Administrative Review Report

Frederic School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/25/2019	03/18/2019
On-Site Review	04/09/2019	04/11/2019
Site Selection Worksheet	02/25/2019	02/25/2019
Entrance Conference	04/09/2019	04/09/2019
Exit Conference	04/10/2019	04/10/2019

Commendations:

Thank you to the staff at Frederic High School for the courtesies extended to us during the administrative review. It was obvious that all staff cares for the well-being of their students. The review team appreciates how receptive everyone was to recommendations and guidance to improve the food service program. Additionally, we appreciate your flexibility in using the new SNACS software for the audit process.

Thank you to the food service director for sending documentation prior to the onsite visit as this greatly expedited the review. The food service director, although new to the role, exemplifies great understanding and knowledge with regulations. They were open to suggestions and feedback and quickly made necessary changes onsite.

The SFA has high food safety standards. Staff maintain a very pleasant meal preparation and service environment. Production and service spaces are clean and tidy. Keep up the good work!

Students have a good understanding of what they may select for a reimbursable meal, showing the work staff has done to educate them throughout the school year.

Awesome job and thank you for what you do for kids!

Recommendations:

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 including Rice Lake. 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, and many other topics. More information along with other upcoming trainings and webinars can be found on the DPI School Nutrition 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, or communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Find more information on the following topics on the <u>DPI School Nutrition Website</u> (https://dpi.wi.gov/school-nutrition)

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Technical Assistance:

Food Cost

During meal observation, it appears students are receiving more food than is required in breakfast and afterschool snack. It is recommended that the food service director access meal cost to determine if this practice is financially sustainable.

Local Wellness Policy

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017. Click here for more information on developing a Local Wellness Policy (LWP) including the LWP Checklist and the LWP builder tool (https://dpi.wi.gov/school-nutrition/wellness-policy).

Food Safety Plan

Update the food safety binder with site specific SOPs (i.e., elementary would not need #18 but would need afterschool snack). Include a list of all process 1, 2, 3 foods. Add SOPs for Afterschool Snack, Approved Food Source, Field Trip Meals, Time as a Public Health Control (must be approved by sanitarian).

Training

Non food service employees operating the POS system are required to complete 4 hours of training including civil rights training and training applicable to duties such as 'Offer vs. Serve'. The training hours are required to be recorded each year.

Annual Financial Report, Nonprogram Food Revenue

On the Annual Financial Report, **Non-program food revenue** should consist only of food sold that is not part of a reimbursable meal. This would include an adult meal, extra entrée, extra milk/juice, catering, foods supplied to organizations outside of food service, a la carte sales. **Non-program food expenses** should consist only of items associated with the revenue items (listed above). This includes food and labor expenses associated with all of the above as well as an appropriate portion of equipment, purchased services and other.

Annual Financial Report

On the Annual Financial Report, expenses listed under 'equipment' should only include purchases of equipment above \$5000 or your district's capitalization threshold. All other equipment purchases should be listed under 'other'.

Findings and Corrective Action:

Site Name	Frederic 6-12 School
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	110
Corrective Action History	Finding: The SFA's direct certification notification letter does not include information on how to notify the SFA of any additional school-aged children in the household not listed on the notification letter. CA: Provide a statement that the SNT template letter will be used, or provide a corrected letter template for direct certification notification to the household.
Site Name	Frederic 6-12 School

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Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action History	Finding: The SFA does not have an Unpaid Meal Charge Policy in place that is being followed. All SFAs must have a clearly communicated Unpaid Meal Charge policy in place that is annually distributed to all households and staff responsible for enforcing the policy. CA: Provide a timeline of when the policy will be completed/implemented and how households will be notified annually.
Site Name	Frederic 6-12 School
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action History	Finding: 1.On the Annual Financial Report, expenses for equipment and purchased services were incorrectly allocated to non-program foods. Finding 2. Revenue for non-program foods is incorrectly allocated. CA: The food service director and the district bookkeeper should review the Annual Financial Report webcast on the DPI website. Upload the certificates from the webcast into SNACS. In addition, the reviewer recommends both people attend the Financial Basics training, which is being offered in Rice Lake and four other locations this summer. Information can be found on the DPI School Nutrition Website.
Site Name	Frederic 6-12 School
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
Corrective Action History	Finding: Catering and items supplied to outside organizations are being provided at cost when all costs for non-program foods, including labor, equipment and purchased services, must be covered so student meals are not subsidizing NPF. The food service account cannot be used as a pass thru account. CA: Submit a statement of how you plan to make sure all non-program food costs are covered and a timeline of when the new guidelines/markup will be in place.
Site Name	Frederic 6-12 School
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action History	Finding: The SFA did not process one household application in compliance with 7 CFR 245.6(a). The household's meal benefits were incorrectly calculated. See the SFA-1 provided by the consultant for details. CA: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter sent and documentation that the benefit issuance list has been updated.
Site Name	Frederic 6-12 School
Form Name	Verification (207 - 215)
Question #	211
Corrective Action History	Finding 1: The SFA did not send the 'We have checked' letter notifying the household of the verification result. Finding 2: The verified application did not contain the correct confirming official signature.

