

Administrative Review Report

Pepin Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/17/2019	01/27/2020
On-Site Review	01/27/2020	01/29/2020
Site Selection Worksheet	12/17/2019	12/19/2019
Entrance Conference	01/27/2020	01/27/2020
Exit Conference	01/29/2020	01/29/2020

Commendations:

Thanks to staff at Pepin Area School District for their cooperation and responsiveness during the Administrative Review. Pepin is doing a good job in meeting the program requirements in several areas: claiming was verified as correct, meals served are reimbursable. The district is committed to ensuring students receive breakfast and lunch. The kitchen is extremely organized and neat. The cafeteria is bright and pleasant. The Food Safety Plan is excellent and obviously utilized. Pepin students are offered a nice variety of foods and take advantage of generous choices in fruits and vegetables.

Recommendations:

No Recommendations found for this review.

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Findings and Corrective Action:

Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually.</p> <p>CA: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually. Use your current procedures to draft your policy.</p>
Site Name	
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete the DPI 5-day Nonprogram Foods Revenue Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>CA 1: Watch the Nonprogram Foods Revenue webcast on the DPI website. CA 2: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year and inputting all the required information into the tool. CA 3: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
Site Name	
Form Name	Verification (207 - 215)
Question #	209
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The verification process was not tracked, documented, nor completed in a timely manner. The application selected for verification was not verified correctly (7 CFR 245.6a).</p> <p>CA: Have the verifying official watch the "Verification Process" webcast on the DPI website and upload a copy of the completed quiz into SNACS.</p>
Site Name	
Form Name	Verification (207 - 215)
Question #	214
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not make updates to the benefit issuance (BI) list after there was a change to eligibility as a result of verification. The SFA did not increase the benefits for the student within three calendar days as outlined in the verification process.</p>

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		CA: Submit a statement of understanding that any increase in eligibility must be updated on the benefit issuance list and in the point of service within 3 days.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		Finding: The correct non-discrimination statement was not included on all program materials including the district website food service page and on each menu. CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		Finding: Documentation of school food service staff training is being maintained to demonstrate compliance with annual training requirements per 7 CFR 210.30, however trackers contain inaccurate information such as required hours and multiple years of training on one tab. No tracker exists for the Administrative Assistant working part-time for the Child Nutrition Programs. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.
Site Name	Pepin Hi	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		Finding: The meal counting and claiming system may not result in accurate meal counts by eligibility. Students were observed at breakfast writing down their pin numbers and first name on paper. Meal counts were not taken as the student received their reimbursable meal but at the beginning of the line. Although this location is approved by contract, the SFA is selling foods A la Carte and has no way to accurately communicate between staff and students when purchasing those A la Carte foods. CA: Correct the location of the POS to the end of the service line so that purchases accurately reflect either a reimbursable meal or A la Carte items. Eliminate the use of handwritten paper lists and insure adult staff are responsible for counting meals. Consider using a single service line, given the small number of students in line at any given time, to feed into the POS. Submit a statement describing what POS changes will be made and when they will be implemented.
Site Name	Pepin Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	

