

Administrative Review Report

Tri-County Area School District

Commendations:

Thank you to the staff at Tri County 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. The food service director and food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

Recommendations:

Join the DPI School Nutrition Team for SNST 2024 at Northeast Wisconsin Technical College in Green Bay, WI. Our summer training conference will kick off the afternoon of Monday, July 15, with classes running through Wednesday, July 17. Stay tuned for the conference schedule and registration, coming in early April. Get ready to champion excellence in school nutrition! For more details, check out the School [Nutrition Summer Training Webpage](#).

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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	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA's direct certification notification letter and notification letter for approval/denial of meal benefits by application does not include the required information on how households that qualify can opt out of Summer EBT.</p> <p>Corrective Action 1: Provide a statement that the SNT template letters will be used or upload a corrected letter templates for direct certification notification and for the approval/denial notification letters for applications to the household into SNACS.</p> <p>Corrective Action 2: Provide the Summer EBT opt out information to all households that qualified for free or reduced meals in SY 2023-2024. Upload copy of what was communicated to households in SNACS.</p>
Form Name	Verification (200 - 204)	
Question #	203	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The verification process was completed in accordance with 7 CFR 245.6(a). However, the Confirming and Verifying officials did not sign in the appropriate areas of the application as required for the verification process.</p> <p>Corrective Action: Provide a statement of how this issue will be corrected moving forward.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The 2022-23 Annual Financial Reports expenses and revenues did not match the PI 1505 (public schools).</p> <p>Corrective Action: Review the expenses and revenues to determine what adjustments are needed to match the PI1505. Complete the AFR template and submit to reviewer</p>

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		for approval. Once approved by reviewer work with the DPI accountant to make the adjustments in the system.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the DPI template policy, develop procedures for the SFA and upload into SNACS.</p>	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content. (7 CFR 210.31).</p> <p>Corrective Action: 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.</p>	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1003	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: SFA did not include a diverse group of stakeholders to participate in the committee update and review the LWP per 7 CFR 210.31.</p> <p>Corrective Action: Provide a statement of understanding that the LWP committee must include a diverse group of stakeholders in the review and update of the LWP.</p>	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1004	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	

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Corrective Action History		<p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.</p> <p>Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the Assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<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).</p> <p>Corrective Action: 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 SFSP outreach materials.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The determined households meal benefits were incorrectly calculated.</p> <p>Corrective Action: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the</p>

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		letter to the household into SNACS and update the benefit issuance list.
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	TA Log# exists	
Due Date	June 25, 3034	
Corrective Action Status	Flagged	
Corrective Action History		<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.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI Professional Standards Training Tracking Tool and upload into SNACS.</p>
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Employee reporting agreements were not completed by food service staff.</p> <p>Corrective Action: Complete employee reporting agreements for all food service staff. Completed onsite, no further action needed.</p>
Site Name	Tri-County Elementary	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count at breakfast due to the process of how students type in the pin numbers and how student meals were identified as reimbursable. The point of service (POS) did not provide a reliable or accurate meal count at lunch due to the process of how student meals were identified as reimbursable. These issues were noted for both reviewed and non-reviewed school sites. Technical assistance was provided</p>

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	onsite to adjust the process in order to correct the situation for breakfast and lunch. Corrective Action: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports for reviewed and non-reviewed school sites. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.
Site Name	Tri-County Elementary
Form Name	Meal Counting and Claiming - Review Period (322-325)
Question #	322
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The SFA is using the wrong software report and therefore not completing the required monthly edit check. Technical assistance was provided to use the correct report moving forward.</p> <p>Corrective Action: Work with your software provider to identify the edit check report and upload monthly edit checks for breakfast and lunch for September thru March into SNACS. Fiscal action will be calculated if meal counting and claiming errors are identified.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: 3 non-reimbursable meals were observed at Tri-County Elementary during breakfast service on Wednesday, April 24, 2024. Under offer versus serve at breakfast, students are required to select 3 of 4 food items, one of which 1/2cup fruit, vegetable, or combination. The non-reimbursable meals included:</p> <ul style="list-style-type: none"> • French Toast Sticks - 2.25 oz eq grain- (Not enough items, Missing 1/2cup fruit) • Cereal, Milk, and String Cheese - 1 oz eq grain, 1 oz eq M/MA, 1 cup milk -(Missing 1/2cup fruit) • French Toast Sticks and String Cheese- 2.25 oz eq grain, 1 oz eq M/MA -(Missing 1/2cup fruit)

