

# Administrative Review Report

Elmwood School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/05/2019	01/14/2020
On-Site Review	01/14/2020	01/16/2020
Site Selection Worksheet	12/05/2019	12/06/2019
Entrance Conference	01/14/2020	01/14/2020
Exit Conference	01/16/2020	01/16/2020

## Commendations:

Thank you to the staff at Elmwood School District for your warm welcome and being available throughout the day to work with us. We appreciate all that you do to feed your students.

## \*\*Special Note

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. See Finding # 603 & 409.

## Recommendations:

It is not required that the SFA provide carbohydrate counts. It is recommended that they do not. However, it is required that SFA have nutrition information available for daily options and can present information when requested. See <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-112817.pdf> for more information.

The Institute of Child Nutrition has printable resources called Basics at a Glance that contain recipe abbreviations, measurement conversions, portioning tools, and steam table pan capacities (<https://theicn.org/icn-resources-a-z/basics-at-a-glance/>).

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Please review the following resources:

Meal pattern ([https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf))  
 Milk ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_milk\\_component.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_milk_component.pdf))  
 Meat/meat alternate ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_mma\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_mma_component_handout.pdf))  
 Yogurt ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/yogurt\\_in\\_cacfp.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/yogurt_in_cacfp.pdf))  
 Fruit and vegetables ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_fv\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_fv_component_handout.pdf))

# Administrative Review Report

Elmwood School District

Grains ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_grain\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_grain_component_handout.pdf))

Grain based desserts ( [https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/grain\\_based\\_dessert\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/grain_based_dessert_handout.pdf))

Cereal ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_cereals\\_meet\\_sugar\\_calc.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_cereals_meet_sugar_calc.pdf))

## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>Corrective Action History</b>	<p><b>Finding:</b> On the Annual Financial Report, the revenues and expenses were not broken out for Nonprogram foods.</p> <p><b>Corrective Action:</b> Review the <a href="#">Annual Financial Report Manual</a> or webcast on the DPI website then update the 2018-19 Annual Financial Report with revenues and expenses broken out by Nonprogram foods. 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>Form Name</b>	Revenue From Non-Program Foods (709 - 711)
<b>Question #</b>	709
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with Nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p><b>Corrective Action #1:</b> Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. SFAs are required to annually complete the <a href="#">DPI Nonprogram Food Revenue Tool</a> or the <a href="#">USDA Nonprogram Food Revenue Tool</a>.</p> <p><b>Corrective Action #2:</b> 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>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1000
<b>Corrective Action History</b>	<p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content including ,Smart Snack/Food Sold, information about the 3 year assessment and Beverage and Marketing information (7 CFR 210.31).</p> <p><b>Corrective Action:</b> Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126

# Administrative Review Report

Elmwood School District

<b>Corrective Action History</b>	<p><b>Finding:</b> The Determining Official did not sign and date all of the applications.</p> <p><b>Corrective Action:</b> Submit a statement of understanding that all applications must be signed and dated by the determining official once an application has been determined.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	128
<b>Corrective Action History</b>	<p><b>Finding:</b> The correct income conversation factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized.</p> <p><b>Corrective Action:</b> Review the Income Conversions section of the <a href="#">Eligibility Manual</a> (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	133
<b>Corrective Action History</b>	<p><b>Finding:</b> Out of a sample of 97 students, 11 students were not receiving the appropriate free or reduced meal benefits. Three of the students did not fall off from carry over.</p> <p><b>Corrective Action #1:</b> Using the Adverse Action template, notify the households of the correct eligibility and upload a copy of each letter. Then upload documentation verifying your system has been updated with the correct eligibility into SNACS.</p> <p><b>Corrective Action #2:</b> Work with your software to set up parameters so students fall off from carry over. Submit a statement of understanding that students are only eligible for free or reduced benefits for the current school year and 30 operating days into the next school year.</p>
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	209
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA should have verified two applications and only verified one.</p> <p><b>Corrective Action #1:</b> Select another application for Verification. Complete the verification process for the application and upload all the completed verification documentation into SNACS before the end of February.</p> <p><b>Corrective Action #2:</b> Update the Verification Collection Report by the end of February with the results of the entire Verification process.</p>
<b>Form Name</b>	Civil Rights (809 - 810)
<b>Question #</b>	810
<b>Corrective Action History</b>	<p><b>Finding:</b> The correct non-discrimination statement was not included on all program materials, including the menu (shortened non-discrimination statement) and the</p>

