

# Administrative Review Report

Whitehall School District

Team Composition:

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/10/2023	03/21/2023
On-Site Review	03/21/2023	03/23/2023
Site Selection Worksheet	02/10/2023	02/10/2023
Entrance Conference	03/21/2023	03/21/2023
Exit Conference	03/23/2023	03/23/2023

Commendations:

Thank

you to all administrative staff, school nutrition professionals, and the Food Service Director for your cooperation during this administrative review. It was great to be able to see so many child nutrition programs in operation including School Breakfast Program, National School Lunch Program, Wisconsin School Day Milk Program, and Afterschool Snack Program. By utilizing all of these programs, it's clear that the children in Whitehall School District have access to the nutrition they need to start and end the day and to avoid that #hangry feeling so they can focus on their academic success.

Whitehall does a great job with student benefit issuance - just 1 error in determination after reviewing 227 records! Counting and claiming systems are accurate. Financial management of the school nutrition programs is tight and well documented. Whitehall food service staff, support, and administration are focused on what is best for students and work cooperatively to integrate school meals into the school day. All staff are interested and open to feedback and preferred to immediately address concerns that arose during the onsite visit. Food service staff appear to enjoy their jobs and take pride in what they are doing - Kudos!

Recommendations:

Our annual School Nutrition Summer Training will return in the Summer of 2023.

Information and registration will be posted in Spring 2023. There will be in-person at several locations around the state and virtually through live, instructor-led online courses. Please see our School Nutrition Summer Training webpage to learn more ( <https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training> ).

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## Findings and Corrective Action:

<b>Site Name</b>	
<b>Form Name</b>	Meal Counting and Claiming (300 - 311)
<b>Question #</b>	305
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually. If Angel or community funds are used to pay student account balances or portions of that procedure should be detailed in the policy. (SP 46-2016)</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p>
<b>Site Name</b>	
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)
<b>Question #</b>	709
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>Corrective Action 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year.</p> <p>Corrective Action 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
<b>Site Name</b>	
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	803
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Provide a timeline for when a school meal program civil rights complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.</p>
<b>Site Name</b>	
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	805
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA has no written policy that details how special dietary needs requests for food substitutions made outside of the meal pattern will be handled, and supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).</p> <p>Corrective Action: Provide a detailed statement or policy indicating the steps the</p>

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	district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. Indicate when and how that policy will be shared with the school community. See the Technical Assistance section of this report for tools and templates.
<b>Site Name</b>	
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1000
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA's current Local Wellness Policy (LWP) from 2015 does not include most of the required content (7 CFR 210.31). Refer to the Policy builder and Policy checklist to ensure that the SFA's personalized policy includes all of the elements.</p> <p>Corrective Action: Revise or re-draft, provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the position/title (s) of the SFA representative(s) that will ensure compliance.</p>
<b>Site Name</b>	
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1003
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA did not invite a diverse group of stakeholders to participate in the Wellness committee to develop, update and review the LWP per 7 CFR 210.31. This was also a finding from the SFA's 2017 Administrative Review: "There must be an active wellness committee in the district. Corrective Action Needed: Please submit a roster of the wellness committee members and titles."</p> <p>Corrective Action: Provide a statement of understanding that the SFA's LWP must invite a diverse group of stakeholders to participate in the Wellness committee. Submit a roster of confirmed wellness committee members and their titles.</p>
<b>Site Name</b>	
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1005
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA has not completed the required triennial assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: After completing a Local Wellness Policy which meets the list of requirements and sharing with the school community (see CA for Q# 1000), plan and submit (report to the school community and to DPI as part of this CA) the frequency of policy reviews for the future . Schedule a triennial assessment to be completed prior to June 30, 2026. Submit the official/position of the person who will be responsible for completing the triennial assessment.</p>
<b>Site Name</b>	
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	1600
<b>TA Log #</b>	No TA Log# found