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Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Any additions or substitutions must be recorded on the daily production record. PBJ sandwiches must be recorded on production records each day that they are offered to high school students. Extra items such as cookies must be recorded. Please ensure that this is done moving forward. Corrective Action: Submit a written statement agreeing that all menu offerings will be recorded on the daily production records.</p>
	<p>CAP Removed 01/28/2020 02:10 PM</p> <p>CAP Removed</p>
	<p>Finding: Daily and weekly grain shortage. The weekly grain shortage is a repeat finding, and therefore 155 meals are subject to fiscal assessment. High school students must have access to 2 oz eq grains daily and 10 oz eq grains weekly. K-8 students must have access to 1 oz eq grain daily and 8 oz eq grain weekly. The following meals are subject to fiscal action: •7 meatball meals on 12/10 (contains 1 oz eq grain) •10 chicken drummies meals on 12/11 (contains 1 oz eq grain) •9 macaroni meals on 12/13 (contains 1 oz eq grain) •13 fish meals on 12/13 (contains 1.75 oz eq grain) •The cause of the weekly grain shortage at K-8 cannot be determined, but 116 meals were sold on the day during the review week with the lowest participation. Corrective Action: Review the week of review. Submit a K-8 and 9-12 lunch menu planning worksheet ONLY FOR THE GRAIN COMPONENT reflecting changes planned to bring the lunch menu into compliance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-9-12.doc ; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc). Include any updated recipes, portion sizes, and crediting documentation for added products.</p>
Site Name	Pepin Hi
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Daily and weekly M/MA shortage. High school students must have access to 2 oz eq M/MA daily and 10 oz eq M/MA weekly. K-8 students must have access to 1 oz eq M/MA daily and 9 oz eq M/MA weekly. Currently, peanut butter is portioned using a #20 scoop, which holds 3.2 tablespoons, which credits at 1.5 oz eq M/MA. This totals 7.5 oz eq M/MA weekly. Peanut butter must measure at least 4 tablespoon or 2.2 ounces by weight in order to credit as 2 oz eq M/MA.</p> <p>Corrective Action: Outline what will be done to portion peanut butter moving forward. Include any updated recipes, portion sizes, and crediting documentation for added products.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/29/2020	1627		Administrative Review					
Comments								
						Created By		Created Date
The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training).								2/11/2020 12:50:01 PM
01/29/2020	1625		Administrative Review					

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Comments				Created By	Created Date
<p>• All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. Instructions are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). • These categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> o Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food". o "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other". o Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections. o Under "nonprogram foods", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from extra milks, adult meals, a la carte, and caterings would also be included here. o When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools. Additional budgeting and Cost control tools are located on the DPI SNT website including tools to calculate Meals per labor hour, Annual time study, and a Menu Raw Food Costing tool. 					2/11/2020 12:45:02 PM
01/29/2020	1624		Administrative Review		
Comments				Created By	Created Date
<p>SFA is required to review and update LWP (1002) The final Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010 rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. This SFA has not reviewed nor updated their policy within the past three years. SFA is required to complete an assessment of the LWP (1005) The first triennial assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. SFAs must release a report to the public detailing the assessment. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at School Nutrition Team's Wellness Policy webpage.</p>					2/11/2020 12:07:44 PM
01/28/2020	1491	137	Administrative Review	ALL	
Comments				Created By	Created Date
<p>The accurate transferal of benefit status and eligibility determination dates from applications and DC lists to the POS and BI list is crucial. NSLP participation requires SFAs to keep a Benefit Issuance list which is up to date and clear. Detailed notes relating to eligibility changes should be kept attached to those student records.</p>					1/28/2020 7:44:11 PM
01/28/2020	1490	103	Administrative Review	ALL	
Comments				Created By	Created Date
<p>According to 7CFR 245.6 a student's eligibility from the previous school year carries over for up to 30 operating days into a new school year, or until a new eligibility determination is made, whichever comes first. The carryover period is not intended to delay processing of applications. Schools must process apps as they are received and promptly notify households of their eligibility status. That change must be effective in the POS and benefit issuance systems on the determination date.</p>					1/28/2020 7:34:36 PM
01/28/2020	1489	801	Administrative Review	ALL	
Comments				Created By	Created Date
<p>SFAs are required to distribute the Public Release to a minimum of 1 news organization and 1 grassroots or nonprofit organization each year before school begins. SFAs should keep a record of to whom they distributed the Public Release and the date. SFAs are</p>					1/28/2020 7:10:39 PM

