

Administrative Review Report

Fond du Lac Juvenile Detention Center

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/12/2019	03/12/2019
On-Site Review	02/12/2019	04/30/2019
Site Selection Worksheet	02/12/2019	02/28/2019
Entrance Conference	03/19/2019	03/19/2019
Exit Conference	03/20/2019	03/20/2019

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 for \$10 for the week. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

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Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Fond du Lac Juvenile Detention Facility for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Thank you to the Food Service Director for your organization, open communication, and timeliness in sending the requested items. This expedited the review process and allows for more technical assistance to be provided from School Nutrition Team staff.

Recommendations

The following recommendations pertain to production records. As communicated prior to the onsite visit, the production records at Fond du Lac Detention Center do contain all the required features. Technical assistance was provided to decipher the variety of milk types and not simply the total. Additionally, temperatures were pre-typed on the production record and a reminder was given that actual temperatures need to be recorded during meal preparation and service.

The following reminders pertain to All Foods Sold in School (Smart Snacks). Foods and beverages sold to students during the school day that is intended to be consumed during the school day are subject to the nutrition standards outlined in the All Foods Sold in School Rule which was finalized in 2014. Foods sold to students need to meet calories, sodium, and fat restrictions while beverages are also monitored for portion size, calories and caffeine content. During the Administrative Review, the School Nutrition Team reviews a la carte items, vending machines, and fundraisers to ensure compliance.

Juveniles are not given opportunities to purchase food items during the instructional school day, which is 8:30am-11:00am and 12:30pm-2:30pm. They are allowed to purchase from the canteen once a week and their items are delivered after 3:00pm.

Information was sent to the SFA regarding the RCCI annual calendar, summer information, the civil rights presentation, DPI SNT contact list, and a new civil rights poster.

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Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
Corrective Action History	<p>Flagged 04/18/2019 08:27 AM</p>	<p>Finding: Given the unique situation of this RCCI, where majority of the population being served includes adults, all of the funds for adult food service and the Child Nutrition Programs (CNP) are combined in the same food service account. While this is allowable, the meal and paid labor costs for the CNP must be broken out to assure that the cost of the meal is being accounted for.</p> <p>Corrective Action: Determine the raw food cost for both breakfast and lunch for the students in the Child Nutrition Programs and the cost of the adult meals. Select either a 30 day average or use a 5 day sample times the number of meals served. Determine the paid labor costs to produce both the student and adult meal. Submit a copy this documentation and a statement of understanding that all labor and food costs will be broken out moving forward.</p>
Form Name	Civil Rights (800 - 807)	
Question #	806	
Corrective Action History	<p>Flagged 03/18/2019 10:48 AM</p>	<p>Finding: Civil Rights training did not occur or 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).</p> <p>Corrective Action: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Form Name	Civil Rights (800 - 807)	
Question #	807	
Corrective Action History	<p>Flagged 03/20/2019 02:48 PM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. Corrected on Site. No further action required.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1006	
Corrective Action History	<p>Flagged 04/17/2019 04:23 PM</p>	<p>Finding: The wellness policy was not made available to public. Upon further discussion with the SFA, it was discussed that it could be displayed at the entrance or near intake for the public to see.</p>

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		Corrective Action: Submit a statement explaining where the wellness policy will be displayed.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	125	
Corrective Action History	Flagged 04/17/2019 04:04 PM	<p>Finding: SFA used a forecast for counting and claiming which is back out system. Although lists of students in the facility were generated every 15 minutes, there was not a list used to check students off as they were given a reimbursable meal.</p> <p>Corrective Action: Submit a statement on how the point of sale will be changed moving forward. Then submit one week of the check off sheets used for the new point of sale.</p>
Form Name	Professional Standards (1210 - 1219)	
Question #	1214	
Corrective Action History	04/17/2019 04:30 PM	<p>Finding: The School Nutrition Program Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30).</p> <p>Corrective Action: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year.</p>
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
Corrective Action History	Flagged 03/20/2019 02:38 PM	<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	320	
Corrective Action History	Flagged 03/19/2019 05:45 PM	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Day of review meal counts are not combined and recorded correctly.</p> <p>Corrective Action: Correct the meal counting process to ensure meal counts are correctly counted. Submit a</p>

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		statement describing the corrected system along with a timeline for implementation.
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Corrective Action History	Flagged 03/19/2019 12:43 PM	<p>Finding: 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.</p> <p>Corrective Action: Please submit a photo of the posted signage when this task is complete.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Corrective Action History	Flagged 03/19/2019 03:28 PM	<p>Finding: There was a daily grain shortage for 9-12 during the week of review. The following days contained shortages:</p> <p>Saturday, February 23, 2019: 1 oz eq grain served (2 oz eq required)</p> <p>Under the National School Lunch Program, students served the 9-12 meal pattern need to be offered at least 2.0 oz eq of grain daily. On Day 7 of the two week cycle menu, the ravioli provided no grains and one 1.0 oz eq slice of whole grain-rich (WGR) bread was planned and served.</p> <p>Corrective Action: Submit a statement explaining how the daily grain shortage will be fixed for the week of review and subsequent cycle menus so that students are offered 2.0 oz eq of grain daily. This was corrected prior to the onsite visit; no further action is needed. The Food Service Director has agreed to serve two slices of WGR bread to meet the daily minimum requirement for this component.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
Corrective Action History	Flagged 04/17/2019 04:46 PM	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location due to safety reasons since it had people's name on it.</p> <p>Corrective Action: SFA should making a copy of the inspection without the names on it. Provide a statement of where the most recent food safety inspection report will be posted and visible to the public.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	

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Corrective Action History	04/15/2019 10:50 AM	<p>Finding</p> <p>There are non-domestic food products in inventory. Under the Buy American Provision, it is required that schools purchase domestic products to the maximum extent practicable. For example, the fresh pineapple is a product of Thailand, the mandarin oranges are a product of China, the mixed fruit is a product of Indonesia, and the spices do not list a country of origin.</p> <p>Corrective Action Needed: It is understood that not all commodities can be produced and purchased in the USA. When it is not practicable to purchase domestically, please complete the Buy American Noncompliant List and keep on file. Please submit three instances of your choice documenting food items produced outside the USA.</p>
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