

# Administrative Review Report

Hustisford School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/07/2024	03/04/2024
On-Site Review	03/13/2024	03/14/2024
Site Selection Worksheet	02/07/2024	02/09/2024
Entrance Conference	03/13/2024	03/13/2024
Exit Conference	03/14/2024	03/14/2024

## Commendations

From the DPI Review Team:

Our sincere thanks to the administration and school nutrition staff of the Hustisford School District. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. We also appreciate the energy and ideas the FSD has for the program, as staff and time are available. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition webpage](https://dpi.wi.gov/school-nutrition). (https://dpi.wi.gov/school-nutrition). 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](https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training) (https://dpi.wi.gov/school-nutrition/training/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) (https://dpi.wi.gov/school-nutrition/training).

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## Findings and Corrective Action:

Site Name		
Form Name	Verification (200 - 204)	
Question #	203	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2024 06:41 PM</p>	<p><b>Finding:</b> The verification process was not completed in accordance with 7 CFR 245.6(a). Process was not completed by 11/15; the "we must check" letter was sent 11/1; "we have checked" letter was sent 11/27; family reverted to paid on 12/8 (no response).</p> <p><b>Corrective Action 1:</b> Review the <a href="#">Verification Process and the Verification Collection Report e-learning module</a> on the DPI website (<a href="https://media.dpi.wi.gov/school-nutrition/verification-process-verification-collection-report/index.html#/">https://media.dpi.wi.gov/school-nutrition/verification-process-verification-collection-report/index.html#/</a>).</p> <p><b>Corrective Action 2:</b> Provide the process that will be used moving forward to ensure all steps of verification are completed. SFAs are strongly encouraged to use the <a href="#">Verification Tracking Form</a> found on the DPI website.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/06/2024 05:03 PM</p>	<p><b>Finding:</b> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). Additionally, expenses and revenues do not match PI-1505.</p> <p><b>Corrective Action 1:</b> Review the <a href="#">Annual Financial Report webcast</a> (<a href="https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story.html">https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story.html</a>) or <a href="#">manual</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-manual.pdf</a>) on the DPI website.</p> <p><b>Corrective Action 2:</b> Print or download a copy of the <a href="#">Annual Financial Report Template</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-template.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-template.pdf</a>) and complete it with the updates required to show the revenues</p>

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		and expenses broken out by program and category. <b>Upload this document into SNACS.</b>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	777	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/15/2024 08:19 AM</p>	<p><b>Finding:</b> The SFA has received Supply Chain Assistance Funds (NSL Funds Other in Aids Register, beginning March 2022) and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.</p> <p><b>Corrective Action:</b> Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. DPI has an optional SCA Funds Tracker (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/sca-funds-expense-tracker.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/sca-funds-expense-tracker.xlsx</a>) available.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/14/2024 10:58 AM</p>	<p><b>Finding:</b> SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p><b>Corrective Action 1:</b> Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year.</p> <p><b>Corrective Action 2:</b> Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 03/13/2024 07:16 PM</p>	<p><b>Finding:</b> The Public Release was posted to the Jr/HS &amp; ES front entrances (7 CFR 245.5(a)(2)).</p> <p><b>Corrective Action:</b> Upload a statement of understanding into SNACS regarding the purpose of public release and where it will be sent in the following school year.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 03/08/2024 08:19 AM</p>	<p><b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific for the USDA school meal program (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Utilizing the DPI <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">template policy</a> (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>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	805	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 03/13/2024 08:07 PM</p>	<p><b>Finding:</b> <b>Two</b> areas of the Dietary Modifications Policy need to be changed.</p> <p>In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. The USDA does not specify how long to wait or how many attempts are needed to receive documentation before discontinuing a meal modification. However, reasonable attempts should be made to get the correct documentation.</p> <p>Additionally, the SFA should not ask for a student's medical condition, but only how the condition or symptom affects the</p>

