

# Administrative Review Report

Independence School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/01/2022	01/30/2023
On-Site Review	02/22/2023	02/23/2023
Site Selection Worksheet	11/01/2022	11/15/2022
Entrance Conference	02/22/2023	02/22/2023
Exit Conference	02/23/2023	02/23/2023

## Commendations:

From the Public Health Nutritionist: Thank you to all staff at the Independence School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was receptive to the reviewer's suggestions, and this was appreciated. The Food Service Director shows a true passion for serving healthy, nutritious meals to students! Thank you!

From the Nutrition Program Consultant: Thank-you to everyone involved in the Administrative Review for Independence School. We appreciate all the cooperation and help in completing the review. All were very receptive, kind and friendly. The suggestions we had for the Food Service staff were taken with smiles and they want to always do better in their program. The staff was also very engaging with the students when serving meals. Keep up the good work!

## Recommendations:

No Recommendations found for this review.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	112	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/23/2023 10:47 AM	Finding: The SFA's Determining Official uses the Income Eligibility Guidelines housed in the Infinite Campus Software system. She checks that they are updated annually. The SFA has uploaded a copy of guidelines in SNACS. This is not the one listed on the DPI website. Corrective Action Needed: The NPC has asked the SFA to use the guidelines from the DPI website so as to be consistent in determining applications. The guidelines in the Infinite Campus software are fine to use as long as they are consistent with DPI's. This was discussed at length, and no further action is needed.
	CAP Submitted 03/01/2023 10:52 AM	The DPI Income Eligibility Guidelines have been scanned and uploaded. These DPI Income Eligibility Guidelines were previously compared to the Income Eligibility Guidelines provided in the student information system for accuracy prior to the beginning of the school year. The software guidelines are consistent with those guidelines from the Department of Public Instruction website.
	CAP Accepted 03/07/2023 04:20 PM	CAP Accepted
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	800	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/23/2023 08:33 AM	Finding: The Non-Discrimination statement is not being used in its entirety as required by USDA regulations on all Food Service documentation going out to the families and public. Corrective Action: Use the complete full Non-Discrimination statement on all documentation that is sent out to families and public. It needs to be in the same font size as the documentation. The shortened statement may be used on the printed menu, as is currently being done. Discussion was had with the FSD, no further action is needed.
	CAP Submitted 03/01/2023 03:30 PM	The full Non-Discrimination statement has been added to form letters generated by our student information system and other letters that are being mailed to families.
	CAP Accepted 03/07/2023 04:19 PM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	409	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:45 AM	Finding: The daily minimum requirement for the fruit component was not met for 9-12 age/grade group field trip meal for lunch during the review period (1/23-1/27/23). The following represent the planned portion sizes:  - - Thursday (1/26): Fresh Orange (113 ct.), 5/8 cup

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		<p>The daily minimum requirement for the 9-12 age/grade group is 1 cup of fruit at lunch.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for the fruit component will be met for lunch during the day containing the shortage – 1/26/23 (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
	CAP Submitted 03/02/2023 11:17 AM	The corrective action plan would be to add a 4-ounce (1/2 cup) 100% fruit juice, in addition to the orange, in order to meet the 1 cup daily requirement of fruit at lunch for grades 9-12.
	CAP Accepted 03/14/2023 10:33 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:35 AM	<p><b>Finding:</b> There was a weekly grain shortage for the week of review (1/23-1/27/23) with the daily alternate menu option at breakfast. Each day, a cereal bowl (1 oz eq. grain) is offered as the alternate breakfast entrée. Although this meets the daily grain requirements, this will not meet the weekly grain requirements (5 oz eq. offered during the week of review; 9 oz eq. grain is required weekly for K-12 students). The cereal should be paired with an additional 1 oz eq. grain or meat/meat alternate on at least 4 days of the week to meet the weekly grain requirement. Please review the breakfast meal pattern table: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/breakfast-meal-pattern.pdf</a> .</p> <p>As this is a repeat finding from the previous Administrative Review, fiscal action will be assessed.</p> <p><b>Corrective Action:</b> State what will be done to the menu during the week of review (1/23-1/27/23) so that 9 oz eq. grain is offered to students over the course of the week from the alternate breakfast entrée. Please submit nutrition facts labels and ingredient lists for any new products added to the menu.</p>
	CAP Submitted 03/02/2023 11:23 AM	The corrective action plan to meet the required weekly grain offering at breakfast for the week of review will be to offer a 1-ounce string cheese or a 4-ounce yogurt paired with the cereal offering all 5 days of the week to meet the weekly grain requirement for grades K-12.
	CAP Accepted	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:39 AM	<p><b>Finding:</b> The daily minimum requirement for the grains component was not met for the K-12 age/grade group for breakfast during the review period (1/23-1/27/23). The following represent the planned portion sizes:</p> <ul style="list-style-type: none"> <li>- Wednesday (1/25): Ham, Egg, &amp; Cheese Fritter (Combo), 0.25 oz eq. grain</li> </ul>

