

Administrative Review Report

Madison Metro School District

Commendations:

Our sincere thanks to the administration and school nutrition professionals of the Madison Metro School District. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students!

Commendation goes out to the district for their extremely well drafted Local Wellness Policy!

Of the 590 benefit issuance certifications reviewed, only two certification errors were found. Kudos to the determining official for a job well done.

Recommendations:

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition webpage](#). For in depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: New students are given a 10-day grace period for free meals, after which they are charged at paid pricing until there is an intervening event, such as a F/R meal application or DC which is an unallowable cost to the food service fund if the student does not qualify for free or reduced meals.</p> <p>Corrective Action: Students not coming from a CEP school must be charged the paid price until an eligible determination is made.</p> <p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016) Because of this, MMSD has a large negative uncollectible fund balance. Bad debt is an unallowable cost to the food service fund. Therefore, a transfer must be made from nonfederal funds, usually the district's general fund, into the food service fund to cover the bad debt.</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p>
Form Name	Meal Counting and Claiming (314 - 316)
Question #	314
Corrective Action Status	Flagged

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Corrective Action History	<p>Finding: Meals are not being claimed by accurate points of service SFA-wide. There must be trained employees operating the POS each day. Each site must have enough trained staff to effectively count and claim all reimbursable meals every day. A minimum of two employees should be at each serving site, so one can be the designated POS person. During the review period, 4 full days of meal counts were not claimed because there was no one to operate the POS. This is an unallowable use of federal funds as unclaimed meals may not be given to students without being reimbursed to the food service fund with nonfederal funds. The use of a clicker counter does not provide accurate Point of Service counts. The 2018 Administrative Review also cited inaccurate POS with use of clicker counters. Due to this repeat, systemic issue, the use of clicker counters for Point of Service must stop immediately, and a plan must be submitted for accurate counting and claiming at all CEP sites. All non-CEP sites must have a reliable POS per their online contract. School sites that state the POS is at the end of the line, must record the meals at the end of the line and not use morning meal counts to charge student accounts.</p> <p>Corrective Action: Please submit a plan of how CEP meals will be counted and claimed SFA-wide. Please submit a POS training plan and documentation that all staff operating the POS have been trained on the POS.</p>
Site Name	Gompers Elementary
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
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). Meal counts were not taken as the student received their reimbursable meal. They were taken by teachers in the classroom each morning when asking if students wanted to take hot lunch.</p> <p>Corrective Action: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	Black Hawk Middle
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
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). On the day of onsite observation, second entrees and ala carte items were observed being claimed and are not eligible for reimbursement.</p> <p>Corrective Action: Discontinue claiming ineligible meals. The district needs to have a clear policy and process for nonprogram foods/ala cart items since students cannot be charged if they don't have money in their account. Fiscal action will be calculated on the number of ineligible meals observed on the day of review.</p>
Site Name	Southside Elementary

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Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
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 due to the person operating the POS was not present at the start of service and a clicker counter was used.</p> <p>Corrective Action: A clicker counter does not produce reliable counts. The use of clicker counter must stop immediately SFA-wide. Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	Spring Harbor Middle
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
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). Milk was past the point of service (POS). This resulted in the service of meals missing a component as all meal components must be before the POS to credit toward the reimbursable meal.</p> <p>Corrective Action: Move all meal components, including milk before the POS. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Form Name	SFA On-Site Monitoring (900)
Question #	900
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8, for many sites SFA-wide.</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 CA.</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 for completing this.</p> <p>Finding: The SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1. Corrective Action: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	703

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Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA made an equipment purchase iSpot over the SFA's capitalization threshold or \$5,000. The equipment is not listed on the pre-approved list on the DPI website and State Agency approval was not received prior to the purchase (FNS Policy Memo SP 31-2014).</p> <p>Corrective Action: Provide a statement of understanding that when equipment is purchased over the capitalization threshold, the SFA must determine if it's on the pre-approved list, or request approval from the State Agency prior to making the purchase.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool but did not include all required information into the tool. Reimbursable meal food cost was not entered. (7 CFR 210.14).</p> <p>Corrective Action 1: Watch the Nonprogram Food Revenue webcast on the DPI website (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html). Provide a statement of understanding that either the DPI or USDA Nonprogram Revenue Tool must be completed yearly.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	710
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not have a process for charging nonprogram food milk to student accounts at the CEP schools. All revenue from nonprogram foods (catering, adult meals, a la carte, vending) did not accrue to the SFAs nonprofit school food service account (7 CFR 210.14).</p> <p>Corrective Action: Submit a plan to charge for nonreimbursable meal items and milk during meal service. If the student accounts are not charged for nonprogram foods, a fund transfer using non-Federal funds is required to cover the cost of nonprogram foods sold/served.</p> <p>Due to the transfer of funds that was made from Fund 10 into Fund 50 to cover the nonprogram food loss, it is highly recommended that the district discontinues its catering operations. Catering is meant to enhance the school nutrition program not to impede it. With the staffing situation at MMSD, it is imperative that staffing is used as effectively as possible.</p>
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action Status	Flagged
Corrective Action History	<p>Findings: The SFA does not have the appropriate USDA procedures for handling discrimination complaints specific for the school meal program (FNS Ins. 113-1).</p>

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	<p>Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS.</p>
Form Name	Civil Rights (800 - 807)
Question #	806
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, the training is located here: https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). 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 (800 - 807)
Question #	807
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31, and when completed, it was completed incorrectly.</p> <p>Corrective Action: Resubmit the corrected Civil Rights Compliance Self Evaluation Form (PI-1441) and upload into SNACS.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct font size and format of non-discrimination statement was not included on all program materials.</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement with correct font size and format. Upload into SNACS a copy of materials updated.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
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). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p>Corrective Action: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)

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Question #	133
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Two students certified as Homeless received the correct benefit however their eligibility was not updated in the SFA's software in a timely manner. One student was certified as homeless on 8/30/2023 and not updated in the software until 10/26/23.</p> <p>Corrective Action: Provide a statement of understanding including a timeline for how the SFA will ensure that new eligibility determinations for Homeless are updated in the software in a timely manner.</p>
Form Name	Verification (200 - 204)
Question #	200
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not select the correct number of applications for verification. The sample size calculated as 23.43 which rounded up would be 24. The VCR showed a sample size of 23, but the SFA verified 26 applications.</p> <p>Corrective Action: Review the Verification Process and the Verification Collection Report e-learning module on the DPI website (https://media.dpi.wi.gov/school-nutrition/verification-process-verification-collection-report/index.html#/). Provide a statement of understanding that going forward the SFA will select the correct sample size per 7 CFR 245.6(a).</p>
Form Name	Verification (207 - 215)
Question #	207
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Per the number of applications reported in section 4 of the Verification Collection Report, Primero Edge submitted 23 applications to verify, however based on verification rounding requirements, it should have been 24.</p> <p>Corrective Action: Work with the software provider to ensure the rounding is correctly set up in the system to pull the correct number of applications. Standard rounding does not apply to verification. Provide a statement of how this will be corrected.</p>
Form Name	Verification (207 - 215)
Question #	208
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>Corrective Action: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Form Name	Verification (207 - 215)
Question #	209