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<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA could not provide examples of adequately informing households of the availability of the School Breakfast Program. At the beginning of the school year, the SFA must notify households of the availability of the School Breakfast Program (SBP) (7 CFR 210.12). The public release, another program requirement does not fulfill this SBP specific requirement. Corrective Action: Submit a statement describing how households will be informed of the availability of the SBP. Please include the method of communication and time frame for distributing breakfast promotion materials . Retain examples of social media posts or outreach to grassroots organizations in program records.</p>
<b>Site Name</b>	
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	1601
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). Although the SFA participates in the Summer Food Service Program and publicizes that summer meals are available in the district, it could not provide any examples of nationwide SFSP promotion. Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Include the method of communication and time frame for distributing SFSP outreach materials and how you will include the ways that students/households can access SFSP in other locations across the country.</p>
<b>Site Name</b>	
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: 227 free and reduced price meal application determinations were reviewed, 1 error was identified. An application was determined without being complete. Corrective Action: Access the student name on the SFA-1 file uploaded into the Documents tab. Attempt to reach the household for the information to complete the application while the reviewer is onsite. If the household cannot be reached, send an adverse action letter to the household explaining the error and notifying them the benefit will decrease in 10 days, although the household is always able to reapply. On that date make the appropriate changes to the BI list. Upload any new application and the corrected BI list if an eligibility change is made. CORRECTIVE ACTION COMPLETED ONSITE</p>
<b>Site Name</b>	
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	138
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not effectively update student eligibility changes to benefit issuance list (BI) or the point of service (POS). Some minor date discrepancies on 3 records - on the BI list/POS a few eligibility dates were set as the date of application rather than the date of determination. These dates appeared to be non-systemic recording errors which did not negatively effect student benefits and were not longer than 2 days. Corrective Action: Provide a process that the SFA will use to ensure student meal eligibility will be updated accurately and timely to the BI list and the POS.</p>

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<b>Site Name</b>	
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	209
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA used Standard sampling method generated by their software program, but did not review the correct number of applications; over-verified by using the total number of error-prone applications the software offered rather than applying the 3%. Corrective Action: Review the Eligibility Manual, or watch the verification webinar and provide a statement of understanding on how to identify error prone applications and the formula applied once those applications have been identified.</p>
<b>Site Name</b>	
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)
<b>Question #</b>	314
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA is not following the current approved contract because they are providing meals to students at an alternate serving site. Corrective Action 1: Update the online contract by adding an alternate serving site to the High School section of Schedule A and submit for approval prior to April 1, 2023. Corrective Action 2: Develop an accurate POS at the alternate serving site by counting the meal, charging the student's account, and ensuring the meal is reimbursable, at the point in time the meal is received by each student. Retain those original records. Submit a statement describing the POS process you will use at this site.. Corrective Action 3: Ensure that meals served to students at the Alternative High School are meeting Offer vs. Serve requirements. Submit a statement describing the Offer vs. Serve process you will use for meals at this site moving forward.</p>
<b>Site Name</b>	
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1217
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<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. Corrective Action: Include all training hours completed this school year for each school food service employee onto the DPI professional standards training tracking tool or an equivalent tool of the SFA's choosing and upload into SNACS. see the Technical Assistance section of this report for details on what a training tracker must include.</p>
<b>Site Name</b>	Whitehall Elementary
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)
<b>Question #</b>	404
<b>TA Log #</b>	TA Log# exists
<b>Due Date</b>	
<b>Corrective Action Status</b>	CAP Accepted