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		<p>student's diet.</p> <p><b>Corrective Action:</b> Provide a timeline for when the Dietary Modifications policy will be changed and the name of the person responsible for ensuring the update is made.</p> <p><b>Remove the language</b> from the Dietary Modifications policy that indicates "The School District will honor the request for ten (10) school days. Within ten (10) school days after receiving the initial request, a health care provider with prescriptive authority in the State of Wisconsin must submit medical certification that the student's medical condition restricts their diet, in accordance with the criteria set forth in 7 C.F.R. Part 15b. The substitutions may be discontinued until such medical certification is received."</p> <p><b>Change list for medical certification to:</b></p> <ul style="list-style-type: none"> <li>-an explanation of how the child's physical or mental impairment restricts the child's diet</li> <li>-the food(s) to be avoided</li> <li>-the food(s) to be substituted</li> </ul>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	807	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>03/08/2024 08:20 AM</p>	<p><b>Finding:</b> The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p><b>Corrective Action:</b> Complete the <a href="#">Civil Rights Compliance Self Evaluation Form (PI-1441)</a> form and submit as corrective action. The form is located here: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc</a>.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>03/06/2024 05:04 PM</p>	<p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content (<b>needs statements for School Meals, Foods Sold Outside of the School Meal Programs, Foods Provided but Not Sold, Food and Beverage</b></p>

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		<p><b>Marketing, &amp; Triennial Assessment) (7 CFR 210.31).</b></p> <p><b>Corrective Action:</b> Provide updated or missing policy statement(s) OR 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>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/06/2024 05:04 PM</p>	<p><b>Finding:</b> SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p><b>Corrective Action:</b> 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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	131	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/13/2024 06:56 PM</p>	<p><b>Finding:</b> One application was incorrectly denied in that it was incomplete; should not have been determined with missing information (HH# box blank and no SS# noted or last 4 digits provided).</p> <p><b>Corrective Action:</b> Verify with household for the missing information, make note on application and initial. Upload a copy of corrected application to SNACS.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/08/2024 08:17 AM</p>	<p><b>Finding 1:</b> The correct non-discrimination statement was not included on all program materials (Board policies 8531 has old NDS).</p>

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		<p><b>Corrective Action 1:</b> Update policy to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated OR <b>provide a timeline of when this will be brought into compliance.</b></p> <p><b>Finding 2:</b> The correct, full non-discrimination statement was not included on all required program materials (Board policy 8510).</p> <p><b>Corrective Action 2:</b> Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS OR <b>provide a timeline of when this will be brought into compliance.</b></p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/14/2024 11:42 AM</p>	<p><b>Finding: Documentation</b> 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><b>Corrective Action: Include</b> 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>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/13/2024 03:34 PM</p>	<p><b>Finding:</b> The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> <li>• Pineapple Chunks- Product of Indonesia</li> <li>• Crushed Pineapple- Product of Philippines</li> <li>• Frozen Broccoli- Product of Mexico</li> </ul> <p><b>Corrective Action:</b> Complete and submit a Noncompliant Product List Form for the non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage.</p>
Site Name	John Hustis Elementary School	

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Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/14/2024 12:29 PM</p>	<p><b>Finding:</b> 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 as two students typed in PIN numbers at POS and did not leave cafeteria with a breakfast meal. It is provided to students at snack time with no counting/tracking of the students actually getting the meal.</p> <p><b>Corrective Action:</b> Correct the meal counting process to ensure meals are tracked as the student receives their meal. Provide a statement of how this process will be brought into compliance.</p>
Site Name	John Hustis Elementary School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/14/2024 11:12 AM</p>	<p><b>Finding:</b> The salad bar and milk bags were located beyond the point of service (POS). Prior approval is required from the DPI before locating a salad bar beyond the POS. In order to locate the salad bar beyond the POS, the following requirements must be met:</p> <ol style="list-style-type: none"> <li>a. All students leave the service line and POS with three full components, including ½ c fruit/veg (if OVS is implemented) to ensure reimbursable meals are served,</li> <li>b. Salad bar signage is used to demonstrate proper portion sizes, and</li> <li>c. Proper portion control utensils and/or pre-portioned servings are included on salad bar.</li> </ol> <p><b>Corrective Action:</b> Food service staff re-arranged the service line and moved the salad bar and milk cooler to the beginning of the service line prior to lunch service, on the day of review. Submit a statement of understand that the milk must not be located beyond the POS, and that the salad bar can only be located beyond the POS if the requirements listed above are met.</p>
Site Name	John Hustis Elementary School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	