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Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: Two applications (5728 and 8272) selected for verification were directly certified for free prior to the start of the verification process and should not have been included in the verification sample pool.</p> <p>Corrective Action1: Work with Primero Edge to ensure that only eligible applications are included in the verification sample pool. Provide a statement of how this will be corrected moving forward.</p> <p>Finding 2: One application selected responded but the original documentation provided by the household could not be located by the SFA.</p> <p>Corrective Action 2: Provide a statement of understanding that all documentation provided by households for verification must be retained on file for three years plus the current.</p>
Form Name	Verification (207 - 215)
Question #	215
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not complete the verification process by November 15 for all applications (there were three that were completed after that date) and was not approved for an extension (7 CFR 245.6a).</p> <p>Corrective Action: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1215
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Food Service Director and School Nutrition Program Managers have not been adequately trained on Meal Pattern or Point of Service (7 CFR 210.30).</p> <p>Corrective Action: The Food service director and the five School Nutrition Program Managers must view the 5 webcasts and take the quizzes at the end. https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html, https://media.dpi.wi.gov/school-nutrition/succeeding-with-standardized-recipes/index.html#/, https://media.dpi.wi.gov/school-nutrition/product-formulation-statements/story.html, https://media.dpi.wi.gov/school-nutrition/portion-control/index.html#/, https://media.dpi.wi.gov/school-nutrition/point-of-service/story.html.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The food safety plans at each school were not site specific. 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</p>

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	210.13). Corrective Action: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1401
Corrective Action Status	Flagged
Corrective Action History	Finding: Employee Reporting Agreements are not on file for all employees in the district. CA: Have each employee sign an Employee Reporting Agreement and upload into SNACS documentation that it has been completed.
Form Name	Reporting and Recordkeeping (1500 - 1501)
Question #	1501
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA is not maintaining program records and documentation for three years plus the current school year to meet record retention requirements (7 CFR 210.23(c)). Corrective Action: Provide a statement of how the record retention requirements will be met moving forward.
Site Name	Black Hawk Middle
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	400
Corrective Action Status	Flagged
Corrective Action History	Finding: During lunch meal service at Blackhawk Middle School, the kitchen staff ran out of all entree options and therefore were unable to offer the Meat/Meat alternative component. Students selected some food items to eat while they waited for pizza to cook. Some students were unable to wait for their meal to be cooked and left without being provided a lunch meal that day. Whether the students eventually ended up with the makings of a reimbursable meal or selected a milk and serving of fruit before leaving the cafeteria, these meals were not claimed as reimbursable. Corrective Action: This lack of preparedness can be attributed to multiple factors. First, there was no current menu or plan of action available in writing to kitchen staff. When asked how they knew what to prepare each day, the Blackhawk and Gompers staff said they relied on the menu taped to the cooler reflecting outdated menu items from the 2022-23 school year and also assumed what food was delivered the day prior was to be served to students that day. Had the intended menu been followed, staff would have prepared cold sandwiches which would have been used to provide the meat/meat alternative component when all other entrees had run out. Having zero entrees available when over 30 students had yet to eat also indicates no forecasting and no tracking food usage between lunch periods. Again, there was no documentation of expected number of students nor a place to document usage during the batch cooking process. For corrective action, please submit a statement outlining the conversations that took place to prevent this from happening in the future.

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Site Name	Black Hawk Middle
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Students without complete meals were counted at the point of service as having a reimbursable meal. In some instances, the non-reimbursable tray was not noticed, while in some cases the staff person alerted the student to please select a fruit or vegetable option and the student walked away. The meal was still marked as reimbursable.</p> <p>Corrective Action: Fiscal action will be assessed for a total of 15 lunches at Blackhawk Middle School. Corrective Action to train point of service staff with the knowledge and confidence to ensure students select a reimbursable meal will be addressed within the submitted corrective action from Finding #314 pertaining to counting and claiming errors district-wide.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During the day of on-site breakfast observation at Southside Elem, it was observed that the Pre-K students do not go through the meal service line. Instead, a teacher put menu items on a cart and wheeled the cart to the Pre-K table in the cafeteria. Pre-K students had the option to select any items from the cart but were not required to select a certain number of items or take 1/2c fruit and/or vegetable to make a reimbursable meal. From observation, teachers did not have training on offer versus serve (OVS) or how to build a reimbursable meal and were not tracking how many meals had been served.</p> <p>11 non-reimbursable breakfasts were observed due to not containing the required ½ cup of fruit and/or vegetable.</p> <p>Corrective Action: Fiscal action will be assessed for a total of 11 breakfasts. Corrective action for Findings 401 and 402 (Southside Elem) is to submit a detailed plan indicating how this process will be changed to ensure that Pre-K students are selecting a reimbursable breakfast and lunch.</p>
Site Name	Gompers Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	402
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The preschool students at Gompers Elementary were served the K-8 meal pattern but were not served at the same time and in the same place as the older students. Children who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals.</p> <p>Corrective Action: Submit a statement describing the specific changes made to meal service in order to serve the preschool students the age-appropriate meal pattern.</p>

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	Please address the rule on flavored milk in your statement, as teachers were under the impression that once the preschool student turned 5 years old, they could have flavored milk at meals.
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	402
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During the day of on-site lunch observation at Southside Elem, it was observed that the Pre-K students do not go through the meal service line. Instead, a teacher put menu items on a cart and wheeled the cart to the Pre-K table in the cafeteria. Students had the option to select any items from the cart but were not required to select a certain number of components, or 1/2c fruit and/or vegetable to make a reimbursable meal. From observation, teachers did not have training on offer versus serve (OVS) or how to build a reimbursable meal and were not tracking how many meals had been served. 15 non-reimbursable lunches were observed at the Pre-K table, due to not containing the required ½ cup of fruit and/or vegetable.</p> <p>3 non-reimbursable lunches were observed from elementary students who went through the lunch line. The meals also did not contain the required 1/2 cup fruit, vegetable, or combination. This was due to students selecting an entrée option and not walking through the garden bar area, or stopping at the POS. The staff working at the POS must ensure that all students have selected a reimbursable meal.</p> <p>Corrective Action 1: Fiscal action will be assessed for a total of 18 lunches at Southside Elementary. Corrective action for Findings 401 and 402 (Southside Elem) is to submit a detailed plan indicating how this process will be changed to ensure that Pre-K students are selecting a reimbursable breakfast and lunch.</p> <p>Corrective Action 2: Submit a statement of how the error with students exiting the line prior to the POS will be corrected and avoided in the future. Within this statement, please indicate understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	403
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Students at Southside Elem/Badger Rock MS were only being offered 1% unflavored milk at breakfast. Grades K-8 must be offered a variety of milk, (at least two allowable milk types) at lunch and breakfast. Allowable milk types in USDA School Meals Programs are low-fat and fat-free flavored or unflavored milk and lactose-free or lactose-reduced fat-free or low-fat milk.</p> <p>As a reminder, if a missing milk variety violation is found during the next Administrative Review, fiscal action will be required.</p>

