

Administrative Review Report

Sparta Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/07/2022	11/17/2022
On-Site Review	11/15/2022	11/17/2022
Site Selection Worksheet	11/07/2022	11/07/2022
Entrance Conference	11/15/2022	11/15/2022
Exit Conference	11/17/2022	11/17/2022

Commendations:

The Food Service director at Sparta Area school District is organized and prepared, supports staff in their professional development, and creates a positive work environment. Administration and school site staff were welcoming and cooperative. Food service staff take pride in their work and relate well to students at meal service. The student eligibility information is kept secure, accurate, and up to date. The verification process was completed efficiently and correctly. SFA claims for reimbursement were verified and accurate. Food safety manuals contain all the required information and are site specific.

Recommendations:

No Recommendations found for this review.

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Findings and Corrective Action:

Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/16/2022 04:36 PM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). CA: Provide a timeline for when a school meal program civil rights complaint policy and procedures will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. SA provided SFA with a template for civil rights complaint procedures.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/16/2022 03:16 PM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content. (7 CFR 210.31).The LWP does not identify the person responsible, reference the triennial assessment, or explain how the public will be notified of updates. CA: 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.
Site Name	Sparta Hi	
Form Name	Dietary Specification Assessment Tool (Off Site Review)	
Question #	22	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 06:49 PM	Finding: The salad bar that is accessible to all students has shredded cheese, diced ham, sliced black olives, and croutons, including squeeze bottles of salad dressings available to students in the amounts of the students choosing. The menu planner does not have a serving size/serving tool that limits the amount students are able to take. This results in the dietary specifications being out of compliance daily and weekly. Corrective Action: Submit a plan of how the salad bar will come into compliance with the dietary specifications.
Site Name	Sparta Hi	
Form Name	Dietary Specification Assessment Tool (On Site Observation)	
Question #	19	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/17/2022 04:11 AM	Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. The recipes currently being used are not standardized to the kitchens where the meals are created. Each site needs to standardize their own recipes. Corrective Action: Submit a standardized recipe for the two of the pizza's made in house at the high school. Be sure to include all requirements of a standardized

