

# Administrative Review Report

Marathon County Juvenile Facility

## Commendations:

From Public Health Nutritionist:

Thank you to all staff at Marathon County Juvenile Facility for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director and Authorized Representative for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Authorized Representative and Food Service Director were very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your residents!

From the Nutrition Program Consultant:

Thank you to all staff at Marathon County Juvenile Facility for their dedication to feeding these juveniles while they are under the facilities care. A big thank you to the authorized representative and food service director as well as the staff at North Central Health Care for being available and very cooperative during both the onsite and offsite portions of this review.

## Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training (SNST) online and in person again in 2024. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

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### Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
<b>Question #</b>	700
<b>Corrective Action History</b>	<p><u>Finding:</u> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p><u>Corrective Action:</u> Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	803
<b>Corrective Action History</b>	<p><u>Findings:</u> The RCCI does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p><u>Corrective Action:</u> Utilizing the DPI template policy (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a>), develop procedures for the RCCI and upload into SNACS.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1000
<b>Corrective Action History</b>	<p><u>Finding:</u> The RCCI does not have a Local Wellness Policy (LWP) in place that reflects what is currently in practice (7 CFR 210.31).</p> <p><u>Corrective Action:</u> Provide a detailed timeline for when the Local Wellness Policy will be implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the RCCI representative(s) that will ensure compliance.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1005
<b>Corrective Action History</b>	<p><u>Finding:</u> RCCI has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p><u>Corrective Action:</u> 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 scores into SNACs or provide a link to this document on the district website.</p>
<b>Form Name</b>	Dietary Specification Assessment Tool (On Site Observation)
<b>Question #</b>	13
<b>Corrective Action History</b>	<p><u>Finding:</u> All grain items on Exhibit A with a superscript 3 (e.g., cookies, dessert pies, cobblers, cake, brownies) are not allowed to be served at breakfast, they may only be served as a dessert at lunch and must not exceed 2 oz eq grains over the course of the week (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf</a>). During onsite review, a brownie was offered at breakfast. This type of grain-based dessert is not allowable at breakfast.</p> <p><u>Corrective Action:</u> Submit a statement of understanding that items with a superscript 3 will not be served at breakfast.</p>
<b>Form Name</b>	Dietary Specification Assessment Tool (On Site Observation)
<b>Question #</b>	25
<b>Corrective Action History</b>	<p><u>Finding:</u> It was observed on the day of review, at lunch, that extra trays of food were offered to residents who already had one reimbursable meal. Discontinue offering second servings (with the exception of fruits and vegetables) free of charge. Offering seconds complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly dietary specifications.</p>

