Administrative Review Report

Wisconsin Dells School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/11/2019	03/29/2019
On-Site Review	04/16/2019	04/18/2019
Site Selection Worksheet	03/11/2019	03/11/2019
Entrance Conference	04/16/2019	04/16/2019
Exit Conference	04/17/2019	04/17/2019

Commendations:

Thank you to the staff at Wisconsin Dells 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 exemplifies great understanding and knowledge with regulations. They were open to suggestions and feedback and quickly made necessary changes onsite.

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. The staff had a good rapport with the students and we were impressed with how fresh and tasty the salad bar looked!

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

Sincere thanks to the Food Service Director and school nutrition professionals of Wisconsin Dells High School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director was receptive to feedback, both positive and constructive criticism. He responded to questions and requests for additional information. He utilized the Nutrition Program Consultant and Public Health Nutritionist as resources, asking questions reflective of his desire to enhance and expand the Child Nutrition Programs at Wisconsin Dells School District. Many colorful signs posted on and around the meal service line help students identify the components of reimbursable breakfasts and lunches. The school nutrition professionals at the point of service (POS) worked quickly and accurately, even when students purchased multiple a la carte foods and beverages in addition to reimbursable meals.

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. 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).

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

Technical Assistance:

Resource Management

When funds in student accounts are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

Resource Management

Reminders regarding the Annual Financial Report: Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows:

- o Revenues are only the state reimbursements
- o Expenses are only the milk expense for free and reduced priced students
- o Revenues and expenses for paid students should be recorded under non program foods

Contracts

Amend the current 18-19 SY School Nutrition Program contract to indicate grades 8-12 at the high school.

Submit an updated contract for the Wisconsin School Day Milk Program if the contract is more than 10 years old OR if there has been a change in procedure.

Professional Standards Training

The Professional Standards tracking tool should list the hours each employee works so it is clear how many training hours they are required to complete

On-site Monitoring

Begin using the updated onsite monitoring forms for the 19-20 SY. Note: there is a separate form for breakfast and lunch. Onsite monitoring forms are found on the DPI SNT Website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting).

Findings and Corrective Action:

Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action History	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 DPI SNT website has helpful information regarding the Local Wellness Policy along with a LWP Checklist and the LWP Policy Builder (https://dpi.wi.gov/school-nutrition/wellness-policy). Finding: The SFA's Local Wellness Policy (LWP) is missing the following required elements:	

		 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. Foods provided but not sold-SFAs must define guidelines in the written policy, such as the district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations will be promoted and a list of ideas is available to staff and family members. *The actual guidelines are a local decision. 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. CA: 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.
Site Name		
Form Name	Non-program Foods	
Corrective Action History	THE PROGRAMM COURT	Finding: A non-program foods tool has not been completed for the 18-19 SY. CA: The SFA completed the DPI non-program foods tool
		during the offsite review process. The SFA is compliant and no further action is required.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action History		380 student determinations were reviewed. There were 5 errors. Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6. One application was incomplete due to a missing adult signature. Two students were not removed from the BI list after carryover. One student has no information on file to support benefit determination.

	CA : The SFA obtained the correct signature. The SFA sent a letter to families notifying them that the status will change to paid in 10 days. No further action necessary.	
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	136	
Corrective Action History	Finding: The SFA's sharing of information form has only one box to check for all types of fee waivers. SFAs must allow households to limit consent to only those programs they wish to share information. SFAs are not allowed to have a blanket fee waiver. Sharing of information forms and Disclosure forms can be found on the DPI SNT website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) CA: Upload a template of the updated Sharing of Information form that lists fee waivers separately such as, registration fees, athletic fees, field trip fees.	
Site Name		
Form Name	Verification (207 - 215)	
Question #	211	
Corrective Action History	Finding: The 'We Have Checked' verification letter does not contain the correct non discrimination statement (NDS). CA: Upload a copy of the corrected 'We Have Checked' verification letter which can be found on the DPI SNT website (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification).	
Site Name		
Form Name	Verification (207 - 215)	
Question #	215	
Corrective Action History	Finding 1: On the Verification Collection Report, it was reported that applications were directly certified when they were not. Finding 2: The verifying official did not sign the application when verification was complete. CA: Technical assistance was provided onsite and the verifying official has a good understanding of how this question should be answered, the official's roles and where to sign the verified application. No further action is required.	
Site Name	· · · · · · · · · · · · · · · · · · ·	
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	

