

# Administrative Review Report

Highland School District

## Commendations:

From the Nutrition Program Consultant: Thank you to the staff at Highland School District for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. 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. All were very receptive to recommendations and guidance. The food service director and food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

From the Public Health Nutritionist: Thank you to all the staff at Highland School District for the warm welcome and cooperation during Highland's Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review and helping us to gather the needed documentation and information prior to our visit. The FSD was very receptive to the technical assistance provided regarding meal pattern and nutritional quality. Thank you for serving healthy, nutritious meals to your students!

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## Findings and Corrective Action:

<b>Site Name</b>	Elementary	
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	107	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The notification letter for the approval/denial of meal benefits is software generated. It was noted that the notification letter's nondiscrimination statement was not in the same font size as the rest of the body of the letter.</p> <p>Corrective Action: Update the font size of the nondiscrimination statement in the notification letter for the approval/denial of meal benefits and upload a copy into SNACS.</p>
<b>Site Name</b>	Elementary	
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	119	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 03, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The benefit issuance list does not include the correct date student eligibility occurred for several students that qualified in months prior to the start of the school year such as July. These students had an effective date that was the listed as the first day of school.</p> <p>Corrective Action: Provide a statement of understanding that the benefit issuance list should include the date a new eligibility status became effective.</p>
<b>Site Name</b>	Elementary	
<b>Form Name</b>	Meal Counting and Claiming (300 - 311)	
<b>Question #</b>	305	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>		<p>Finding: The Unpaid Meal Charge Policy was not communicated and distributed to households annually. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016)</p> <p>Corrective Action: Provide a statement of how households will be notified annually of the Unpaid Meal Charges Policy.</p>
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: On the Annual Financial Report, non-program foods labor costs were not broken out. (7 CFR 210.19).</p> <p>Corrective Action: Please correct this and resubmit the report. Upload a copy of the updated Annual Financial Report into SNACS.</p>
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The SFA completed the Nonprogram Foods Revenue Tool but did not sufficiently increase nonprogram food prices to meet the ratio requirement (7 CFR 210.14). It was mentioned that there may be some error with pricing that was currently listed in the tool for food items.</p> <p>Corrective Action: Using the SFAs current Nonprogram Foods Revenue Tool, review the nonprogram food prices and make adjustments as needed in the tool. Upload a copy of the updated Nonprogram Foods Revenue tool into SNACS. If the tool still shows that there is a need for additional revenue in order to meet compliance, please submit a statement on how this will be corrected.</p>
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<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: Provide a copy of a policy or procedure utilizing the DPI template to assist in developing procedures for handling discrimination complaints specific to the school meal service program and upload into SNACS.</p>
<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>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The Current Local Wellness Policy (LWP) does not include all the required content. Missing content are Policy Leadership, Nutrition Promotion which includes SFAs exploring the use of evidenced based strategies (Wisconsin Team Nutrition Meal Appeal Self-Assessment) when identifying goals and the Nondiscrimination statement.</p> <p>Corrective Action: Provide 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>
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: The correct nondiscrimination statement was not included in the student handbook where the lunch program is referenced.</p> <p>Corrective Action: Update the student handbook to include the correct nondiscrimination statement. Upload a copy of the nondiscrimination statement that will be used for the student handbook or submit a copy of the updated handbook into SNACS.</p>

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<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1219	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) specifically for WSDMP did not receive job specific training in the current school year (7 CFR 210.30).</p> <p>Corrective Action: A minimum of civil rights training is required for WSDMP and any training related to job duties for WSDMP. Please provide Civil Rights training for staff that have duties in WSDMP and upload a sign in sheet or a training rooster into SNACS.</p>
<b>Site Name</b>	Highland EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p>Finding: There was a weekly grain shortage at breakfast for the week of review with the daily alternate menu option. Each day, 1 slice of bread (.75 oz eq grain) and Apple Jacks cereal bowl (.5 oz eq grain) were offered together which provides 1.25 oz eq grain. Although this meets the daily grain requirements, this will not meet the weekly requirements (6.25 oz eq offered during the week of review; 9 oz eq grain required weekly for K-12 students).</p> <p>Corrective Action: State what will be done to the menu during the week of review so that 9 oz eq grain is offered to students over the course of the week.</p>
<b>Site Name</b>	Highland EI	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	January 3, 2024	
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	<p>Finding: The weekly juice limit was exceeded at breakfast. No more than half (50 percent) of the total fruit offerings may be in the form of juice. A total of 6 ½ cups of fruit (including whole fruit and juice) were offered during the week of review and of that 4 cups were juice. This means 61.5% of the fruit offered was in the form of juice. This exceeds the 50% juice limit.</p> <p>Corrective Action: Submit a statement that explains what changes will be made to the breakfast menu for the week of review to decrease the amount of juice offered and to be compliant with the weekly juice limit.</p>
<b>Site Name</b>	Highland EI
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	435
<b>TA Log #</b>	TA Log# exists
<b>Due Date</b>	January 3, 2024
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Recipes are utilized for all menu items at Highland Elementary School. However, the recipe on file for the Mexican Lasagna served during the week of review does not accurately reflect the specific ingredients or procedures that are followed by staff. The meal component contribution per serving changed based on the ingredients used, and the ingredients that were excluded from the original recipe.</p> <p>Corrective Action: Submit an updated standardized recipe for the Mexican Lasagna. Be sure to include all requirements of a standardized recipe, including specific ingredients, weight or measurement of each ingredient, and detailed step-by-step instructions. Templates and other resources can be found on the Standardized Recipes webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a>).</p>
<b>Site Name</b>	Highland EI
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	437
<b>TA Log #</b>	TA Log# exists
<b>Due Date</b>	January 3, 2024
<b>Corrective Action Status</b>	Flagged