# Administrative Review Report

Elmwood School District

	notification and denial of benefits template (full nondiscrimination statement).  <b>Corrective Action:</b> Update program materials (menu to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1216
<b>Corrective Action History</b>	<b>Finding:</b> The school nutrition program staff did not complete the required training hours for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30).  <b>Corrective Action:</b> Review the School Nutrition Team <a href="#">Professional Standards webpage</a> for annual training requirements for school food service staff. Provide a training plan for how each staff member that is not in compliance will meet the required training hours for the current school year.
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1217
<b>Corrective Action History</b>	<b>Finding:</b> Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.  <b>Corrective Action:</b> Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool, which can be found on the <a href="#">Professional Standards webpage</a> and upload into SNACS.
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)
<b>Question #</b>	325
<b>Corrective Action History</b>	<b>Finding 1:</b> 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 for the elementary school.  <b>Finding 2:</b> SFA did not use the correct monthly edit check (Accuclaim) for counting and claiming.  <b>Finding 3:</b> The enrollment for the month of review at each school varied between breakfast and lunch.  <b>Corrective Action #1:</b> Work with software to identify why the enrollment numbers are off between breakfast and lunch. Submit an explanation.  <b>Corrective Action #2:</b> Upload monthly edit checks for breakfast and lunch for September thru December into SNACS for each school.
<b>Site Name</b>	Elmwood High School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)

# Administrative Review Report

Elmwood School District

Question #	409
Corrective Action History	<p><b>Finding:</b> 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 (picture or copy of original) to sufficiently document meal component crediting. Acceptable crediting documentation was not available for:</p> <ul style="list-style-type: none"> <li>•Gold Kist Farms Fully Cooked CN Homestyle Whole Grain Chicken Patty with ISP</li> <li>•Advance Pierre Fully Cooked Pork Sausage Link</li> <li>•Yang's BBQ Teriyaki Chicken</li> <li>•Yang's Lemongrass Chicken</li> <li>•Albie's Whole Grain Pizza Calzone</li> <li>•Jennie-O Fully Cooked Shredded Turkey with Gravy</li> <li>•Sunny Fresh Precooked Frozen Egg Patty</li> <li>•Breakfast burrito</li> <li>•Pizza</li> <li>•Bun (submit nutrition fact label)</li> </ul> <p><b>Corrective Action:</b> Submit acceptable crediting documentation for the items listed. Additionally, submit label for the bun that includes the weight of a serving in grams or ounces, the ingredient list, and nutrition facts.</p>
Site Name	Elmwood High School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	<p><b>Finding:</b> Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The following information was missing or incomplete on the production records from the week of review:</p> <ul style="list-style-type: none"> <li>•The planned serving size listed was not actually accurate on all production records (for example, 3.5 oz peas and carrots on 12/2, and ½ pint mixed fruit on 12/5.</li> <li>•The number of meals planned and served is not consistently recorded</li> <li>•The date is not recorded</li> <li>•The specific type(s) of fruit offered, along with planned portion size(s) each day was not recorded</li> </ul> <p><b>Corrective Action:</b> Review the Production Record Requirements (<a href="http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>). Submit one week of completed production records, including accurate planned serving size for each item daily.</p>
Site Name	Elmwood High School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	411
Corrective Action History	<p><b>Finding:</b> Meat/Meat Alternate is credited by weight not volume. Crediting cannot be determined without the weight of M/MAs served.</p> <p><b>Corrective Action:</b> Please submit the weight of a serving of</p> <ul style="list-style-type: none"> <li>•Yang's Teriyaki Chicken</li> <li>•Yang's Lemongrass Chicken</li> </ul>