	Finding : Field trip meals are being charged to student accounts from an attendance roster on the day of the field trip.	
Corrective Action History	CA: Provide a statement of how students on field trips will be marked as taking a meal at the time they receive a reimbursable meal and entered in the system after this has been verified.	
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action History	Finding: The menus do not contain the correct non-discrimination statement. The shortened statement may be used on menus and should read 'This institution is an equal opportunity provider'. CA: Upload all menus with the correct statement.	
Site Name	or w opredia dirimenta mantano aon escretare menta	
Form Name	Food Safety S. Ruy American (1400, 1402)	
Question #	Food Safety & Buy American (1400 - 1403)	
Question#		
Corrective Action History	Each school within the SFA must have a written site specific food safety plan, for compliance with Hazard analysis Critical Control Points (HACCP) (7 CFR 210.13). Finding: The SFA has a comprehensive, updated food safety plan; however, it is missing the SOP for Use of Insulated Milk Bags. Additional SOPs is found on the DPI SNT website (https://dpi.wi.gov/school-nutrition/food-safety#templates). CA: Upload the updated SOP. It is recommended to ask your sanitarian to review new SOPs.	
Cita Nama		
Site Name	Wisconsin Dells Hi	
Form Name Question #	Meal Counting and Claiming - Day of Review (317-321)	
Question#	317	
Corrective Action History	Finding: The SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at the point of service that can be seen by students; which constitutes overt identification. CA: This was corrected onsite. No further action is required.	
Site Name	Wisconsin Dells Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
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Corrective Action History	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). Finding: Although it is clear, the school has limited storage space, the freezer, cooler, and dry good storage had items sitting directly on the floor in violation of SOP #10, which indicates items will be kept 6" above the floor. CA: Store items 6" above the floor and submit a statement that this has been completed. One suggestion is using soda crates or small pallets that have a small footprint and can be easily moved around.	
Site Name	Wisconsin Dells Hi	
Form Name	Afterschool Snack Program	
Question #	6	
Corrective Action History	Finding 1: In the Afterschool Snack Program, a whole grain cookie was served on 4 days during the review period (March). Grain based desserts are not allowable. Finding 2: Production records do not clearly describe the snack provided to show that it meets the meal pattern requirements. For example, instead of 'banana bread', write 'WG banana bread 1.25 oz.' CA: Retrain staff responsible for providing snacks for the Afterschool Snack Program on allowable snacks, portion sizes and completing production records. Submit a statement when the training has been completed.	

Technical Assistance:

Production Records

The current breakfast, lunch, alternate entrée, and salad bar production record templates do not meet the production record requirements per the "Must Haves and Nice to Haves" list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Production records submitted for the review period were not filled in completely nor consistently.

The following information must be corrected on the breakfast production record to meet the production record requirements:

- Menu item with recipe name/reference number or product name/description
- Actual number of servings prepared
- Planned/actual quantity prepared in purchase units
- Number of reimbursable and non-reimbursable (adult) meals planned and served

The following information must be corrected on the lunch production record to meet the production record requirements:

- Actual number of servings prepared
- Planned/actual quantity prepared in purchase units
- Actual milk usage by type

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The following information must be corrected on the alternate entrée production record to meet the production record requirements:

- Serving site
- Menu type
- Grade grouping(s)
- Menu item with recipe name/reference number or product name/description
- Planned serving size for each grade group and adults
- Planned number of servings prepared
- Planned/actual quantity prepared in purchase units

The following information must be corrected on the salad bar production record to meet the production record requirements:

- Grade grouping(s)
- Planned serving size
- Crediting/Veg. Subgroup
- Planned quantity prepared in purchase units
- Planned serving size and usage for condiments and any extra menu items

Be specific about the identity, brand, and description of the items served. Instead of "breadsticks," "hot dog," or "breakfast pizza" list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

Planned portion sizes are required for every meal component and menu item, including condiments. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates (m/ma) and grains. Fruit sizes (e.g. case count) should also be recorded.