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		<p>Corrective Action: Submit a statement which indicates understanding that students must select 3 of 4 food items at breakfast, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future. OVS training will be required under Finding #500.</p>
Site Name	Tri-County Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
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 lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.</p> <p>In addition, no salad bar signage was posted to demonstrate proper portion sizes of vegetables. Tongs were used as the serving utensil for all items except the canned fruit. Without signage or proper portioning utensils (for items that fit nicely in a spoodle), students are unable to determine how much they need to take in order to meet the 1/2 cup requirement under offer versus serve. Salad bar signage templates are available on the DPI Signage page and may be used if desired. In-house yield studies are an ideal way to determine the quantities to fill out on the signage.</p> <p>Signage examples can be found on our Signage webpage.</p> <p>Corrective Action: Submit a picture of completed breakfast and lunch signage posted near the beginning of the service line. Submit a picture of the garden bar signage and documentation.</p>
Site Name	Tri-County Elementary	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	

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Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The meal service and production records indicate that one meal pattern is being provided to the K4-4th grade students and another to the 5th-12th grade students. Because there is no overlap with the dietary specifications for grades 5-12, the school needs to follow a separate K-5, 6-8, and 9-12 meal patterns OR a K-8 and 9-12 meal pattern. Production records should document the appropriate serving sizes for each age/grade group to meet daily and weekly meal pattern requirements.</p> <p>Corrective Action: Submit a statement explaining which meal patterns will be followed going forward. Compliance with this requirement will also be verified with the production records submitted with Finding #430.</p>
Site Name	Tri-County Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The planned and served lunch menu on Wednesday, March 13 included turkey and gravy, mashed potatoes, green beans, and fruit. There was no grain component served at lunch on this day.</p> <p>Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 191 meals on Wednesday, March 13, the day with the missing grain component at Tri-County Elementary School. Per USDA, <i>“for central/satellite kitchens and/or district-wide menus, the SA must assess fiscal action for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served.”</i> Since Tri-County Middle and High School are following a district-wide menu, and production records indicate a missing grain component at these sites, fiscal action is also assessed for 100 6-8 and 95 9-12 meals on Wednesday, March 13, 2024.</p> <p>In addition, the errors identified were found to be systemic errors, and therefore the review was opened to the entire review month (March). USDA defines systemic as <i>“If any of the contributing factors are built into the process and would recur if the process is not changed, the error is systemic. Systemic errors are serious in nature.”</i> Per the production records, no other days in the month appear to have a missing grain component.</p> <p><u>Fiscal action will be assessed for a total of 386 lunch meals on Wednesday March 13.</u></p>

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Corrective Action: Please refer to the CA under Finding #410.

Finding: The planned breakfast menu on Friday, March 15 indicates a yogurt parfait entree option (yogurt, granola, and fruit). However, in conversations with the FSD on-site, the K4-4th grade students did not receive the parfait or granola, and only received the Trix yogurt (1 oz eq M/MA), strawberry cup (1/2cup fruit), and fruit juice (1/2 cup fruit), and milk (8 fl oz). A M/MA product cannot contribute to the grain requirement at breakfast until the 1 oz eq grain requirement is first met. Therefore, this day is treated as having a missing grain component.

Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 81 breakfast meals on Friday, March 15, 2024, the day with the missing grain component at Tri-County Elementary School. Per USDA, *“for central/satellite kitchens and/or district-wide menus, the SA must assess fiscal action for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served.”* Since Tri-County Middle and High School are following a district-wide menu, and production records indicate a missing grain component at these sites, fiscal action is also assessed for 44 6-8 meals and 62 9-12 breakfast meals on Friday, March 15, 2024. Fiscal action will be assessed for Tri-County Elementary, Middle, and High School.

In addition, the errors identified were found to be systemic errors, and therefore the review was opened to the entire review month (March). USDA defines systemic as *“If any of the contributing factors are built into the process and would recur if the process is not changed, the error is systemic. Systemic errors are serious in nature.”* Breakfast production records were reviewed for the entire month of March to assess for any other days that may have had a missing grain component. Per the production records, the following days in March were missing a grain component:

- March 5, 2024- Yogurt- 138 elementary meals, 57 middle school meals, 59 high school meals
 - The planned menu on March 5 did include a “bar,” however this was not recorded on the production record.
- March 18, 2024- Cheese Omelet-131 elementary meals, 44 middle school meals, 61 high school meals

Fiscal action will be assessed for a total of 677 breakfast meals.