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		<u>Corrective Action:</u> Submit a statement of understanding that residents may not receive more than one reimbursable meal tray per meal service.
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1213	
<b>Corrective Action History</b>		<p><u>Finding:</u> 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><u>Corrective Action:</u> 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	
<b>Corrective Action History</b>		<p><u>Finding:</u> 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><u>Corrective Action:</u> Include all training hours completed this school year for each school food service employee onto the <a href="#">USDA Professional Standards Tracking Tool Version 2.0</a> or <a href="#">DPI-developed Professional Standards Tracking Tool</a> and upload into SNACS.</p>
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	400	
<b>Corrective Action History</b>		<p><u>Finding:</u> <b>Fiscal action is required for a missing component.</b> There was no fruit served on the day of review (12/19). Therefore, fiscal action will be assessed for 12 lunch meals on Tuesday, December 19, 2023.</p> <p><u>Corrective Action:</u> Submit a statement addressing how the fruit component will be met for the 9-12 grade group at lunch.</p> <p>State Agency will be reviewing menus, production records, and menu planning worksheets for meal pattern compliance in the corrective action for questions 410 and 430.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	409	
<b>Corrective Action History</b>		<p><u>Finding:</u> During the week of review, residents were not offered a fruit component at lunch. <b>Fiscal action is required for a missing component.</b> Due to this finding, the review was opened up to the review period (November 2023) and subsequently the entire 2023-2024 school year. After reviewing menus and production records it was determined that the missing fruit component is a systemic issue.</p> <p>As of December 19, 2023, all lunches claimed for reimbursement in the 2023-2024 school year are subject to fiscal action and will be reclaimed. All other meals served and not yet claimed will be unallowable (no reimbursement will be provided) until the RCCI demonstrates to the satisfaction of the State Agency that reimbursable meals are being planned, served, and properly documented.</p> <p><u>Corrective Action:</u> Submit a statement addressing how the fruit component will be met for the 9-12 grade group at lunch.</p> <p>State Agency will be reviewing menus, production records, and menu planning worksheets for meal pattern compliance in the corrective action for questions 410 and 430.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>Corrective Action History</b>		<p><u>Finding:</u> There were several meal pattern shortages identified during the week of review for the 9-12 grade group at lunch. <b>Future quantity shortage findings may result in fiscal action.</b></p> <ul style="list-style-type: none"> <li>• Vegetables: There was a daily shortage of vegetables during the week of review. Residents were offered between ½ to ¾ cup of vegetables per day. The 9-12 meal pattern requires 1 cup of vegetables to be offered daily and 7 cups weekly.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Meat/Meat Alternate: There was a daily meat/meat alternate shortage during the week of review. At least 2.0 oz. eq. m/ma must be served daily. The shortages occurred on the following days:               <ul style="list-style-type: none"> <li>○ Wednesday (11/8): Turkey and dumplings – only 1.25 oz. eq. m/ma was offered, and 2.0 oz. eq. is required to be served daily.</li> <li>○ Thursday (11/9): Roast – only 1.75 oz. eq. m/ma was offered, and 2.0 oz. eq. is required to be served daily.</li> <li>○ <b>This finding is a repeat finding. Fiscal action is required when there is a repeat violation of meat/meat alternate shortages, however the meals served on 11/8 and 11/9 are already being reclaimed due to the missing fruit component finding.</b></li> </ul> </li> <li>• Grains: There was a daily and weekly grain shortage during the week of review. The 9-12 meal pattern requires at least 2.0 oz. eq. grain to be served daily and at least 14 oz. eq. to be served weekly. The shortages occurred on the following days:               <ul style="list-style-type: none"> <li>○ Monday (11/6): Meatloaf – the only grain offered this day was breadcrumbs in the meatloaf recipe. Due to lack of crediting documentation, it is difficult to determine the amount of creditable grain served.</li> <li>○ Friday (11/10): Barley casserole – only 0.75 oz. eq. of grain is offered from the barley casserole.</li> <li>○ Saturday (11/11): Hamburger bun – only 1.5 oz. eq. was offered from the hamburger bun.</li> </ul> </li> </ul> <p><u>Corrective Action:</u> Please submit 2 weeks (7- day weeks) of menu planning worksheets for lunch for the 9-12 meal pattern. This week should occur after the receipt of the Administrative Review report, but before the corrective action due date. Menu planning worksheets can be found here: <a href="https://dpi.wi.gov/school-nutrition/rcci-meal-pattern-nutritional-quality">https://dpi.wi.gov/school-nutrition/rcci-meal-pattern-nutritional-quality</a>.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	430
<b>Corrective Action History</b>	<p><u>Finding:</u> The following items were not consistently filled in daily on production records during the week of review:</p> <ul style="list-style-type: none"> <li>• Serving location</li> <li>• Grade group served</li> <li>• Planned/actual number of servings prepared</li> <li>• Planned/actual quantity prepared in bulk</li> <li>• Leftovers and milk usage</li> <li>• Number of reimbursable meals actually served.</li> </ul> <p>Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (<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>)</p> <p><u>Corrective Action:</u> Submit 2 full weeks (7-day weeks) of completed production records that meet all of the production record requirements. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date. In addition to the production records, please include:</p> <ul style="list-style-type: none"> <li>• Lunch menus</li> <li>• All standardized recipes during these two weeks</li> <li>• All nutrition facts labels with ingredient labels</li> <li>• All Child Nutrition (CN) labels or product formulation statements for all products, as appropriate</li> <li>• All fresh fruits/vegetables should include any information needed to determine meal pattern contribution, such as size/case counts.</li> </ul>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	436
<b>Corrective Action History</b>	<p><u>Finding:</u> At least 80% of the grains offered weekly on each must be whole grain-rich. Only 66.67% of products offered at breakfast during the week of review were whole grain-rich (14.25 oz. eq. grains offered, 9.5 oz. eq. were WGR) and only 16.36% of products offered at lunch during the week of review were whole grain-rich (13.75 oz. eq. grains offered, 2.25 oz. eq. were WGR).</p> <p><u>Corrective Action:</u> Describe how the menu would be changed to comply with the 80% whole grain-rich requirement. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be planned in place of enriched grain items.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	437

