

Administrative Review Report

Racine Unified School District

Commendations:

Our sincere thanks to the administration and school nutrition professionals of the Racine Unified School District. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students! Your quick responses to actions needed were greatly appreciated!

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

Recommendations:

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition webpage](#). For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays the week of January 16-20, 2023. Take the pledge to participate in any capacity from adding a new dip or seasoning to showcasing several new dishes. It is up to you! Visit the [Around the World in 80 Trays webpage](#) to take the pledge and find more event information. Document the event (pictures, video, sound clips, etc.) and send to DPIFNS@dpi.wi.gov so we can share your success!

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA allows the purchase of a second meal or a hot or cold pack. Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements. CA: Provide a statement of how individual items will be sold to students as nonprogram foods.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA has received Supply Chain Assistance Funds and usage is not being tracked with document submission from the FSMC. CA: Please upload into SNACS, a tracker and documents/invoices to show funds were used appropriately for unprocessed or minimally processed foods.</p>

Administrative Review Report

Racine Unified School District

Form Name	Civil Rights (800 - 807)
Question #	801
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Public Release was not published or distributed to the required locations.</p> <p>CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Form Name	Civil Rights (800 - 807)
Question #	805
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).</p> <p>CA: Provide a detailed statement or policy indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. See the SNT Special Dietary Needs example policy for assistance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).</p>
Form Name	Civil Rights (800 - 807)
Question #	806
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Civil Rights training did not occur for all staff who interact with program participants in the current school year (FNS Instruction 113-1).</p> <p>CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The full non-discrimination statement was not included on the food service page of the school website. CA: Add the full Nondiscrimination statement or a link to it on each food service page of the school website.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (language related to permitting public involvement in development, implementation, and review of the LWP; language regarding compliance with the triennial assessment; language regarding updating/informing the public of updates to the policy) (7 CFR 210.31).</p> <p>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.</p>

Administrative Review Report

Racine Unified School District

Form Name	Local School Wellness (1000 - 1006)
Question #	1002
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated.</p> <p>CA: Provide a plan on when and how the LWP will be reviewed and updated.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1003
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA does not currently have a committee to develop, update and review the LWP per 7 CFR 210.31.</p> <p>CA: Provide a timeline for when the committee will be created and a statement of understanding that the committee must invite a diverse group of stakeholders to participate.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1004
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.</p> <p>CA: Provide a plan on how potential stakeholders will be notified of their ability to participate.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1006
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>CA: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1212
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Food Service Director was hired after July 1, 2015 and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1)).</p> <p>CA 1: Review the Professional Standards hiring requirements on the School Nutrition Team website and submit a statement of understanding that the district will ensure that the FSMC maintains an FSD in the SFA that meets hiring standards for a 10,000+ school district.</p>
Form Name	Professional Standards (1210 - 1219)

Administrative Review Report

Racine Unified School District

Question #	1217
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: 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.</p> <p>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.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA's food safety plan was not site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>CA: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1403
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The following products were identified in the Racine Unified School District's storage areas as non-domestic and not documented: Grape Tomatoes from Mexico. Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above and any future products determined non-compliant with the Buy American rule. Please provide training to the persons in charge at each site that completes ordering products for school meals. (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>
Site Name	Mitchell School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	400
Corrective Action Status	Flagged
Corrective Action History	<p>Breakfast in the Classroom for a preschool room was observed on 12/13/22. Finding: The preschool teacher purposely withheld the entire fruit component from the students due to her perception of the sugar content of the craisins. The preschool meal pattern requires that all meal components must be served to students in at least the minimum serving size. There is no offer versus serve in the preschool meal pattern. Corrective Action: Submit a statement which indicates understanding that preschool students must select all full components offered with the breakfast meal when they are not co-mingled with K-8th graders. Additionally, in this statement explain how these errors will be corrected and avoided in the future in the preschool classrooms.</p>
Site Name	Mitchell School
Form Name	Meal Components and Quantities - Day of Review (400-408)