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<b>Corrective Action History</b>	Finding: Signage was not posted at breakfast 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 breakfast signage should list the three components and inform students that under Offer versus Serve (OVS), they must select at least three items, 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 ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a> ). Corrective Action: Submit a picture of completed signage posted near the breakfast service line.	
	CAP Submitted Kristan OToole 03/22/2023 10:52 AM	Picture uploaded of posted signage.
	CAP Accepted Kristan OToole 03/22/2023 10:55 AM	CAP Accepted
<b>Site Name</b>	Whitehall Elementary	
<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>	Flagged	
<b>Corrective Action History</b>	Finding: The daily minimum requirement for meat/meat alternates was not met for preschoolers aged 3-5 years old for lunch during the week of review. The following represent the planned portion sizes: - Daily: PBJ sandwich (1.0 oz eq M/MA) - Monday: Grilled cheese sandwich (1.0 oz eq M/MA) The daily minimum requirement for preschoolers aged 3-5 years old is 1.5 oz eq M/MA. Corrective Action: Describe specifically how the daily minimum requirement for M/MA will be met for lunch for the entrees containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).	
	Site Name	
	Whitehall Elementary	
<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>	Flagged	
<b>Corrective Action History</b>	The meal components are based on the USDA's MyPlate and Dietary Guidelines for Americans. Whole grains are made from wheat, rice, oats, cornmeal, barley, and other cereal grains. Grains are important sources of many nutrients including complex carbohydrates, dietary fiber, several B vitamins and minerals (iron, magnesium, and selenium). Protein foods include foods such as seafood, meat, poultry, eggs, beans, peas, nuts, seeds, lentils, and soy products. Protein foods are important for protein, B vitamins, vitamin E, iron, zinc, and magnesium. On the production records, sunflower seeds were credited as 1.0 oz eq grain; however, they should be credited as 1.0 oz eq M/MA. This crediting appears to have caused the weekly grain shortage in the meal pattern for K-8. Finding: There was a weekly grain shortage at lunch during the week of review. A minimum of 7.0 oz eq grain was offered over the course of the week, which does not meet the minimum 8.0 oz. eq. grain requirement for the K-8 meal pattern. The following were the minimum available grains planned: Mon: PBJ sandwich with string cheese and sunflower seeds (1 oz eq grain) Tues: Chicken breast bites and a cookie (1.5 oz eq grain) Wed: PBJ sandwich with string cheese and sunflower seeds (1 oz eq grain) Thurs: Cheeseburger on 3.5" bun (1.5 oz eq grain) Fri: PBJ with string cheese and bug bites (2 oz eq grain) Corrective Action: Submit a statement explaining how this 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.	
	Site Name	
	Whitehall Elementary	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	434	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>					
<b>Corrective Action Status</b>	CAP Accepted				
<b>Corrective Action History</b>	<p>Anything made in house with two or more ingredients, including water, must have a standardized recipe. While mashed potatoes contain a recipe on the back of the bag of mashed potato mix, a school's standardized recipe will be standardized to the school kitchen that the item is prepared in and indicate the scoop size, pans/pots, etc., needed that are available in the kitchen. In addition, when scaling up or down recipes, the amount of water needed may change depending upon the desired texture (for example, on the recipe on the back of the potatoes it states "for creamier mashed potatoes, add more boiling water" and this is not a standardized step). Leave nothing to chance. The purpose of a standardized recipe is to produce a consistent, high quality product and yield every time when the exact procedures, equipment and ingredients are used. Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the mashed potatoes mixed with water. Corrective Action: Submit a standardized recipe for the whipped potatoes. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a>). This was created and submitted prior to onsite visit. No further action required.</p> <table border="1"> <tr> <td>CAP Submitted Kristan OToole 03/22/2023 10:53 AM</td> <td>Recipe uploaded.</td> </tr> <tr> <td>CAP Accepted Kristan OToole 03/22/2023 10:55 AM</td> <td>CAP Accepted</td> </tr> </table>	CAP Submitted Kristan OToole 03/22/2023 10:53 AM	Recipe uploaded.	CAP Accepted Kristan OToole 03/22/2023 10:55 AM	CAP Accepted
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CAP Accepted Kristan OToole 03/22/2023 10:55 AM	CAP Accepted				
<b>Site Name</b>	Whitehall Elementary				
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)				
<b>Question #</b>	435				
<b>TA Log #</b>	TA Log# exists				
<b>Due Date</b>					
<b>Corrective Action Status</b>	Flagged				
<b>Corrective Action History</b>	<p>Finding: Though there is a recipe on file for the apple salad, it is currently not being followed as written. It was observed during meal preparation that 20 lb of strawberry yogurt was being used in the recipe due to the school nutrition professional stating that this makes the salad a bit creamier and because the bulk yogurt came in 5 lb increments, not 4 lb. The recipe called for only 16 lb of strawberry yogurt. Other information missing from the recipe were details for ingredients, i.e. "strawberry yogurt" instead of "Nonfat strawberry yogurt, Upstate Farms," pan sizes, and number of pans. Corrective Action: Please update the apple salad recipe to reflect current practices and standardize it to the current kitchen in which it is being used. Be sure to include pan sizes and number of pans, details about the ingredients, and crediting documentation.</p>				
<b>Site Name</b>	Whitehall Elementary				
<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>	Flagged				
<b>Corrective Action History</b>	<p>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. A total of 3.5 oz eq was offered during the week of review: Tuesday: Tiger bites (1.0 oz eq GBD), cookie (0.5 oz eq GBD) Thursday: Tiger Bites (1.0 oz eq GBD) Friday: Bug Bites (1.0 oz eq GBD) Corrective Action: Describe how the menu would be changed to comply with the grain-based dessert limit. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be planned in place of a grain-based dessert.</p>				
<b>Site Name</b>	Whitehall Elementary				
<b>Form Name</b>	Offer vs Serve (500-502)				