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		recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes)
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	135	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Removed	
Corrective Action History	Flagged 11/15/2022 05:21 PM	Finding: The SFA did not retain direct certification (DC) match runs on file at the SFA, either electronically or hard copy (7 CFR 245.6). CA: Provide a statement describing how the SFA will retain DC files for the required timeframe.
	CAP Removed 11/29/2022 12:32 PM	CAP Removed. Corrected on site.
Site Name	Herrman Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 04:40 PM	Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line.
Site Name	Sparta Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 06:36 PM	Finding: The deli bar had a meat/meat alternate shortage. The roast beef was not being weighed and credited properly. The roast beef slices weigh 0.5 oz each and 4 slices weigh 2 oz. Per the crediting documentation 2oz by wt. credits as 1 oz eq m/ma. Even with a slice of cheese, 0.5 oz eq, this sandwich will credit as 1.5 oz eq m/ma. This is a daily and weekly shortage. Corrective Action: Submit a plan of how this deli bar will always produce 2 oz eq m/ma sandwiches daily.
Site Name	Sparta Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 06:20 PM	finding: The high school production records - deli bar, pizza bar, salad bar, vegetable bar, fruit bar, and main line were not consistently filled in daily on 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. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Corrective Action: Submit one full week of completed production records, including all required information, including planned serving sizes for each item offered. Choose a complete week (Monday - Friday) after the completion of the administration review (AR), but before the corrective action due date.
Site Name	Sparta Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 06:11 PM	Finding: At least 80% of the grains offered weekly on each serving line must be whole grain rich. The herb garden tortilla used daily on the deli bar is not whole grain rich. Corrective Action: Describe how the deli bar menu will be changed to comply with the 80% whole grain-rich requirement. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be offered in place of the non-wgr tortilla.
Site Name	Sparta Hi	
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	Flagged 11/22/2022 06:02 PM	Finding: There was a weekly bean/pea/legume shortage, not a missing subgroup because they appear on the Salad Bar that all students have access to. Based on the amount listed on the production records, missing planned portion size, and amount provided is not enough to credit properly. The menu planner must plan at least 1/2 cup serving of bean/pea/legumes over the course of the week. Corrective Action: Submit a statement explaining how this weekly bean/pea/legume shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredient lists, crediting documentation, and a standardized recipe if applicable.
Site Name	Herrman Elementary	
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	Flagged 11/22/2022 07:38 PM	Finding: Over the course of the review week, only 1/4 cup of bean/pea/legume was planned and offered. Corrective Action: Please submit a detailed statement explaining how this shortage will be addressed each week.
Site Name	Herrman Elementary	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 07:23 PM	Finding: Food service staff were unclear about how offer versus serve (OVS) is meant to be used for breakfast and lunch. Although all students observed took a reimbursable meal, it is important for staff to understand OVS. Resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning). The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns:~:text=Policy-,Meal%20Patterns,-Title%20/%20Description). Corrective Action: Have all serving staff attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.
Site Name	Sparta Hi	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/15/2022 09:56 PM	Finding: The nondiscrimination "And Justice for All" poster is located in the meal service area and visible to students (FNS Instruction 113).however it is the 2015 version of the AJFA poster and not the allowable 2019 or 2022 version. CA: Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required.
Site Name	Sparta Hi	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1104	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 07:04 PM	Finding: The Sparta School Store offers a double packaged beef stick with no documentation to ensure it meets the Smart Snacks Standards. Schools across the country agree to comply with the regulations set forth by the USDA when they choose to participate in the USDA School Meals Programs, willful noncompliance of regulations can result in the loss of federal funding. As school nutrition professionals we work hard to offer students the best we are able, as we do not have control or any idea what students have access to when they are not at school. Corrective Action: Submit a statement explaining how the school store will bring all foods and beverages into compliance. Include who at the high school will be responsible for tracking the items and how the documentation will be kept. Each item must have ingredient and nutrition labels as well as the Healthier Generations sheets, indicating the items compliance.
Site Name	Sparta Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 07:14 PM	Finding: Food products currently being used by the SFA for the CNPs are not being tracked for the Buy American provision. Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributors website. If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american). Submit a detail plan for how items will be monitored and kept on site.

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Site Name	Sparta Hi		
Form Name	Afterschool Snack Program (1700)		
Question #	1700		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 11/22/2022 03:11 PM	Finding: Afterschool Snack counts were incorrectly claimed (7 CFR 210.10) by SFA listing the NSLP ADA as the Afterschool snack ADA. Activity attendance is not being tracked. CA: One day per month take attendance of each and all afterschool enrichment and educational programs. Upload these attendance counts by each activity into SNACS. Total and use this actual attendance count as the ADA for Afterschool snack claiming moving forward.	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/22/2022	2458	10	Administrative Review	Sparta Hi	Food Service			
Comments								
							Created By	Created Date
Ensure that the And Justice For All poster is displayed during ASP service at or near the POS for all program participants to view.								
11/22/2022	2487	306	Administrative Review	ALL	Food service			11/22/2022 3:04:32 PM
Comments								
							Created By	Created Date
Edit check: in order for the Accuclaim report to be used as an edit check the SFA must regularly calculate and enter an Attendance Factor. The attendance factor is determined by dividing the average daily attendance for students by the school enrollment to obtain the attendance factor. The attendance factor is percentage of students in attendance. The attendance factor must be calculated at least once each school year but may be computed each month. Input this figure into Accuclaim in order for the report to accurately check for counting errors.								
11/22/2022	2484	314	Administrative Review	ALL	Food service			11/29/2022 12:27:43 PM
Comments								
							Created By	Created Date
The SFA's online contract indicates that for Herrman Elementary the POS is a "Cash register at beginning of line" however reviewers observed that the POS was at the end of the line at Herrman Elementary. Best practice is to review the contract after each school year begins to see that the Meal Accountability Systems selected accurately reflect the actual procedure at each site. Please update your online contract accordingly for SY 22/23.								
11/22/2022	2483	200	Administrative Review	ALL	Food service			11/29/2022 11:42:52 AM
Comments								
							Created By	Created Date
Verification Collection Report terminology: In the VCR the term "Direct Verification" is referring to Section 9(b)(3)(F) of the NSLA and Program regulations at 7 CFR 245.6a(g) which permits SFAs to "directly" verify approved applications selected for verification. Direct verification involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. Direct verification may be used when the household application, certified based on case number, is subject to verification under the SFA's use of alternative sample size. SFAs may conduct direct verification activities with Assistance Programs and with the agency that administers Medicaid and CHIP at the State level. Direct verification must be conducted prior to contacting the household for documentation. The public agency's records may document income for any point in time between the month prior to application and the time the household is required to provide income documentation. Often confused with Direct Certification and with Verification itself, Direct Verification refers only to the specific process above.								
							Created By	Created Date
11/29/2022 11:23:36 AM								