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		Corrective Action: Please refer to the CA under Finding #412.
Site Name	Tri-County Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The daily and weekly minimum requirement for the Meat/Meat Alternate (M/MA) was not met for K-5 for lunch during the review period. This resulted from the lack of crediting documentation, recipes, and production records not accurately reflecting the served portion sizes. When the meal component contribution of served menu items could not be determined, the lowest creditable amount was entered into the USDA workbook (.25 oz eq M/MA). The following represents the planned portion sizes:</p> <ul style="list-style-type: none"> Monday 3/11/24: Taco Meat- 3/4fl oz scoop used, weight unknown (crediting unable to be determined)- .25 oz eq M/MA Tuesday 3/12/24: Chicken Patty, 1 patty- 2 oz eq M/MA (met the daily requirement) Wednesday 3/13/24: Turkey and Gravy- "4oz" serving, No crediting documentation provided- .25 oz eq M/MA Thursday 3/14/24: Hot ham and cheese- No crediting documentation or recipe provided- .25 oz eq M/MA Friday 3/15/24: Cheese Fry- 4.3oz- No crediting documentation provided- .25 oz eq M/MA. <p>The daily minimum requirement for K-5 is 1 oz eq M/MA. If following the K-5 meal pattern, the weekly requirement is 8 oz eq M/MA. If the SFA decides to follow one K-8 meal pattern for elementary and middle school students, the weekly minimum requirement is 9 oz eq M/MA.</p> <p>Fiscal action is required for any repeat M/MA daily/weekly shortage violations from the previous Administrative Review. During the 2017-18 Administrative Review, a daily and weekly M/MA shortage was found.</p> <p>Finding: The daily and weekly minimum requirement for the grain was not met for K-5 for lunch during the review period. This resulted from the lack of crediting documentation, recipes, and production records not accurately reflecting the served portion sizes. When the meal component contribution of served menu items could not be determined, the lowest</p>

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creditable amount was entered into the USDA workbook (.25 oz eq grain). The following represents the planned portion sizes:

- Monday 3/11/24: Nacho Chips 1/3c, weight unknown (crediting unable to be determined)- .25 oz eq grain and Rice (#24 scoop per FSD on-site) .25 oz eq grain
- Tuesday 3/12/24: Bun- 2 oz eq grain (met the daily requirement)
- Wednesday 3/13/24: Missing grain component
- Thursday 3/14/24: Hot ham and cheese -2 oz eq grain
- Friday 3/15/24: Cheese Fry- 4.3oz- No crediting documentation provided- .25 oz eq grain

The daily minimum requirement for K-5 is 1 oz eq grain. The weekly minimum requirement is 8 oz eq grain.

Fiscal action is required for any repeat grain daily/weekly shortage violations from the previous Administrative Review. During the 2017-18 Administrative Review, a daily and weekly grain shortage was found.

The daily quantity shortages listed in the two previous findings are both subject to fiscal action. Per USDA, "*for central/satellite kitchens and/or district-wide menus, the SA must assess fiscal action for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served.*" Due to the component shortages occurring at all sites within the district, fiscal action will be assessed for Tri-County Elementary, Middle, and High School. The following days during the week of review will be reclaimed due to the repeat daily shortages above:

- Monday, March 11: 217 elementary meals, 102 middle school meals, 107 high school meals
- Thursday, March 14: 207 elementary meals, 105 middle school meals, 106 high school meals
- Friday, March 15: 188 elementary meals, 81 middle school meals, 89 high school meals.

Fiscal action will be assessed for a total of 1,202 meals.

Finding: During the week of review, an alternate entree option of an Uncrustable sandwich was served 4 of the 5 days. The uncrustable sandwich credits as 1 oz eq M/MA and 1 oz eq grain. Although this meets the daily K-5 grain and M/MA requirements, this would not meet the weekly grain or M/MA requirements. If a student were to select the uncrustable sandwich daily, they would receive 5 oz M/MA over the course of the week (8 oz eq M/MA required for K-5, 9 oz eq M/MA required for K-8 meal pattern) and 5 oz eq grain over the course of the week (8 oz eq grain required).