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<b>Corrective Action History</b>	<p><u>Finding:</u> There were no vegetables offered from the dark green subgroup or the bean/peas (legumes) subgroup during the week of review. As a reminder, a minimum of ½ cup of dark green vegetables and ½ cup of legumes must be offered in the 9-12 grade lunch meal pattern. <b>Future findings related to vegetable subgroups will be subject to fiscal action.</b></p> <p><u>Corrective Action:</u> Submit a statement addressing how the dark green and legumes vegetable subgroups will be met for the 9-12 grade group at lunch.</p>
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**Technical Assistance Entries:**

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
12/20/2023	3950		Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
USDA foods (commodities) are intended to be used within the National School Lunch Program, Breakfast Program and Afterschool Snack Program, however, there is no requirement to keep inventory separate for USDA foods from commercial products, therefore these products may be commingled.					
12/20/2023	3945	403	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
The printed menu should list all components included with the reimbursable meal. Currently, only 1% milk is listed on the menu, but it was observed during onsite review that 1% white and skim white milk are both offered. The milk variety may either be listed daily or in one place on the menu and include a statement that says that a variety of milk is offered daily as part of a reimbursable meal.					
12/20/2023	3944	12	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
Dessert is offered to residents daily. It is important to understand that these extra items do not contribute to the meal pattern but must still be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra, non-creditable items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served.					
12/20/2023	3943	407	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
It was observed during the day of review at breakfast that some juice offerings were not 100% juice (fruit cocktail-15% juice). Technical assistance was provided that in order for juice to contribute to the fruit component it must be 100% fruit juice.					
12/20/2023	3942	410	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
The breakfast menu consistently offers more grains than the 10 oz eq weekly recommended maximum. During the week of review, students were offered 23.25 oz eq grains for the week. When the amount of grains offered exceeds the recommended maximum, it is more likely that the dietary specifications for saturated fat, sodium, calories, and trans-fat are also exceeded. This practice may also contribute to higher food costs and more food waste for your SFA.					
12/20/2023	3941	431	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). It is important to indicate the serving sizes of fruits and vegetables in volume measurements.					
12/20/2023	3940	431	Administrative Review	Marathon County Secure Detention	FSD
<b>Comments</b>					
Be specific on production records about the identity, brand, portion size, and description of items served. Instead of "fruit", list the specific fruit to clearly indicate what was served.					
12/20/2023	3939	435	Administrative Review	Marathon County Secure Detention	FSD

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Comments					
<p>A few recipes used during the review week lacked pieces of information necessary for standardized recipes. Recipe did not indicate the grade groups being served or the intended meal pattern contributions based on the serving sizes. In addition, the chili recipe observed on the day of lunch service observation contained noodles, but the recipe provided did not call for noodles. Technical assistance was provided on-site to analyze each portion of the recipe. This is needed for menu planning to ensure that the portions offered are actually what is intended.</p> <p>Please use our Standardized Recipes webpage to aid in this process (<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>). The recipe standardization process may take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.</p>					
12/20/2023	3938	1403	Administrative Review	ALL	FSD
Comments					
<p>The following information must be recorded on a Buy American Non-Compliant Product List:</p> <ol style="list-style-type: none"> <li>1. Date</li> <li>2. Name of product</li> <li>3. Country of origin</li> <li>4. Reason                             <ol style="list-style-type: none"> <li>a. Cost analysis</li> <li>b. Seasonality</li> <li>c. Availability</li> <li>d. Substitution</li> <li>e. Distribution</li> <li>f. Other</li> </ol> </li> </ol> <p>A suggested Buy American - Non-Compliant Product List template can be found on the Buy American webpage (<a href="https://dpi.wi.gov/school-nutrition/procurement/buy-american">https://dpi.wi.gov/school-nutrition/procurement/buy-american</a>).</p>					
12/19/2023	3936	1400	Administrative Review	ALL	FSD
Comments					
<p>There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.</p>					
12/19/2023	3934	500	Administrative Review	Marathon County Secure Detention	FSD
Comments					
<p>RCCI does not currently use OVS (trays are passed to residents in cells), but no OVS waiver was filled out prior to onsite visit. Authorized Representative filled out the OVS waiver for RCCIs while onsite.</p>					
12/19/2023	3934		Administrative Review	Marathon County Secure Detention	FSD
Comments					
<p>Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (7 CFR 210.30).</p>					