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11/22/2022	2482	126	Administrative Review	ALL	Food services				
Comments					Created By	Created Date			
While electronic systems may report an annualized income for all Free & Reduced Meal applications it is required that determinations are made only by the specific income frequency indicated by the applicant. The exception would be when the applicant indicates a mix of income frequencies in which case each amount is annualized and all amounts then added together. The electronic system in use shows both an annualized income and the frequency income. SFA has been incorrectly noting the annualized income on the application notes by determining official. Ensure that going forward applications are determined and noted as having been determined on the correct income frequency.						11/29/2022 11:10:18 AM			
11/16/2022	2415	1600	Administrative Review	ALL	FSD				
Comments					Created By	Created Date			
Excellent job promoting the SBP in the beginning of the school year. Best practice is to promote the SBP throughout the school year. For example, promote the SBP at the beginning of the second semester or quarterly. Consider strategies available on the SNT Marketing Your Program Webpage.						11/16/2022 5:23:19 PM			
11/16/2022	2414	805	Administrative Review	ALL	FSD				
Comments					Created By	Created Date			
Food Service Department should retain a copy of student IEPs that relate to special dietary needs. Food service should work collaboratively with the Special Education Department to maximize food choices for students while adhering to the IEP. For example, teachers can take a tray with all components and one empty tray to the student. Then, the student can select which food items they would like. Another option is to inform the student of all available items and ask them which items they would like to take for that meal.						11/16/2022 5:02:10 PM			
11/16/2022	2413	305	Administrative Review	ALL	Food service				
Comments					Created By	Created Date			
It is important that an Angel Fund is distributed equitably among the students to protect your SFA from civil rights complaints. The unpaid meal charge policy should explicitly explain to households how they can request assistance from the Angel Fund. Additionally, if your SFA sets a limit on how long families can rely on the Angel Fund this should also be stated in the unpaid meal charge policy. For example, set a dollar amount that the Angel Fund will support each household or a timeframe, such as one month. Funds may be transferred from the Angel Fund into Fund 50 to cover (write off) bad debt. To do this the money is entered into each negative student lunch account to zero it out and then add up the total the SFA will write off. Next, transfer from the Angel Fund into Fund 50 the full write-off amount. To establish a long-term payment plan for households with negative meal accounts, SFAs may create repayment plans helpful for households with income just above the threshold for free or reduced-price meals or where income is sporadic. SFAs also are able to carry over unpaid meal charges at the end of the school year (i.e. beyond June 30) as a delinquent debt and collection procedures may continue into the next school year.						11/16/2022 4:44:51 PM			
11/16/2022	2412	803	Administrative Review	ALL	FSD				
Comments					Created By	Created Date			
To develop a civil rights complaint procedure specific for your SFA's school meal programs, reference the template civil rights complaint procedures for SFAs from the SNT Civil Rights Webpage.						11/16/2022 4:39:43 PM			
11/16/2022	2410	305	Administrative Review	ALL	Food Service Director				
Comments					Created By	Created Date			
When counting and claiming field trip meals ensure that student accounts are not charged based on 'orders' for field trip meals. Send a student roster along with preordered meals, have adult staff person check off each student's name as they receive their meal (POS) and return the roster to food service. At that point student accounts may be charged.						11/16/2022 4:19:47 PM			