# Administrative Review Report

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<b>Question #</b>	500					
<b>TA Log #</b>	TA Log# exists					
<b>Due Date</b>						
<b>Corrective Action Status</b>	Flagged					
<b>Corrective Action History</b>	<p>The infant and preschool meal pattern replaces the previous meal pattern options for School Food Authorities (SFAs) serving infants and children aged 1-5 and not yet in kindergarten. Meals served under these meal patterns include a greater variety of vegetables and fruits, more whole grains, and less added sugar. Information on these meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool</a>). The SFA is currently serving preschoolers by delivering food portions to the classrooms where teachers dish up the meals. In some classrooms Offer versus Serve was being implemented. If an SFA is not using a preschool co-mingling flexibility, students should be served all components of the meal. In addition, there was concern that teacher(s) may not understand which parts of the meal should be served together. It was discussed onsite with school nutrition professionals the best way to provide that information to teachers when the food is delivered, such as, adding sticky notes to each component indicating serving size/scoop/spoodle to use, or a written guide on the components and which items are served together. Finding: Currently, the preschool students are being served with Offer vs Serve. Offer versus Serve is not an allowable service style for preschool students, unless the co-mingling flexibility is being used. Children must be served all five components at lunch and all three components at breakfast to be a reimbursable meal, unless family style meal service is implemented. For more information about family style meal service, please see the Family Style Meal Service Resource: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/family-style-meal-service.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/family-style-meal-service.pdf</a>. Corrective Action: Submit a statement describing how preschool students will be served going forward to meet meal pattern requirements.</p>					
<b>Site Name</b>	Whitehall Elementary					
<b>Form Name</b>	Offer vs Serve (500-502)					
<b>Question #</b>	502					
<b>TA Log #</b>	No TA Log# found					
<b>Due Date</b>						
<b>Corrective Action Status</b>	CAP Accepted					
<b>Corrective Action History</b>	<p>Finding: Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, signage does not list this. Corrective Action: Submit a picture of the supplementary signage.</p> <table border="1"> <tr> <td>CAP Submitted Kristan OToole 03/22/2023 10:52 AM</td> <td>Picture of breakfast and lunch signage including the 1/2 cup fruit and/or vegetable requirement uploaded.</td> </tr> <tr> <td>CAP Accepted Kristan OToole 03/22/2023 10:54 AM</td> <td>CAP Accepted</td> </tr> </table>		CAP Submitted Kristan OToole 03/22/2023 10:52 AM	Picture of breakfast and lunch signage including the 1/2 cup fruit and/or vegetable requirement uploaded.	CAP Accepted Kristan OToole 03/22/2023 10:54 AM	CAP Accepted
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CAP Accepted Kristan OToole 03/22/2023 10:54 AM	CAP Accepted					
<b>Site Name</b>	Whitehall Elementary					
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)					
<b>Question #</b>	1411					
<b>TA Log #</b>	No TA Log# found					
<b>Due Date</b>						
<b>Corrective Action Status</b>	CAP Accepted					
<b>Corrective Action History</b>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> <li>Farmer's Best Fresh Cucumbers - Mexico</li> <li>Marengo tomatoes Fresh - Mexico</li> <li>Family Favorite's Sugar Snap Peas - Mexico</li> <li>The Lunch Bunch Grapes - Chile</li> </ul>					



