

Administrative Review Report

Pewaukee School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/08/2022	05/31/2023
On-Site Review	11/08/2022	05/31/2023
Site Selection Worksheet	12/11/2022	12/11/2022
Entrance Conference	02/15/2023	02/15/2023
Exit Conference	02/16/2023	02/16/2023

Commendations:

From the Nutrition Program Consultant:

Thank you to the staff at Pewaukee 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 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 staff at Pewaukee School District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director who goes above and beyond to integrate his skills as a chef into the school nutrition program recipes and meals. Standardized recipes and production records were well-filled out and provided clear documentation of the nutritional content of every meal served. In addition, thank you to the school nutrition professionals and administrative staff for supporting such a great school nutrition program. It's always a pleasure to witness the relationships between school nutrition professionals and their students; the cafeteria is also a classroom. Thank you for serving healthy, nutritious meals to your students and for going above and beyond to care for your students!

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	110	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA's direct certification notification letter non-discrimination statement is not in the correct format.</p> <p>Corrective Action: Correct the non-discrimination statement format in the direct certification letter and upload a copy of the letter into SNACS.</p>
Form Name	Civil Rights (800 - 807)	
Question #	800	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The non-discrimination statement was not listed in the student handbook.</p> <p>Corrective Action: Submit a statement on how this will be corrected.</p> <p>Finding: The non-discrimination statement that was listed in the Food Service Policy 3700.01 was not the updated version.</p> <p>Corrective Action: Submit a statement on how this will be corrected.</p>
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Civil Rights training documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).</p> <p>Corrective Action: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Form Name	Civil Rights (809 - 810)	

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Question #	810	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on the approval and denial notification letters.</p> <p>Corrective Action: Update the approval and denial notification letters to include the correct non-discrimination statement. Upload into SNACS a copy of the updated letters.</p> <p>Finding: The non-discrimination statement was not included on the food service webpage.</p> <p>Corrective Action: Add the Nondiscrimination statement to the food service webpage and submit a statement as to when this was completed.</p>	
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: Documentation of school food service staff training is being tracked however the tracking tool does not demonstrate compliance. There are missing components that should be included in the tracking mechanism that the district is using. In addition, it was noted that the district requires trainings each year however the only training listed on the tracking mechanism was Safety Basics.</p> <p>Corrective Action 1: Please determine a tracking mechanism that includes all required components. It is recommended that the district use the USDA or DPI professional standards training tracking tool to track annual trainings. If the district chooses to use another type of tracking mechanism than it needs to include all the required components required by USDA. Please upload a copy into SNACS of what tracking mechanism will be used moving forward by the district.</p> <p>Corrective Action 2: Please provide a list of any trainings that were taken related to food service this year and were not listed on the current tracking mechanism for food service staff. Please also list any trainings that may be planned for this current school year. Provide a plan moving forward on training topics that will be provided each year to food service staff and when these trainings will occur.</p>	
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	

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Question #	1400	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: There were no employee reporting agreements on file.</p> <p>Corrective Action: Please have foodservice staff complete employee reporting agreements. Please upload into SNACS copies of the employee reporting agreements for food service staff.</p>
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <p>Canned corn - "packed by" Red and Green Bell Pepper - "Product in Mexico" Romaine - "Product of Mexico" Ardmore Juice - "USA, Argentina, Chile" Angela Mia Pizza Sauce - nothing noted on the label Frozen whole green beans - "Product of Spain"</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.</p>
Site Name	Asa Clark Mid	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<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 students, which constitutes overt identification.</p>

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		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.
Site Name	Asa Clark Mid	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Signage was not posted at breakfast or lunch 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 1/2 cup fruit and/or vegetable. The lunch signage should list the five components and inform students that under OVS, they must select at least three full components, one of which must be at least 1/2 cup fruit and/or vegetable. Signage examples can be found on our Signage webpage.</p> <p>Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service lines.</p>
Site Name	Asa Clark Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: There was a beans/peas/legumes vegetable subgroup shortage at lunch during the week of review (1/9-1/13/23). Only 1/4 cup of beans were offered over the course of the week, which does not meet the minimum 1/2 cup requirement for the 6-8 meal pattern.</p> <p>Corrective Action: Submit a statement explaining how the weekly beans/peas/legumes vegetable subgroup shortage will be fixed during the week of review.</p>
Site Name	Asa Clark Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	

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TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: At least 80% of the grains offered weekly on each serving line must be whole grain-rich. During the week of review (1/9-1/13), the pizzas were made with non-whole grain-rich dough (pizza crust provided 2.25 oz eq non-whole grain-rich grains). This led to 27.00 oz eq total grains out of 42.5 oz eq grains being whole-grain rich, or 62.53% of weekly offerings.</p> <p>Corrective Action: Describe how the menu would be changed to comply with the 80% whole grain-rich requirement. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be planned in place of enriched grain items.</p>
Site Name	Asa Clark Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Over the course of a week, schools serving K-12 meal patterns must offer all vegetable subgroups in each serving line to ensure that all students have access to all vegetable subgroups. During the week of review (1/9-1/13), all students did not have access to the starchy vegetable subgroup as starchy vegetables were only planned with three particular entrée options: Mashed potato chicken bowl, Thai chicken with peas, and Meatball sub with a hashbrown patty.</p> <p>Corrective Action: Submit a statement explaining how the missing weekly starchy vegetable subgroup will be fixed during the week of review.</p>
Site Name	Asa Clark Mid	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date	April 10, 2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Under Offer versus Serve (OVS) at breakfast, students must take three items, one of which is 1/2 cup fruit and/or vegetable. During day of review, the school nutrition professional at breakfast was unclear about the requirements at breakfast for OVS as the breakfast program is new to the school and they were still getting familiar with</p>