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Corrective Action History		<p>Finding: The following vegetable subgroups were not served on the lunch menu during the week of review: Dark Green (0 cups served, ½ cup required) Beans/Peas/Legumes (0 cups served, ½ cup required).</p> <p>Corrective Action: State specifically what will be done to the menu during the week of review so that these vegetable subgroup shortages are fixed.</p>
Site Name	Highland EI	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date	January 3, 2024	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The food safety plan was missing the following information: Employee Reporting Agreements.</p> <p>Corrective Action: Update the food safety plan to include the missing information. Upload a copy of the Employee Reporting Agreement for each food service staff member into SNACS.</p>
Site Name	Highland EI	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date	January 3, 2024	
Corrective Action Status	CAP Submitted	
Corrective Action History		<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. <b>Corrected onsite, no further action required.</b></p>
Site Name	Highland EI	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date	January 3, 2024	
Corrective Action Status	Flagged	

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<p><b>Corrective Action History</b></p>		<p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site specific SOP's for proper glove usage.</p> <p>Corrective Action: Review the SOP. Modify the SOP so that it aligns with actual practices or adjust practices to align with the SOP as written. Submit a statement describing how practices will be adjusted to be compliant with the established SOP.</p> <p>Finding: Time-Temperature control for safety (TCS) for specifically milk was held outside of temperature control during Breakfast service and WSDMP. The breakfast milk is served on a tray on the counter without the use of any cold holding equipment. It was also noted that one class received the milk for WSDMP about a half hour before it was served. This practice constitutes using "time as a public health control" (TPHC) since temperature control is not being used. The unserved milk for breakfast is saved for future service after the end of the meal period. This is not allowed under TPHC.</p> <p>Corrective Action: Submit a plan describing how the procedures will be modified and the food safety plan updated if needed. The SFA could:</p> <ul style="list-style-type: none"> <li>• Utilize ice-lined containers on the serving line to provide temperature control.</li> <li>• Utilize time as a public health control procedure.</li> <li>• Work with sanitarian to develop an acceptable alternative method for serving TCS foods held out temperature control.</li> </ul>
<p><b>Site Name</b></p>	<p>Highland El</p>	
<p><b>Form Name</b></p>	<p>Food Safety, Storage and Buy American (1404-1411)</p>	
<p><b>Question #</b></p>	<p>1411</p>	
<p><b>TA Log #</b></p>	<p>No TA Log# found</p>	
<p><b>Due Date</b></p>	<p>January 3, 2024</p>	
<p><b>Corrective Action Status</b></p>	<p>CAP Submitted</p>	
<p><b>Corrective Action History</b></p>		<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Broccoli Cuts- Product of Mexico Petite Whole Baby Carrots- Product of Belgium Cut Corn- Product of France, Spain.</p>

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	Corrective Action: 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 ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american">https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american</a> ). <b>Forms were completed by the FSD on-site. No further corrective action required.</b>
<b>Site Name</b>	Highland EI
<b>Form Name</b>	Wisconsin School Day Milk Program
<b>Question #</b>	4
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	January 3, 2024
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receive a milk. It was noted students go to a touch screen in the classroom and check that they took a milk which was brought to the classroom. The POS requires adult supervision. It was noted that some of the classroom's procedures for POS were not the most acceptable method for the WSDMP.</p> <p>Corrective Action: Provide training for staff that manage the WSDMP on the proper POS procedures for the WSDMP so all staff are consistent. Upload documentation to support the training that was completed by providing a staff sign in sheet into SNACS.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/14/23	3695		Administrative Review		FSD			

Offer versus Serve (OVS): Under Offer versus Serve (OVS) at breakfast, four food items must be offered (from the three required components of grain, fruit and milk) and students must select at least three food items, one of which is ½ cup fruit and/or vegetable to have a reimbursable meal. An item is defined as 1 cup milk, ½ cup fruit and 1 oz eq grain. During the day of on-site review, there was some confusion by students and staff because the toast credited as .75 oz eq grain, and did not meet the requirements of a food item under OVS. During the week of review, there was also a cereal bowl that credited as .5 oz eq grain. It is recommended to bundle these smaller grain options together so that if a student selects a grain, they have at least 1 oz eq grain. Another option would be to purchase a larger cereal bowl that does credit as at least 1 oz

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eq grain. Continue to work on ensuring your production records accurately reflect the meal component contribution of each menu item, and that your staff understands how a student can build a reimbursable meal prior to meal service.