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encouraged to share the Public Release on their school website, with local employers and to print in district newsletters.							
01/28/2020	1488	1409	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
Regular reminders to staff to keep cases and buckets off the floor of the walk-in cooler and freezer are helpful. Kitchen staff should be encouraged to take food safety training for professional development and to ensure all food safety rules are followed if at any time FSD is not present.						1/28/2020 6:16:21 PM	
01/28/2020	1487	1219	Administrative Review	ALL			
Comments							
				Created By	Created Date		
Non-food service staff assisting at the POS should receive annual Civil Rights and Offer vs. Serve training. See SNT website for appropriate training materials. Best practice is to create and retain training sign-in materials						1/28/2020 5:34:27 PM	
01/28/2020	1484	1105	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
Regarding Smart Snack Regulations, USDA does not define the age/grade groups. Instead, requirements differ for "elementary," "middle," and "high" schools. Pepin High School in non-traditional in the fact that it contains students grades 7-12. All 7-12 grade students in Pepin High School may be sold Smart Snacks following the "high school" regulations. However, it is best practice to promote healthy habits and limit portion sizes of all beverages sold to all students.						1/28/2020 2:21:37 PM	
01/28/2020	1483	501	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
Those involved with USDA School Meal Programs are encouraged to attend Wisconsin DPI trainings. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements, including OVS. Travel expenses are allowable food service expenses. More information can be found on the Training webpage (https://dpi.wi.gov/school-nutrition/training).						1/28/2020 2:18:47 PM	
01/28/2020	1482	500	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
Reimbursable meals using OVS at lunch. The school must offer the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offerings, students must select at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.						1/28/2020 2:17:46 PM	
01/28/2020	1480	406	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
Continue to divide the high school students (grades 7-12) by serving the K-8 meal pattern to the 7-8 grade students and the 9-12 meal pattern to 9-12 grade students at lunch. All students may be served using the K-12 meal pattern at breakfast.						1/28/2020 2:13:05 PM	
01/28/2020	1495	501	Administrative Review	Pepin Hi			
Comments							
				Created By	Created Date		
OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html).						1/29/2020 12:17:38 PM	

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01/28/2020	1477	409	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources or contact a Public Health Nutritionist for assistance (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). A standardized recipe should not contain any alternate or optional ingredients. The information currently recorded under "Servings per Pan" should be recorded under "number of portions."							1/28/2020 11:33:19 AM		
01/28/2020	1476	409	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
As of school year 2019-20, only half of the weekly grains offered and credited in school meal programs must be whole grain-rich. Frito chips served with the chili cheese may credit toward the meal pattern. During the week of review, these would be the only non-whole grain rich offering, which would fall well below the 50% limit and is compliant. Also note that whole grain rich Frito chips are available for purchase, if you would prefer.							1/28/2020 11:32:58 AM		
01/28/2020	1475	409	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
No more than half (50%) of the fruit offered over the course of a week can be in the form of juice. Blended fruit, such as fruit used in smoothies, count as juice. It is possible to offer juice daily and still meet the 50 percent juice limit as long as every ½ cup of juice is offered along with ½ cup fruit (fresh, frozen, dried, or canned). The total amount of juice available at all meals over the course of the week is divided by this total fruit offering to determine the weekly juice offering.							1/28/2020 11:32:32 AM		
01/28/2020	1474	1411	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
Products were identified in the SFA's storage area as non-domestic and not documented • Bananas- Guatemala • Strawberries- Mexico Further information can be found in Buy American in a Nutshell (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf). Corrective Action: Complete the Non-Compliant Product Forms for non-domestic products(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). COMPLETED ONSITE							1/28/2020 11:29:43 AM		
01/28/2020	1435	403	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
Be sure to open the milk cooler prior to breakfast service to promote milk consumption with the reimbursable meal.							1/28/2020 10:02:46 AM		
01/28/2020	1492	409	Administrative Review	Pepin Hi					
Comments									
					Created By	Created Date			
Fluid ounces are a volume measure, while ounces are a weight measure. Spoodles measure fluid ounces, not ounces by weight. Meat/meat alternate (M/MA) is credited by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. To ensure that students receive the proper amount of M/MA, weigh the product, then determine which scoop will hold that weight of meat.							1/29/2020 9:35:43 AM		