Administrative Review Report

Racine Unified School District

Question #	401
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Classroom had a substitute teacher who did not know what constituted a reimbursable breakfast meal. 1 student took a nonreimbursable meal without fruit and one student only took a cheese stick. CA: Please upload into SNACS the sign-in sheet for teacher training on reimbursable breakfast meals. Fiscal action will be calculated for the nonreimbursable meals, but there is a \$600.00 disregard before a reclaim is necessary.</p>
Site Name	The REAL School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	402
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During lunch observation at the REAL School on 12/12/22, an alternate meal did not contain 2.0 oz eq of meat/meat alternate as the planned recipe intended. Per the standardized recipe, a 2 oz eq bagel is accompanied by 1/2 cup celery, 1 oz eq cheese stick, and 1 oz eq peanut butter serving. The pre-portioned JIF peanut butter cup was 0.75 ounces and credited as 0.5 oz eq meat/meat alternate. This is acceptable, but does create confusion for students and POS staff when every other alternate entree at the school is planned to be reimbursable on its own for the 9-12th graders. Corrective Action: Please submit a plan moving forward when the scoop of fresh peanut butter is not available. The plan would include instructions for staff at the prep location for how to proceed when substituting pre-portioned peanut butter cups.</p>
Site Name	The REAL School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The same meal pattern is used for grades 6-12 at the REAL School. During lunch observation, no distinction in the served menu was made between middle school and high school students. Because there is no overlap with the weekly dietary specifications for these age groups, a separate 6-8 and 9-12 meal pattern must be followed. For example, 2 dinner rolls were served with the salisbury steak and mashed potatoes on 12/12/22. For the middle school students, this could easily be changed by placing only one dinner roll with the entree. Corrective Action: Submit a statement explaining how a separate 6-8 and 9-12 meal pattern will be followed going forward. This might include details regarding meal service and the planned menu.</p>
Site Name	Walden III Hi
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At Walden, the same meal pattern is used for middle school and high schoolers. Because there is no overlap with the dietary specifications for these age groups under the NSLP, a separate 6-8 and 9-12 meal pattern must be followed. For example, on Chicken Lo Mein day, you may choose to have staff change out the</p>

Administrative Review Report

Racine Unified School District

	<p>serving utensil to offer different portion sizes for the age/grade groups. Corrective Action: Submit a statement explaining how a separate 6-8 and 9-12 meal pattern will be followed going forward.</p>
Site Name	The REAL School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The same meal pattern is used for grades 6-12. Because there is no overlap with the dietary specifications for these age groups under the NSLP, a separate 6-8 and 9-12 meal pattern must be followed. Corrective Action : Submit completed production records showing a distinct menu offering between these two grade groups at least 2x during the week. The production records should please be the version that was also sent to the REAL school, which is a new initiative moving forward that all sites receive production records instead of or in addition to transport sheets.</p>
Site Name	Julian Thomas El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	432
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Transport sheets may be used for sites that receive meals from an offsite production kitchen. Between production kitchen records and transport sheets, all production record requirements must be met. Julian Thomas Elementary does not have a copy of the production record on site, nor do the transport sheets used document all of the required information. Corrective Action: SFA may choose to update the transport sheets to include production record information, or send the elementary school a copy of the production record. Submit one week of updated transport sheets or completed production records.</p>
Site Name	Julian Thomas El
Form Name	Offer vs Serve (500-502)
Question #	502
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At Julian Thomas Elementary, signage was not posted at 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. Corrective Action: Submit a picture of completed signage at Julian Thomas Elementary posted near the lunch service line.</p>
Site Name	Walden III Hi
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action Status	CAP Submitted

Administrative Review Report

Racine Unified School District

Corrective Action History	<p>Finding: The nondiscrimination "And Justice for All" poster is not located in the meal service area and/or not visible to students (FNS Instruction 113). CA: Provide a statement and or image of how this requirement will be met. Corrected while onsite, no further action required.</p> <p>Signage was moved during site visit 12/13/22.</p>
Site Name	The REAL School
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Ruffles Baked Cheddar and Sour Cream Chips is not smart snack compliant. A product must first meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. The first ingredient in this Ruffles product is dried potato, therefore, it does meet the Smart Snacks general standard, but it does not meet dietary specifications. Snacks sold a la carte must contain less than 200 mg of sodium per serving. This product contains 280 mg sodium per serving. Corrective Action: Please remove this variety of potato chip from the inventory. Send a statement when this is completed.</p>
Site Name	The REAL School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1404
Corrective Action Status	Flagged
Corrective Action History	<p>FINDING: Employee Reporting Agreements were not on file for all employees.CA Upload into SNACS a list of all employees who have signed the Employee Reporting Agreement.</p>
Site Name	The REAL School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Mitchell School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>