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	<p>Suncup OJ - USA, Brazil, Costa Rica, and/or Mexico World Horizons Mandarin Oranges - China Marquis Tropical Fruit - Thailand Fruit cocktail - China Broccoli, Frozen - Mexico</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Noncompliant Product List templates can be found on the Buy American webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american">https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american</a> ). List submitted during onsite review. No further action required.</p>				
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CAP Submitted Kristan OToole 03/22/2023 10:53 AM	Completed onsite.				
CAP Accepted Kristan OToole 03/22/2023 10:55 AM	CAP Accepted				
<b>Site Name</b>	Whitehall Elementary				
<b>Form Name</b>	Wisconsin School Day Milk Program				
<b>Question #</b>	10				
<b>TA Log #</b>	No TA Log# found				
<b>Due Date</b>					
<b>Corrective Action Status</b>	Flagged				
<b>Corrective Action History</b>	<p>Finding: Documentation was not available to determine if the milk served as part of the Wisconsin School Day Milk Program (WSDMP) meets the criteria for "Wisconsin produced milk". Wisconsin produced milk means that all or part of the raw milk used by the milk processor was produced in Wisconsin. Per the Agreement for the WSDMP the SFA agrees to serve Wisconsin produced milk.</p> <p>Corrective Action1: Submit documentation showing the milk used in the WSDMP is produced or partially produced in Wisconsin. Documentation may include a statement from the distributor, milk invoices showing where the milk is produced or any other documentation showing the milk used in the WSDMP is a Wisconsin agricultural product.</p> <p>Corrective Action 2: Provide a statement of understanding that procurement documents for milk must include language that WI produced milk be provided for this program.</p>				

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/23/2023	3233		Administrative Review		Afterschool Snack Program Servers, Food Service Di			
<b>Comments</b>								
							<b>Created By</b>	<b>Created Date</b>
Afterschool Snack Program (ASP) Production and Counting records - For Area Eligible ASP, SFAs are able to use a tally method to indicate the number of snacks served. However, this tally becomes the actual record of the number of snacks served from which the claim is prepared. Tally marks must be made at an accurate Point of Service (POS) which is the point in time when an eligible student receives a reimbursable snack. Tallies cannot be taken after all students have been served or by using back out counts, such as subtracting the number of snack servings remaining from the number prepared. Any paper used to make tally marks must be retained as a record. A tally mark is an individual slash mark counting one student. It is not a continuous line drawn through numbers until a total number is reached. ASP staff at the POS should receive training annually in POS, ASP meal pattern, and DPI's Civil Rights presentation.								
03/23/2023	3232		Administrative Review		Food Service Director, Food Service Staff			
<b>Comments</b>								
							<b>Created By</b>	<b>Created Date</b>
Food Storage - All foods, in cases or in individual containers, must be stored at least 6" off the floor in dry storage rooms, walk-in and reach-in coolers and freezers. This is also the requirement for food service supplies.								
03/23/2023	3231		Administrative Review		Food Service Director			

