

Administrative Review Report

Lake Geneva-Genoa UHS

Commendations:

Thank you for the warm welcome to Lake Geneva-Genoa School District. We appreciate the nice facility that was booked for the visit and the Food Service Coordinator's dedication to this review process. Jaclyn is receptive to all feedback and technical assistance; she also appears to have a good working relationship with the food service staff. The School Nutrition Team reviewers are confident she will continue to thrive in her position as school meals programs rules revert back to standard regulations as the public health emergency is expiring.

Recommendations:

We encourage those involved with USDA School Meal Programs to attend Wisconsin Department of Public Instruction (DPI) trainings offered in the summer.

This year's School Nutrition Summer Training (SNST), formerly SNSDC, will have both in-person and virtual options. The first session is in July at the Northcentral Technical College in Wausau. The second session is in August at the Waukesha County Technical College. The virtual option will also be offered in August with NEW advanced and beginner options. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. Travel expenses are an allowable food service expense. More information can be found on the Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 05:26 PM</p>	<p>Finding: The SFA does have an Unpaid Meal Charge Policy in place; however, it is only posted on the website. The policy must be communicated and distributed to all households, annually. (SP 46-2016).</p> <p>CA: Provide information of how all households will be notified annually.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 07:22 PM</p>	<p>Finding 1: The Public Release was not distributed to the required locations. In addition to local media SFAs are required to distribute the public release to grassroots organizations (e.g., food pantry, public library, local churches, etc.), unemployment office, employers experiencing or contemplating layoffs.</p> <p>CA 1: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p> <p>Finding 2: The public release cannot be posted on the school district website.</p> <p>CA 2: Remove the public release from the website. Provide a statement in SNACS that this has been completed.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 07:34 PM</p>	<p>Findings: The SFA does not have compliant written procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). It is</p>

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		<p>recommended the SFA use the DPI Civil Rights Complaints of Discrimination Template to create a written policy.</p> <p>CA: 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>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 07:07 PM</p>	<p>Finding: Staff received civil rights training. The training was recorded on the DPI professional standards tracker; however, staff did not sign the civil rights attendance sheet.</p> <p>CA: Upload to SNACS, the civil rights attendance sheet with the names and signatures of all staff that received civil rights training.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 07:53 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all the required content (7 CFR 210.31). Add the following to the policy (<i>italicized parts are suggestions to meet the requirement</i>).</p> <p>Triennial Assessment- LWPs must include language regarding the completion of a triennial assessment. <i>The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.</i></p> <p>Update/Inform the Public - The SFA is required to inform and update the public about the content and implementation of the policy. The written policy must include language specifying how the SFA will be in compliance with this requirement. <i>The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.</i></p>

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		CA: Submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/07/2023 07:39 PM</p>	<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). Inform households of the availability of SFSP at your location. In addition, inform families that they can find summer meals by:</p> <ul style="list-style-type: none"> the summer meals locator on the Summer Food Service Program website calling 211 texting 'food' to 304-304. <p>CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing this information.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/08/2023 09:49 AM</p>	<p>304 free and reduced-price meal application determinations were reviewed, 7 errors were identified. This is an error rate of 2.3%. Fiscal action is assessed with an error rate at 3% or above.</p> <p>Finding 1: There were 7 applications (11 students) with errors. Six applications (9 students) must be changed to paid eligibility.</p> <p>CA 1: The families should receive a letter stating their eligibility will change to paid in 10 calendar days. A courtesy phone call is also recommended to help mitigate an unpaid meal balance.</p> <p>Finding 2: One application (2 students) must be changed from a paid eligibility to a reduced eligibility.</p>