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		<p>The daily minimum requirement for the K-12 age/grade group at breakfast is 1 oz eq. grain. Any meat/meat alternates cannot count towards the daily/weekly grain requirement until 1 oz eq. true grain is offered.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for the grains component will be met for breakfast during the day containing the shortage - 1/25/23 (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
	CAP Submitted 03/09/2023 09:38 AM	The corrective action plan for the date of 1/25: To meet the daily grain requirement, the ham, egg and cheese fritter will now be paired with a WG strawberry graham cracker crediting as 1oz grain equivalent for a total offering of 1.25 oz grain equivalent. All other days of this weeks offerings have been updated to offer a 2oz grain eq. for a weekly total of 9oz grain equivalents.
	CAP Accepted 03/14/2023 10:38 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	412	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:47 AM	<p>Finding: The daily minimum requirement for the vegetable component was not met for 9-12 age/grade group field trip meal for lunch during the review period (1/23-1/27/23). The following represent the planned portion sizes:</p> <ul style="list-style-type: none"> <li>· Thursday (1/26): Baby Carrots, 1/2 cup</li> </ul> <p>The daily minimum requirement for the 9-12 age/grade group is 1 cup of vegetable at lunch.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for the vegetable component will be met for lunch during the day containing the shortage - 1/26/23 (e.g., portion sizes increased, additional menu items, product replacements, etc.).</p>
	CAP Submitted 03/02/2023 11:32 AM	The corrective action plan for meeting the 1/2 cup vegetable shortage for the field trip meal for grades 9-12 on 1/26/23 will be to add an additional 1/2 cup serving of cucumber slices to the already 1/2 cup of baby carrots being offered to meet the daily 1 cup requirement of vegetables for grades 9-12.
	CAP Accepted 03/14/2023 10:39 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	430	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:49 AM	<p>Finding: The daily minimum requirement for meat/meat alternate component was not met for the 9-12 age/grade group for lunch during the review period (1/23-1/27/23). The following represent the planned portion sizes:</p> <ul style="list-style-type: none"> <li>· Daily alternate entrée sandwich: Tuna Salad Sandwich, 1.5 oz eq. meat/meat alternate</li> <li>· Daily alternate entrée sandwich: Ham</li> </ul>

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		Salad Sandwich, 1.25 oz eq. meat/meat alternate
		The daily minimum requirement for the 9-12 age/grade group for the meat/meat alternate component is 2.0 oz eq.
		Corrective Action: Updated recipes for the tuna salad and ham salad sandwiches were sent prior to the onsite portion of the Administrative Review. The updated ham salad recipe credits as 2.0 oz eq. meat/meat alternate and the updated tuna salad recipe credits as 2.25 oz eq. meat/meat alternate. No further corrective action is required.
	CAP Submitted 03/02/2023 12:12 PM	No further action is required.
	CAP Accepted Brittany Zerbe 03/14/2023 10:41 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	431	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:40 AM	Finding: The alternate entrée deli sandwiches were not included on the lunch production records during the week of review (1/23-1/27/23). All menu items that are part of reimbursable meals must be included on the daily production records. Please review the Production Record Requirements ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a> ).  Corrective Action: Submit one full week of completed production records, including the deli sandwich offerings, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
	CAP Submitted 03/13/2023 12:00 PM	Corrective action: One week (3/6/2023 - 3/10/2023) of completed sandwich records has been uploaded to SNACS. The deli sandwiches have been added to the back side of all lunch production records,
	CAP Accepted 03/14/2023 10:50 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	436	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:44 AM	Finding: For grades K-12, up to 2 oz eq. of grain-based desserts per week are allowed in the NSLP. The menu for the week of review exceeded the grain-based dessert limit. The following represent the planned portion sizes:  <ul style="list-style-type: none"> <li>- Monday (1/23): Keebler Gripz Cinnamon Grahams, 1 oz eq. grain-based dessert</li> <li>- Wednesday (1/25): Keebler Gripz Cinnamon Grahams, 1 oz eq. grain-based dessert and Quaker Chewy Granola Bar Chocolate Chip, 0.25 oz eq. grain-based dessert</li> <li>- Thursday (1/26): UBR Cinnamon Breakfast Round, 2.0 oz eq. grain-based dessert</li> </ul>