11/14/23	3694	435	Administrative Review	Highland EI	FSD			
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Meal Pattern: The same meal pattern is currently used for grades K-12. Because there is no overlap with the dietary specifications for these age groups under the NSLP, a separate K-8 and 9-12 meal pattern must be followed. During the week of review, the Mexican Lasagna recipe was not prepared as written, and therefore one serving of the lasagna only contributed 1.50 oz eq meat/meat alternate (M/MA) per serving. While this meets the daily requirement for the K-8 meal pattern, this does create a M/MA shortage for the 9-12 age/grade group. 2.0 oz eq M/MA is required daily for the 9-12 age/grade group. Please review the Lunch Meal Pattern handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf>), and ensure you are following separate meal patterns going forward. Continue to work on standardizing all recipes used at Highland School District, and ensure staff are following all recipes as written.

11/14/23	3693	805	Administrative Review	ALL	Authorized Representative			
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Federal civil rights legislation, including Section 504 of the Rehabilitation Act of 1973, IDEA, and Titles II and III of the ADA, requires that in providing nonacademic services, including meals, school districts must ensure children with disabilities participate along with children without disabilities to the maximum extent appropriate. Under some circumstances it may be appropriate for children with certain disabilities to sit at a separate table or to not come to the cafeteria to choose their meal. However, schools may not separate children from the regular meal service due to their disability for convenience purposes. The 504 coordinator or school administration can make the decision for alternate meal service that is in the best interest of the child. The USDA does not require written documentation to change the way a lunch is served when it is in the best interest of the child. However, it is recommended that this be written into an IEP or 504 plan, to help ensure administration, teaching staff, food service, and parents/guardians are on the same page. If an adult picks up a meal for a child, the adult should not choose the components for the student. A student can choose from a menu or pictures what they would like to eat each day, then the adult can pick up those items. It is also acceptable for the adult to take all components on a tray and then have the student select the items they would like to have on their own tray. Please note: the student must choose a reimbursable meal and must choose ½ cup fruit or vegetable along with two other components. If a child has a disability which creates challenges with choosing a reimbursable meal, the IEP, 504 plan or a medical statement could list the meal accommodation needed. For example, a student with autism spectrum disorder does not want a fruit or vegetable on their tray. The IEP could state "(Student name) has (type of disability such as autism spectrum disorder with selective eating challenges) and can choose what he/she would like from the day's menu". Knowing it does take some time for an IEP to be changed, food service should make the accommodation while waiting for the IEP anticipating that the IEP will include the meal accommodation in a reasonable amount of time and the foodservice department must have a copy of the medical statement or the portion of the IEP/504 plan pertaining to meal service, on file. If an IEP, 504 plan, or medical statement has a meal accommodation request the USDA requires: 1. The child's physical or mental impairment as it relates to the diet (i.e., autism spectrum disorder with selective eating and sensory challenges) 2. The foods to substitute 3. The foods to omit (i.e., in the example above, sub and omit is anything the child does or does not want to eat from the day's menu). If a meal is picked up by an adult for a student, there must also be a system in place to

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count the meal when the student receives the meal. If the meal is counted when the adult picks it up there needs to be a system that determines that the student accepted the meal (even if they don't eat the meal) and a method of allowing the student to choose the items, they would like on the tray. A checklist in the classroom with the student's name and the components they selected is acceptable; however, the adult must be trained in reimbursable meals and OVS. In the event the meal is partially or completely rejected, other students/adults cannot consume any part of the meal.

11/13/23	3689	431	Administrative Review	Highland EI	FSD			
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**Production Records:** Technical assistance was provided on-site regarding production record requirements and accurately documenting all information. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Be specific on production records about the identity, brand, portion size, and description of items served. Continue to work with staff to record the planned/actual amount prepared in bulk units for all menu items and the meal component contribution. The meal component contribution should be based on the crediting documentation and reflect your planned serving size for each age/grade group. Planned portion sizes are required for every meal component, including condiments and self-service items. A copy of the Production Record Requirements and templates may be found on our webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>).

11/09/23	3688		Administrative Review		FSD			
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**Crediting Documentation:** Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS), Child Nutrition (CN) label, or USDA Product Information Sheet to document meal component crediting. 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.

11/09/23	3687	437	Administrative Review	Highland EI	FSD			
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**Vegetable Subgroups:** The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) to identify vegetables in each subgroup. Refer to the Lunch Meal Pattern handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf>) to identify the weekly quantity requirements from each vegetable subgroup. Please notice the differences between the K-8 and 9-12 meal pattern to ensure the minimum requirements are met for each age/grade group served at the school.

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11/09/23	3690	Administrative Review	FSD			
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Portion Utensils: The iceberg lettuce was served on 11/09/23 by the FSD's gloved hand, which is not an appropriate serving utensil. If the iceberg lettuce is being credited towards the vegetable component, it needs to be measured out with a utensil that provides a standardized form of measurement, such as a spoodle. If you choose to use your self-service salad bar area again in the future, please be sure to communicate portion sizes of at least 1/8 cup to students with signage. Salad bar signage templates can be found on our signage webpage: <https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage>.