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	<p>Please note, this was a repeat finding due to the same alternate entree being offered during the last Administrative Review.</p> <p>Corrective Action 1: The FSD should complete the following trainings in the DPI School Nutrition Online Learning Library:</p> <ul style="list-style-type: none"> • Breakfast Meal Pattern • Lunch Meal Pattern • The Grain Component • The Fruit Component • The Meat/Meat Alternate (M/MA) Component • The Milk Component • The Vegetable Component • Weight versus Volume (no certificate) <p>Completed quizzes and/or course certificates should be uploaded into SNACS.</p> <p>Corrective Action 2: Submit a menu planning worksheet for Lunch for grades K-8 for the week of review (March 11-15, 2024), showing that all components and quantities will be met. Please complete the menu planning worksheet to reflect the changes to the originally served menu. Refer to the Lunch Meal Pattern for daily and weekly requirements.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	411
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The daily and weekly minimum requirement for the fruit was not met for K-5 for lunch during the review period. This resulted from the lack of planned serving sizes for fruit on the salad bar production records. When a serving size of each fruit available was not planned and communicated to students, the lowest creditable amount was entered into the USDA workbook (1/8cup fruit). The following represents the fruit served during the week of review:</p> <ul style="list-style-type: none"> • Monday 3/11/24: Mixed Fruit, 1/8cup fruit, Apples 1/8cup • Tuesday 3/12/24: Mixed Fruit 1/8cup, Mandarin Oranges 1/8cup, Apples 1/8cup • Wednesday 3/13/24: Pears 1/8cup, Peaches 1/8cup, Mandarin Oranges 1/8cup, Apples 1/8 cup • Thursday 3/14/24: Mixed Fruit 1/8cup, Mandarin Oranges 1/8cup • Friday 3/15/24: Mixed Fruit 1/8cup, Mandarin Oranges 1/8cup

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	<p>The daily minimum requirement for K-5 is 1/2cup fruit. The weekly minimum requirement is 2 1/2cups fruit.</p> <p>Finding: The daily and weekly minimum requirement for the vegetable component was not met for K-5 for lunch during the review period. This resulted from the lack of planned serving sizes for vegetables on the salad bar production records. When a serving size of each vegetable available was not planned and communicated to students, the lowest creditable amount was entered into the USDA workbook (1/8cup vegetable). The following represents the daily vegetable shortage that led to the weekly shortage during the week of review:</p> <ul style="list-style-type: none"> Monday 3/11/24: Salad Bar: Carrots 1/8cup, Peppers 1/8cup, Lettuce 1/8cup <p>The daily minimum requirement for K-5 is 3/4cup vegetable. The weekly minimum requirement is 3 3/4cup vegetable.</p> <p>Corrective Action: Please refer to the CA under Finding #410 for required trainings and a lunch menu planning worksheet.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	412
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The daily and weekly minimum requirement for fruit was not met at breakfast for K-12 during the review period. The following represent the planned portion sizes:</p> <ul style="list-style-type: none"> Monday (3/11/24): Cutie (Clementine)- 3/8cup fruit and Fruit Juice (4fl oz)- 1/2 cup fruit. Total= 7/8cup. <p>The daily minimum requirement for fruit for K-12 is 1 cup fruit. The weekly minimum requirement for fruit for K-12 is 5 cups.</p> <p>Finding: There was a weekly grain shortage at breakfast for the week of review with the daily alternate option menu option. Each day, 1 cereal bowl (1 oz eq grain) is offered as an alternate entree. Although this meets the daily grain requirement, this will not meet the weekly requirements (5 oz eq offered during the week of review; 9 oz eq grain required weekly for the K-12 breakfast menu).</p> <p>Fiscal action is required for any repeat weekly grain shortage violations from the previous Administrative Review. However, fiscal action is already being taken on the day</p>