# Administrative Review Report

Elmwood School District

	<ul style="list-style-type: none"> <li>•Manwich meat (1/2 cup portion)</li> </ul>
Site Name	Elmwood High School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	412
Corrective Action History	<p><b>Finding:</b> Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the breakfast sandwich or Manwich meat.</p> <p><b>Corrective Action:</b> Submit a standardized recipe for the breakfast sandwich and Manwich meat. 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>).</p>
Site Name	Elmwood High School
Form Name	Dietary Specifications and Nutrient Analysis (603-605)
Question #	603
Corrective Action History	<p><b>Finding:</b> Daily, weekly, and sub-group vegetable shortages. High school students must have access to 1 cup vegetables daily at lunch. Vegetable subgroup requirements must be met weekly (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetables-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetables-in-a-nutshell.pdf</a>)</p> <p><b>Corrective Action:</b> See <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a> for meal pattern requirements, menu planning worksheets, and completed examples. Submit completed breakfast and lunch menu planning worksheets for grades 9-12 for the week of review (December 2-6, 2019), showing that all quantities will be met.</p>
Site Name	Elmwood High School
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action History	<p><b>Finding:</b> The nondiscrimination “And Justice for All” poster was the outdated version from the 1990s. New posters were requested and sent to the SFA.</p> <p><b>Corrective Action:</b> Provide an image of the new poster displayed in a prominent location in the cafeteria.</p>
Site Name	Elmwood High School
Form Name	Smart Snacks (1104 - 1107)
Question #	1104
Corrective Action History	<p><b>Finding:</b> None of the items in the vending machine are Smart Snack compliant. These items can only be sold outside of the school day (midnight – 30 minutes after the instructional day ends).</p>

# Administrative Review Report

Elmwood School District

	<p><b>Corrective Action:</b> Submit a written plan of action that will be taken. This might include altering the offerings in the vending machine to be Smart Snack compliant. Alternately, set the vend time to be thirty minutes after the end of the instructional day until midnight.</p>
Site Name	Elmwood High School
Form Name	Smart Snacks (1104 - 1107)
Question #	1106
Corrective Action History	<p><b>Finding:</b> Tracking exempt fundraisers is crucial to ensuring compliance. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers, and ensuring that each fundraiser is not more than two consecutive weeks. Tracking templates are available on the Smart Snacks webpage, (<a href="http://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>). Consider sharing Smart Snacks in a Nutshell with staff members (<a href="http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf">dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf</a>). The Alliance for a Healthier Generation has a useful calculator that can be used to determine product compliance (<a href="http://foodplanner.healthiergeneration.org/calculator">foodplanner.healthiergeneration.org/calculator</a>).</p> <p><b>Corrective Action:</b> Submit a statement explaining how the school will bring all food and beverage fundraisers into compliance. Include specifics on who at the school will be responsible for tracking exempt fundraisers and how documentation will be kept.</p>
Site Name	Elmwood High School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action History	<p><b>Finding:</b> The most recent food safety inspection report was not posted in a publicly visible location.</p> <p><b>Corrective Action:</b> Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.</p>
Site Name	Elmwood High School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	<p><b>Finding:</b> 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.</p> <ul style="list-style-type: none"> <li>•Mandarin oranges- China</li> <li>•Kiwi- Greece</li> <li>•Juice cups- Germany, Hungary, Chile, and China</li> </ul> <p>Further information can be found in Buy American in a Nutshell (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf</a>).</p>

# Administrative Review Report

Elmwood School District

**Corrective Action:** Please submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

## Technical Assistance:

### Free and Reduced Information

- The homeless liaison can provide the Determining Official a list of students whom they have deemed homeless throughout the year (e-mail/paper). The homeless Liaison does not need to fill out an application for each child who is homeless. The effective date of eligibility is when the DO receives notification from the homeless liaison that a students qualifies as homeless.
- When making changes to an application, the DO or VO should sign and date next to the edit.

### Food Safety

- All food service employees must have a signed Food Employee Reporting Agreement on file. The FSD did not have a signed copy on site but staff did While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.
- SFA received a delivery during the review. Boxes of food were placed on the floor. Food must be stored at least 6" off the ground. Review SOP for receiving food and modify as necessary.

### Financials

- SFA was charging raw food costs for catering expenses. Costs should be reflective of labor (ordering, receiving shipments, etc), food and any other operational costs that went into the catering.

### Crediting Documentation

- An electronic production record for 3 grade groups (K-5, 6-8, and 9-12) has been uploaded to SNACS under the document tab with the name production-record-lunch-three-grade-groups.xlsx. Although use of this template is not required, it is highly recommended. Having all information recorded on one page will simplify the production record keeping process.

### Beverage Sales

- Propel can only be sold to students in high school. Discontinue selling Propel and any other calorie-free beverages to students not in high school. Remember that calorie-free beverages must be limited to 20 fluid ounces.

### Disclosure

- The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal or milk benefits.
- Each school year, the SFA must seek written consent from the parent or guardian to use the information provided on the application or through DC for non-program purposes, such as fee waivers. Detailed consent must be obtained each school year. Find the Sharing of Information with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage.



# Administrative Review Report

Elmwood School District

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and kept on file at the district. Find the Disclosure of Free and Reduced-Price Information template on the Free and Reduced Meal Applications and Eligibility webpage.