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TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/14/2024 11:08 AM</p>	<p><b>Finding:</b> During the day of on-site review at John Hustis Elementary (3/13/24), the main entrée option (tortilla with ham and cheese) would not have met the daily meat/meat alternate requirement. The planned menu and production record indicated the serving size was 2 oz of deli sliced ham and 1 slice of cheese. Food service staff stated that the serving size of the ham was 2 slices. The crediting documentation for the sliced ham indicates that 1.22 oz by weight credits as 1 oz eq M/MA. The 2 slices of ham were weighed prior to lunch service and weighed .53 ounces.</p> <p>If 1.22 oz of ham = 1 oz eq M/MA Then .53 oz of ham = .43 oz eq M/MA .43 oz M/MA + 1 slice of cheese (.5 oz eq M/MA) = .93 oz eq M/MA, rounded down to .75 oz eq M/MA</p> <p>The daily minimum requirement for grades K-5 is 1 oz eq M/MA. DPI intervened to ensure that reimbursable meals were offered to students, and the FSD increased the serving sizes of the ham to 4 slices and the cheese to 2 slices. This brought the daily M/MA component for this entrée option to 1.75 oz eq M/MA.</p> <p>Going forward, the menu planner needs to review the crediting documentation for all processed products on the menu prior to service to ensure that the daily (and weekly) minimum requirements are met for each component for each age/grade group served. It is recommended that menu planning worksheets are utilized for both breakfast and lunch.</p> <p><b>Corrective Action:</b> Submit a statement of understanding of the lunch meal pattern requirements for grades K-5. Additionally, explain how this type of error will be avoided in the future.</p>
Site Name	John Hustis Elementary School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/14/2024 11:47 AM</p>	<p><b>Finding:</b> The planned serving size, meal component contribution, substitutions made, and leftover amounts were not consistently filled in daily on production records during</p>

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the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Review the [Production Record Requirements](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>).

Technical assistance was provided on-site regarding the serving size of menu items recorded on production records, the difference between weight versus volume, meal component contribution, and variety item recipes. Grain products and some meat/meat alternate products (processed) do not credit ounce-for-ounce, and the crediting document should be referenced for meal component contribution. Lunch production records do not currently indicate the meal component contribution of each menu item, but instead list only the component. Instead of listing "M/MA" or "WG," please detail the contribution such as "1 oz eq M/MA." Leftover amounts for vegetables on the garden bar during the week of review consistently listed "zero." Even when the leftover vegetables are being thrown away after service, the leftover amount must be recorded on the record.

At breakfast, when a variety item recipe is not on file for the different flavors of juice, cereal bars, cereal bowls, and pop-tarts, then each specific type must be listed as a separate line item on the production record. If a variety item recipe is created for these menu items, then the total number of items planned and served can continue to be documented on the production record.

When a product substitution is made due to availability, the menu item names and planned serving size/meal component contribution must be updated on the production record to reflect the change. During the week of review on February 14, the production record indicated Gold Kist WG Homestyle Breaded Chicken nuggets (USDA) were served, however the FSD confirmed that the Brake Bush product was served on this day. Processed products will credit differently, so when product substitutions are made, the crediting documentation must be referenced, the planned serving size should be updated (if needed), and the production record must be updated to reflect any changes.

**Corrective Action:** Submit one full week of completed breakfast and lunch production records, including all requirements recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action

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		due date. In addition, if a variety item recipe is created for any breakfast menu items, please upload a copy of the recipe(s).
Site Name	John Hustis Elementary School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p><b>Finding:</b> Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at both breakfast and lunch. The breakfast and lunch Offer versus Serve (OVS) requirements are not fully understood by foodservice staff at the point of service.</p> <p>At breakfast, a food item is defined as 1/2cup of fruit, 1 oz eq grain, and 1 cup of milk. Therefore, if a grain product is served that credits as 2 oz eq grain, the menu planner can choose whether the grain will count as one or two items. The crediting must be clearly communicated to students and staff, so that OVS can be properly implemented. <a href="#">The Offer versus Serve webcast</a> available on our Online Learning webpage may be used as a training resource. (<a href="https://dpi.wi.gov/school-nutrition/training/online-learning#offer-versus-serve">https://dpi.wi.gov/school-nutrition/training/online-learning#offer-versus-serve</a>:~:text=Standards%20and%20GOALS-,Offer%20versus%20Serve,-Offer%20versus%20Serve).</p> <p><b>Corrective Action:</b> Have staff responsible for determining reimbursable meals at the elementary school complete the webcast training on OVS. Please submit the certificate of completion.</p>
	03/14/2024 11:20 AM	
Site Name	John Hustis Elementary School	
Form Name	Offer vs Serve (500-502)	
Question #	502	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p><b>Finding:</b> Signage was not posted in a visible location 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,</p>
	03/14/2024 11:22 AM	

