

Administrative Review Report

River Ridge School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/22/2025	03/04/2025
On-Site Review	4/22/2025	4/23/2025
Site Selection Worksheet	01/22/2025	01/22/2025
Entrance Conference	4/22/2025	4/22/2025
Exit Conference	4/23/2025	4/23/2025

Commendations:

From the Nutrition Program Consultant: Our sincere thanks to the staff at River Ridge School District for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. Thank you to the school staff members for welcoming us during the review, and for being available throughout the on-site visit to answer questions. Everyone was very receptive to feedback, eager to learn, and quick to correct immediately anything that they could. The servers were very friendly during the review and they provide excellent customer service to the students. You should be very proud of your team!

From the Public Health Nutritionist: Thank you to all staff at River Ridge School District for the warm welcome and cooperation during this Administrative Review (AR). It was a pleasure to see the hard work and dedication of all food service staff that work diligently and effectively to serve school meals. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. Thank you for your availability during our on-site visit to answer our questions and complete the review in a timely manner. Thank you for all you do to serve your students and community!

Recommendations:

Every summer, the School Nutrition Team (SNT) hosts School Nutrition Summer Training both in-person at several locations around the state and virtually through live, instructor-led online courses. Please see our School Nutrition Summer Training webpage to learn more (<https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training>).

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA has an Unpaid Meal Charge Policy in place, however the school practices being implemented do not align with the policy. The Negative Account Balance Policy posted on the School District Website is not consistent with the letters sent to households and the Student Handbook. The policy should be updated to ensure consistency across all communications.</p> <p>Corrective Action: The policy must accurately reflect actual practices. Update the policy and provide training to all appropriate staff. Upload into SNACS a copy of the updated policy and a an attendance roster of staff who have received training on the new policy.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The 2023-24 Annual Financial Reports Expenses and Revenues of previous year do not match the WISFIP Fund 50 Report</p> <p>Corrective Action: Download the Annual Financial Report Template. Update the template with changes needed on the AFR. Upload the document into SNACS.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: 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: A fund transfer using non-Federal funds is required to cover the cost of nonprogram foods sold during SY 23-24. A Transfer of \$110.04 from Fund</p>

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		10 to Fund 50 for Senior Breakfast Invoice. A Catering invoice was not billed/collected for \$78.86 and credited to Fund 50. Upload a copy of the general ledger showing the fund transfers into the nonprofit school food service account.
Site Name		
Form Name	Civil Rights (800 - 806)	
Question #	803	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the DPI template policy (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>
Site Name		
Form Name	Civil Rights (800 - 806)	
Question #	805	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA uses the Neola #8500 Food Service Policy which includes Dietary Modification language. The following statements are incorrect per USDA guidance and need to be updated in the policy: "The school district will honor the request upon receipt of the required documentation from a state authorized medical authority" and "A special dietary needs request will be approved and implemented upon submission of a completed authorized medical statement".</p> <p>Corrective Action: Work with Neola to update these statements in policy 8500 to indicate the requests will be implemented right away and the SFA will work with the household to get the required documentation. Provide a timeline for when the policy will be updated and implemented.</p>
Site Name		
Form Name	Civil Rights (800 - 806)	
Question #	806	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History		<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 113-1). FNS substitute did not complete Civil Rights Training.</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 PowerPoint into SNACS.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31):</p> <ul style="list-style-type: none"> • School Meals section does not include link to USDA meal pattern requirements • Foods Sold Outside of the School Meal Program section does not include a link to USDA Smart Snack Standards) (7 CFR 210.31) • Missing Food and Beverage Marketing • Wrong Nondiscrimination Statement on Policy <p>Corrective Action: Provide updated or missing policy statement(s) and 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	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT</p>