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		<p>A total of 4.25 oz eq. grain-based desserts were offered over the course of the review week.</p> <p>Corrective Action: Submit a statement that explains the plan to reduce the amount of grain-based desserts offered at lunch during the week of review (1/23-1/27/23).</p>
	CAP Submitted 03/02/2023 12:25 PM	The corrective action for the excess dessert-based grains offered during the week in review would be as follows: - Monday (1/23): Keebler Gripz Cinnamon Grahams, 1 oz eq. would be offered · - Wednesday (1/25): Keebler Gripz Cinnamon Grahams, 1 oz eq. OR Quaker Chewy Granola Bar Chocolate Chip, 0.5 oz eq. would be offered. · - Thursday (1/26): UBR Cinnamon Breakfast Round, 2.0 oz eq, was not a "normal" offering and would in the future be eliminated from the bag lunch offering for the 9-12 grade group and replaced with a 1 oz Doritos Cool RanchChip, 1.5 oz eq.
	CAP Accepted 03/14/2023 10:45 AM	CAP Accepted
<b>Site Name</b>	Independence Hi	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1105	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	Flagged 02/22/2023 07:52 AM	<p>Finding: The Bongards Marble Cheese Stick is not Smart Snacks compliant. Cheese products must meet the Smart Snacks nutrient standards unless they are reduced-fat cheese or part-skim mozzarella in which they are exempt from the standards. The Bongards Marble Cheese Stick is not reduced-fat cheese or part-skim mozzarella thus, it must meet the standards. It does not meet Smart Snacks standards as it exceeds 35% of total calories from total fat as well as 10% of total calories from saturated fat.</p> <p>Corrective Action: Please remove the Bongards Marble Cheese Stick from the a la carte offerings. Send a statement when this is complete.</p>
	CAP Submitted 03/13/2023 11:52 AM	The corrective action plan is to utilize the remaining cheese sticks in question so as not to waste them. They have since been used out and have been replaced with a Reduced Fat Marble Jack cheese stick. The nutrition information for the current cheese stick has been uploaded to SNACS.
	CAP Accepted 03/14/2023 10:40 AM	CAP Accepted

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/22/2023	2961	431	Administrative Review	Independence Hi	FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
<p>Technical Assistance: The breakfast production records are missing the Quantity Prepared in Purchase Units (i.e., 2- No. 10 cans, 10 lb. case, 2-96 count case). Production records verify that reimbursable meals were served and are intended to be useful tools to record information prior to production, during production, and following production. Please work to ensure that breakfast production records are filled in completely, including the Quantity Prepared in Purchase Units for all menu items.</p>								2/22/2023 7:41:53 AM
02/22/2023	2960	406	Administrative Review	Independence Hi	FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
<p>There is no overlap in calorie requirements for grades 6-8 and grades 9-12. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. Consider separating grades 6-8 and 9-12 to simplify meal service. Grades 6-8 can follow the 6-8 or K-8 meal pattern. If grades cannot be separated, consider posting signage instructing students what serving sizes are needed for their grade, making different size spoodles available, or using</p>								2/22/2023 7:27:36 AM

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different cafeteria lines or colored trays.		
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