

Administrative Review Report

Pecatonica Area Schools

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/24/2019	02/11/2019
On-Site Review	03/05/2019	03/07/2019
Site Selection Worksheet	01/25/2019	01/28/2019
Entrance Conference	03/05/2019	03/05/2019
Exit Conference	03/06/2019	03/06/2019

Commendations:

Thank you to the staff at the Pecatonica Area School District for the courtesies extended to us during the administrative review. It was obvious that all staff cares for the well-being of their students. The review team appreciates how receptive everyone was to recommendations and guidance to improve the food service program. We especially enjoyed the fun marketing and great atmosphere in the cafeteria. We were impressed with not only the nutritious meals, but also how much the students love the food service staff! Awesome job and thank you for what you do for kids!

Documentation was complete and on-file for all non-domestic products found during the review of the Buy American Provision. Great job!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements, financial management, meal benefit determination process, procurement, and many other topics. More information along with other trainings and webinars are found on the Wisconsin DPI School Nutrition Training webpage.

The 2019 SNSDC will be held at the following locations:

Appleton (Fox Valley Technical College) : July 16-18, 2019

Milwaukee (Alverno College) : July 23-25, 2019

Rice Lake (Wisconsin Indianhead Technical College) : July 30-August 1, 2019

Middleton (Kromrey Middle School) : August 6-8, 2019

Wausau (Northcentral Technical College) : August 13-15, 2019

Breakfast participation in the Pecatonica Area Schools is low compared to the number of students enrolled in the district. In school year 2017-2018, average daily participation in the School Breakfast Program was less than 20% that of the average daily participation in the National School Lunch Program. Looking specifically at students eligible for free and reduced price meals, only about 30 out of every 100 kids eating lunch also ate breakfast.

Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.

Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or ideas to increase participation, contact the [School Breakfast Program Specialists](mailto:DPISBP@dpi.wi.gov) (DPISBP@dpi.wi.gov).

Lastly, consider sending this [School Breakfast brochure](#) to families and caregivers to promote the benefits of breakfast.

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)
Question #	113
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: 1. The programs listed on the 'Sharing of Information' form are not specific. 2. Non food service staff associated with programs listed on the Sharing of Information form, with access to benefit data, do not have the USDA disclosure agreement on file. The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of benefit information. CA: Provide a statement explaining how the district will handle sharing of information and disclosure going forward.</p>
Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to all households, annually. CA: Provide a timeline of when the policy will be completed and implemented. Provide a statement of how the policy will be distributed to all households and staff responsible for policy enforcement.</p>
Site Name	
Form Name	Technical Assistance and Corrective Action
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Items sold to outside organizations are being sold at invoice cost when all costs for non-program foods, including food, labor, equipment, and purchased services must be covered so student meals are not subsidizing non-program foods. The nonprofit food service account cannot be used as a 'pass-thru' account. CA: Submit a statement of how you plan to make sure all non-program food costs are covered and a timeline of when new price guidelines will be in place. .</p>
Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Some materials related to the food service program do not contain the USDA non-discrimination statement (NDS). CA: Add the NDS to the Food Service Payment Form and to section Food Service Management, WASB Code: 760</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1212
Corrective Action Status	Flagged

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Corrective Action History	<p>Finding: 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>CA: The Professional Standards Exemption form has been submitted to Karrie Isaacson. Complete the training plan provided by Karrie Isaacson.</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action Status	Flagged
Corrective Action History	<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>CA: Submit a copy of the training tracking tool that will be used to monitor employee training going forward.</p>
Site Name	Pecatonica EI
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At both breakfast and lunch meal service, Pre-K students were marked as needing a meal prior to meal service. Students were entered into the POS using this list.</p> <p>CA: A recalculation of pre-K meals for both breakfast and lunch will be necessary. Submit 30 days of corrected counts for pre-K, for both breakfast and lunch, beginning the day the error is fixed.</p> <p>Finding: Field trip meals are being charged to student accounts from the morning roster.</p> <p>CA: Submit a statement of how going forward, students on field trips will be marked as taking a meal at the time they receive a reimbursable meal and entered into the system after this has been verified.</p>
Site Name	Pecatonica EI
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	409
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Production record requirements are not being fully met. A list of ("Must Haves and Nice to Haves") and sample production record templates can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).</p> <ul style="list-style-type: none"> • For breakfast - Each item must be recorded separately – if variety offered, each type separately • Planned and actual number of meals served should both be documented • Planned number of servings for each item • Breakfast items/portion sizes offered to pre-k should be clearly documented