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		<p>one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">Signage webpage</a> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p><b>Corrective Action:</b> Breakfast and lunch signage was moved to a visible location while on-site. No further corrective action required.</p>
Site Name	John Hustis Elementary School	
Form Name	Civil Rights (811-812)	
Question #	811	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/13/2024 12:13 PM</p>	<p><b>Finding:</b> The nondiscrimination “And Justice for All” poster is located in the meal service area but is not visible to students due to being hung high on a cabinet behind service line (FNS Instruction 113).</p> <p><b>Corrective Action:</b> Hang the USDA nondiscrimination "And Justice for All" poster in a prominent, accessible location in the meal service area. Provide a statement or image of how this requirement will be met.</p>
Site Name	John Hustis Elementary School	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/13/2024 09:58 AM</p>	<p><b>Finding:</b> The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p><b>Corrective Action 1:</b> Complete all required onsite monitoring forms for the <a href="#">NSLP</a> and <a href="#">SBP</a> 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><b>Corrective Action 2:</b> 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>
Site Name	John Hustis Elementary School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	

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Question #	1404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2024 12:05 PM</p>	<p><b>Finding:</b> 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 was missing the following information: <b>not site-specific--includes all template SOPs, not reviewed/dated for review, menu items are not HACCP 1-2-3 categorized, no SOP for Sharing/No Thank You table (within the <a href="#">Toolkit</a>), no <a href="#">SOP for milk bag/cooler usage</a>).</b></p> <p><b>Corrective Action:</b> Update the food safety plan to include the missing information and upload the updated portions of the food safety plan into SNACS (updated index, completed review page, categorized menu items and missing SOPs).</p>
Site Name	John Hustis Elementary School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2024 12:10 PM</p>	<p><b>Finding:</b> The most recent food safety inspection report was not posted in a publicly visible location.</p> <p><b>Corrective Action:</b> 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	John Hustis Elementary School	
Form Name	Wisconsin School Day Milk Program	
Question #	4	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/13/2024 07:22 PM</p>	<p><b>Finding:</b> Milks in the WSDMP are being claimed in some classrooms based on attendance counts or another counting system rather than an appropriate point of service count. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receive a milk. A "back out system" which indicates who did not take</p>

# Administrative Review Report

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	<p>a milk, rather than who did take a milk is not allowable.</p> <p><b>Corrective Action 1: Submit a detailed statement</b>, outlining how the school has changed the accountability system for claiming milk to include an approved POS.</p> <p><b>Corrective Action 2: Retrain staff on the new POS procedures. Upload documentation to support the training that was completed, and staff sign in sheet into SNACS.</b></p> <p><b>Corrective Action 3: Provide two weeks of WSDMP counts from all classrooms</b> with the corrected counting system. Upload in SNACS.</p>
<b>Site Name</b>	John Hustis Elementary School
<b>Form Name</b>	Wisconsin School Day Milk Program
<b>Question #</b>	7
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Flagged 03/14/2024 11:22 AM</p> <p><b>Finding:</b> SFA did not accurately determine the cost per half pint of milk for the Wisconsin School Day Milk Program (WSDMP).</p> <p><b>Corrective Action:</b> Provide a statement on how the cost of milk for the WSDMP will be determined moving forward.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username	
03/14/2024	4522	402	Administrative Review	John Hustis Elementary School	FSD				
<b>Comments</b>									
						<b>Created By</b>	<b>Created Date</b>		
<p><b>Crediting, Applesauce Cups:</b> During the day of on-site lunch observation, a 4-ounce (by weight) applesauce cup was served, and on the planned production record as contributing ½ cup of fruit. When packaged by weight, 4.0 ounces of applesauce does not equal 4.0 fluid ounces (1/2 cup) fruit. A 4.0-ounce applesauce cup must be paired with another fruit to satisfy the required ½ cup fruit and/or vegetable requirement for a reimbursable meal. The lunch served on this day also included ½ cup servings of grapes (½ cup fruit) and whole apples (3/4cup fruit), and all students observed took a reimbursable meal.</p>									
						3/14/2024 12:15:47 PM			
03/14/2024	4521	410	Administrative Review	John Hustis Elementary School	FSD				