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	CA : Submit a statement that the Verification Tracker Form, found on the School Nutrition website, will be used for the 19-20 SY to ensure all requirements are met.
Site Name	Frederic 6-12 School
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action History	Finding: Some materials related to the food service program do not contain the required USDA non discrimination statement (NDS). CA: On the website, add the full NDS to Food Services 760 and Free/Reduced Meals 761. Add at least the short NDS to online menus. Upload a copy of the corrected documents/screen shots into SNACS.
Site Name	Frederic 6-12 School
Form Name	Local School Wellness (1007)
Question #	1007
Corrective Action History	Finding: In 2010, Congress passed the Healthy, Hunger-Free Kids Act and added new provisions related to implementation, evaluation, and publicly reporting on progress of local school wellness policies. The SFA's Local Wellness Policy (LWP) is missing the following required elements: 1. Policy Leadership-SFA's are required to identify the official responsible for LWP oversight. This may state a position instead of a name such as, the superintendent shall implement and ensure compliance with the policy. 2. Public Involvement-SFAs are required to include language related to permitting the public to participate in LWP development, implementation, and review in the written policy such as, the district will invite a diverse group of stakeholders from the list below to participate in the development, implementation, and periodic review and update of the policy. 3. School Meals-SFAs are required to adhere to meal regulations and include language related to this in the written policy such as, all meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010 4. Foods sold outside of school meals programs-SFAs must adhere to Smart Snacks and include language related to this in the written policy such as, all food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. 5. Food and Beverage Marketing-SFAs may only market products that adhere to Smart Snacks guidelines during the school day and include language related to this in the written policy. For example, schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. 5. Triennial Assessment-LWPs must include language regarding the completion of a triennial assessment such as, the district will evaluate compliance with the Wellness Policy no less than once

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Site Name	Frederic 6-12 School
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action History	Finding: The SFA has not updated the food safety plan and is missing some required elements. Each school 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). CA: Update the food safety plan to be specific for each participating school in the SFA. It is recommended to have all new SOPs, reviewed by the sanitarian. Submit a statement that a site-specific plan has been updated for each site.
Site Name	Frederic 6-12 School
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1401
Corrective Action History	Finding: The SFA does not have a signed Employee Reporting Agreement (Preventing Transmission of Diseases) on file for all employees associated with food service. This is required to be kept on file for each employee. It is recommended but not required to have agreements signed each school year. CA : Upload into SNACS a copy of the signed Employee Reporting Agreements for all staff associated with food service.
Site Name	Frederic 6-12 School
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action History	Finding: The SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1. CA: Provide a statement of understanding that all on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.
Site Name	Frederic 6-12 School
Form Name	Afterschool Snack Program
Question #	7
Corrective Action History	Finding: Onsite monitoring was not completed within the first 4 weeks of the program. CA : Provide a statement that moving forward, Afterschool Snack Program onsite monitoring will be completed two times per year with the first monitoring being completed within 4 weeks of the start of the program.

Technical Assistance (Meal Pattern, Smart Snacks):

Meal Pattern, Production Records

There is no overlapping meal pattern for 6-12, therefore production records must reflect the different serving sizes between 6-8 and 9-12. Currently, production records have 6-12 in one column.

Menu Planning Tools

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Use the following tools to assist in menu planning:

- <u>Breakfast meal pattern table</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf). Can follow K-12 meal pattern.
- <u>Lunch meal pattern table</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf). Must follow 6-8 and 9-12 meal patterns.
- <u>Breakfast menu planning worksheets</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-breakfast.docx).
- Lunch menu planning worksheets (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)

Meal Pattern Daily and Weekly Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements.