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	Corrective Action Needed: Submit one week of completed production records (breakfast, lunch and salad bar) that are in compliance with all production record requirements.
Site Name	Pecatonica El
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: If following the CACFP meal pattern, pre-k students must be offered 1.5 oz eq m/ma daily at lunch. The week of review was short of this requirement daily.</p> <ul style="list-style-type: none"> • Monday - ½ cheeseburger: 1.25 oz eq • Tuesday - ½ chicken patty: 1 oz eq • Wednesday - ½ hot dog: 0.75 oz eq • Thursday - Cheese bosco (0.5 oz eq) or ½ pretzel bosco + cheese cubes (1.25 oz eq) • Friday - 3 chicken nuggets: 1 oz eq <p>Corrective Action Needed: This was discussed prior to on-site review and it was determined that the pre-k students were actually comingled at lunch. During meal observation, pre-k students were offered the K-5 meal pattern. No further action needed.</p>
Site Name	Pecatonica El
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	411
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Lucky charms served during the week of review exceeded the sugar limit for the CACFP meal pattern.</p> <p>Corrective Action Needed: Going forward, lucky charms will not be served at Pecatonica Elementary. No further action needed.</p>
Site Name	Pecatonica El
Form Name	Offer vs Serve (500-502)
Question #	500
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Pre-k students eat in the classroom and teachers come down to the cafeteria to pack a bagged breakfast for students who are eating. During the review period, teachers only selected milk on days that cereal was offered according to food service staff on site (this was reinforced when observing pre-k breakfast as students questioned why there was milk in their bags as there was no cereal).</p>

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Therefore, on all other days, breakfasts served to pre-k were missing a component (milk). Pre-K breakfasts will be reclaimed for the following dates during the review period: February 1, 4, 5, 8, 11, 15, 18, 19, 22, 25, 26, 28.

Corrective Action Needed:

- Pre-K meal counts for the dates listed above.
- Statement of understanding that pre-k students eating in the classroom must be following the CACFP meal pattern for breakfast and cannot utilize OVS (they must have a minimum of ½ oz eq grain, ½ cup fruit and ¾ cup of milk in order to be claimed as a reimbursable meal)
- If structure of meal service is changed, submit a statement describing where pre-k students will be eating, who is selecting their meals, where meals are being counted and if they are following the comingling flexibility.

Site Name	Pecatonica El
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action Status	Flagged
Corrective Action History	Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8. CA: Complete all required onsite monitoring 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.
Site Name	Pecatonica El
Form Name	Wisconsin School Day Milk Program
Question #	4
Corrective Action Status	Flagged
Corrective Action History	Finding; During Wisconsin School Day Milk Program service, students were marked as taking a milk before they received the milk. CA: Submit a statement of how going forward, students will be counted as taking a milk and entered into the point of service/skyward system after they receive the milk.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	
03/25/2019	353	410	Administrative Review	
Comments				
Grain-based desserts may not be credited towards the grain component under the CACFP meal pattern. The pre-k breakfast menu should be evaluated and updated as necessary. Grain-based desserts include brownies, cake, cereal bars/granola bars, cookies, doughnuts, toaster pastries, sweet rolls, etc. For additional information on grain-based desserts, including Exhibit A for Child Nutrition Programs, refer to the Grain-Based Desserts memo.				
03/25/2019	352	410	Administrative Review	

