

# Administrative Review Report

Clara Mohammed School, Inc.

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/13/2022	01/31/2023
On-Site Review	11/22/2022	11/23/2022
Site Selection Worksheet	11/21/2022	11/21/2022
Entrance Conference	11/22/2022	11/22/2022
Exit Conference	11/23/2022	11/23/2022

## Commendations:

Thank you to all staff at the Clara Mohammed School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Authorized Representative and Food Service Director for being available during the onsite visit and providing additional information as needed; both were very receptive to recommendations and guidance.

## Recommendations:

Clara Mohammed School was awarded the Fresh Fruit and Vegetable Program (FFVP) Grant for the 2022-23 school year. Please review the FFVP Handbook (<https://fns-prod.azureedge.us/sites/default/files/resource-files/handbook.pdf>) to learn about the program, as this is your first year receiving the grant funds. The intention of the program is to expose students to a variety of unique fruits and vegetables outside the school meals program.

The DPI review team is confident that Clara Mohammed School will continue to improve their knowledge and operation of child nutrition programs, through trainings and links on the [DPI website](#).

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## Findings and Corrective Action:

<b>Site Name</b>	
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding 1:</b> On the Annual Financial Report, not all of the revenues and expenses were broken out by program and expense category (7 CFR 210.19).</p> <p><b>Corrective Action 1:</b> Update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Submit a statement that the AFR has been updated and all revenues and expenses are broken out appropriately.</p> <p><b>Finding 2:</b> The SFA has received Supply Chain Assistance Funds (SCA Funds) and not in compliance with the Attestation signed when receiving these funds. The SFA was not aware that Supply Chain Assistance Funds were to be tracked separately when used.</p> <p><b>Corrective Action 2:</b> Upload a statement in SNACS of the process that will be used to track the unprocessed or minimally processed food items purchased with the SCA Funds and the amount of funds used.</p>
<b>Site Name</b>	
<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>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> A la Carte milk is being provided to students free of charge. This is a nonprogram food and the student(s) must be charged for the milk, the school can cover the cost of the milk (not from Nonprofit school food service funds) or the student can participate in the meal program and take a full reimbursable meal to obtain the milk. A reimbursable meal means the student must take 3 of the 5 components, 1 component must be a 1/2 cup fruit/vegetable.</p> <p><b>Corrective Action:</b> Provide a statement of how you plan to handle the a la carte milk.</p>
<b>Site Name</b>	
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1001
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.</p> <p><b>Corrective Action:</b> Notify the public of the LWP via uploading to the school website, through an email, newsletter, or another means. Upload a statement in SNACS about how the public was notified.</p>
<b>Site Name</b>	
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1213
<b>TA Log #</b>	No TA Log# found

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<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The new Food Service Director (FSD) did not meet the food safety training requirements of 8 hours of food safety training (Servsafe) within 5 years prior to start date or within 30 days of hire (7 CFR 210.30(b)(v)).</p> <p><b>Corrective Action:</b> FSD must complete 8 hours of food safety training during the 22-23 SY. Upload a statement in SNACS of when the food safety training will be completed.</p>
<b>Site Name</b>	
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1217
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> 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><b>Corrective Action:</b> Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)
<b>Question #</b>	403
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> A milk variety was not offered to students at the MLK school location on 11/22/22 at breakfast. Only 1% unflavored milk was offered. Students must be offered a variety of milk, (at least two allowable milk types) at breakfast. Allowable milk types in Child Nutrition Programs include fat-free (skim) and low-fat (1 percent) flavored and unflavored milk, and lactose-free or lactose-reduced fat-free or low-fat milk.</p> <p><b>Corrective Action:</b> Please submit a picture showing at least two milk varieties are available for students to choose from at breakfast.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	433
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> Acceptable crediting documentation was not available for the Ground Beef Patty 80/20, served on October 14th, 2022.</p> <p><b>Corrective Action:</b> Submit updated crediting documentation for the Ground Beef Patty 80/20 that includes an accurate description of the creditable meat ingredient per the Food Buying Guide along with the Food Buying Guide yield.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	436

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p><b>Finding:</b> At least 80% of the grains offered weekly must be whole-grain rich. Only 73.68% of products were whole grain-rich at the Wright school location and 76.19% at the MLK school location. This is due to the Domino's Smart Slice cheese pizza that credits as 2.5 oz eq grain.</p> <p><b>Corrective Action:</b> Please submit a statement outlining the plan of action to increase the percentage of whole grain-rich offerings to at least 80% over the course of the week. If a replacement product is found, please submit crediting documentation.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	500	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p><b>Finding:</b> Although no non-reimbursable meals were observed during the day of onsite review, all students were made to take all components excluding milk at lunch. The lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service.</p> <p><b>Corrective Action:</b> Please conduct a training in-service for foodservice staff at MLK school and submit a written statement with details on the training.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	501	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p><b>Finding:</b> At the Wright St school location the point of service staff member let a student go past the point of service without a 1/2 cup of fruit in their breakfast meal. DPI staff intervened and corrected the situation.</p> <p><b>Corrective Action:</b> Please submit a statement that staff have been retrained on reimbursable meals to confirm understanding of the Offer Versus Serve procedures at breakfast.</p>
<b>Site Name</b>	Clara Mohammed School, Inc.	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1409	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		<p><b>Finding:</b> School Food Authorities (SFAs) are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). It was noted that food was not properly safeguarded. The cooler that stores food for the school nutrition programs had staff food comingled. Staff food must be kept in a separate cooler. There was unopened, frozen milk in the milk cooler at the elementary school that was dated for 11/17 and was still in cooler on 11/21. Make sure all milk is discarded by the end of the day the date that is stamped on the carton. Observed a bag of rotten celery at the elementary school kitchen. All foods must be discarded within 4 days of opening from original package.</p>