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		scores into SNACs or provide a link to this document on the district website.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on all program materials (Local Wellness Policy and Website)</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of the updated materials or provide a link to this information on the district website.</p>	
Site Name	River Ridge HS	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Finding 1: No breakfast or lunch signage posted that identifies the components of a reimbursable meal to students.</p> <p>As required by NSLP regulation 7 CFR 210.10(a)(2), schools must post signage near or at the beginning of serving lines to clearly identify the components of a reimbursable meal for both breakfast and lunch. The signage should be visible to students and must indicate the offered meal components, specifying what students need to select in order to make a reimbursable meal.</p> <p>For lunch, the signage should list the five components and explain that under Offer Versus Serve (OVS), students must select at least three full components, one of which must be at least ½ cup of fruit, vegetables, or a combination.</p> <p>For breakfast, the signage should list the three components, and the four items offered, making it clear that under Offer Versus Serve (OVS), students must choose at least three food items, one of which must be at least ½ cup of fruit, vegetables, or a combination.</p> <p>While a dry erase board was updated daily with the breakfast and lunch menu, it did not identify the components or what was needed to select for a reimbursable meal.</p>	

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	<p>Sample signage that can be printed or customized for your school is available on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action 1: Upload a photo of the completed signage posted near both breakfast and lunch service line into SNACS.</p> <p>Finding 2: No salad bar bar signage posted to demonstrate proper portion sizes of vegetables. Tongs were used as a serving utensil for all items, except for fresh fruit. Without signage or a portion-measuring utensil, students are unable to determine how much they need to take in order to meet the 1/2 cup requirement under Offer versus Serve (OVS). Salad bar signage templates are available on the DPI Signage page and may be used if desired. Portion Size Studies are an ideal way to determine the quantities to fill out on the signage https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/portion-size-study.pdf).</p> <p>Additionally, no portion size studies had been conducted to determine the portion size needed for items that do not fit nicely into a portion-measuring utensil, such as broccoli, baby carrots, lettuce, celery sticks, cherry tomatoes, and grapes. Procedures for conducting a portion size study can be found on the DPI Menu Planning webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>Corrective action 2: Upload a photo of posted salad bar signage as well as documentation of the portion size studies for broccoli, baby carrots, cherry tomatoes, and grapes into SNACS.</p>
Site Name	River Ridge HS
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: Daily grain shortage at lunch for the 9-12 grade group during the week of review. Per 7 CFR 210.10(c), the daily minimum requirement for 9-12 grade group is 2 oz eq per day On Thursday, March 27 the planned menu contained:</p> <ul style="list-style-type: none"> • Meatballs and Gravy (credits as 3 oz eq M/MA) • 1 dinner roll (credits as 1 oz eq whole grain-rich grain) • 1/2 cup mashed potatoes (credits as 1/2 cup starchy vegetable)

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- 1/4 cup corn (credits as 1/4 cup starchy vegetable)
- 1/2 cup peaches, 1/2 cup apples, 1/2 cup pineapple, 1.33 oz package raisins (all credit as 1/2 cup fruit each)

The planned portions for foods on the Salad Bar:

- 1/4 cup croutons (credits as 0.5 oz eq whole grain-rich grain)
- 1/2 cup baby carrots (credits as 1/2 cup R/O vegetable)
- 1/4 cup cherry tomatoes (credits as 1/4 cup R/O vegetable)
- 1 cup lettuce (credits as 1/2 cup other vegetable)
- 1/8 cup red onion (credits as 1/8 cup other vegetable)

Repeat daily grain shortages or violations at lunch during subsequent Administrative Reviews may be subject to fiscal action.

Corrective Action 1: Submit a statement describing how the daily minimum requirement for grains will be met for lunch during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).

Finding 2: Weekly beans/peas/legumes vegetable subgroup shortage at breakfast for the 9-12 grade group during the week of review. Per 7 CFR 220.8(c), the weekly minimum requirement for 9-12 grade group is 1/2 cup per week. The following represents the planned portion sizes on both the main entrée line and the salad bar:

- Monday, March 24: 3/4 cup carrots, 1/4 cup broccoli florets, 1/8 cup celery sticks, 1/4 cup cherry tomatoes, 1/4 cup cucumber slices, 1/4 cup bell peppers, 1 cup lettuce, 1/4 cup spinach
- Tuesday, March 25: 1/4 cup coleslaw, 1/2 cup baby carrots, 1/4 cup broccoli florets, 1/4 cup cucumber slices, 1 cup lettuce, 1/4 cup spinach, 1/8 cup red onion
- Wednesday, March 26: 1/2 cup baby carrots, 1/4 cup cucumber slices, 1/4 cup bell peppers, 1 cup lettuce
- Thursday, March 27: 1/2 cup mashed potatoes, 1/4 cup corn, 1/2 cup baby carrots, 1/4 cup cucumber slices, 1 cup lettuce, 1/8 cup red onion
- Friday, March 28: 1/4 cup peas, 1/4 cup cucumber slices, 1/4 cup bell peppers, 1 cup lettuce

Repeat weekly vegetable subgroup shortages or violations at breakfast during subsequent Administrative Reviews may be subject to fiscal action.