Crediting information recorded on the standardized recipes and the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements (PFS), or the USDA Food Buying Guide for Child Nutrition Programs (FBG).

Mixed vegetables contains vegetables from multiple subgroups (corn, carrots, green beans, and green peas), including starchy. Therefore, it credits as **additional** vegetable. This still credits towards the daily minimum requirement for vegetables, but does not contribute to a specific vegetable subgroup.

Garden Bar

Produce on a garden bar can credit toward the meal pattern each day that it is offered to students (e.g. if garbanzo beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup is offered each week and meets the minimum 1/2 cup requirement for beans and peas [legumes]). Even with garden bars, the menu planner must plan specific portion sizes that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, then portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as half the volume served.

Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a <u>Salad Bar Signage Template</u> with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx)

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by food service. It produces a consistent quality and yield every time, when the **exact** procedures, equipment, and ingredients are used. Recipes, including *On*, *Wisconsin!* cycle menu recipes and Jennie-O Turkey Store recipes, must be updated to reflect current practices and products. Standardized recipes exist but may not accurately reflect what happens in the kitchen.

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Use the resources on the <u>Standardized Recipes webpage</u>, including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and <u>templates to organize all information once obtained</u> (http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menuplanning/recipes, https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc). The Public Health Nutritionist (PHN) also encourages viewing the webcast, "<u>What's the Yield with Standardized Recipes?</u>," which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

<u>USDA's What's Cooking? recipes</u> include nutritional and crediting information (https://whatscooking.fns.usda.gov/). Although USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they are tried, tested, and adapted to your food service operation.

Weight versus Volume

There is a difference between weight (ounces [oz]) and volume (fluid ounces [fl oz]). While spoodles are referred to and labeled with "oz," they actually measure "fl oz." Therefore, a "4 oz spoodle" measures 4 fluid ounces or 1/2 cup (volume), not 4 ounces (weight). Most foods measured with a 4 fluid ounce spoodle will not weigh 4 ounces on a scale. This is an important distinction.

To ensure that students receive appropriate amounts of m/ma, weigh the m/ma, then determine which scoop will hold that weight of meat.

Crediting Documentation

Processed foods that are not listed in the FBG must be accompanied by a PFS or CN label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson).

Per USDA memorandum <u>TA 07-2010 (v.3)</u>, "Guidance for Accepting Processed Product Documentation for Meal <u>Pattern Requirements</u>," (https://fns-prod.azureedge.net/sites/default/files/cn/TA07-2010v3os.pdf) to verify the accuracy of a PFS:

- Determine that creditable ingredients listed in the PFS match a description in the FBG.
- Verify that the credit a product contributes to meal pattern requirements is not greater than the serving size of the product.
- Assure that the creditable components are visible in the finished product.

Food and Nutrition Services (FNS) encourages program operators to review product literature carefully, since they are responsible if meals they serve do not meet meal pattern requirements. Any crediting information received from a manufacturer other than a valid CN label should be checked by the SFA or other program operator for accuracy prior to the item being included in the reimbursable meal.

The PFS submitted for Jennie-O Sliced Turkey Combo Pack (Code No. 2095) lists Turkey (Turkey Ham), Turkey (Turkey Bologna), and Turkey (Turkey Salami) as Description of Creditable Ingredients per Food Buying Guide. However, these do not match descriptions in the FBG. As a result, it is unclear how the manufacturer determined the Food Buying Guide Yields and Creditable Amounts for these sliced meats.

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock.

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School Breakfast Program (SBP)

Item Recipe

If it becomes too time- or labor-intensive to record breakfast item (e.g. cereal, cereal bars, juice, toaster pastries, etc.) usage by type on production records, consider using recipes. Individual recipes document average breakfast item usage by meal and grade group. When a breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students' preferences change.