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	<p>Corrective Action: Submit a statement of understanding that a variety of milk (at least two allowable milk types) must be offered at both breakfast and lunch. Compliance with this regulation will also be verified with the production records submitted with Finding #430.</p>
Site Name	Spring Harbor Middle
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	403
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Milk component located after the Point of Service (POS)-The milk component is typically offered after to the POS. The meal service line must be restructured so that all components are offered prior to the POS.</p> <p>Corrective Action: Please submit a statement which details the changes that will be made to bring the lunch meal service line into compliance such that all meal pattern components are available prior to the POS. Additionally, please include a picture of the new meal service line set up.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Signage was not posted at breakfast or lunch at Southside Elem/Badger Rock MS or Spring Harbor MS to show students what makes up a reimbursable meal. Inaccurate signage was posted Gompers Elem/Black Hawk MS and did not correctly communicate to students how to build 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. Breakfast signage should list the three required components and tell students that they must choose at least three items, including ½ cup fruit and/or vegetable at breakfast. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit pictures of the completed signage posted near the lunch and breakfast service lines at Southside Elementary/Badger Rock MS, Spring Harbor MS, and Gompers Elem/Black Hawk MS.</p>
Site Name	Gompers Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
Corrective Action Status	Flagged

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<p>Corrective Action History</p>	<p>Finding: Instead of eating in the cafeteria, kindergarten students at Gompers Elementary order a hot lunch entree in the morning and the meal is delivered via a cart to the classroom. All components are present, but only ½ cup of vegetable was served instead of the daily requirement of ¾ cup. When students do not select their own meal and do not utilize Offer versus Serve, all components must be present in their full planned amount.</p> <p>Corrective Action: Nine meals were served to kindergarten students that did not meet the minimum daily vegetable requirement. Should Kindergarten students continue to have their meals delivered to the classroom, the standard operating procedure needs to include offering at least two allowable milk types and satisfying the daily minimum requirement for the vegetable component. From the one week of production records submitted for Corrective Action, Public Health Nutritionists will assess if the delivered meals to kindergarten classrooms are notated with the correct portion sizes.</p>
<p>Site Name</p>	<p>Capital High</p>
<p>Form Name</p>	<p>Meal Components and Quantities - Day of Review (400-408)</p>
<p>Question #</p>	<p>406</p>
<p>Corrective Action Status</p>	<p>Flagged</p>
<p>Corrective Action History</p>	<p>Finding: Capital High School (9-12) is currently following the district's middle school menu (6-8). Because there is no overlap with the dietary specifications for the 6-8 and 9-12 age/grade groups under the NSLP, a separate 6-8 and 9-12 meal pattern must be followed.</p> <p>Please note that this led to the daily fruit shortage on the planned menu (which was cited as a missing fruit component as no oranges were served- Finding #409) and the daily vegetable shortage (Finding #410) during the week of review.</p> <p>Corrective Action: Submit a statement of understanding that the 9-12 meal pattern should be followed at Capital High School going forward. Compliance with this requirement will also be verified on the production records that are submitted as corrective action for Finding #430.</p>
<p>Site Name</p>	<p>Capital High</p>
<p>Form Name</p>	<p>Meal Components and Quantities - Day of Review (400-408)</p>
<p>Question #</p>	<p>407</p>
<p>Corrective Action Status</p>	<p>Flagged</p>
<p>Corrective Action History</p>	<p>Finding: During the day of on-site observation at Capital High, the planned menu indicated Sweet Chili Wings w/ Seasoned Rice. The standardized recipe indicated that bone-in wings would be served, and 4 wings equaled one serving. The menu item prepared for lunch was boneless wings (cooked plain) with barbeque sauce available on the side, and no rice.</p> <p>The recipe provided to the state agency for the menu change was for Honey Sriracha Boneless Wings served with a breadstick and indicated a serving size of 5 wings (however staff stated they always serve 6 wings). Crediting documentation was not on-site to verify meal component contribution for the boneless wings, however the</p>

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	<p>state agency had it available from the week of review, and 6 boneless wings were weighed prior to lunch service to verify 2 oz eq M/MA was being served.</p> <p>Throughout the AR on-site observations, it was observed that this pattern repeated at several schools. There was a lack of menu documentation available for staff to reference for meal preparation and meal service.</p> <p>Corrective Action: Submit a detailed plan including what steps will be taken to address discrepancies (e.g. menu, recipes, product substitutions, etc.) going forward. Within this plan, indicate how portion sizes will be communicated with the school nutrition professionals on-site, and who will be responsible for menu and recipe revisions.</p>
Site Name	Capital High
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Fiscal action is required for any missing component. The planned menu at Capital High on Wednesday, November 8th, 2023, included oranges (1 each= 1/2c fruit), however per the production records provided, no servings were produced or served. It was verified via the paper records that there was not a fruit available on this day.</p> <p>Please note that Capital High is currently following the middle school (6-8 menu), however all other high schools in the district are following a separate 9-12 menu. The planned menu for this day would have led to a fruit shortage still, as 1/2c fruit was planned.</p> <p>The fruit requirement for the 9-12 age/grade group is 1 cup of fruit.</p> <p>Corrective Action: Fiscal action will be assessed for 46 9-12 meals on Wednesday, November 8th, 2023, the day with the missing fruit component at Capital High. Submit a statement that explains specifically how the menu would be changed to ensure no missing component on this day. In addition, Capital HS will need to follow a 9-12 menu to ensure the minimum required quantities of each component are available, and the dietary specifications are met (see finding #406).</p>
Site Name	Gompers Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The daily and weekly minimum requirement for meat/meat alternate was not met for K-8 for lunch at Gompers Elem/Black Hawk MS during the week of review. The component shortage is due to a vegetarian burger served during this week. The vegetarian burger (Morning Star Spicy Black Bean Veggie Burger) does not have valid crediting documentation to indicate meal component contribution. Without crediting documentation, a product cannot be credited towards the meal pattern requirements.</p>

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Since we can determine there is some amount of meat/meat alternate in the product (in the form of black beans), but we are unable to determine how much, the minimum creditable amount (.25 oz eq M/MA) is used for assessing meal pattern compliance.