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		Corrective Action 2: Submit a statement describing how the weekly minimum requirement for the beans/peas/lentils vegetable subgroup will be met for breakfast during the week of review (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).
Site Name	River Ridge HS	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Incomplete breakfast and lunch production records during the week of review. Per 7 CFR 210.10(a)(3), records must show how the meals offered contribute to the required meal components and food quantities for each age/grade group every day. The following were not consistently filled in daily on production records:</p> <ul style="list-style-type: none"> • Menu items provided to students with special dietary needs • Planned/actual number of servings prepared: Planned number of servings based on planned number of meals. If you end up preparing more or less, record as planned #/actual #. • Planned/actual quantity prepared in bulk units (example: # of cans, bags, boxes, pounds): Recorded for many items, but not in the correct column. Note that column headings can be rearranged if needed. This line needs to be added to the production record. <p>Corrective Action: Upload 2 days of completed breakfast and lunch production records, including all requirements recorded daily into SNACS. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date. Production record templates for breakfast and lunch are available on our Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p> <p>While these templates are provided to assist schools in meeting documentation requirements, it is not mandatory to use the DPI template. SFAs may create their own production records or use another template, as long as it includes all required information, which can be found on our Production Record Requirements list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p>

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Site Name	River Ridge HS	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	433	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Unacceptable crediting documentation.</p> <p>The Child Nutrition (CN) Label provided for the mozzarella dippers, French toast sticks, Max pizza wedge, and cheese quesadilla was watermarked. Watermarked CN labels can only be accepted if accompanied by a Bill of Lading (invoice). Use the Tips for Accepting Processed Product Documentation for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/tipsheet_processedproduct.pdf). Additional information on CN labels can be found at the CN Labeling webpage (https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry).</p> <p>While these items were verified on-site, it is important to maintain the appropriate crediting documentation and review it regularly to ensure that the meals served meet the meal pattern requirements. Any crediting information received from a manufacturer other than a valid CN label must be verified by the program operator for accuracy.</p> <p>Corrective Action: Submit a statement that includes a procedure for obtaining, maintaining and updating crediting documentation.</p>
Site Name	River Ridge HS	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	434	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Standardized recipes missing.</p> <p>Per 7 CFR 210.10 (c)(5), all schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods. There was no standardized recipe for the following:</p> <ul style="list-style-type: none"> • Cinnamon Toast • Muffins – blueberry and chocolate chip <p>Corrective Action: Upload a standardized recipe for the menu items listed above into SNACS. Be sure to include</p>

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		all requirements of a standardized recipe. Templates and other resources can be found on the Standardized Recipes webpage https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes .
Site Name	River Ridge HS	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). A sharing table was observed; however, no SOP was available in the Food Safety Plan.</p> <p>Corrective Action: Upload into SNACS an SOP for the sharing table that includes which foods are allowable and how the table will be monitored to ensure food safety.</p>
Site Name	River Ridge HS	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: Cases of water for other school organizations were stored on the floor of the walk in cooler. This was stated to be approved by the local sanitarian</p> <p>Corrective Action: Correct food storage violation and/or obtain written approval from sanitarian that food products belonging to other organizations are approved to be stored on the floor. Upload into SNACS written documents from sanitarian.</p>
Site Name	River Ridge HS	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
Due Date		
Corrective Action Status	Flagged	

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<p>Corrective Action History</p>	<p>Finding: SFA does not maintain documentation for non-domestic products served in the school meal programs.</p> <p>Per 7 CFR 210.21(d), SFA's must purchase, to the maximum extent practicable, domestic commodities or products. When purchasing a non-domestic item, SFA's must maintain documentation demonstrating the exception, except when the item purchased is found on the FAR at 48 CFR 25.104 when using an exception under paragraph (d)(5)(i). The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> • Cucumbers – Canada • Bell Peppers – Mexico <p>WI DPI non-compliant product list templates can be used to fulfill this requirement. https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american#:~:text=non%2Ddomestic%20product.-,Tracking%20Tools%C2%A0,-Noncompliant%20Product%20List.</p> <p>If the item is on this list (https://www.ecfr.gov/current/title-48/chapter-1/subchapter-D/part-25/subpart-25.1/section-25.104) it does not need to be included as part of your Buy American documentation.</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Corrected on-site. No further CA submission is required.</p>
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Technical Assistance Entries:

Per 7 CFR 210.21(d), SFAs are required to purchase domestic commodities or products to the maximum extent practicable. If a non-domestic item is purchased, SFAs must maintain documentation justifying the exception. 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). When using non-domestic products, the following information must be recorded on the Buy American Non-Compliant Product List: date, product name, country of origin, and reason for the exception (e.g., cost analysis, seasonality, availability, substitution, distribution, or other). A suggested Buy American - Non-Compliant Product List template can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). The following information must be recorded on a Buy American Non-Compliant Product List- Date, name of product, country of origin, reason (i.e. cost analysis seasonality, availability, substitution, distribution, other). Beginning July 1, 2025, non-domestic food purchases must not exceed 10 percent of a school food authority's total annual commercial food costs for the school year. A phased cap on non-domestic food purchases will be implemented as follows:

- 10% cap starting in the 2025-2026 school year (effective July 1, 2025).
- 8% cap starting in the 2028-2029 school year (effective July 1, 2028).
- 5% cap starting in the 2031-2032 school year (effective July 1, 2031). States may grant temporary relief if schools are unable to meet the cap.

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Dried fruit credits as double the volume served (e.g. 1/4 cup of raisins or craisins credits as 1/2 cup fruit)

The specific product that is served and leftover need to be documented on the production record each day. This includes the different varieties of cereals and juices, rather than documenting "cereal" on a single line, as this does not capture the specific product served. A variety item recipe can be used when the same items and number of each item are served daily. A template for variety item recipes can be found on the DPI Website (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/standardized-recipes>).

It was observed on-site that butter is added to toast prior to service and cinnamon-sugar is offered as an additional topping. Adding butter to toast prior to service contributes additional calories and fat to the meal, which may negatively impact the nutritional balance of the meal and risks exceeding dietary specifications for fat and calorie intake. Likewise, cinnamon-sugar adds calories and sugar. The intent of the NSLP and SBP is to provide meals that support students' health and well-being by offering nutrient-dense options. Instead, schools should consider occasionally offering butter or jelly as an optional topping, allowing students to make informed choices about their portion sizes and nutrient intake. Discontinuing or limiting the use of butter and cinnamon-sugar toppings is strongly recommended. By reducing unnecessary added fats, sugars, and calories, schools can better meet dietary guidelines and promote healthier meal options for students.

Condiment usage is not monitored nor are portion sizes communicated to students. It was observed on-site that squeeze bottles of ketchup are placed on each of the student meal tables. This practice is not recommended as it does not promote appropriate portion sizes and condiments can be a significant source of calories, saturated fat, and sodium, which contribute to the dietary specifications. Please monitor your school's condiment usage and communicate appropriate portion sizes to students. Promote appropriate serving sizes by adding signage at the condiment station, portioning condiments into cups, purchase portion-controlled packets, and/or photos of the planned portion size of the condiments.

Students who do not have sufficient account balance or cash on hand to purchase a meal are provided with an alternative meal consisting of a peanut butter sandwich and a carton of milk. We recommend modifying this meal to make it reimbursable based on the grade-appropriate meal pattern.

Sharing tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) to address and regulations that must be followed to safely and responsibly implement each type of table. It is recommended that the DPI's Sharing and No Thank You Table Toolkit be used as a resource.

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-no-thank-you-toolkit.docx>

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

District Website includes a link to "Wellness Policy" that directs to a "Healthy School Snacks" PDF. The link should be retitled to reflect that this document is not the wellness policy.

The POS system has buttons for "a la carte" and "second meal". Since these buttons are not used, and the School District does not complete a Nonprogram Foods Revenue Tool, these buttons should be removed from the POS System.

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The Free and Reduced Meal Application posted on the School District website does not include an address for households to return the application. The online application should be updated to include the school and address to return the application.