Administrative Review Report

Racine Unified School District

Site Name	Julian Thomas El
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	The REAL School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1408
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested hot food temperature logs were incomplete (no dates) or had inaccurate information (incorrect food item listed).</p> <p>CA: Upload one month of completed hot food temperature logs into SNACS and provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.</p>
Site Name	Walden III Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1409
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). During on-site review, the shelves in the dry storage area were not a full six inches above the floor. CA: Raise shelving units to be at least six inches off the floor. This was corrected on site. No further action is required.</p> <p>Completed during site visit 12/13/22.</p>
Site Name	Walden III Hi
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: There was no vegetable served during the week of review from the Bean/Pea/Legume category at Walden High School. Fiscal action will not be assessed, as it was inconclusive if vegetable subgroups were missing from the week of review during Racine Unified School District's previous Administrative Review during the 2016-17 school year. Please know that fiscal action will be assessed at the next Administrative Review if this finding occurs again. CA: Please send completed production records for one week in January indicating the 9-12 meal pattern requirements were met at Walden High School.</p>

Administrative Review Report

Racine Unified School District

Technical Assistance Entries:								
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/14/2022	2588		Administrative Review					
Comments								
Breakfast Food Items: The menu planner has the discretion to determine how to credit certain food items. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. Therefore, if an apple is served that credits as 1 cup fruit, the menu planner can choose whether the apple will count as one or two items. The same goes for grains. A 2 oz eq muffin may count as one or two items. Remember, the crediting must be clearly communicated to students and staff.								
12/14/2022	2587		Administrative Review					
Comments								
Condiment Usage: Although you are utilizing pre-packaged condiments, portion sizes are not communicated to students. Please communicate appropriate portion sizes to students, as condiments can be a significant source of calories, saturated fat, and sodium. Promote appropriate serving sizes by adding signage at the condiment station.								
12/14/2022	2586		Administrative Review					
Comments								
Program Intent: The intent of the NSLP is to serve students nutritiously balanced meals and teach them healthy habits to last a lifetime. Offering portions greatly exceeding the daily minimum serving size does not aid in teaching students good nutrition or eating habits. This practice also drives up food costs and most likely does not fit into the dietary specifications. WI DPI encourages schools to keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.								
12/14/2022	2585		Administrative Review					:20 AM
Comments								
Meal Pattern: There is no overlap in calorie requirements for middle school and high schoolers. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. A separate 6-8 and 9-12 meal pattern must be followed. You may choose to utilize the same menu but have staff change the serving utensil to offer a different portion size for the appropriate age/grade group requirement.								
12/14/2022	2584		Administrative Review					41 AM
Comments								
Signage: Signage helps students understand what components make up a reimbursable meal. Please add a statement to your current signage that states the student must take at least ½ cup fruit and/or vegetable, or a combination.								
12/14/2022	2603	1400	Administrative Review	ALL	AR			:33 AM
Comments								
<ul style="list-style-type: none"> ●All food service employees must have a signed Food Employee Reporting Agreement on file. ●There are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information. 								
12/14/2022	2600	1406	Administrative Review	The REAL School	AR			

Administrative Review Report

Racine Unified School District

Comments						
<p>•Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's Food Safety Plan. •The most recent food safety inspection report must be posted in public view. •If you request a food safety inspection and are denied, document the request date and retain any correspondence (email, letters, phone call details) with the sanitation inspection agency.</p>						
12/14/2022	2598	700	Administrative Review	ALL	AR	
Comments						
<p>SCA funds are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs. The USDA Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers includes detailed information on allowable ways to utilize these funds</p>						
12/14/2022	2597	805	Administrative Review	ALL	AR	
Comments						
<p>The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information. • Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include: 1. an explanation of how the child's physical or mental impairment restricts the child's diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. • A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements. • SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within offer vs. serve. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance</p>						
12/07/2022	2545	800	Administrative Review	ALL	AR	
Comments						
<p>All food substitutions made outside of the meal pattern must be supported by a signed medical statement from a licensed medical professional (7 CFR 210.10). See the SNT Special Dietary Needs example policy for assistance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).</p>						

- [Local Wellness Policy In a Nutshell](#) provides an overview of policy requirements.
- [Local Wellness Policy Checklist](#) is a resource that will help schools determine if all required content areas are included in their LWP.

As of June 30, 2020, SFAs must complete their first triennial assessment. **The assessment must be completed, at minimum, once every three years.** It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.

- [Local Wellness Policy Triennial Assessment Report Card](#) - SFAs must use the **Wisconsin Local Wellness Policy Triennial Assessment Report Card** in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on

Administrative Review Report

Racine Unified School District

page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. **The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team.** The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.

Local Wellness Policy Builder

Local Wellness Policy Builder is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.

Local Wellness Policy Builder - Full Text is a compilation of all statements available in the *Local Wellness Policy Builder Online Tool*.