

# Administrative Review Report

Germantown School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/08/2022	01/16/2023
On-Site Review	11/08/2022	02/27/2023
Site Selection Worksheet	11/08/2022	11/09/2022
Entrance Conference	12/06/2022	12/06/2022
Exit Conference	12/07/2022	12/07/2022

## Commendations:

### From the Nutrition Program Consultant:

Thank you to the staff at Germantown school district for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The food service director and the food service team do a nice job of offering nutritional meals to students. The support that staff that work with the food service director do a great job with their responsibilities to support the food service program. It was a pleasure to work with everyone!

### From the Public Health Nutritionist:

Thank you to all the staff at Rockfield Elementary and MacArthur Elementary for the warm welcome and cooperation during Germantown's Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Your organized recordkeeping of production records, crediting documentation, and Buy American tracking is very much appreciated. Your menus met all meal pattern requirements, and you offered a great variety of food. Thank you for serving healthy, nutritious meals to your students!

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## Findings and Corrective Action:

<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	110	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The SFA's notification letters for direct certification, letter for approval and denial of meal benefits, verification and the sharing of information letters did include all required information. However, there were non-compliant issue with the formatting of the non-discrimination statement with all letters. In addition, some of the letters had issues with the font size of the nondiscrimination statement.</p> <p>Corrective Action: Please correct the formatting and font issues and upload a copy of each of the letters into SNACs with the updates needed to bring the letter into compliance.</p>
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The finding was that the <i>Sharing of Information</i> letter needs to be updated to be more specific to what type of fee waivers are offered. This is so households can decide what waivers they want to provide their consent for. Technical assistance was provided.</p> <p>Corrective Action: Please submit an updated <i>Sharing of Information</i> letter to show what the specific fee waivers are that are offered.</p>
<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>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The process of purchasing a milk (non-program foods) by students who take a cold lunch did not have an acceptable point of service. Technical assistance was provided.</p>

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		Corrective Action: Please review your process for extra milk purchases and submit a statement on how this process for the point of service will be corrected.
<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>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: Current Local Wellness Policy (LWP) does not include all the required content. It appears that there are two types of policies that make up the wellness policy, but these policies are missing information. The district needs to have one LWP with all the required content.</p> <p>CA: Provide a statement of a plan for bringing the LWP into compliance with one policy. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1002	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated. Technical assistance was provided.</p> <p>CA: Provide a plan with a timeline on when and how the LWP will be reviewed and updated.</p>
<b>Form Name</b>	Certification and Benefit Issuance 124 - 142)	
<b>Question #</b>	136	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: SFA is not in compliance with nondiscrimination practices per 7 CFR 245.8. Overt identification of students' eligibility for meal benefits was noted on the computer screens.</p>

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		CA: Provide a statement on how this SFA will correct the overt identification of students with meal benefits.
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The non-discrimination statement was not included on all required program materials. It was noted that the menu signage at McArthur and Rockfield did not have at a minimum the shorten version of the non-discrimination statement listed.</p> <p>Corrective Action: Add the Nondiscrimination statement to menu signage and upload updated a picture of the corrections into SNACS.</p>
<b>Site Name</b>	Rockfield EI	
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	317	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: 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 others, which constitutes overt identification.</p> <p>Corrective Action: Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Submit a statement documenting how this was corrected.</p>
<b>Site Name</b>	MacArthur EI	
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	317	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at</p>

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		<p>the point of service that can be seen by others, which constitutes overt identification.</p> <p>Corrective Action: Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Submit a statement documenting how this was corrected.</p>
<b>Site Name</b>	Rockfield El	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	400	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The salad bar is located beyond the point of service (POS). The current location of the salad bar is due to the plug and location of the electrical outlet. For that reason, it may or may not be possible to move it in front of the POS. Prior approval is required from the DPI before locating a salad bar beyond the POS to ensure reimbursable meals are served. In order to locate the salad bar beyond the POS, the following requirements must be met:</p> <ol style="list-style-type: none"> <li>All students leave the service line and POS with three full components, including ½ c fruit/veg to ensure reimbursable meals are served,</li> <li>Salad bar signage is used to demonstrate proper portion sizes, and</li> <li>Proper portion control utensils and/or pre-portioned servings are included on salad bar.</li> <li>The monitor has documented OVS training</li> </ol> <p>Corrective Action: Describe specifically how the SFA will ensure that the above salad bar requirements are met for a salad bar located beyond the POS, and request approval for this placement from the DPI. If the SFA determines they are able to safely move the salad bar to the front of the POS, submit a statement including logistics and the timeline of how the food service department will arrange the cafeteria to make these changes.</p>
<b>Site Name</b>	MacArthur El	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	400	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: At MacArthur Elementary, the salad bar is located beyond the point of service (POS). Prior approval is required from the DPI before locating a salad bar beyond the POS to ensure reimbursable meals are served. In order to locate the salad bar beyond the POS, the following requirements must be met:</p> <ol style="list-style-type: none"> <li>All students leave the service line and POS with three full components, including <math>\frac{1}{2}</math> c fruit/veg to ensure reimbursable meals are served,</li> <li>Salad bar signage is used to demonstrate proper portion sizes, and</li> <li>Proper portion control utensils and/or pre-portioned servings are included on salad bar.</li> <li>The monitor has documented OVS training</li> </ol> <p>Corrective Action: Describe specifically how the SFA will ensure that the above salad bar requirements are met for a salad bar located beyond the POS, and request approval for this placement from the DPI. If the SFA determines they are able to safely move the salad bar to the front of the POS, submit a statement including logistics and the timeline of how the food service department will arrange the cafeteria to make these changes.</p>
<b>Site Name</b>	MacArthur El	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1106	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/27/2023	
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>		<p>Finding: At MacArthur Elementary, the first-grade class held a fundraiser with items that did not meet Smart Snacks standards. The Wisconsin DPI allows two fundraiser exemptions per student organization, per school year. However, there was no documentation on the fundraiser tracking tool regarding this fundraiser. Tracking exempt fundraiser is crucial to ensuring compliance with regulations.</p> <p>Corrective Action: The fundraiser tracking tool was filled in on-site by the administrative assistant with the fundraiser details. Continue to track all fundraiser events using this tool.</p>