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	<p>during the week of review with the lowest participation (Friday, March 15, 2024) because it was also the day with the missing grain component. No further fiscal action will be assessed.</p> <p>Corrective Action: Submit a menu planning worksheet for Breakfast for grades K-12 for the week of review (March 11-15, 2024), showing that all components and quantity requirements will be met. Please complete the menu planning worksheet to reflect the changes to the originally served menu. Refer to the Breakfast Meal Pattern for daily and weekly requirements.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	430
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Breakfast and lunch production records submitted for the week of review do not meet all production record requirements. The following requirements are missing or were inconsistently filled out:</p> <ul style="list-style-type: none"> • Menu item with recipe name/reference number or product name/description <ul style="list-style-type: none"> ○ Instead of listing “fruit” or “cereal,” the specific type must be listed, unless a variety item recipe is created for these menu items • Planning serving size for each age/grade group and adults • Planned/actual number of servings prepared • Planned/actual quantity prepared in bulk units • Amount leftover • Milk types available and actual usage by type <ul style="list-style-type: none"> ○ Invoices were requested from the week of review to verify that allowable milk types were available. • Planned serving size and usage for condiments • Number of reimbursable and non-reimbursable (adult) meals planned and served • Substitutions made to original plans • Contribution to meal pattern <ul style="list-style-type: none"> ○ Although this is considered a best practice for production records, it is required to be documented somewhere (if not on production records) <p>Based on conversations on-site with the FSD, the provided production records also do not accurately reflect the exact</p>

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	<p>menu items served to each age/grade group, serving sizes that were actually provided to students, or meal component contribution (crediting information). <u>Production records are required as the documentation that reimbursable meals were both planned and served.</u> Technical assistance provided to FSD on-site regarding production record requirements.</p> <p>Corrective Action 1: Submit one full week of completed breakfast and lunch 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> <p>Corrective Action 2: Submit verification that the FSD has completed additional Production Record training (e.g. SNT Production Records webcast on the DPI Online Learning Library).</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: There were no salad bar production records on file for the week of review. The FSD was able to provide a piece of scratch paper that indicated what fruits and vegetables were put out each day that was used to evaluate meal pattern compliance. Salad bar production records must meet the same criteria as production records used to record main line items. Review the Production Record Requirements.</p> <p>Corrective Action: Submit one full week of completed salad bar production records with serving sizes for each menu item. Although not required, DPI's Salad Bar or Garden Bar Production Records may be used.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	432
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During the on-site portion of the Administrative Review, it was identified that breakfast and lunch production records were not being completed from the beginning of the school year through December. Production records started to be completed by staff in January. Technical assistance</p>

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	<p>provided on-site regarding that production records are the proof that reimbursable meals were both planned and served to students, as well as the production record requirements for breakfast, lunch, and the salad bar. Production records are a program requirement. Since records were provided for the week of review and review month, no fiscal action will be taken for the beginning of the school year.</p> <p>Corrective Action: Production record training and one new full week of completed records will be submitted as CA for Finding #430. No further corrective action required.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Crediting documentation was not submitted to the Public Health Nutritionist prior to the onsite review and was not available onsite. Processed foods not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting, and must be used when menu planning to ensure daily and weekly component requirements are being met for each age/grade group. Crediting documentation must be kept on file for all processed products served in the Child Nutrition Programs and should be reviewed and updated at least twice per year and as new products are purchased.</p> <p>The lack of crediting documentation available for menu items served during the week of review contributed to the component shortages cited under Finding #410 and #411.</p> <p>Crediting documentation was not available for the following products served during the week of review:</p> <ul style="list-style-type: none"> • Turkey (Wednesday, 3/13/24) • Ham (Thursday, 3/14/24) • Cheese Fry (Portesi Italian Flatbread- Friday, 3/15/24) <p>Corrective Action: Submit acceptable crediting documentation for the turkey, ham, and cheese fry menu items. If crediting documentation cannot be obtained for certain products, submit a statement of understanding that they cannot be credited towards the meal pattern.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)