# Administrative Review Report

Whitehall School District

Comments								Created By	Created Date
<p>Training tracking tools for food serving program staff - SFAs <b>must establish a process for tracking</b> and monitoring annual training for school nutrition employees.</p> <p>USDA does not mandate a specific tool be used.  <a href="#">DPI-developed Professional Standards Tracking Tool</a></p> <p>A tracking tool <b>must include</b> a trainee's: name, date of hire, position/role, required hours of training. Each entry into the tracker should indicate the date of the training, the title or subject, the name of the entity who provided or produced the training, the hours or minutes, and the subtraction of that time from the required hours of training.</p>									
03/23/2023	3230		Administrative Review		Food Service Director				
Comments								Created By	Created Date
<p>Resources for required SBP and SFSP outreach –</p> <p>SFAs must inform families of the availability of reimbursable breakfasts served under the <a href="#">School Breakfast Program (SBP)</a> at the beginning and throughout the school year. The goal of providing school breakfast outreach is to increase participation in the SBP. Access the <a href="#">School Nutrition Outreach Toolkit</a> through DPI Team Nutrition.</p> <p>All SFAs are required to inform households before the end of the school year of the availability and location of meals offered through the SFSP. Outreach for SFSP must be completed by all SFAs regardless of whether SFSP is offered by the SFA itself.</p> <p>Acceptable outreach activities inform families about the availability and location of summer meals prior to the end of the school year. SFAs distribute information through means normally used to communicate with households of enrolled children. This may include newsletters, automatic calling and texting services, email, or mailings.</p> <p>SFAs can inform families of summer meals by promoting the following:</p> <ul style="list-style-type: none"> <li>• Access the <a href="#">Summer Meals Site Finder</a> on the <a href="#">Find a Summer Meals Site</a> webpage</li> <li>• Call 211 to locate meals in the area</li> <li>• Text "food" (in English or Spanish) to 304-304</li> <li>• Visit the <a href="#">Summer Food Service Program</a> webpage</li> </ul> <p>Additional information can be found on the <a href="#">Administrative Review</a> webpage and the <a href="#">SFSP Outreach Materials</a> webpage. SFAs may also use ready-made promotional materials found within the <a href="#">Summer Meals Outreach Toolkit</a> developed by No Kid Hungry.</p>									
03/23/2023	3229		Administrative Review		Authorized Representative				
Comments								Created By	Created Date
<p>Local Wellness Policy Tools and Resources –</p> <p>As of June 30, 2017, SFAs must fully comply with the requirements of the final rule.</p> <ul style="list-style-type: none"> <li>• <a href="#">Local Wellness Policy In a Nutshell</a> provides an overview of policy requirements.</li> <li>• <a href="#">Local Wellness Policy Checklist</a> is a resource that will help schools determine if all required content areas are included in their LWP.</li> </ul> <p><a href="#">Local Wellness Policy Builder</a> 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.  <a href="#">Local Wellness Policy Builder - Full Text</a> is a compilation of all statements available in the <a href="#">Local Wellness Policy Builder Online Tool</a>.</p> <p>As of June 30, 2020, SFAs must complete their first triennial assessment. <b>The assessment must be completed, at minimum, once every three years.</b> 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.</p> <ul style="list-style-type: none"> <li>• <a href="#">Local Wellness Policy Triennial Assessment Report Card</a> - SFAs must use the <b>Wisconsin Local Wellness Policy Triennial Assessment Report Card</b> 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 page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. <b>The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team.</b> 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.</li> </ul>									
03/23/2023	3228		Administrative Review		Authorized Representative, Food Service Director				

# Administrative Review Report

Whitehall School District

Comments							Created By	Created Date
<p>Complaint Procedure within the School Meals Program – Any person or representative alleging discrimination based on a protected class has the right to file a complaint <b>within 180 days</b> of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs.</p> <p><a href="#">Template Civil Rights Complaint Procedures for SFAs</a></p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <p><b>1. Document the complaint.</b></p> <p><a href="#">USDA Program Discrimination Complaint Form (Espanol)</a></p> <p><b>2. Submit complaints within five days</b> of receiving the complaint to:</p> <p><b>Wisconsin Department of Public Instructions (DPI)</b>  <b>Mail:</b> Director, School Nutrition Team            125 S. Webster Street            Madison, WI 53707-7841  <b>Fax:</b> (608) 267-0363  <b>Email:</b> <a href="mailto:jessica.sharkus@dpi.wi.gov">jessica.sharkus@dpi.wi.gov</a></p> <p><b>3. Maintain a separate Civil Rights complaint log</b> at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know.</p> <p><a href="#">Civil Rights Complaint Log</a></p>								
03/23/2023	3227		Administrative Review		Authorized Representative, Food Service Director			
Comments							Created By	Created Date
<p>Special Dietary Needs Policy Tools and Resources –</p> <p>The School Nutrition Team has created an example Special Dietary Needs policy that can be used at your school or district. Please note, this template should be thoroughly reviewed and modified to fit the needs of your school or district. All highlighted areas are meant to be filled in to reflect your school(s) or district.</p> <ul style="list-style-type: none"> <li><a href="#">Special Dietary Needs Example Policy</a></li> </ul>								
03/23/2023	3226		Administrative Review		Authorized Representative, Food Service Director			
Comments							Created By	Created Date
<p>Unpaid Meal Charges and Student Accounts - There is good guidance in the USDA's <a href="#">Overcoming the Unpaid Meal Challenge Proven Strategies from Our Nation's Schools</a>, including a checklist in the appendix, starting on page 52.</p>								
03/23/2023	3225		Administrative Review		Authorized Representative, Food Service Director,			
Comments							Created By	Created Date
<p>Students Present at the Point of Service (POS) - Per SP26-2017: May an SFA serve meals to children with disabilities in an area separate from the cafeteria where the majority of the school children eat? Federal civil rights legislation, including Section 504 of the Rehabilitation Act of 1973, IDEA, and Titles II and III of the ADA, requires that in providing nonacademic services, including meals, school districts must ensure children with disabilities participate along with children without disabilities to the maximum extent appropriate. This allows children to interact with and learn from other children with backgrounds different from their own. However, under some circumstances it may be appropriate to require children with certain special needs to sit at a separate table. For example, if a child requires a large amount of</p>								