Participation

Breakfast participation at Wisconsin Dells High School is low compared to the number of students enrolled in the school. Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways. Consider sending this School Breakfast brochure to families and caregivers to promote the benefits of breakfast

(https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf). For questions on breakfast models or ideas to increase participation, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

Buy American

There are four pieces of information per non-compliant item that must be recorded on the <u>Buy American Non-Compliant Product List</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) or SFA equivalent:

- 1. Date
- 2. Name of product
- 3. Country of origin
- 4. Reason
 - a. Cost analysis
 - b. Seasonality-record the months that the domestic product is not available
 - c. Availability
 - d. Substitution-record the reason the distributor substituted the product
 - e. Distribution-record the reason the distributor carries the non-domestic product
 - f. Other-explain

You may record additional information if you find it beneficial.

Findings and Corrective Action:		
Site Name	Wisconsin Dells Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
Corrective Action History	Flagged 04/17/2019 12:45 PM	Meal Pattern Finding: Current breakfast, lunch, alternate entrée, and salad bar production record templates do not meet the production record requirements. Production records submitted for the review period were not filled in completely. Required Corrective Action: Update production records to include the following missing and/or incomplete information: serving site (alternate entrée); menu type (alternate entrée); grade grouping(s) (alternate entrée, salad bar); menu item with recipe name/reference number or product name/description (breakfast, alternate entrée); planned

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		serving size for each grade group and adults (alternate entrée, salad bar); planned/actual number of servings prepared (breakfast, lunch, alternate entrée); planned/actual quantity prepared in purchase units (breakfast, lunch, alternate entrée, salad bar); actual milk usage by type (lunch); number of reimbursable and non-reimbursable (adult) meals planned and served (breakfast); and planned serving size and usage for condiments and any extra menu items (salad bar). Please submit three full days of completed production records, updated to reflect these requirements. Select production records you are confident are filled in accurately and completely.
Site Name	Wisconsin Dells Hi	
Form Name	Meal Components and C	Quantities - Review Period (409-412)
Question #	410	
Corrective Action History	Flagged 04/17/2019 11:23 AM	Meal Pattern Finding: The daily minimum requirement for grain was not met for age/grade group 9-12 at Wisconsin Dells High School for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period: • Tuesday: Popcorn chicken (14 each, 1.5 oz eq) • Includes 0.5 oz eq from 14 grams of croutons, offered daily on the salad bar • Friday: Chicken nuggets (5 each, 1.50 oz eq) The daily minimum requirement for age/grade group 9-12 is 2 oz eq. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action. Required Corrective Action: Describe specifically how the daily minimum requirement for grain will be met for age/grade group 9-12 at Wisconsin Dells High School for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address popcorn chicken and chicken nuggets in your reply. Meal Pattern Finding: The daily minimum requirement for m/ma was not met for age/grade group 9-12 at Wisconsin Dells High School for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period: • Tuesday: Chicken fajita wrap (1.75 oz eq) • Includes 0.5 oz eq from 1/8 cup of garbanzo beans, offered daily on the salad bar The daily minimum requirement for age/grade group 9-12 is 2 oz eq. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action. Required Corrective Action: Describe specifically how the
		daily minimum requirement for grain will be met for age/grade group 9-12 at Wisconsin Dells High School for lunch during the review period (e.g. portion sizes increased or

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		decreased, additional menu items, product replacements, etc.). Please address chicken fajita wrap in your reply.
Site Name	Wisconsin Dells Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
	Flagged 04/17/2019 12:48 PM	Meal Pattern Finding: Recipes for turkey pizza burger, veggie soup, chicken fajita wrap, two potato mash, fiesta mac, and hot ham & cheese on a bun are not standardized to the operation. Required Corrective Action: Submit standardized recipes for these menu items, including serving size for single portion(s), total number of portions, and total volume or measure.
Site Name	Wisconsin Dells Hi	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
	Flagged 04/17/2019 12:29 PM	Finding: 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, or did not have proper labeling to identify the country of origin: fresh mushrooms from Canada. Required Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. Provide a copy of the form(s) that will be used and include any noncompliant products.