

# Administrative Review Report

N.W. Regional Juvenile Detention Center

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	05/03/2019	06/07/2019
On-Site Review	05/03/2019	10/31/2019
Site Selection Worksheet	05/03/2019	05/31/2019
Entrance Conference	06/10/2019	06/10/2019
Exit Conference	06/12/2019	06/12/2019

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at N.W. Regional Juvenile Facility for the courtesies extended to us during the on-site review, for being available to answer questions and provide additional information. All were receptive to recommendations and guidance.

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## Recommendations:

22.75 oz eq of grain are served at breakfast over the week of review. You must serve at least 12.5 oz eq at breakfast during a 7 day week, but no more than 14 oz eq grain is recommended. Consider eliminating one grain item on days when cereal, bread, and eggs are all served for breakfast.

It was noted that applesauce was served for breakfast 6 of 7 days and a banana was served for lunch 6 of 7 days during the review week. We encourage you to add variety to your menus. We recommend posting the monthly menu in the MPR or sharing the daily menu with students.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

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## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	700	
<b>Corrective Action History</b>	<p>Flagged 07/08/2019 09:53 AM</p>	<p><b>Finding:</b> SFA did not complete the 2017-2018 Annual Financial Report (AFR).</p> <p><b>CA:</b> Complete the 2017-2018 AFR. Upload a copy into SNACS. To complete the AFR, the SFA will need to work with Aramark to find out how much of the total meal rate (\$2.06 for lunch and \$.468 for snack) is food cost, labor cost and purchased services (profit). The labor costs that are associated with the juvenile center staff will also have to be broken out by breakfast, lunch, dinner and snack and then added to the labor costs that Aramark provided per meal.</p> <p>Once the parts of the meal rate are known, the total costs can be calculated by multiplying the total number of meals served by program during the 2017-2018 SY by the determined food and labor costs for breakfast, lunch, dinner and snacks. Under the expenditure section of the AFR, enter the lunch, breakfast and snack costs for labor/food/purchased services. All of the dinners will need to be recorded under the non-program foods expenditure section.</p> <p>On the AFR, nonprogram foods can never end in the negative. If it does, a fund transfer will need to be made into Fund 50.</p>
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	807	
<b>Corrective Action History</b>	<p>Flagged 06/10/2019 07:21 PM</p>	<p><b>Finding:</b> The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p><b>CA:</b> Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>Corrective Action History</b>	<p>Flagged 07/08/2019 10:47 AM</p>	<p><b>Finding:</b> Current LWP does not include all of the required content (policy leadership, public involvement/wellness committee, school meals meeting USDA regulations, food sold, foods provided and not sold and food marketing ).</p> <p><b>CA:</b> Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. On the LWP website, <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a>, the SFA can use the LWP builder and the LWP checklist to update the wellness policy.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Corrective Action History</b>	<p>Flagged 07/08/2019 08:48 AM</p>	<p><b>Finding:</b> The severe need numbers for the 2017-2018 SY did not match the SFAs Annual Financial Report.</p>

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		<p><b>CA:</b> Submit a statement of understanding that the severe need numbers will be calculated based on the student lunches served from the second preceding school year (July 1-June 30). These numbers should align with the Annual Financial Report.</p>
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	215	
<b>Corrective Action History</b>	<p>Flagged 07/08/2019 08:51 AM</p>	<p><b>Finding:</b> The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a)</p> <p><b>CA:</b> Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>Corrective Action History</b>	<p>Flagged 06/10/2019 07:18 PM</p>	<p><b>Finding:</b> The menus contain the incorrect nondiscrimination statement (NDS).</p> <p><b>CA:</b> Upload the current menus with the current NDS.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1212	
<b>Corrective Action History</b>	<p>Flagged 07/01/2019 08:04 AM</p>	<p><b>Finding:</b> The Food Service Director was hired after July 1, 2015 and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1).</p> <p><b>CA 1:</b> Review the Professional Standards hiring requirements on the School Nutrition Team website and submit a statement of understanding of the hiring requirements for your SFA.</p> <p><b>CA 2:</b> Complete the Professional Standards Exemption form and submit to Karrie Isaacson at karrie.isaacson@dpi.wi.gov for review.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1213	
<b>Corrective Action History</b>	<p>Flagged 07/01/2019 08:05 AM</p>	<p><b>Finding:</b> The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v).</p> <p><b>CA:</b> Complete 8 hours of food safety training and provide documentation of completion.</p>
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1217	