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Question #	434
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the following menu items served during the week of review:</p> <ul style="list-style-type: none"> • Breakfast Sandwich (Tuesday, 3/12/24) • Ham and Cheese sandwich (Thursday, 3/14/24) • Pasta Salad (Friday, 3/15/24) <p>In addition, quantity recipes were submitted for the potato wedges, brown rice, chicken patty sandwich, and tacos. Quantity recipes can be used as a resource for the Child Nutrition Programs, but the recipes must be adapted to your specific food service operation. The taco recipe is missing a total yield, number of portions, and meal component contribution per serving.</p> <p>Continue to work towards recipe standardization as menu items are served.</p> <p>Corrective Action 1: The FSD (menu planner) should complete at least one of the following trainings in the DPI School Nutrition Online Learning Library and upload the certificate into SNACS:</p> <ul style="list-style-type: none"> • Standardized Recipes: Adding it All Up • Succeeding with Standardized Recipes <p>Corrective Action 2: Submit a standardized recipe for the following menu items:</p> <ul style="list-style-type: none"> • Breakfast sandwich • Ham and cheese sandwich • Tacos <p>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.</p>
Site Name	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	436
TA Log #	TA Log# exists
Due Date	June 25, 2024
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. Only 60% of products</p>

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	<p>offered at breakfast meal service during the week of review were whole grain-rich.</p> <ul style="list-style-type: none"> Monday: Poptart, 1 oz eq grain WGR Tuesday: Breakfast Sandwich 2 oz eq grain WGR Wednesday: French Toast Sticks (3), 2 oz eq grain WGR Thursday: Cherry turnover (Exhibit A), 3 oz eq grain-Not WGR Friday: Missing grain component <p>Corrective Action: On the menu planning worksheet submitted for Finding #412, show 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	Tri-County Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
TA Log #	TA Log# exists
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The K-5 meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. The following vegetable subgroup shortages occurred during the week of review:</p> <ul style="list-style-type: none"> Red/Orange subgroup: 1/2cup served, 3/4cup required <p><u>In addition, zero cups of beans/peas/legumes were served during the week of review.</u> This vegetable subgroup was also missing during the 2017-18 Administrative Review. Fiscal action is required for a repeat missing vegetable subgroup, however fiscal is already being taken due to the component shortages and missing component during the week of review (see Finding #410). No further fiscal action taken.</p> <p>Corrective Action: Please refer to the CA under Finding #410. On the menu planning worksheet submitted, show how all vegetable subgroup requirements will be met.</p>
Site Name	Tri-County Elementary
Form Name	Offer vs Serve (500-502)
Question #	500
TA Log #	TA Log# exists
Due Date	June 25, 2024

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Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements at breakfast and lunch. Menu items, planned portion sizes, and the meal component contribution (crediting information) also need to be reflected on the production records so staff are aware of how students can build a reimbursable meal from the menu options available. OVS resources on WI DPI's Menu Planning webpage may be used as training resources.</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals attend training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Tri-County Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Each school within the SFA must have a written site specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). The food safety plan's Description of the Facility needed to be updated. Technical assistance was provided.</p> <p>Corrective Action: Update the Description of the Facility and upload into SNACS.</p>
Site Name	Tri-County Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
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 SOPs for glove handling. Training and technical assistance was provided onsite.</p> <p>Corrective Action: Adjust practices to align with the SOP as written. Provide training to staff by reviewing the glove</p>

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		handling SOP. Submit a statement describing how practices moving forward will be adjusted to be compliant with the established SOP.
Site Name	Tri-County Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). It was noted that several days did not have recorded temperatures for all refrigeration, freezers and dish machine)</p> <p>Corrective Action: Upload two weeks of completed temperature logs into SNACS and provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.</p>
Site Name	Tri-County Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
TA Log #	No TA Log# found	
Due Date	June 25, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed and boxed food items were on the floor.</p> <p>Corrective Action: Submit a statement on indicating the food safety violations will be corrected moving forward.</p>
Site Name	Tri-County Elementary	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	TA Log# exists	
Due Date	June 25, 2024	
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> <ul style="list-style-type: none"> • Mango Slices- Product of Mexico

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	<ul style="list-style-type: none"> Mixed Peppers- Product of Mexico/Canada Pineapple Tidbits- Product of Indonesia English Muffins- Product of Canada Tropical Fruit- Product of Thailand <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	Tri-County Elementary
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)
Question #	1905
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The FFVP was not publicized to students and families.</p> <p>Corrective Action: Provide a statement of how the FFVP will be publicized or promoted to students and families.</p>
Site Name	Tri-County Elementary
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)
Question #	1910
TA Log #	No TA Log# found
Due Date	June 25, 2024
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The school does not have an FFVP Standard Operating Procedure (SOP) included in their food safety plan.</p> <p>Corrective Action: Update the food safety plan to include the FFVP SOP specific to the school's operation. A template is found on the DPI Food Safety webpage. Upload to SNACS a copy of the FFVP SOP.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/13/24	5012	1105	Administrative Review	Tri-County Elementary	AR			