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		CA 2: This application change should be made immediately, and a letter sent to the family. We recommend funds be credited to the account.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/08/2023 09:52 AM	<p>Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with multiple income frequencies were not annualized correctly.</p> <p>CA: The determining official should watch the Free, Reduced-price, and Verification four-part series Webcast OR plan to sign up for the Free and Reduced-price class offered at the School Nutrition Summer Training offered in August. Indicate in SNACS when the training has been completed or if the determining official will attend this class in August.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/08/2023 10:01 AM	<p>Finding: One of the applications chosen for verification was determined incorrectly. When reviewing pay stubs the determination was made using net pay instead of gross pay. The eligibility should have been changed to paid.</p> <p>CA: The verification official should view the DPI Verification webcast. Provide a statement that the webcast was viewed and the verification official has a good understanding of the process.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 03/07/2023 04:41 PM	Finding: The correct non-discrimination statement was not included on all program materials. CA: Update the following program materials to include the 2022 non-discrimination statement and upload the corrected documents to SNACS. <ul style="list-style-type: none"> • Board Policy 8500 • Board Policy 8531 • Unpaid Meal Charge Policy School Website - COMPLETED • Free & reduced-price approval of benefits letter • Denied benefits letter • "We Must Check"-Verification letter • Change shortened NDS on menu to "This institution is an equal opportunity provider". - COMPLETED
Site Name	Badger High School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/08/2023 08:17 AM	Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for breakfast. Meal service was observed at both the Commons and Union kitchen locations. Each staff member counted two trays as a reimbursable meal when it was missing the 1/2 cup fruit. Corrective Action: Fiscal action will be assessed for the 4 non-reimbursable breakfast meals observed at Badger High School that were missing the fruit component on the tray.
Site Name	Badger High School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/08/2023 08:22 AM	Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for breakfast. Two incomplete meals were counted for reimbursement and are subject to fiscal action. The trays contained a total of two items, not meeting the minimum requirement of three items. Corrective Action: Fiscal action will be assessed for the additional 2 non-reimbursable breakfast meals observed at Badger High School that had incomplete food quantities.
Site Name	Badger High School	

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Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 08:49 AM</p>	<p>Finding: Staff at Badger High School did not comply with the planned menu for the day of the review. The production records indicated the planned serving size for both the regular chicken strips and spicy chicken strips were 3 each. During the observation of meal preparation, staff at both the Commons and Union kitchen locations said they plan to serve 4 strips of the spicy chicken strips. Food service staff at one location served 3 regular chicken strips while the other meal service location in the same high school decided to serve 4 regular chicken strips as the planned portion size.</p> <p>Corrective Action: The Food Service Coordinator needs to make a final decision on the planned portion size for menu items and train all kitchen staff on following the production records. When changes in decisions are made based on personal judgement or historical practices, this results in unfair treatment of students. Depending on which cafeteria location they choose to eat, the students are receiving different amounts of food for the same price. Please cover this topic at your staff meeting on 3/23/23. Please upload agenda, meeting notes and list of attendees into SNACS.</p>
Site Name	Badger High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 08:04 AM</p>	<p>Finding: The daily minimum requirement for meat/meat alternate was not met for the Badger High School 9-12 students for lunch during the day of review. The Tyson hot n' spicy chicken nuggets contribute 2.0 oz eq of meat/meat alternate when 8 pieces are served per the manufacturer's Production Formulation Statement. The production records indicate 5 pieces is the planned portion size, which credits as 1.25 oz eq meat/meat alternate. This is a shortage for the daily component. This is not a repeat finding for this Administrative Review (AR), however repeat findings on a subsequent AR may result in fiscal action.</p> <p>Corrective Action: Please send completed production records the next time this product is served showing that the daily meat/meat alternate requirement was met.</p>

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Site Name	Badger High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 11:49 AM</p>	<p>Finding: The column "Planned Serving Size" in the production records was not always accurate to what was happening in the operation. Staff frequently chose a different portion size than what is listed. Other columns such as "Planned # of servings" and "Planned Quantity Prepared (in purchase units)" were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Submit one full week of completed production records. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Badger High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	433	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 11:45 AM</p>	<p>Finding: Crediting documentation was unacceptable for the BBQ Pork from Brookwood Farms as it had inaccurate description of ingredients information as well as an inaccurate Food Buying Guide yield.</p> <p>Corrective Action : Submit a correct PFS from the manufacturer Brookwood Farms for the BBQ Pork served on Tuesday, Feb 7.</p>
Site Name	Badger High School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 03/07/2023 04:10 PM	<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for lunch. During the day of review, a high school student's tray at lunch contained chicken tenders and two 1/2 cup fruit servings. The cashier and food service coordinator both considered this meal reimbursable.</p> <p>Corrective Action: Have staff responsible for identifying reimbursable meals participate in onsite training led by the Food Service Coordinator using their SFA's specific menus and products. A description of the training and a sign-in sheet identifying who attended can be uploaded into SNACS. Please also attest to registering for School Nutrition Summer Training this August provided by DPI School Nutrition Team.</p>
Site Name	Badger High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2023 07:58 PM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location in the Union kitchen. This was posted publicly in the Commons kitchen.</p> <p>CA: Provide a statement of where the most recent food safety inspection report will be posted and visible to the public. .</p>
Site Name	Badger High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2023 08:07 PM	<p>Finding 1: There were 5 cases of frozen chicken tenders on a cart outside of the freezer while they were placed on pans for service. TCS (time temperature control for safety) foods should be kept under temperature control until ready to use. For example, only one case of chicken tenders should be removed from the freezer at a time.</p> <p>CA 1: Train staff on temperature control for TCS foods. Indicate in SNACS when the training was completed.</p> <p>Finding 2: There were some food items in the Union kitchen cooler, freezer, and dry (non-food) supplies that were directly on the floor. These should be kept a minimum of 6 inches off the floor.</p>