This leads to a daily meat/meat alternate shortage on the following days:

- Monday, November 6th, 2023
- Tuesday, November 7th, 2023
- Wednesday, November 8th, 2023
- Friday, November 10th, 2023

The daily minimum requirement for K-8 is 1 oz eq meat/meat alternate. The weekly minimum requirement for K-8 is 9 oz eq meat/meat alternate.

Fiscal action is required for any repeat daily meat/meat alternate shortage violations (not site-specific) from the previous Administrative Review. Therefore, fiscal action will be assessed for the vegetarian burger entrees served on these 4 days at Gompers Elem/Black Hawk MS, as well as at all other schools within the district that served the vegetarian burger during the week of review. Per the records provided, the following meals will be subject to fiscal action during the week of review:

- Monday, November 6th: 42 vegetarian burgers served.
- Tuesday, November 7th: 391 vegetarian burgers served.
- Wednesday, November 8th: 36 vegetarian burgers served.
- Thursday, November 9th: 393 vegetarian burgers served.
- Friday, November 10th: 39 vegetarian burgers served.

The total number of lunch meals subject to fiscal action from November 6-10, 2023, is 901.

Corrective Action 1: Discontinue serving the product that does not have acceptable crediting documentation. Submit a statement of understanding that items without proper crediting documentation, this item cannot be offered to meet meal pattern requirements.

Corrective Action 2: Describe specifically how the daily minimum requirement for meat/meat alternate will be met for lunch during the days containing the shortage.

Site Name	Capital High
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The daily and weekly minimum requirement for the vegetable component was not met for 9-12 for lunch at Capital High School during the week of review. Below are the minimum daily vegetable contributions and shortages detailed by entrée option.</p> <ul style="list-style-type: none"> • Tuesday (11/07/23): <ul style="list-style-type: none"> ○ Spicy Chicken Sandwich (Dragon Punch 4fl oz, 1/2c veg- juice) = 1/2c vegetable • Wednesday (11/08/23): <ul style="list-style-type: none"> ○ Grab n Go Turkey Cheese Meal (Carrots, 1/2c veg) = 1/2c vegetable ○ Sriracha Honey Wings (Carrots, 1/2c veg) = 1/2c vegetable • Friday (11/10/23): <ul style="list-style-type: none"> ○ Hamburger (Tater Tots, 1/2c veg) = 1/2c vegetable ○ Grab n Go Turkey Cheese Meal (Carrots, 1/2c veg) = 1/2c vegetable

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The daily minimum requirement for 9-12 is 1 cup vegetable. The weekly minimum requirement for 9-12 is 5 cups vegetable.

Corrective Action: Describe specifically how the daily minimum requirement for the vegetable component will be met for lunch during the days containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). In addition, Capital HS will need to follow a 9-12 menu to ensure the minimum required quantities of each component are available, and the dietary specifications are met (see finding #406).

Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At Southside Elementary/Badger Rock MS, there was a daily and weekly vegetable shortage for K-8 during the week of review. This shortage likely resulted from the lack of recordkeeping of all available menu items, as well as the lack of serving sizes on production records. Please note that when production records did not include a planned serving size, the minimum creditable amount (1/8c) was used for assessing meal pattern compliance. The following days/entrees contained shortages:</p> <ul style="list-style-type: none"> ○ Monday, November 6th, 2023 <ul style="list-style-type: none"> ○ Cheese Pizza (Pizza sauce 1/8c, Carrots 1/8c) = 1/4c vegetable ○ Turkey Cheese Grab and-Go (Carrots 1/2c) = 1/2c vegetable ○ Chicken Corn Dog (Potato Wedges 1/2c, Carrots 1/8c) = 5/8c vegetable ○ Spicy Chicken (Potato Wedges 1/2c, Carrots 1/8c) = 5/8c vegetable ○ Regular Chicken (Potato Wedges 1/2c, Carrots 1/8c) = 5/8 c vegetable ○ Tuesday, November 7th, 2023 <ul style="list-style-type: none"> ○ Pepperoni Pizza (Pizza Sauce 1/8c, Carrots 1/8c, Salad Mix 1/8c) = 3/8c vegetable ○ Bosco Sticks (Marinara 1/4c, Carrots 1/8c, Salad Mix 1/8c) = 1/2c vegetable ○ Wednesday, November 8, 2023: <ul style="list-style-type: none"> ○ Turkey Ham Cheese Grab-and-Go (Carrots 1/2c) = 1/2c vegetable ○ Corn Dog (Potato wedge 1/2c) = 1/2c vegetable ○ Cheese Pizza (Pizza sauce 1/8c) = 1/8c vegetable ○ Thursday, November 9th, 2023: <ul style="list-style-type: none"> ○ Pepperoni Pizza (Pizza sauce 1/8c, Carrots 1/8c, Salad Mix 1/8c)= 3/8c vegetable ○ Friday, November 10, 2023 <ul style="list-style-type: none"> ○ Turkey Cheese Grab and-Go (Carrots 1/2c) = 1/2c vegetable ○ Hamburgers (Potato wedge 1/2c) = 1/2c vegetable ○ Cheese Pizza (Pizza sauce 1/8c) = 1/8c vegetable ○ Bosco Sticks (Marinara Sauce 1/4c) = 1/4c vegetable <p>The daily minimum requirement for K-8 is 3/4c vegetable. The weekly minimum requirement for K-8 is 5 cups.</p>

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	Corrective Action: Describe specifically how the daily and weekly minimum requirement for the vegetable component will be met for lunch during the days containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).
Site Name	Spring Harbor Middle
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The weekly juice limit was exceeded at breakfast at Spring Harbor MS. No more than half (50 percent) of the total fruit offerings may be in the form of juice. It was observed on-site that students were permitted to take two 1/2 cup servings of fruit juice, resulting in their entire fruit component being provided solely in juice form. During the week of review, both whole fruit and fruit juice were available daily to meet the 1 cup requirement. If a student was able to select 2 juices (1 cup total) daily, this would equal 5 cups of juice over the course of the week and mean 100% of the fruit was in the form of juice. This exceeds the 50% juice limit.</p> <p>Corrective Action: Submit a statement that explains what changes will be made to the breakfast menu for the week of review to decrease the amount of juice offered and to be compliant with the weekly juice limit.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	430
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Production records are the SFA's way of proving that reimbursable meals were planned and served. Breakfast and lunch production records were not consistently completed during the week of review (11/06-11/10/23). The following production record requirements were missing or inconsistently filled in: Planned serving sizes, milk types available and actual usage by type, meal contribution (does not have to be documented on the production records, but must be documented somewhere), and the planned serving size and usage for condiments and extra menu items.</p> <p>It was noted during the week of review that the comments box frequently listed multiple menu items that were added but were not a line item on the production record, and therefore only included the amount served. Per on-site observations, this is highly due to the menu software posing challenges to staff due to inadequate training on utilizing the software. Each item offered as part of a reimbursable meal (even those that are added to the menu) must have all production record requirements documented, including: menu item with product name/description, planned serving size, planned/actual number of servings prepared, planned/actual quantity prepared in bulk units, and amount leftover.</p>

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It is also essential for production records to accurately reflect when menu items are served together (e.g., a Hamburger bundled with French Fries) by consolidating these items into one line item with a referenced standardized recipe. It was observed on-site at some of the schools that the potato products are served exclusively in service boats, bundled with an entrée(hamburger) and this vegetable option was not available to other entrée options. If this situation continues, please ensure the production records accurately reflect that.