# Administrative Review Report

## Whitehall School District

assistance from an aide in order to consume their meals, it may be necessary for the child and the aide to have more space during the meal service. SFAs may not, however, segregate children from the regular meal service due to their disability simply as a matter of convenience, and it is not appropriate to simultaneously use a separate table to segregate children who are being punished for misconduct. If it is determined that a separate eating area would be best for a student, this should be written into an IEP or a 504 plan. In this case, the adult picking up the student's meal will need to put all items available on the tray for the student to choose from. The adult may not choose for the student based on "what the student likes to eat". Leftovers cannot be consumed by adults.								
03/23/2023	3224		Administrative Review		Determining Official			
<b>Comments</b>							<b>Created By</b>	<b>Created Date</b>
Carryover - For purposes of the CNPs, carryover refers to a child's eligibility from the previous school year being carried over into the current or new school year. According to 7 CFR 245.6(c)(2), an individual student's eligibility from the previous school year (before July 1) carries over for up to 30 operating days (serving days) into the new school year, or until a new eligibility determination is made, whichever comes first. The 30 operating days begins on the first operating day of school. Operating days are the days on which reimbursable meals or milk are provided by a school or another program sponsor [7 CFR 245.2]. Carryover applies to eligibility established through a household application or through direct certification. Meals served during the carryover period are claimed at the appropriate rate, depending on the individual child's eligibility status from the previous school year. Carryover allows students to continue receiving school meal benefits while families complete and submit, and schools process, applications. The carryover period is not intended to delay processing of applications. Instead, schools must process applications as they are received and promptly notify households of their eligibility status. Within 10 days of receiving the application, the LEA must make a determination and notify the household of its eligibility status [7 CFR 245.6(c)(6)]. While not required to issue a notification about the carryover period, school officials are encouraged to clarify for families that the carryover will end after 30 operating days. School officials should inform affected families that they must submit a new application for meal benefits to re-establish their child's eligibility before the end of the carryover period.								
03/22/2023	3220	500	Administrative Review	Whitehall Elementary	FSD			
<b>Comments</b>							<b>Created By</b>	<b>Created Date</b>
Offer Versus Serve (OVS) is not being properly implemented at the alternate serving location which turned out to be serving 9-12th graders. Students are served some of all five components rather than being allowed to select three components, including 1/2 cup fruit and/or vegetable. For an example, students were able to select the entree and milk choice; however, are then served 1/2 cup vegetable and 1/2 cup fruit. Under the 9-12 meal pattern, students must have access to a full cup of fruit and full cup of vegetable and if these components will be pre-plated then the full amount must be sent. With DPI intervention, the full cup of fruit and vegetable was sent to this alternate site. Technical assistance was provided and moving forward the school will pre-plate the meal and offer the entree and milk choice to comply with offer versus serve at this site. In the future, they may consider finding a way to offer fruit and vegetable options to help minimize food waste.								
03/22/2023	3217		Administrative Review	Whitehall Elementary	FSD			
<b>Comments</b>							<b>Created By</b>	<b>Created Date</b>
On the production records, graham crackers were listed as crediting 1.0 oz eq grain towards the breakfast meal pattern for K-8. The definition of a food item at breakfast is 1/2 cup fruit, 1 oz eq grain, and 1 cup milk. The Nabisco Graham Crackers weighed 0.75 oz and using Exhibit A credit as 0.75 oz eq. While this did not result in a shortage of items offered at breakfast nor any non-reimbursable meals, technical assistance was provided on the crediting and what counts as an item.								
03/22/2023	3216	404	Administrative Review	Whitehall Elementary	FSD			
<b>Comments</b>							<b>Created By</b>	<b>Created Date</b>
Because the vegetables on the garden bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx</a> ). Signage helps students understand what components make up a reimbursable meal.								
03/21/2023	3213	501	Administrative Review	Whitehall Elementary	FSD			
<b>Comments</b>							<b>Created By</b>	<b>Created Date</b>
Food service staff did not have a clear understanding of the Offer Versus Serve (OVS) requirements for lunch. There was confusion about the fruit and vegetable requirement for OVS. It was observed that school nutrition staff attempted to make a couple of students go back for a 1/2 cup vegetable even though they each already had 1/2 cup fruit, grain, meat, and milk on their tray. With DPI intervention, education was provided and the students were not required to take the 1/2 cup vegetable. The staff member thought that 1 cup of fruit, vegetable or combination of both was required, not just 1/2 cup. Although all students observed took a reimbursable meal, it is important for staff to understand OVS requirements. Visit our Online Learning Library for opportunities ( <a href="https://dpi.wi.gov/school-nutrition/training/online-learning">https://dpi.wi.gov/school-nutrition/training/online-learning</a> ).								
03/21/2023	3212	431	Administrative Review	Whitehall Elementary	FSD			