Smart Snacks, Vending Machines: The vending machine located in the cafeteria contains many non-smart snacks compliant food and beverages (e.g. regular soda, candy bars, cookies). Staff reported that the vending machines are turned off during the school day, but turn on at the end of the school day (3:05pm). As a reminder, all food and beverages sold to students during the school day, on the school campus, must meet both the general and nutrient standards outlined in the Smart Snacks Final Rule, unless they qualify for an exemption. USDA defines the "school day" as midnight

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the day of through 30 minutes after the end of the school day. Since the vending machine contains non-compliant products, it should not be turned on until 3:35pm. More information can be found on our [Smart Snacks webpage](#).

05/13/24	5011	410	Administrative Review	Tri-County Elementary	FSD			
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Multiple entrée options: The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line," and therefore needs to meet the daily as well as the weekly requirements. The alternate entree option of an uncrustable sandwich credits as 1 oz eq grain and 1 oz eq M/MA. While this meets the daily minimum requirements, this does not meet the weekly grain or weekly M/MA requirement. See Finding #410 for additional information.

05/13/24	5010	412	Administrative Review	Tri-County Elementary	FSD			
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PBR: Related to systemic non-compliance with meal pattern requirements, the performance-based 8 cent reimbursement (PBR) will be stopped beginning May 1, 2024. Restarting the PBR is contingent upon successful completion of the corrective action assigned in this report. Please be aware that it is not sufficient to only make changes to one week of menus. The changes that need to be made to bring menus into compliance must be long-term, sustainable measures.

05/09/24	4971	322	Administrative Review	Tri-County Elementary	FSD			
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SFAs are required to have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. This includes a monthly edit check which compares each school's daily counts of free, reduced & paid lunches against the number of children in that school currently eligible for free, reduced and paid lunches multiplied by the attendance factor (7 CFR 210.8)

05/07/24	4952		Administrative Review		FSD			
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The SFA must inform and update the public about the assessment of the implementation of Local Wellness Policy (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public including: mailing flyers, newsletters, emails, website postings, and newspaper articles and/or posting to the school/district's website.

05/07/24	4951	1005	Administrative Review	ALL	FSD			
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An assessment of the Local Wellness Policy (LWP) must be conducted once every three years. The LWP Assessment includes: a report that describes the extent to which schools comply with the LWP; the progress made toward attaining the goals of the LWP; and the extent to which the LWP compares to a model policy. To meet this requirement, the report card includes completion of the WellSAT 3.0 tool (for comparison to model policies) and a self-assessment of the policy (for compliance with and progress toward the goals of the policy). These tools are located on the Local Wellness Policy webpage. Retain a copy of the assessment report and documentation regarding the public notification (7 CFR 210.31).

05/07/24	4950		Administrative Review		FSD			
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SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31).

05/07/24	4949		Administrative Review		FSD			
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Language that can be used to meet the requirement for Summer EBT: If your child(ren) qualify for free or reduced-price meals this school year, they are also eligible to receive Summer EBT benefits for this upcoming summer. Summer EBT provides funds for each eligible child to help with costs of food during the summer months. To learn more about this program, to update your contact information, or to opt out of receiving these benefits visit Summer EBT Benefit Management.

05/07/24	4945	7	Administrative Review	Tri-County Elementary	FSD			
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When determining the cost per half pint of milk, use the monthly milk invoices and take the total dollar amount spent on milk that month divided by the total number of milks purchased. This is the weighted average cost per half pint of milk for that month. When submitting the annual claim, use the monthly averages for the year to get an average cost per 1/2 pint for the entire year that is used in the Wisconsin School Day Milk Program (WSDMP) claim.

05/07/24	4943		Administrative Review		District Administrator			
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All SFAs must have an Unpaid Meal Charge policy in place per USDA Memorandum that is communicated and distributed to the households, annually. (SP 46-2016)

05/07/24	4942	1219	Administrative Review	ALL	FSD			
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Each year, non-school nutrition staff with responsibility for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30).

05/07/24	4941	1217	Administrative Review	ALL	FSD			
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Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (7 CFR 210.30).