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Comments							
				Created By		Created Date	
<p><b>Alternate Entrée Option, Weekly Grain Requirement:</b> An alternate entrée option of an Uncrustable sandwich (1 oz eq M/MA, 1 oz eq grain) paired with a cheese stick or yogurt (1 oz eq M/MA) is available daily at the elementary school. Although this entrée option meets the daily grain requirement, it would fall short of the weekly grain requirement (5 oz eq offered; 8 oz eq grain required for K-5 students) if served daily. On-site observations for lunch service on 3/13/24 showed that students who took this alternate entrée did have access to another grain option on the menu (Doritos, 2 oz eq grain), as was the case during the week of review. The menu served during the week of review included enough grain options on the side that this alternate entrée option did not cause a weekly grain shortage, but it is recommended that the menu planner bundle the Uncrustable sandwich with a grain item in addition to the meat/meat alternate (and create a standardized recipe), and complete menu planning worksheets for K-5 lunch weekly to ensure that component requirements are being met. These can be found on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">NSLP Menu Planning webpage</a>, under the Menu Planning Tools heading (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a>).</p>							
3/14/2024 12:13:51 PM							
03/14/2024	4520	433	Administrative Review	John Hustis Elementary School	FSD		
Comments							
				Created By		Created Date	
<p><b>Crediting Documentation:</b> 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.</p> <p>Several production specification sheets and watermarked CN labels (indicating "Copy-Not for documenting federal meal requirements") were submitted for the week of review. The FSD was able to produce all needed crediting documentation on-site and updated the crediting binder. These records should be reviewed and updated at least twice per year and as new products are purchased. Continue to work on ensuring the menu planning worksheets and production records accurately reflect the meal component contribution per serving size.</p>							
3/14/2024 11:51:18 AM							
03/14/2024	4519	433	Administrative Review	John Hustis Elementary School	FSD		
Comments							
				Created By		Created Date	
<p><b>Food Buying Guide:</b> The <a href="https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs">USDA Food Buying Guide (FBG)</a> contains yield and crediting information for foods with a standard of identity (<a href="https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs">https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs</a>). Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. Grains can be credited based on weight using <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf">Exhibit A</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf</a>). If a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that</p>							

# Administrative Review Report

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lists the grams of creditable grain in the product. Due to the crediting discrepancies found during the week of review, it is recommended that the FSD complete additional training on crediting, found on our [Online Learning Library](https://dpi.wi.gov/school-nutrition/training/online-learning#Crediting:~:text=to%20Learning%20Topics-,Crediting,-Title%20/%20Description) (<https://dpi.wi.gov/school-nutrition/training/online-learning#Crediting:~:text=to%20Learning%20Topics-,Crediting,-Title%20/%20Description>). Please reference our [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-in-a-nutshell.pdf>) and [Crediting Documentation in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-documentation-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-documentation-in-a-nutshell.pdf>) for additional information.

3/14/2024 11:50:33 AM

03/14/2024	4518		Administrative Review		Business Manager			
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## Comments

Created By

Created Date

### Donation of Remaining Funds in Food Service Account

From the [Financial Q&A](#) on the SNT website:

**Q12.** After a student graduates or leaves the district, if there are funds remaining in a student's meal account, can a SFA establish a dollar amount (e.g., anything under \$10.00) that the SFA will not attempt to refund?

**A. No.** When any student leaves the district or graduates, SFAs must attempt to contact the student's household to return any funds remaining in the account. Currently, **there is no approved flexibility to simply set a dollar threshold** (e.g., \$10.00), SFAs can transfer remaining funds in a student's meal account to a sibling in the same household who remains in the district. **SNT encourages SFAs to develop policy language which clearly explains how households will be contacted to issue refunds (e.g., via email, phone, mail), the number of times (e.g., three attempts) before the SFA will no longer attempt to issue a refund, and that the school will report the funds as "unclaimed property".**

**Q13.** If the agency has remaining funds in accounts that can no longer be refunded because the SFA is unable to contact the household, or has exhausted attempts to contact the household, **what should happen to the remaining funds?**

**A.** Funds in student meal accounts are considered a liability until a meal is purchased. **When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR)** (<https://www.revenue.wi.gov/Pages/UnclaimedProperty/Home.aspx>) as unclaimed property. The DOR has rules concerning unclaimed property (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>) that must be followed.