Breakfast Items, Cookies

When viewing the breakfast menu for the month of April, an UBR "cookie" is offered. Because cookies are an unallowable breakfast item to be offered, and because UBR did rename their product to "bar," please update the wording on the menu to reflect "bar" rather than "cookie."

Breakfast, Grains Exceeding Maximums

The breakfast menu for the week of review considerably exceeds the grain maximums both daily and weekly. The minimum requirement daily is 1.0 ounce equivalent (oz eq) grain and the minimum requirement weekly is 9.0 oz eq grain under the K-12 breakfast meal pattern. Although maximums are not enforced in the breakfast or lunch meal patterns, the minimums and maximums are good ranges to reference. If the grains are within the ranges, the dietary specifications of saturated fat, sodium, calories, and trans fat are most likely being met.

During the week of review, breakfast grains were between 17.0 oz eq and 19.25 oz eq over the course of the week dependent on selections. The minimums and maximums established by USDA are 9.0 oz eq and 10 oz eq respectively. If each oz eq was 50 calories, the ranges are 450-500 calories as a daily average for breakfast over the course of the week. This means some days may be higher in calories, and others lower, just so long as the average over the course of the week is between 450-500 calories. For 17.0 oz eq and 19.25 oz eq, that equates to 850 calories and 962.5 calories respectively, which are double the recommended amount of calories. For 19.25 oz eq grain over the course of the week, this equates to 512.50 extra calories per week, 2,050 extra calories per month, and 24,600 extra calories per year. This may contribute to poor dietary eating habits, weight gain, higher food cost, and more food waste.

With the current breakfast offerings, the dietary specifications are most likely exceeded. These figures also only take into account the grain component and not the daily fruit offerings and milk choice. Consider taking what is currently offered at breakfast and grouping them into two separate entrée options. For example, students currently can select French Toast Sticks (1.5 oz eq grain, 1.0 oz eq meat/meat alternate [M/MA] [counting as a grain]), a cereal (1.0 oz eq grain), and a yogurt as their entrée options. It is recommended to make the French Toast sticks one option and the cereal and yogurt as another option. Reorganizing breakfast this way may also help cut down on food cost.

Product Specification Sheet vs. Product Formulation Statement (PFS)

There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product codes, case weight, shelf life, and packing information. A PFS is crediting documentation that shows exactly how a product contributes to the meal pattern. A PFS is required for processed products not listed in the FBG and that do not have a Child Nutrition (CN label).

Whole Grain-Rich

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Foods that meet the whole grain-rich (WGR) criteria contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. The Malt-O-Meal cereals are not WGR. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products (https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

Weight vs. Volume

There is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4.0 oz spoodle" which can be somewhat confusing. A 4.0 oz or ½ cup spoodle is actually 4.0 fl oz rather than 4.0 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).

Standardized Recipes

Any menu item that has more than one ingredient must have a standardized recipe. This is one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Standardized recipe resources, including templates and list of requirements, can be found on the standardized recipe webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. For more information on what essential information must be on a standardized recipe, review the Standardized Recipe Checklist (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/standardized-recipe-checklist.pdf).

Consider creating standardized recipes for items with a variety that are put out daily at breakfast. If a recipe is not created and followed, the varieties must be listed out on production records. For example, there are many varieties of cereal, yogurt, and juice offered daily at breakfast. Consider recipes for each of these (e.g. 10 of each variety, total yield of 50).

Standardized Recipes, Breadstick

All salad recipes include a breadstick (1.5 oz eq grain) and/or a package of croutons (0.5 oz eq grain). There is wording on the bottom of each recipe stating, "remove breadstick if a grain is offered on the line." If there is a grain offered on the line and a breadstick is taken off the salad, the menu planner must ensure a full 2.0 oz eq grain is offered in some way to high school students. Taking the breadstick off led to shortages during the week of review.

Production Records

Be specific on production records about the identity, brand, and description of the items served. Instead of "cereal", list the specific varieties (or create a recipe). There is a wide variation in the formulation of the many of these products. It is helpful to also include crediting, on the production records.

Production record templates for breakfast and lunch can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Smart Snacks

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The Smart Snacks In a Nutshell document provides all Wisconsin-specific rules on fundraisers and food and beverage requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).