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		CA 2: Provide a statement in SNACS that food and non-food supplies will be kept 6 inches above the floor.
Site Name	Badger High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 08:12 PM</p>	<p>Finding 1: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). 3-6-23 was randomly chosen for review of temperatures. On 3-6-23 there were no temperatures recorded for the Commons Kitchen.</p> <p>CA 1: Review with staff the procedure of recording temperatures daily.</p> <p>Finding 2: In the Union kitchen there is no temperature sheet for the "salad bar" cooler. A staff person confirmed the temperatures are not recorded for the cooler.</p> <p>CA 2: Upload a statement in SNACS that the Union kitchen has begun recording the temperature of this cooler. The requested temperature logs were not available for review or were incomplete.</p>
Site Name	Badger High School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 11:50 AM</p>	<p>Finding: Non-domestic products are not being tracked. Products noncompliant with the Buy American provision, such as the black olives from Spain, were identified in the storage area.</p> <p>Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. Provide a copy of the form(s) that will be used and include any noncompliant products. A template can be found on the Procurement webpage: https://dpi.wi.gov/school-</p>

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nutrition/program-requirements/procurement/buy-american.

Technical Assistance Entries:

Comments

Adequate signage helps students understand what components make up a reimbursable meal and what they can select to satisfy the OVS requirements. Signage using the DPI template was available and completed in both the Commons and Union cafeteria; however, based on meal service observation, it is recommended to have supplemental signage throughout the meal service line, especially at breakfast. Consider adding a statement to your meal service line that states the student must take at least ½ cup fruit and/or vegetable to make it a reimbursable meal. You may even consider adding a fruit basket by the cashier for students to take a piece of fruit if needed.

3/8/2023 10:34:13 AM

Comments

It is critical that food service staff thoroughly understand Offer versus Serve (OVS) to ensure that all students select reimbursable meals. OVS resources on WI DPI's Menu Planning webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve>) may be used as training resources.

3/8/2023 10:13:14 AM

Comments

At a minimum SFAs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy using [the Special Dietary Needs Policy template](#). This can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to make sure important information is included. This will help to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination.

3/7/2023 7:31:03 PM

Comments

The SFA is in year one with an excess cash balance. We commend the staff for the fiscal viability of the child nutrition programs; however, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status. No action is necessary in year one. In year two, it may be necessary to complete a spend down plan with DPI. Note: Supply chain assistance funds are taken into consideration when reviewing spend down plans.

Excess cash balance can be used to support the operation and improvement of the school meals program(s) such as universal free breakfast, elimination of reduced meal prices, new kitchen equipment (i.e., equipment), meal quality improvement, staff enticements (i.e., increased wages, bonuses),

Comments

It is a local decision when delinquent unpaid meal charges (negative accounts) are classified as bad debt. This is generally when it is determined that collection efforts will not be successful or are too costly. The food service account may not be used to cover bad debt and a transfer must be made into the food service account to cover these costs. Nonfederal funds such as fund 10 or donations can be used to cover bad debt.

Comments

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It is recommended to use the DPI eligibility notification letters found on the School Nutrition website. These letters are kept current and contain the most recent non-discrimination statement. These can also be added to school district letterhead if you wish.

Comments

Field trip meals must be counted at the point where the student is given the meal. Pre meal counts are important for planning purposes but cannot be used for the reimbursement claim. Best practice is to have adult staff check off names on the field trip as the meals are distributed. After the field trip that document is given to the food service director, then the meals are entered in the POS.

Comments

There must be one person on staff with a current food protection manager certification such as ServSafe. It is highly recommended the food service director responsible for food safety training also have a food protection manager certification. It may also be beneficial for the head cooks to have a food protection manager certification to ensure the most current practices are being followed