Each site needs to be provided with a production record that includes that day's planned menu, the appropriate serving sizes for the age/grade group being served and allows them to verify meal pattern is being met. Production records are intended to be useful tools to record information prior to production, during production, and following production. If the expectation is that staff can use the menu planning software to access the planned production record for that day, please provide additional training to them on how they can access this information. As mentioned in Finding #400 (Black Hawk MS), the lack of a planned production record and menu caused confusion for staff during meal preparation and contributed to a lack of food available to students on this day.

Review the Production Record Requirements [here](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf):
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

Corrective Action 1: Please submit a training plan that shows that site operators have been trained on general production record requirements, as well as how to utilize the current menu planning software to ensure that requirements are being documented daily.

Corrective Action 2: Please submit a detailed plan outlining the SFA's strategy for ongoing monitoring of production records and include who will be responsible for monitoring that production record requirements are being met.

Corrective Action 3: Submit one full week of completed breakfast and lunch production records from Southside Elem/Badger Rock and Spring Harbor MS. Submit one full week of completed lunch production records from Gompers Elem/Black Hawk MS and Capital HS. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	Finding: Crediting documentation is not available on-site at each school within the school district. Each school must have copies of the crediting documentation for menu items being served at that location. Schools may have a physical binder at each site that includes copies or have access to a digital folder that includes these files.

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	<p>Corrective Action: Submit a detailed plan indicating how crediting documentation will be distributed to each school going forward. In addition to this plan, submit a statement of understanding that crediting documentation must be reviewed and updated at least twice per year, and as any new products are purchased.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	434
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Standardized recipes must be available on-site at each school where meal preparation is taking place. The days of on-site observations indicated that Southside Elem/Badger Rock MS and Spring Harbor MS did not have any recipes available for the planned menu. All menu items made in-house with more than one ingredient and menu items that are served bundled together (e.g. hamburger bundled with French fries, turkey cheese grab-and-go meal) require a recipe. This ensures that a consistent menu item is served to students each time it is on the menu and provides the same meal component contribution per serving.</p> <p>Corrective Action: Submit a statement of understanding that standardized recipes must be made available at each school within the district. Within this statement, indicate specifically how recipes will be distributed to each site based on the planned menu.</p>
Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Standardized recipes provided for the week of review and days of on-site visits were missing required information, were inaccurate based on the menu items being served, and were not site-specific. Standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used at each site, and reflect the appropriate serving size based on the age/grade group being served. Standardized recipes should be tried, tested, evaluated, and adapted to the food service operation.</p> <p>When standardized recipes are written for a menu item, it is also important that they are followed as written. They are intended to be followed exactly to produce a consistent, quality product that credits a specific way. Based on on-site observations and discussions with staff, some of the common alternative entrée options are prepared differently at each site, which directly affects the meal component contribution. For example, the Turkey Cheese and Turkey Ham and Cheese grab-and-go meals- The recipes provided for these meals indicate that 1 slice of cheese should be added to the sandwich. The food production kitchen is adding 2 slices of cheese, and the sites reviewed have been adding 1 slice.</p> <p>The list below indicates recipes from the week of review/days of on-site visit that are missing required information. Due to the substantial errors found, all standardized recipes within the district must be audited and reviewed for accuracy.</p>

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- Turkey/Cheese Grab n Go and Turkey Ham/Cheese Grab n Go: Both recipes are missing preparation instructions, and do not credit accurately. Please review the crediting documentation for the meat/meat alternate products and cheese slice used and update the recipes for these grab-and-go meals.
 - During on-site observations at Capital HS, the lead stated that a different vegetable is included each day (based on what is sent from the food production kitchen). A separate recipe must be created for each grab and-go meal if different fruits or vegetables will be placed in the bag, or a variety item recipe (site-specific, not district wide) can be created at each site and referenced in these recipes.
- Hamburger: Tater tots are missing from the ingredient list, but are mentioned under the preparation instructions. If you decide to serve the starchy vegetable on the side (not bundled) going forward, please update the recipe to omit the vegetable altogether.
- Grab n Go Sunbutter and Jelly Sandwich (Grab n Go)- Recipe is missing preparation instructions and has inaccurate ingredients listed-The recipe states that 2 slices of bread, 2 ounces of sunbutter, and 1 ounce of grape jelly are used. During on-site observation, it was observed that 2 pre-packaged sandwiches (SunWise Sunbutter) are included with this meal. There was also craisins and baked Cheetos in the clam shell, which are not listed in the standardized recipe.
- Sweet BBQ Wings and Buffalo Wings: If the wings are not served physically bundled with the rice and baby carrots, then the rice and baby carrots should not be listed on the recipe and should be listed as a separate line item on the production record.
- Honey Sriracha Boneless Wings: Separate recipes are needed for the different flavors of boneless wings served (see Capital HS Finding #407). In addition, please update the serving size and meal component contribution based on the crediting documentation for the boneless wings.
- Egg & Cheese Bagel Sandwich: Missing preparation instructions
- Sausage & Egg Biscuit: Missing preparation instructions and meal component contribution per serving
- Salad, Caesar Secondary: The recipe indicates this is an entrée salad with romaine, chicken, cheese, and salad dressing. On-site observation indicated that these entrée salads are served with a fruit and grain product in the clam shell. When items are served bundled together, all ingredients must be listed on the standardized recipe.

Visit our [Standardized Recipe webpage](https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes) (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes) for more information on recipe requirements and additional resources.

Corrective Action 1: Submit a detailed plan outlining the SFA's strategy for auditing all standardized recipes. Within this plan, include how standardized recipes will be adapted to be site and/or age/grade group specific, and who will be responsible for monitoring that standardized recipes include all necessary information.

Corrective Action 2: Please submit into SNACS an updated recipe for the following menu items: Turkey Cheese Grab-and-Go Meal, Turkey Ham and Cheese Grab-and-Go Meal, Sunbutter and Jelly Sandwich Grab-and-Go Meal.