**Q14.** There are households that receive free and reduced-price meals requesting to donate their remaining funds. **Can the SFA implement an optional household signature agreement for all eligibility categories (F/R/P) who choose to donate remaining funds when a student graduates or leaves the district? (SP 23-2017 just addresses donations from paid households.)**

**A. No.** At this time, there is no flexibility which allows for the donation of remaining funds other than from households not approved for free and reduced-price meals, so these funds must be turned over as unclaimed property.

3/14/2024 11:48:45 AM

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03/14/2024	4517		Administrative Review	John Hustis Elementary School	FSD			
Comments					Created By	Created Date		
<p><b>Breakfast Participation:</b> It is strongly encouraged that the SFA explore the option of Breakfast After the Bell (BATB), both to reach more students and to increase revenue from a boost to the number of reimbursable meals sold. BATB can be structured in a variety of ways and tailored to best meet the needs of your students and staff. Most importantly, BATB ensures access to breakfast for all students, including those who may not arrive to school early enough to participate in the traditional breakfast in the cafeteria. With support from food service staff, administration, custodial services, and teachers, BATB can be executed with minimal-to-no impact to the regular school day. Visit our <a href="#">School Breakfast Resources webpage</a> for more information on school breakfast models, online learning, marketing and promotion strategies and more (<a href="https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources">https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources</a>) or reach out to our School Breakfast Specialists (DPISBP@dpi.wi.gov).</p>								
						3/14/2024 11:31:49 AM		
03/14/2024	4516	500	Administrative Review	John Hustis Elementary School	FSD			
Comments					Created By	Created Date		
<p><b>Crediting Breakfast Items:</b> At breakfast, the menu planner has the discretion to determine how to credit certain food items. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. Therefore, if a grain product is served that credits as 2 oz eq grain, the menu planner can choose whether the grain will count as one or two items. The crediting must be clearly communicated to students and staff, so that offer versus serve (OVS) can be properly implemented.</p>								
						3/14/2024 11:25:14 AM		
03/14/2024	4515	402	Administrative Review	John Hustis Elementary School	FSD			
Comments					Created By	Created Date		
<p><b>Crediting Meat/Meat Alternates:</b> Some Meat/Meat alternates (M/MA) do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading). For example, the deli sliced ham (served on the day of on-site review) credits as 1-ounce equivalents (oz eq) for every 1.22 ounce by weight. This led to confusion with the food service staff regarding the planned portion size. The production record indicated the serving size was 2 oz of deli sliced ham, which the staff took as meaning 2 slices of deli ham. See finding #402 for additional details and required corrective action. Make sure to use current product information to determine the weight of each serving in order to ensure the daily and weekly requirements are being met. See this <a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/MMA_TipSheet.pdf">Crediting Meat/Meat Alternates in the Child Nutrition Programs Tip Sheet</a> for additional information (<a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/MMA_TipSheet.pdf">https://fns-prod.azureedge.us/sites/default/files/resource-files/MMA_TipSheet.pdf</a>).</p>								
						3/14/2024 11:08:52 AM		
03/14/2024	4514	432	Administrative Review	John Hustis Elementary School	FSD			

