><u>Corrective Action:</u> Submit a statement of understanding that second servings free of charge to students is not allowable and that this practice will be discontinued.</p>
Site Name	Carter Lower Campus	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
Corrective Action History		<p><u>Finding:</u> The leftovers and milk usage, and milk variety were not consistently filled in daily on breakfast and lunch production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production.</p>

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	<p>Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>In addition, the quantity prepared in purchase units did not match how many servings were prepared, and crediting information was frequently incorrect. Menu items were not detailed in their description and serving sizes were often written incorrectly or weight was written when it should have been volume (i.e. 8 oz vs 8 fl oz).</p> <p>Corrective Action: Submit one full week of completed breakfast and lunch production records, including leftovers and milk usage recorded daily in addition to detailed menu item descriptions, correct crediting, and correct serving sizes. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Carter Lower Campus
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
Corrective Action History	<p>Finding: Acceptable crediting documentation was not available for the Egg Patty, served March 16th, 2023, as a watermarked CN label was submitted, and the box was not available onsite during review.</p> <p>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.</p> <p>Additionally, there was not acceptable crediting documentation for the Campbell's Condensed Tomato Soup (March 14, 2023), Jennie-O turkey breast slices (March 15th), and Basic American Foods Scalloped Potato Mix (March 16th).</p> <p>Corrective Action: Submit acceptable crediting documentation for the Egg Patty (photo of the CN label), Campbell's Condensed Tomato Soup (<u>obtained onsite; no further action required</u>), Jennie-O turkey breast slices (CN label or PFS), and BAF Scalloped Potato Mix (<u>obtained onsite; no further action required</u>).</p>
Site Name	Carter Lower Campus
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
Corrective Action History	<p>Finding: Standardized recipes on file used during the onsite review and review week lacked pieces of information necessary for standardized recipes. Technical assistance was provided on-site to analyze each portion of the recipe. This is needed for menu planning to ensure that the portions offered are actually what is intended.</p> <p>Please use our Standardized Recipes webpage to aid in this process (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). The recipe standardization process may take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.</p> <p>Corrective Action: Update and submit a standardized recipe for the scalloped potatoes (or alternative recipe for mashed potatoes), tomato soup, corn, turkey sandwich, grilled cheese, and oatmeal. Be sure to include all requirements of a standardized recipe, including serving size and yield.</p> <p>Resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>
Site Name	Carter Lower Campus
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action History	<p>Finding: SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1, the SFA only completed NSLP on-site monitoring for 1 site and must monitor all NSLP locations.</p> <p>Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP.</p>

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		<p>The NSLP On-Site Monitoring Form and the SBP On-Site Monitoring Form forms are on the Onsite Monitoring section of the DPI SNT website.</p> <p><u>Corrective Action:</u> Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.</p>
Site Name	Carter Lower Campus	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
Corrective Action History		<p><u>Finding 1:</u> SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.</p> <p>In the back storage room, it was observed that sanitizer was being stored next to food. It is recommended that the disposable trays be placed in between the food and sanitizer instead of being stored on the end to prevent potential cross contamination.</p> <p><u>Corrective Action 1:</u> Since correcting this storage violation cannot be corrected while on-site, please correct this violation and submit a photo of the back storeroom where this violation occurred.</p> <p><u>Finding 2:</u> Milk was observed on the counter without temperature control during service (not in a cooler, no ice, no ice-lined milk bags, or barrels).</p> <p><u>Corrective Action 2:</u> SFA may choose one of the three following options.</p> <ol style="list-style-type: none"> 1. Utilize time as a public health control (TPHC) procedures requiring disposal of product at the end of each meal period. 2. Utilize ice-lined milk bags or barrels so that temperature control is used. 3. Work with local regulatory authority/sanitarian to develop an alternative method for serving milk outside of temperature control. <p>Provide a statement of how this requirement will be met.</p>
Site Name	Carter Lower Campus	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
Corrective Action History		<p><u>Finding:</u> The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <p>Mandarin Oranges (China) Pineapple Tidbits (Indonesia)</p> <p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).</p> <p><u>Corrective Action:</u> Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>

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Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
04/06/2023	3391	434	Administrative Review	Carter Lower Campus	Lunch Administrator
Comments					
<p>Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made.</p> <p>Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p> <p>1. Tomato soup - the recipe was not being followed as written. The staff were preparing 10 - 50 oz cans of condensed soup with 10 cups of milk and were serving it in 1/2 cup portions, not full cup portions. Using the total volume of the recipe, this would produce 131 half cup servings. Additionally, the recipe crediting was incorrect and there was not a PFS on file for the condensed tomato soup. DPI obtained a PFS in order to credit the recipe as prepared.</p> <p>2. Scalloped potatoes - the Basic American Foods Scalloped Potatoes Mix was incorrectly credited, and the recipe ingredients inconsistently reflected bulk ingredients and individual ingredients. A PFS was not on file for the BAF Scalloped potatoes. A PFS was obtained by DPI and the recipe credited based on the information. The 1/2 cup serving of potatoes only credits as 3/8 cup due to additives in the potato mix.</p> <p>3. Turkey Sandwich - the amount of turkey to pull divided by number of sandwiches prepared yields 2.13 oz (wt) per sandwich; however, there was no PFS on file to be able to credit the turkey sandwich properly. Corn - the current number of cans pulled in the recipe does not yield 100 half cup servings as the recipe indicates. Each number 10 can of corn, drained yields 19.8 half cup servings of heated, drained corn per the USDA Food Buying Guide. Thus, 4 number 10 cans would yield 79.2 half cup servings, not 100.</p>					
04/04/2023	3360		Administrative Review		FSD
Comments					
<p>It is recommended that all SFAs have some type of translation services offered to students and families to help with completing paperwork and communicating with Nutrition Services as well as other departments in the School District.</p>					
04/04/2023	3392	431	Administrative Review	Carter Lower Campus	Lunch Administrator
Comments					
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff to record actual amounts prepared, leftovers, additional servings prepared, and any bagged meals. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.</p>					
04/04/2023	3358		Administrative Review		FSD
Comments					
<p>Wellness policy includes specific Smart Snacks regulations, would recommend including the statement along the lines of "foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule."</p>					
04/04/2023	3357		Administrative Review		FSD
Comments					
<p>The SFA must inform the public about the content, implementation of, and updates to the LWP on an annual basis, it is recommended to have the wellness policy available on the SFA website.</p>					