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TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/22/2022	2459	1905	Administrative Review	Clara Mohammed School, Inc.				
<p><b>Corrective Action:</b> Upload a statement in SNACS of how you will ensure that all facilities (ex: training staff on proper food safety practices) that store food intended for school meals is safeguarded against theft and spoilage.</p>								
<p>Technical Assistance Entries:</p>								
<p><b>Comments</b></p>								
						<b>Created By</b>		<b>Created Date</b>
Please inform families of the unique opportunity their children are partaking in by sending home a FFVP Parent Letter. Templates for this communication are found on the FFVP Webpage ( <a href="https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable">https://dpi.wi.gov/school-nutrition/programs/fresh-fruit-vegetable</a> ). Alternatively, this editable letter could be posted on your school's website to promote awareness of the program.								11/22/2022 3:30:33 PM
11/22/2022	2449	305	Administrative Review	ALL	Food Service Director			
<p><b>Comments</b></p>								
						<b>Created By</b>		<b>Created Date</b>
Per SP54-2016, visiting school age (K-12) students can be offered a meal and claimed if they received a reimbursable meal.								11/22/2022 2:03:57 PM
11/22/2022	2448	807	Administrative Review	ALL	Food Service Director			
<p><b>Comments</b></p>								
						<b>Created By</b>		<b>Created Date</b>
The <a href="#">Civil Rights Self-Evaluation Compliance form</a> must be completed by October 31 annually. This is kept on file at the SFA until requested by DPI.								11/22/2022 1:58:17 PM
11/22/2022	2445	801	Administrative Review	ALL	Food Service Director			
<p><b>Comments</b></p>								
						<b>Created By</b>		<b>Created Date</b>
All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available.								
SFAs must annually distribute the Public Release to:								
<ul style="list-style-type: none"> <li>o Local news media</li> <li>o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)</li> <li>o Local employment office</li> <li>o Major employers contemplating or experiencing large layoffs</li> </ul>								11/22/2022 1:53:37 PM
SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.								
11/22/2022	2443	1404	Administrative Review	Clara Mohammed School, Inc.	Food Service Director			
<p><b>Comments</b></p>								
						<b>Created By</b>		<b>Created Date</b>
Both sharing tables and no thank you 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) that must be followed to implement each type of table safely and responsibly.								
Refer to the <a href="#">Sharing and No Thank You Tables Toolkit</a> for a comprehensive guide including standard operating procedures.								11/22/2022 1:04:58 PM
Definitions: A <b>sharing table</b> is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.								

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<p><b>A no thank you table</b> is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.</p> <p>Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.</p> <p>Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.</p>						
11/21/2022	2434	1006	Administrative Review	ALL	Food Service Director	
<b>Comments</b>					<b>Created By</b>	<b>Created Date</b>
The results of the Triennial Assessment of the Local Wellness Policy and any findings must be released to the public as a written report meaning they must be publicized either on the school website, in a school newsletter, email or other means. There is no required template for this report.						11/21/2022 3:59:41 PM
11/21/2022	2433	1005	Administrative Review	ALL	Food Service Director	
<b>Comments</b>					<b>Created By</b>	<b>Created Date</b>
SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)).						11/21/2022 3:58:48 PM
11/21/2022	2432	805	Administrative Review	ALL	Food Service Director	
<b>Comments</b>					<b>Created By</b>	<b>Created Date</b>
<p>At a minimum, School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination.</p> <p>The School Nutrition Team has created a <a href="#">Special Dietary Needs Policy template</a> which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information.</p>						11/21/2022 3:50:37 PM
11/22/2022	2462	803	Administrative Review	ALL	Food Service Director	
<b>Comments</b>					<b>Created By</b>	<b>Created Date</b>
<p><u>Processes for Complaints</u></p> <ul style="list-style-type: none"> <li>• Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</li> <li>• All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the <a href="#">Template Civil Rights Complaint Procedures</a> to create written procedures.</li> <li>• An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</li> <li>• If a complaint of discrimination is received at your district, the following procedures should be followed:             <ol style="list-style-type: none"> <li>1. Document the complaint using the <a href="#">USDA Program Discrimination Complaint Form (Español)</a>.</li> <li>2. Submit complaints within five days of receiving the complaint to:                 <ul style="list-style-type: none"> <li>Wisconsin Department of Public Instruction (DPI)                     <ul style="list-style-type: none"> <li>o Mail:                             <ul style="list-style-type: none"> <li>Director, School Nutrition Team</li> <li>125 S. Webster Street</li> </ul> </li> </ul> </li> </ul> </li> </ol> </li> </ul>						11/22/2022 6:06:39 PM

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Clara Mohammed School, Inc.

<ul style="list-style-type: none"><li>○ Madison, WI 53707-7841</li><li>○ Fax: (608) 267-0363</li><li>○ Email: <a href="mailto:jessica.sharkus@dpi.wi.gov">jessica.sharkus@dpi.wi.gov</a></li></ul> <p>3. Maintain a <a href="#">Civil Rights complaint log</a> at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.</p>		
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