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Hustisford School District

Comments									
				Created By			Created Date		
<p><b>Transport Sheets:</b> The elementary school is a satellite location and keeps a handwritten production record daily, in addition to a transport sheet that reflects almost all of the same information twice. The requirement is that between production kitchen records and transport sheets, all production record requirements must be met. If the temperature upon arrival and service temperature of menu items are added to the regular production record, then the transport sheet would not be necessary, and would save staff a considerable amount of time. It was also noted that the vegetable options are often documented on the regular production record in addition to the garden bar production record. Each fruit and vegetable menu item should only be recorded on one production record. Following meal service, all of the handwritten production records are then entered into the computer system on a digital production record. In order to increase efficiency, consider consolidating the transport sheet and production record into one document, and scanning the handwritten copies into the computer instead of typing them up, if a digital copy is preferred. Production record requirements and transport sheet requirements can be found on our <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">Production Records webpage</a> (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a>).</p>									
3/14/2024 11:01:05 AM									
03/14/2024	4513	430	Administrative Review	John Hustis Elementary School	FSD				
Comments									Created Date
<p><b>Variety Item Recipes:</b> At breakfast, when a variety item recipe is not on file for the different flavors of juice, cereal bars, cereal bowls, and pop-tarts, then each specific type must be listed as a separate line item on the production record. If a variety item recipe is created for these menu items, then the total number of items planned and served can continue to be documented on the production record. A variety item recipe must be site specific and completed for breakfast and lunch individually. The <a href="#">variety item recipe template</a> and instructions can be found here: <a href="https://www.google.com/url?client=internal-element-cse&amp;cx=012012553761441775853:itqvwm_yb2u&amp;q=https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx&amp;sa=U&amp;ved=2ahUKEwjzjaec7eKEAxUshIkEHfATBiYQFnoEAcQAQ&amp;usg=AOvVaw0QRkdtvjvTQu519uH1T9yV">https://www.google.com/url?client=internal-element-cse&amp;cx=012012553761441775853:itqvwm_yb2u&amp;q=https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx&amp;sa=U&amp;ved=2ahUKEwjzjaec7eKEAxUshIkEHfATBiYQFnoEAcQAQ&amp;usg=AOvVaw0QRkdtvjvTQu519uH1T9yV</a>.</p>									3/14/2024 10:58:02 AM
03/14/2024	4523	320	Administrative Review	John Hustis Elementary School	Food Service Director				
Comments					Created By			Created Date	
<p><b>Accurate POS Meal Counting</b> Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim.</p> <p>The meal report from the POS system in Hustisford has columns labeled as Free, Reduced and Paid but also additional columns ("ALT X PAID" AND "ALT X RED") that are confusing to the accurate meal count. In some cases, the counts for reduced-price and paid meals show up in these "ALT X PAID" or "ALT X RED" columns. This should be</p>									

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investigated with the software provider to understand what this column is and why meals are tallied there. Additionally, the POS utilizes USDA language ("Type A Meal") for a reimbursable meal which has not been in use for many years.

3/15/2024 8:35:57 AM

03/13/2024	4510	131	Administrative Review	ALL	Determining Official			
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## Comments

Created By

Created Date

### Determining Meal Applications

Applications for meal benefits should not be determined if they are incomplete. If incomplete, the Determining Official must communicate with the Household (HH) to clarify or get the missing information so the application can be processed. **A complete meal application will include:**

\*The name of the student and all HH members, 12th grade and under, listed in Step 1,

\*All income received for children and adults, listed in Step 3,

\*Adult HH members' names and **total HH member box accurately completed, plus the last 4 digits of the social security number or the box checked for "no SSN"**, in Step 3 and

\*Finally, a signature from an adult household member all completed in Step 4.

3/13/2024 7:01:21 PM

03/13/2024	4509	203	Administrative Review	ALL	Determining Official			
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## Comments

Created By

Created Date

### Verification Process

Verifying Official should consult the verification letter, sent before October 1, to the Authorized Representative and Food Service Director of your SFA from the DPI School Nutrition Team, to find out which sample method is required at your SFA. The sample method determines how many applications need to be verified.

-Determine the number of approved applications on file as of October 1 from the current school year.

-Start the verification around October 1.

**-Verification must be completed by November 15.**

3/13/2024 6:45:21 PM

03/13/2024	4508	1402	Administrative Review	ALL	FSD			
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## Comments

Created By

Created Date

**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). A suggested template can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

3/13/2024 3:33:45 PM

03/13/2024	4505	317	Administrative Review	John Hustis Elementary School	Food Service Director			
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## Comments

Created By

Created Date

### Meal Prices on the POS Screen

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During meal observation, it was noted that meal prices by showed on the computer screen when students entered their PINs. Because the different prices for their meals were visible (\$0.00, \$0.40, \$2.80), the POS operator can know who is free, reduced or paid. This information is likely not needed for the operator to do their job and should be removed if possible. Balance information on the screen is allowable. It is suggested to work with the software provider and SFA staff members who program the POS to modify how these prices appear on the computer screens. If prices cannot be removed from sales screen, it is likely that all can be set to all free or all to paid so prices appear the same on screen for all students.

3/13/2024 12:35:19 PM