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Comments				
<p>According to the CACFP meal pattern, juice must be limited to once per day. However, as pre-k students are following the CACFP meal pattern for breakfast and K-5 meal pattern for lunch, it would be logistically challenging to coordinate limiting juice between the two meals. If it is possible to plan ahead and not offer pre-k students at breakfast on days that it is planned at lunch (such as when a sidekick is offered), that would be a best practice to keep the intention of the CACFP juice limit.</p>				
03/25/2019	351	410	Administrative Review	
Comments				
<p>Great job using menu planning worksheets to ensure the planned menu is meeting meal pattern requirements! Keep in mind that if only one entrée option is offered, the min and max will be in the same for the meat/meat alternate (m/ma) component as well as the grain component. Additionally, min and max are determined based on planned menu, and do not take offer versus serve (OVS) into consideration.</p>				
03/25/2019	350	409	Administrative Review	
Comments				
<p>Production records are documentation that reimbursable meals are served and must accurately reflect service. All items offered as part of the reimbursable meal must be documented, including yogurt and cheese sticks offered at breakfast.</p> <p>As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the USDA <i>Food Buying Guide</i> for School Meal Programs. A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label. When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.</p> <p>More information about crediting documentation can be found on the NSLP Menu Planning webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs)</p>				
03/25/2019	349	1410	Administrative Review	
Comments				
<p>The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices</p>				

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for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

- Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT Procurement webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

- Strawberry pop-tarts
- Ketchup packets
- Ranch packets
- Cumin
- Garlic powder
- Canned green beans
- Bush's black beans
- Side kick slushies
- Juice cups
- Frozen sliced carrots

03/07/2019	205	1000	Administrative Review
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Comments

The School Board policies section of the website contains the previous Local Wellness Policy (LWP). Please replace this with the current policy.

03/07/2019	204	805	Administrative Review
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A student's IEP can take place of a medical statement if it contains specific instructions and/or food substitutions; however, food service needs to have the section about meal accommodations on file in the food service area to support the accommodation and ensure it is being followed properly.

03/07/2019	203	805	Administrative Review
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Comments

It is recommended to use the DPI prototype medical statement for special dietary needs, found on our website. Food substitutions without a signed medical statement from a licensed medical professional must meet meal pattern (OVS can be used). A dietary request with a signed medical statement does not have to meet meal pattern and instead should follow directions on the statement.

03/07/2019	202		Administrative Review
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Comments

The USDA Non-program Revenue Tool must be completed yearly at a minimum; however, it is recommended to complete the DPI Non-program Food Revenue Tool located on our website. This will aid in calculating prices of non-program food and meeting USDA non-program food regulations.

03/07/2019	201		Administrative Review
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Comments

Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.

03/07/2019	200	128	Administrative Review
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Comments

When a household reports one income or multiple incomes with the same frequency (i.e. bi-weekly, monthly etc.) you should not convert to annual income. You should approve based on the stated frequency. If a household reports multiple incomes with different frequencies, you should convert all incomes to annual.

03/07/2019	199		Administrative Review
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Comments

When a student deposits funds in their lunch account, it is not revenue until the meal has been sold. Student deposits should be placed in a liability account until the meal is sold. Student deposits and refunds should not be recorded as revenue/part of the fund balance or expenses on your Annual Financial Report.

03/07/2019	207	1601	Administrative Review
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Comments

Inform families of summer meals via the following methods: Call 211 to locate meals in the area. Text 'food' to 877-877 to locate meals in the area. The summer meals locator and interactive map found on the DPI School Food Service Program website.

03/07/2019	206	1404	Administrative Review
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Comments

Great job on keeping temperature, calibration and sanitizing logs up to date. Add two SOPs for Approved Food Source, Purchasing Locally Grown Produce and Breakfast in the Classroom.