Site Name

Spring Harbor Middle

Form Name

Meal Components and Quantities - Review Period (409-412, 430-437)

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Question #	436
TA Log #	TA Log# exists
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. Each entree option is evaluated independently. The Spring Harbor production records indicate bagels were available daily as a grain, and reference “Bagel Recipe TR1002” with “Bagel Blue, Bagel Cinnamon, and Bagel Plain” listed under quantity prepared. On-site observations confirmed that a variety item recipe is not on file for the bagel options available daily. When a variety item recipe is not used, each bagel option must be listed separately as a line item on the production record.</p> <p>Crediting documentation provided for the bagels showed that the cinnamon raisin bagel is not a whole grain-rich product. With each entrée option being evaluated independently, and this non whole grain-rich product being offered daily, the 80% WGR requirement was not met.</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	Capital High
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The 9-12 meal pattern requires the menu planner to offer students a certain amount of vegetables from the five vegetable subgroups over the course of the week. This requirement was not met at Capital HS, as detailed below.</p> <p>Onsite observations showed that certain vegetables are exclusively paired with specific entrée options (e.g., baby carrots are bundled with a turkey and cheese sandwich in the grab and-go meal). The practice of bundling restricts access to the bundled vegetable to only students selecting that particular entrée. Therefore, all entrée options must be evaluated individually to ensure that students have access to all vegetable subgroups across the week, regardless of the entrée option selected.</p> <p>Based on review of the documentation provided and onsite observation, the following vegetable subgroup shortages and missing subgroups were identified for the 9-12 lunch meal pattern:</p> <ul style="list-style-type: none"> ○ Red/Orange: 1/4c served (1 1/4c required) ○ Beans/peas/legumes: 0 cups served (1/2c required) ○ Other: 0 cups served (3/4c required) <p>As a reminder, if a repeat missing vegetable subgroup violation is found during the next Administrative Review, fiscal action will be required.</p> <p>Corrective Action: Describe specifically how the weekly shortage and missing subgroups will be fixed during the week of review at Capital HS. Include product information and serving sizes of the added vegetables with the statement.</p>

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Site Name	Southside Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The K-8 meal pattern requires the menu planner to offer students a certain amount of vegetables from the five vegetable subgroups over the course of the week. This requirement was not met at Southside Elem/Black Hawk MS, as detailed below.</p> <p>Onsite observations showed that certain vegetables are exclusively paired with specific entrée options (e.g., French Fries are bundled with a Hamburger, served together in one service boat). The practice of bundling restricts access to the bundled vegetable to only students selecting that particular entrée. Therefore, all entrée options must be evaluated individually to ensure that students have access to all vegetable subgroups across the week, regardless of the entrée option selected.</p> <p>Please note that when production records do not include a planned serving size, the minimum creditable amount (1/8c) is used for assessing meal pattern compliance. Based on review of the documentation provided and onsite observation, the following vegetable subgroup shortages and missing subgroups were identified for the K-8 lunch meal pattern:</p> <ul style="list-style-type: none"> ○ Dark Green: 1/4c served (1/2c required) ○ Red/Orange: 3/8c served (3/4c required) ○ Beans/peas/legumes: 0 cups served (1/2c required) ○ Starchy: 0 cups served (1/2c required) ○ Other: 0 cups served (1/2c required) <p>As a reminder, if a repeat missing vegetable subgroup violation is found during the next Administrative Review, fiscal action will be required.</p> <p>Corrective Action: Describe specifically how the weekly shortages will be fixed during the week of review. Include product information and serving sizes of the added vegetables with the statement.</p>
Site Name	Spring Harbor Middle
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The K-8 meal pattern requires the menu planner to offer students a certain amount of vegetables from the five vegetable subgroups over the course of the week. This requirement was not met at Spring Harbor MS, as detailed below.</p> <p>Onsite observations showed that certain vegetables are exclusively paired with specific entrée options (e.g., French Fries are bundled with a Hamburger, served together in one service boat). The practice of bundling restricts access to the bundled vegetable to only students selecting that particular entrée. Therefore, all entrée options must be evaluated individually to ensure that students have access to all vegetable subgroups across the week, regardless of the entrée option selected.</p>

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	<p>Based on review of the documentation provided and onsite observation, zero cups of starchy vegetables were served; 1/2c required.</p> <p>As a reminder, if a repeat missing vegetable subgroup violation is found during the next Administrative Review, fiscal action will be required.</p> <p>Corrective Action: Describe specifically how the weekly shortage will be fixed during the week of review. Include product information and serving size of the added vegetable with the statement.</p>
Site Name	Southside Elementary
Form Name	Offer vs Serve (500-502)
Question #	500
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Food service staff at Southside Elem/Badger Rock MS were unclear about the Offer versus Serve (OVS) requirements for breakfast and lunch. It is important for staff to understand the OVS requirements so they may assist students with building a reimbursable meal. The planned menu, portion sizes, and crediting information must be communicated to staff prior to meal service for them to be able to assist students with selecting a reimbursable meal.</p> <p>It is also a requirement to have signage that communicates to students how to build a reimbursable meal and includes the requirement to select at least 1/2c fruit and/or vegetable (Flagged under finding #404). OVS resources on WI DPI's Menu Planning webpage may be used as training resources for staff (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals at Southside Elem/Badger Rock MS 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	Southside Elementary
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The wrong "And Justice for All" poster is posted in the meal service area (FNS Instruction 113).</p> <p>Corrective Action: Hang the current USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met.</p>
Site Name	Black Hawk Middle
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
Corrective Action Status	Flagged

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Corrective Action History	<p>Finding: During lunch observation at Blackhawk, multiple students asked for large portions of the fries and did not select enough additional food items to create a reimbursable meal. The waffle fries and French fries do not meet Smart Snacks standards when served in a 1 cup portion.</p> <p>Corrective Action: To comply with the Smart Snack regulations, please stop the ability to purchase larger than ½ cup portions of fried potato products. Please submit a statement of understanding and attest that allowable and unallowable a la carte purchases will be reviewed with school staff.</p>
Site Name	Spring Harbor Middle
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Based on the USDA required review of at least 10% of a la carte sales, a non-compliant item has been identified at Spring Harbor MS. The Ruffles Baked Cheddar and Sour Cream Chip is not smart snack compliant. It does meet the Smart Snacks general standards, but it does not meet the dietary specifications (exceeds the sodium limits). It is crucial to note that this list is not exhaustive and there may be additional non-compliant products on the a la carte menus throughout the district. Therefore, a comprehensive review of all products and recipes is recommended to ensure full compliance with Smart Snacks regulations.</p> <p>Corrective Action: Please remove this variety of potato chip from the inventory. Submit product label(s) and crediting documentation for any item(s) intended to substitute for the non-compliant product. If the decision is made to discontinue the item without a replacement, please include this in your statement.</p>
Site Name	Black Hawk Middle
Form Name	Water (1300)
Question #	1300
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Free, potable water was not accessible to all students during breakfast and/or lunch meal service (7 CFR 220.8 and 7 CFR 210.10). Selective denial of access to water fountain in the hallway is reportedly a procedure in place to manage behavioral concerns.</p> <p>Corrective Action: Submit a statement explaining how free potable water will be made available to all students during breakfast and lunch meal service.</p>
Site Name	Southside Elementary
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1404
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</p>