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<b>Corrective Action History</b>	Flagged 06/10/2019 07:15 PM	<p><b>Finding:</b> Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p><b>CA:</b> Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1400	
<b>Corrective Action History</b>	Flagged 07/08/2019 08:29 AM	<p><b>Finding:</b> SFA did not have Employee Reporting Agreements on file.</p> <p><b>CA:</b> All staff serving food in the juvenile center will need to sign the Employee Reporting Agreement. Upload a copy of all the signed agreements. <a href="https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf">https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf</a></p>
<b>Form Name</b>	Reporting and Recordkeeping (1500 - 1501)	
<b>Question #</b>	1500	
<b>Corrective Action History</b>	Flagged 07/08/2019 09:42 AM	<p><b>Finding:</b> SFA did not complete reports on time (Verification Collection Report, FNS-10 Report, Paid Lunch Price Report and Annual Financial Report) and did not submit several claims.</p> <p><b>CA:</b> Submit a statement of understanding that reports and claims will be submitted by the appropriate deadline. The calendar of requirements highlights important deadline reminders, <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-rcci-without-day-students.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-rcci-without-day-students.pdf</a>.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	409	
<b>Corrective Action History</b>	Flagged 06/11/2019 12:37 PM	<p><b>Finding:</b> The PBJ recipe is outdated since students receive a peanut butter packet and a jelly packet with bread, not a scoop of PBJ filling. Note: 1 oz eq of peanut butter weighs 1.1 ounces.</p> <p><b>ARAMARK CA:</b> Discontinue use of the PBJ recipe. Instead, record the peanut butter packet, the jelly packet, and the bread on separate lines of the production record. Submit completed production records the next time that PBJ is served for lunch. Submit a written statement describing what will be done so that 2 oz eq M/MA are served with the PBJ meal. Once the Public Health Nutritionist has all crediting documentation and standardized recipe for the week of review, menus can be analyzed for compliance. Until then, the review cannot be closed. Additional errors may require additional corrective action and may also be subject to fiscal action.</p>

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<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	410	
<b>Corrective Action History</b>	<p>Flagged 06/11/2019 12:38 PM</p>	<p><b>Finding:</b> Several PFSs provided were 5+ years old. Food manufacturers continuously reformulate products. It is important to stay current with these changes. Crediting documentation should be reviewed and updated at least twice per year and as new products are purchased or substituted.</p> <p><b>ARAMARK CA:</b> Submit updated crediting information for the meatloaf (2012), hot dog (2011), charbroiled patty (2003), and roasted turkey (2012) served during the week of review. Once the Public Health Nutritionist has all crediting documentation for the week of review, menus can be analyzed for compliance. Until then, the review cannot be closed. Additional errors may require additional corrective action and may also be subject to fiscal action.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	411	
<b>Corrective Action History</b>	<p>Flagged 06/11/2019 12:41 PM</p>	<p><b>Finding:</b> Insufficient production records are kept for the JDC. Production records should be kept for the JDC independent of the jail. Review <a href="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</a> which lists information that must be recorded on the JDC production records. All items served must be recorded. Be specific on production records about the identity, brand, and description of the items served. Fruit sizes (e.g. case count) should also be recorded. You must record daily usage by milk type on your production records (e.g., skim milk or 1% milk). Any changes to the planned menu (e.g., accommodations for special dietary needs) must be documented on the production record. Consider consolidating the transport sheet and production record into one document. ARAMARK</p> <p><b>CA:</b> submit new production record for JDC. Include 5 consecutive days of completed breakfast and lunch production records.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	412	
<b>Corrective Action History</b>	<p>Flagged 06/11/2019 12:42 PM</p>	<p><b>Finding:</b> Aramark and JDC must utilize daily transport sheets. Please see the list of requirements <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/transport-sheet-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/transport-sheet-requirements.pdf</a> And a suggested template <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/transport-sheet.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/transport-sheet.xlsx</a>. JDC and</p> <p><b>ARAMARK CA:</b> Submit 5 consecutive days of completed breakfast and lunch transport sheets.</p>

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<b>Form Name</b>	Afterschool Snack Program	
<b>Question #</b>	7	
<b>Corrective Action History</b>	Flagged 06/10/2019 07:27 PM	<p><b>Finding:</b> Onsite monitoring was completed but not within the first four weeks of the program.</p> <p><b>CA:</b> Submit a statement of understanding that onsite monitoring is required twice per year, with the first monitoring completed within the first four weeks of the program.</p>

## Technical Assistance Entries: Question # 1402

Track all future non-domestic items purchased for the JDC. Record the date, item, country of origin, and reason for purchase. See our suggested tracking template. <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>