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	<p>the program. They were making students take a grain, the string cheese as "dairy", and fruit. Onsite education was provided regarding the meal components at breakfast (milk, grain, fruit) and the requirements that only three items need to be taken one of which is 1/2 cup fruit, clarifying that string cheese is not in the milk category, counts as an item, and does not have to be selected.</p> <p>Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements. OVS resources on WI DPI's Menu Planning webpage may be used as training resources.</p> <p>The Meal Pattern e-learning resources may also be helpful and include a Webcast on OVS.</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals at breakfast complete Offer Versus Serve Training. Please submit details regarding when the training occurred and how the training was conducted.</p>
Site Name	Asa Clark Mid
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
TA Log #	No TA Log# found
Due Date	April 10, 2023
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>Corrective Action 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of corrective action.</p> <p>Corrective Action 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.</p>
Site Name	Asa Clark Mid
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
TA Log #	No TA Log# found
Due Date	April 10, 2023
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Nutrigrain Blueberry and Apple Cinnamon varieties, all Miss Vickie's chips, Ruffles Baked Cheddar and</p>

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	<p>Sour Cream chips are not smart snack compliant. A product must first meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. The first ingredient in the Nutrigrain products is whole grain oats and potatoes in the potato chips, therefore, they do meet the Smart Snacks general standard, but they do not meet dietary specifications. Snacks sold a la carte must contain less than 35% sugar by weight per serving, less than 35% total fat, & It;/= 200 calories per serving, & It;/= 200 mg sodium per serving and the two varieties of nutrigrain bars exceed 35% sugar by weight and the Miss Vickie's chips exceed 35% total fat, and the Ruffle's chips exceed 200 mg sodium per serving.</p> <p>Corrective Action: State what will be done with these products to comply with the Smart Snack regulations.</p>
Site Name	Asa Clark Mid
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
TA Log #	No TA Log# found
Due Date	April 10, 2023
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP for proper glove usage.</p> <p>Corrective Action: Provide training to staff at middle school on proper glove usage. Please submit a statement on the training that was provided. Please submit a training roster of those that attended the training.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/15/2023	2915	435	Administrative Review	Asa Clark Mid	FSD			
Comments						Created By		Created Date
<p>It is important to remember that there is a difference between weight (ounces) and volume (fluid ounces). Fluid ounces are a volume measurement, while ounces are a weight measurement. Measuring cups measure fluid ounces, not ounces by weight. Meat/meat alternate (M/MA) is credited by weight, so it is not appropriate to use a heaping 8 oz measuring cup for an intended 9.5 oz (by weight) serving of diced chicken for the BBQ chicken pizza. To ensure that students receive the proper amount of M/MA, first</p>								2/15/2023 4:12:08 PM

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weigh the product, then determine which scoop/utensil will hold that weight of meat. Training was provided onsite for this example, and it was determined that of the diced chicken, two level measuring cups provided the intended 9.5 oz of diced chicken. There are many resources on DPI's website that may assist in reviewing and training on Portion Control and signage detailing the differences between Weight and volume .								
02/15/2023	2914	431	Administrative Review	Asa Clark Mid	FSD			
Comments								
					Created By	Created Date		
Breakfast production records were incompletely filled out for milk usage during the week of review. Milk is a required component as part of the National School Lunch Program (NSLP). Daily usage by milk type must be recorded on your production records (e.g., skim chocolate milk, 1 percent white milk).						2/15/2023 3:57:50 PM		
02/15/2023	2935		Administrative Review	Asa Clark Mid	FSD			
Comments								
					Created By	Created Date		
School Breakfast Program: Consider sending this School Breakfast brochure to families and caregivers to promote the benefits of breakfast. It is strongly encouraged that the SFA explore the option of Breakfast After The Bell (BATB), both to reach more students and to increase revenue from a boost to the number of reimbursable meals sold. BATB can be structured in a variety of ways and tailored to best meet the needs of your students and staff. Most importantly, BATB ensures access to breakfast for all students, including those who may not arrive to school early enough to participate in the traditional breakfast in the cafeteria. Many schools utilize a Grab'n'Go style of service for BATB. Students can quickly select a portable reimbursable meal during passing times. Some schools opt to extend the passing time between first and second periods to allow for a "Nutrition Break," which is another option to consider. With support from food service staff, administration, custodial services, and teachers, BATB can be executed with minimal-to-no impact to the regular school day. Visit our School Breakfast Resources webpage for more information on school breakfast models, online learning, marketing and promotion strategies and more or reach out to our School Breakfast Specialists (DPISBP@dpi.wi.gov).						2/16/2023 7:58:12 AM		