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	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 was not site specific. Corrective Action: Update the food safety plan to be site specific and upload the updated portions of the food safety plan into SNACS.
Site Name	Gompers Elementary
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. It was posted within the kitchen area, which is not open to the public at all times.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Southside Elementary
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.</p>
Site Name	Southside Elementary
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)
Question #	1906
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During on-site observation of the FFVP at Southside Elementary, room 1012 (5K students) received grape tomatoes. The teacher was observed handing out the tomatoes at the same time as a fruit roll-up snack (which was provided by a parent) and stated that not all students enjoy the fruit or vegetable, so she provides another option during the snack break each day.</p> <p>Corrective Action: The Fresh Fruit and Vegetable Program (FFVP) is an effective way of introducing a variety of fruits and vegetables as healthy snack options with the goal of encouraging lifelong nutritious habits. Please discontinue the practice of serving store-bought snack items alongside the fresh fruit and vegetable snacks provided by a federal grant.</p>
Site Name	Southside Elementary
Form Name	Fresh Fruit and Vegetable Program - Day of Review (1903-1910)
Question #	1910

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Corrective Action Status	Flagged
Corrective Action History	<p>Finding: During the day of on-site FFVP observation at Southside Elementary, the grape tomatoes were taken out of temperature control and delivered to classroom counters between 8:30-9:00am. When teachers were asked when they served the snack to the students, they all indicated that it happens after lunch service (4-5 hours after being delivered and not temperature controlled). This appears to be the normal practice and may also be happening on days when a time and temperature control (TCS) food item is being served. On the day of observation, staff did collect the tomatoes and return them to the kitchen refrigerator. However, food safety practices need to be followed for the FFVP program, and the site needs to be following the standard operating procedure (SOP) in their site-specific 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. Please upload a copy of the FFVP SOP.</p>
Form Name	Afterschool Snack Program
Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: Onsite Monitoring was not completed for any Afterschool Snack sites in the 23-24 school year, and 22-23 monitoring could not be produced.</p> <p>Corrective Action1: Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at. Once during the first four weeks of the program plus one additional time during the program year.</p> <p>Corrective Action 2: Complete and upload into SNACS the Afterschool Snack onsite monitoring forms for each afterschool snack service location. Previous finding in 2018</p> <p>Finding 2: Attendance is not taken at the ASP sites. Average Daily Attendance was incorrectly calculated and school NSLP Average Daily Attendance was used.</p> <p>Corrective Action: Provide a statement that attendance will be taken at all ASP sites and the ASP ADA will be used in claim submission. Previous finding in 2018.</p> <p>Finding 3: The SFA was unable to provide production records or other documentation to support reimbursable snacks were provided and claimed for the Afterschool Snack Program. (7 CFR 210.10) Southside elementary had no production records and the production records that were available for other sites did not show that 2 different components were served to or taken by students. Blackhawk production records were blank, and nothing was recorded on the count sheets for components served. Afterschool Counting and Claiming is an SFA-wide systemic issue.</p> <p>Corrective Action: Review the Afterschool Snack e-learning module located at https://media.dpi.wi.gov/school-nutrition/afterschool-snack-program/index.html#/lessons/cKz5V7LBwbA_AB5r0AVdlfvPinYStrrD and upload proof of completion into SNACS. Corrective Action 2: Provide two weeks of accurately completed Afterschool Snack production records for all sites serving Afterschool Snack SFA-wide for review. (7 CFR 210.10) Previous finding in 2013 and</p>

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in 2018 a district-wide fiscal recalculation was required with a fiscal reclaim of \$5,418.

Finding 4: All days' POS counts, at Southside Elementary school, were the same number (30) every day for the entire month of November. Other site's count sheets had counts from previous month's added into the total. The week's counts were not recorded by month. Many days, for multiple sites, listed on the SFA-wide count sheet, had the same number of meals claimed as were delivered to the site which constitutes an unallowable POS.

Corrective Action: After the POS issues are fully corrected SFA-wide, submit 1 full month of SFA-wide count sheets for each site that operates area eligible afterschool snack. **Previous finding in 2013 and in 2018.**

Finding 5: Spring Harbor - day of onsite review

- No POS **Previous finding in 2018**
- No attendance taken. **Previous finding in 2018**
- Counts were not taken at all for the month of January.
- Adult took a snack and is not charged for doing so.
- Some students took two of the same components and some took only one component. **Previous finding in 2018**
- Staff over seeing ASP are not aware of the process for providing a reimbursable snack and how to record them. **Previous finding in 2018**
- Staff set bags with snack components out on table and let students take whatever they wanted and did not encourage students to take a reimbursable snack.
- Of the snacks taken on the day of review, only 2 reimbursable snacks were taken.

Due to the egregious NSLP Afterschool Snack violations and continued noncompliance that was identified in the previous two Administrative Reviews, this constitutes a material failure to comply with the provisions of the federal regulations governing the NSLP Afterschool Snack Program at 7 CFR 210.10(o). Per 7 CFR 210.19(c), the DPI must take fiscal action against SFAs for reimbursement claims that are not properly payable.

As a result, all Afterschool Snacks from school year 2023-24 will be reclaimed. The Madison Metro School District has been placed in claims withholding for the Area Eligible Afterschool Snack Program. Afterschool Snacks cannot be claimed until all corrective action is received and approved and the SFA is able to demonstrate to the satisfaction of the State Agency that reimbursable snacks are offered and served, and all program requirements are met. Once approved, snacks may be claimed moving forward, the approval will not be retroactive. If the SFA is unable to demonstrate to the satisfaction of the State Agency that the NSLP Afterschool Snack Program can be operated according to program requirements, this may result in termination of the program.

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Technical Assistance

Water fountain located in the hallway. Elementary students can access during mealtimes without restriction; Middle School students are selectively allowed into the hallway for water due to safety, disciplinary, and behavior concerns. Offer a water cooler or other dispenser in the cafeteria during Middle School lunch if not all students are allowed into the hallway for water fountain access

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 ½ cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Please add signage to your garden bars at all schools within the district.

Each school must receive at least two food safety inspections each school year (7 CFR 210.13). The most recent food safety inspection report must be posted in public view. Posting in the kitchen is not considered publicly available.

Spring Harbor - No Trays: During the onsite observation at Spring Harbor MS, it was noted that students were not provided with trays during meal service. This practice may inadvertently discourage students from taking the full complement of entitled food items due to challenges in carrying multiple items. A student must be able to select all components of a reimbursable meal. Additionally, the absence of trays may contribute to a less tidy meal service, with a heightened risk of spills and dropped food. To address these concerns, please implement the use of trays during meal service. This not only facilitates students in comfortably carrying their complete meals but also promotes a more organized and efficient dining experience, reducing the likelihood of spills and waste. The introduction of trays aligns with best practices for meal service, ensuring students can fully enjoy and benefit from the nutritious meals offered.