Use the Alliance for a Healthier Generation Smart Snacks Product Calculator to assess product compliance (https://foodplanner.healthiergeneration.org/calculator/). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Smart Snacks, Vending Machines

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like low-calorie (=5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (<5 kcal/8 fluid oz; =10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

Smart Snacks, Fundraisers

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Tracking tools are available on the smart:snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Findings and Corrective Action (Meal Pattern, Smart Snacks, Buy American):

Site Name	Frederic 6-12 School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	409
Corrective Action History	 Finding: Production record requirements and standardized recipe requirements were not met. Finding A: Production records for breakfast and lunch do not contain the total planned number of meals, total served number of meals, serving site, and grade groupings. Production records must also differentiate the appropriate serving sizes per meal pattern (e.g. 6-8 and 9-12). There must be two different columns differentiating the age/grade groups and their serving sizes. Corrective Action A: Submit an updated template of a breakfast production record and a lunch production record with all requirements and age/grade groups separated. Finding B: Standardized recipes submitted for the week of review do not accurately reflect what is done in practice and do not have everything required (e.g. yield, accurate measure or weight of ingredients). There are discrepancies between weight and volume measurements. Also, if offering a variety of flavors or kinds of a menu item, must either list out all on production records or create a recipe. Corrective Action B: Submit the following standardized recipes that meet recipe requirements: Cereal recipe Chicken Taco Salad Recipe Turkey Salad Recipe Oriental Chicken Salad Recipe Beef Taco Salad Recipe

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	- Tuna on Lettuce Recipe
Site Name	Frederic 6-12 School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	Finding: The whole grain-rich requirement was not met during the week of review at breakfast. There was a missing beans/peas/legumes vegetable subgroup for 6-8 and 9-12; there was a daily fruit shortage, daily grain shortage, and weekly grain shortage for 9-12 during the week of review at lunch. See final report. - Finding A: The Malt-O-Meal Frosted Flakes, Tootie Fruity, and Apple Zings cereals were not whole grain-rich Corrective Action A: Find new, whole grain-rich versions of the products listed above and submit nutrition facts labels, ingredient lists and recipes, if applicable. Or submit a statement explaining how these will be discontinued going forward, if not replacing with other cereal varieties. - Finding B: The meal pattern requirements for the lunch week of review were not met. The following shortages occurred: - Missing beans/peas/legumes vegetable subgroup for 6-8 and 9-12 Daily fruit shortage for 9-12 on Wednesday and Friday during the lunch week of review. 1 cup is required Daily grain shortage for 9-12 on Wednesday and Friday during the lunch week of review. Only 1 oz eq grain offered with the Oriental Chicken Salad option (Cheezits) and only 1 oz eq grain offered with the Oriental Chicken Salad option (Breading). A full 2 oz eq grain is required for 9-12 Weekly grain shortage for 9-12 during the lunch week of review because of the two daily shortages mentioned. Only 8 oz eq grain offered during the week, a full 10 oz eq grain required for 9-12. Repeat violations of a missing vegetable subgroup, daily fruit shortage, daily grain shortage, and weekly grain shortage during subsequent ARs may result in fiscal action and will be assessed district-wide on like menus. - Corrective Action B: Submit a statement explaining how the beans/peas/legume, daily fruit shortage, daily grain shortage, and weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. Explain what day t
Site Name	Frederic 6-12 School
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
Corrective Action History	Finding: The following beverages in the vending machine are not allowable at the middle school level: Propel (20 fl oz), Gatorade (12 fl oz), Vita Ice (20 fl oz), Sobe Life Water (20 fl oz), and Bubly Sparkling Water (20 fl oz). Only plain water, 100% juice, or milk are allowable smart snack beverages in middle schools. Consider adding signage to the vending machine restricting the middle school students to only the V8 juice and water, which are allowable. Corrective Action: Submit a statement explaining what will be done with these
	Corrective Action: Submit a statement explaining what will be done with these products to comply with the Smart Snack regulations.

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Site Name	Frederic 6-12 School
Form Name	Smart Snacks (1104 - 1107)
Question #	1106
Corrective Action History	Finding: Fundraisers are not tracked at Frederic School District. Corrective Action : Submit a summary outlining who will be responsible for oversight of Smart Snack regulations in the district. Include details as to how various groups will ensure compliance with these regulations. Visit the Smart Snacks webpage for tracking tools (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).
Site Name	Frederic 6-12 School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	Finding: The following products were identified in the SFA's storage area as nondomestic and not documented: Mandarin oranges (China), Guacamole (Mexico), Cucumber (Mexico), and Pears in Dole Fruit Cup (South Africa). Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).