# Administrative Review Report

Whitehall School District

Comments							Created By	Created Date
<p>On the production record for the garden bar line item and the garden bar production records planned portion size is not documented. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (<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>). Additionally, items that are not bundled or a recipe should be included as separate line items on the production record. For example, "yogurt and tiger bites" should each be individually listed if students are not required to take both when going through the line. Menu items should also contain information such as recipe numbers, brand names, purchasing information that eliminates any confusion about what item is needed for the day. For example, "broccoli with cheese." In this example is the broccoli fresh, frozen, diced? Some menu items do contain this information, and some do not. Currently, production records have two columns for documenting total quantity planned and prepared in purchase units. To maximize space and reduce confusion, eliminate one of the columns on the production record.</p>								
03/21/2023	3211	435	Administrative Review	Whitehall Elementary	FSD			
Comments							Created By	Created Date
<p>Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Standardized recipes are often missing information such as total recipe by weight/volume/number of pans or pan size and number of pans, or lack detail on the ingredient needed to prepare the recipe. For more information on what essential information must be on a standardized recipe, review the Standardized Recipes in a Nutshell document (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf</a>). 1. Chicken salad a. Be specific about ingredient - "Celery, diced" or "Onions, fresh, diced", type of salad dressing, brand or product code of diced chicken. b. Put the total recipe yield by weight/volume/number of pans or pan size c. Crediting: Currently, the recipe is noted as crediting 2 oz eq M/MA; however, the current recipe yield and volume of chicken only yields 1.75 oz eq M/MA per serving. i. 6 lb of chicken, diced, cooked x 16 oz/lb = 96 oz / 44 servings = 2.18 oz per serving ii. Tyson PFS for diced chicken states 2.3 oz = 2 oz eq M/MA (or, 1.15 oz = 1 oz eq M/MA) iii. So, 2.18 oz/ 1.15 oz/oz eq = 1.895 oz eq rounded down to 1.75 oz eq. It is recommended to update the crediting of this recipe as it is used for both the K-8 and 9-12 meal pattern and can lead to M/MA shortages for the high school grade grouping.</p>								