Crediting Discrepancies: Some of the standardized recipes and menu items referenced on the production records during the week of review contain incorrect crediting information based on the documentation provided. Below are some of the crediting discrepancies. Please review and update the crediting information within your menu planning software and continue to review/update these as products change. In addition, a thorough review of the standardized recipes will be required as corrective action with Finding #435.

- Pepperoni Pizza- Listed as 2 oz eq M/MA, 2 ¼ oz eq grain.
 - Credits as 2 oz eq M/MA, 2 oz eq grain, 1/8c veg (RO)
- Hamburger (with tater tots)- Listed as 2 ¾ oz eq M/MA, 1/2c veg (S)
 - Credits as 2 oz eq M/MA, 2 oz eq grain, 1/2c veg (S)
- Spicy Chicken Sandwich- Listed as 2 oz eq M/MA, and 3 oz grain.
 - Credits as 2 oz eq M/MA and 2.75 oz eq grain
- Chicken Sandwich- Listed as 2 oz eq M/MA, 3 oz eq grain, 3/4c veg (S)
 - Credits as 2 oz eq M/MA and 3 oz eq grain
- Sweet BBQ Wings (4)- listed as 2 oz eq M/MA, ½ oz eq grain, 1/2c veg (RO)
 - Credits as 1.5 oz eq M/MA, 2 oz eq grain, 1/2c veg (RO)
- 2 oz marinara sauce cup (served with the cheese filled breadsticks)- listed as 1/2c veg.
 - Credits as 1/4c veg- RO.
- Salad Caesar Secondary- listed as 2 3/4oz eq M/MA, 1c veg-DG.
 - Credits as 3 oz eq M/MA, 1c veg- DG

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Milk component located after the Point of Service: Due to the physical constraints of the Spring Harbor kitchen and service area footprint, a portable milk cooler is used during lunch meal service, located past the Point of Service (POS). All meal pattern components must be offered prior to the POS. Given the very limited serving and storage space of the meal service area, strategic adjustments will be necessary to ensure that milk is offered prior to the POS. Possibilities were discussed with staff onsite. The most feasible solution, for the time being, is to place the milk on the chilled Garden Bar. However, this displaces either fruits, vegetables, or the to-go disposable kitchen boats. An additional viable option is to have students accept or decline the milk component prior to entering the main meal service line by setting up a small, portable milk cooler at the beginning of each service line. A long-term solution is required.

Crediting Documentation: Processed products not listed in the USDA Food Buying Guide (FBG) require a Child Nutrition (CN) label, product formulation statement (PFS), or USDA Product Information Sheet to credit toward the meal pattern. 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 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. CN labels must be collected directly from the product packaging, and not from the manufacturer's website (with the watermark label of "Copy not for documenting federal meal requirements.")

In addition, crediting documentation must be available on-site at each school within the district. Each school may have a physical binder or access to a digital folder that includes these files.

Condiment Usage: Production records must include condiments available and the planned serving size. Condiment usage is not currently monitored at the schools, nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students, as condiments can be a significant source of calories, saturated fat, and sodium. Promote appropriate serving sizes by adding signage at the condiment station and/or photos of the planned portion size of the condiments.

Vegetable Subgroups: Students are only able to select one entrée option at lunch; therefore, each entrée option must be viewed as one "line" and evaluated for meal compliance separately. Regardless of entrée selection, students must have access to all vegetable subgroups over the course of the week. 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) to identify vegetables in each subgroup.

Production Records: During the week of review, the production record comments box listed multiple menu items that were not a line item on the production record. Each item offered as part of a reimbursable meal must have all production record requirements documented, including menu item with product name/description, planned serving size, planned/actual number of servings prepared, planned/actual quantity prepared in bulk units, and amount leftover. Milk types available and actual usage by type, or a total milk usage if a milk recipe used must also be documented on production records. All menu items offered on the garden bar must also have a planned serving size. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Please review the [Production Record Requirements document](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>) and continue to work with staff at each site to ensure all required information is documented for both breakfast and lunch.

Signage: 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. The breakfast signage must list the three components and the four items offered, and must communicate to

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students that under OVS, they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. Adequate signage helps ensure that students accurately select reimbursable meals.

Milk Variety: A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include fat-free (skim) flavored or unflavored, low-fat (1 percent) flavored or unflavored milk, and lactose-free or lactose-reduced fat-free or low-fat milk. During the day of on-site observation at Southside Elem/Badger Rock MS, it was noted that only 1% unflavored milk was available for the students. The State Agency noticed this error and corrected it prior to meal service, so that students had access to both 1% unflavored and skim chocolate milk at breakfast. Please ensure all schools within the district are offering a milk variety to students at both breakfast and lunch.

Juice Limit at Breakfast: No more than half of the fruit component offered for the week may be in the form of juice. Schools can comply with this regulation by offering 1/2-cup fruit and 1/2-cup juice daily. With this set up, students must not be able to select two juices. If a student would like two, he or she must purchase the second a la carte. Onsite observation at Spring Harbor MS showed that students are permitted to take two 1/2-cup servings of fruit juice, resulting in the entire fruit component being provided solely in juice form.

Whole Grain-Rich Rule: 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.

Smart Snacks: The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on [WI DPI's Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks) (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

We recommend continuing to use the Alliance for a Healthier Generation Smart Snacks Product Calculator to assess compliance of products sold outside the reimbursable meals (<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. Review of documentation and onsite observation revealed a la carte food sales that do not meet Smart Snacks regulations. Specifics are detailed in the Findings and Corrective Action portion of this report.

When using SCA funds for milk, the milk sold as nonprogram foods must be removed,

Non-discrimination Statement (NDS)

- When including the [non-discrimination statement](#) on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current **full** official statement. The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.
- The abbreviated statement, "This institution is an equal opportunity provider", is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document's main text. Statement words and formatting cannot be altered.
- Additional languages are found on the [USDA FNS Non-discrimination](#) webpage.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. mail:

U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

2. fax:

(833) 256-1665 or (202) 690-7442; or

3. email:

program.intake@usda.gov

This institution is an equal opportunity provider.

Processes for Complaints

- Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the [Template Civil Rights Complaint Procedures](#) to create written procedures.
- An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.
- If a complaint of discrimination is received at your district, the following procedures should be followed:
 1. Document the complaint using the [USDA Program Discrimination Complaint Form \(Español\)](#).
 2. Submit complaints within five days of receiving the complaint to:

Wisconsin Department of Public Instruction (DPI)

 - Mail:

Director, School Nutrition Team
125 S. Webster Street
Madison, WI 53707-7841
 - Fax: (608) 267-0363
 - Email: jessica.sharkus@dpi.wi.gov
 3. Maintain a [Civil Rights complaint log](#) at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.