05/07/24	4931	1601	Administrative Review	ALL	FSD			
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USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the summer meals locator on the DPI Summer Meals webpage
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 304-304 to locate meals in the area
- Promotion of the USDA Summer Food website (<http://www.fns.usda.gov/summerfoodrocks>) 7 CFR 210.12(d)

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05/07/24	4930		Administrative Review		FSD			
<p>All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 5 days. SFAs are strongly encouraged to adopt the DPI SNT template civil rights complaint procedures.</p>								
05/07/24	4928		Administrative Review		FSD			
<p>Each SFA must have a food safety plan that is implemented and includes Standard Operating Procedures (SOP), Identify foods by process 1-2-3, critical control points, monitoring procedures and corrective action procedures (7 CFR 210.13).</p>								
05/07/24	4927	1408	Administrative Review	Tri-County Elementary	FSD			
<p>Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily and serves as documentation that critical limits were achieved and that corrective action was taken when necessary (7 CFR 210.13). Temperature logs must be retained for at least six months (7 CFR 210.15).</p>								
04/24/24	5009	1106	Administrative Review	Tri-County Elementary	FSD			
<p>Smart Snacks, Fundraiser Tracking: Someone at each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser tracking tools on our Smart Snacks webpage.</p>								
04/24/24	5008	500	Administrative Review	Tri-County Elementary	FSD			
<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. The school must offer the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offerings, students must select at least three full, different, food components, one of which is ½ cup fruit and/or vegetable. Under Offer versus Serve (OVS) at breakfast, four food items must be offered (from the three required components of grain, fruit and milk) and students must select at least three food items, one of which is ½ cup fruit and/or vegetable to have a reimbursable meal. Use the OVS In a Nutshell for guidance.</p>								
04/24/24	5007		Administrative Review	Tri-County Elementary	FSD			
<p>Weight versus volume: As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).</p>								
04/24/24	5006		Administrative Review	Tri-County Elementary	FSD			

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Salad Bar, Portion Sizes: Fruits and vegetables on a garden bar can credit towards the meal pattern. Even with garden bars, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.

04/24/24	5005	437	Administrative Review	Tri-County Elementary	FSD			
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Vegetable Subgroups: The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the [Vegetable Subgroups handout](#).

04/24/24	5004	433	Administrative Review	Tri-County Elementary	FSD			
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Crediting documentation: SFAs are required to document how foods offered credit towards the daily and weekly meal pattern requirements. Proper crediting documentation was not available for multiple menu items served during the week of review. Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS), Child Nutrition (CN) label, or USDA Product Information Sheet to document meal component crediting. If a processed product does not have a Child Nutrition (CN) label, product formulation statement (PFS), USDA Product Information Sheet, and is not in the USDA Food Buying Guide (FBG), it may not credit toward the meal pattern. Refer to our [Crediting Documentation In a Nutshell](#) handout.

04/24/24	5003	436	Administrative Review	Tri-County Elementary	FSD			
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Crediting grains: 80 percent of the weekly grains offered and credited in school meal programs must be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

04/24/24	5002	434	Administrative Review	Tri-County Elementary	FSD			
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Standardized Recipes: All menu items made with more than one ingredient requires a standardized recipe. Several quantity recipes were submitted for menu items served during the week of review. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. Technical assistance was provided on the recipe standardization process. For more information on what essential information must be on a standardized recipe, review the [Standardized Recipes in a Nutshell](#) document.

04/24/24	5001	430	Administrative Review	Tri-County Elementary	FSD			
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Salad Bar, Production Records: Production records must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the [Production Records webpage](#). A [Vegetable Subgroup handout](#) that identifies common vegetables with their respective subgroups is also available.

04/24/24	5000	430	Administrative Review	Tri-County Elementary	FSD			
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Production Records: Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff to record all requirements at breakfast, lunch, and on the salad bar. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on using volume measures to record portion sizes of fruits and vegetables, and using weight measures to record portion sizes of M/MA and grains. Production record templates for breakfast and lunch can be found on our [Production Records webpage](#).

04/24/24	4841	404	Administrative Review	Tri-County Elementary	FSD			
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Signage: The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage webpage](#).

04/24/24	4840	1411	Administrative Review	Tri-County Elementary	FSD			
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Buy American: The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands). 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. A suggested Buy American - Non Compliant Product List template can be found on the [Buy American webpage](#).