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	CAP Submitted	Corrective action completed on-site.
	12/15/2022 07:17 AM	
	CAP Accepted	CAP Accepted
	12/15/2022 07:22 AM	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/16/2022	2609	113	Administrative Review	ALL				
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
If the SFA chooses to provide additional benefits (e.g., fee waivers) for children eligible for free and reduced price meals, the SFA must obtain informed consent from the household.								12/16/2022 7:06:32 AM
12/16/2022	2608	1002	Administrative Review	ALL				
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
								12/16/2022 6:33:27 AM
12/14/2022	2593		Administrative Review					
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Variety Item Recipes: The variety item recipes may be used when you are putting out the same amount of a variety of items for meal service. You have the option to document item variety and usage by type directly on the daily production records or use a variety item recipe. You currently have variety item recipes for your milk, cereals, and breakfast bars. These recipes must be site specific, and also the milk recipe must be completed for both breakfast and lunch individually. Even with the variety item recipes on file, the total number of items planned and served for the meal needs to be documented on the production record.								12/14/2022 3:00:01 PM
12/14/2022	2592		Administrative Review					

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Comments					Created By	Created Date
<p>Crediting Documentation: TA was provided prior to on-site visit on the acceptable forms of crediting documentation. There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing information. Product specification sheets are not acceptable forms of crediting documentation. A PFS is considered acceptable crediting documentation and it shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label or USDA Product Information Sheet. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. Crediting documentation must be available on-site at each location within the school district. Currently, crediting binders are kept at the high school only. I recommend starting a binder for the elementary schools that includes physical copies of the crediting documents, or organizing them as digital files that the schools have access to. These records should be reviewed and updated at least twice per year and as new products are purchased.</p>						12/14/2022 2:57:23 PM
12/14/2022	2599		Administrative Review			
Comments					Created By	Created Date
<p>Smart Snacks: Tracking exempt fundraisers is crucial to ensuring compliance. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers, and ensuring that each fundraiser is not more than two consecutive weeks. Tracking templates are available on the Smart Snacks webpage, (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>).</p>						12/15/2022 7:26:47 AM
12/14/2022	2582	136	Administrative Review	ALL		
Comments					Created By	Created Date
<p>SFAs must avoid any policy or practice leading to the overt identification of children receiving free or reduced price meal</p>						12/14/2022 6:59:50 AM



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benefits. Overt identification is any action that may result in a child being recognized as potentially eligible for or certified for free or reduced price school meals.								
12/08/2022	2557	430	Administrative Review	MacArthur EI				
Comments								
					Created By	Created Date		
<p>Production Records: TA was provided on -site regarding production records. Current production records have columns for "Padded/Planned Reimbursable" and "Students Served Reimbursable." Production record requirements require "Planned/Actual number of servings prepared" and "Planned/actual Quantity Prepared in Purchase Units." These numbers are often recorded by staff on the sheets, but inconsistently due to the column not indicating the need to record these items. A copy of the Production Record Requirements and templates may be found on our webpage. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. You may utilize DPI's production record template located on our webpage, or update your current template.</p>						12/8/2022 12:48:19 PM		
12/08/2022	2556		Administrative Review					
Comments								
					Created By	Created Date		
<p>Offer versus Serve (OVS): It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. When implementing OVS at lunch, students are required to take 3 of the 5 components offered, one of which is ½ cup fruit and/or vegetable. Food service staff at Rockfield Elementary did not have a clear understanding of OVS. Some students were told to take the ½ cup serving of fruit, despite having ½ cup serving of vegetable on their tray and 3 total components. Although all students observed took a reimbursable meal, it is important for staff to understand OVS requirements. OVS resources can be found on WI DPI's Menu Planning webpage, and our Online Learning Library contains training you may use for your staff.</p>						12/8/2022 12:46:10 PM		