

Administrative Review Report

Drummond Area School District

Commendations:

Thank you to all staff at Drummond Area School District for your cooperation during this Administrative Review (AR). A big thank you to the Food Service Director (FSD) and Authorized Representative for the well organized and thorough documentation provided prior to the review and for the quick response to questions and retrieval of additional documentation while the state agency was onsite; this greatly expedited the AR. We would like to extend a heart-felt thank you to all the food service staff at Drummond, you are operating a well-run program and it is clear that the students are benefitting from the care and work that is put in. It was great to see many scratch recipes and a mid-morning breakfast option for the older students.

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 online and in person in 2023. Find more information on these training opportunities on the DPI School Nutrition Training Webpage.

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition GOALS Training Webpage.

Administrative Review Report

Drummond Area School District

Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
Corrective Action History		<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>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Corrective Action History		<p><u>Finding:</u> The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not tracking the use of the funds separately.</p> <p><u>Corrective Action:</u> Provide a statement about the process that will be used to track how the funds are spent.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
Corrective Action History		<p><u>Finding:</u> SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p><u>Corrective Action 1:</u> Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year.</p> <p><u>Corrective Action 2:</u> Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	

Administrative Review Report

Drummond Area School District

<p>Corrective Action History</p>		<p><u>Finding:</u> Current Local Wellness Policy (LWP) does not include all of the required content and is missing foods sold outside of the school meal programs, foods provided but not sold, food and beverage marketing, triennial assessment, update/inform the public and the full nondiscrimination statement. (7 CFR 210.31).</p> <p><u>Corrective Action:</u> 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>
<p>Form Name</p>	<p>Professional Standards (1210 - 1219)</p>	
<p>Question #</p>	<p>1219</p>	
<p>Corrective Action History</p>		<p><u>Finding:</u> Non-school nutrition staff who have responsibilities for the school nutrition program(s), specifically the financial specialist, did not receive job specific training in the current school year (7 CFR 210.30).</p> <p><u>Corrective Action:</u> Provide a training plan for the current school year, for the financial specialist. This must include a minimum of civil rights training and would recommend either viewing the annual financial report webcast or reviewing the annual financial report manual.</p>
<p>Site Name</p>	<p>Drummond Hi</p>	
<p>Form Name</p>	<p>Meal Counting and Claiming - Day of Review (317-321)</p>	
<p>Question #</p>	<p>318</p>	
<p>Corrective Action History</p>		<p><u>Finding 1:</u> The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). On the day of onsite observation, 1 meal was not a complete reimbursable meal.</p> <p><u>Corrective Action 1:</u> Ensure all meals claimed are complete reimbursable meals and do not claim non reimbursable meals. Fiscal action will be calculated on the number of ineligible meals observed on the day of review.</p> <p><u>Finding 2:</u> The meal counting and claiming system for field trip meals does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal.</p> <p><u>Corrective Action 2:</u> Correct the meal counting process</p>

Administrative Review Report

Drummond Area School District

		to ensure field trip meals are tracked as the student receives their meal and provide a statement of how this process will be done moving forward.
Site Name	Drummond Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Corrective Action History		<p><u>Finding:</u> Drummond Area School District offers a self-serve garden bar, which is fantastic! However, no salad bar signage was posted to demonstrate proper portion sizes. Additionally, no in-house yield studies had been conducted to determine the portion size needed for items that do not fit nicely into a portioning utensil, such as cucumbers, radishes, carrots, celery and Bayfield apples.</p> <p>Procedures for conducting an in-house yield study can be found on the DPI Menu Planning page under Crediting (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>Salad bar signage templates are available on the DPI Signage page and may be used if desired. (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage)</p> <p><u>Corrective action:</u> Submit a photo of posted garden bar signage as well as documentation of in-house yield studies for cucumbers, radishes and Bayfield apples.</p>
Site Name	Drummond Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
Corrective Action History		<p><u>Finding:</u> At least 80% of the grains offered weekly must be whole grain rich. Due to a non-whole grain-rich hoagie bun crediting as 3.75oz eq of grain, only 76.56% of products offered during the week of review were whole grain-rich. Per the FSD, this was not the product that is typically used (the usual hoagie is non-whole grain-rich, but only 2 oz eq of grain, which would meet the 80% requirement).</p> <p><u>Corrective Action:</u> Submit crediting documentation for the hoagie bun that is usually ordered for the sub along with a statement of understanding that the 3.75 oz eq</p>

Administrative Review Report

Drummond Area School District

		bun should not be ordered and all planned menus must meet the 80% whole grain-rich requirement.
Site Name	Drummond Hi	
Form Name	Offer vs Serve (500-502)	
Question #	501	
Corrective Action History		<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for breakfast and lunch. With the exception of one, all students observed took a reimbursable meal. However, it is important for staff to understand the OVS requirements.</p> <p>OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns:~:text=Policy-,Meal%20Patterns,-Title%20/%20Description).</p> <p>A few specific situations observed include:</p> <ul style="list-style-type: none"> • One student had a meatball sub with cheese and an applesauce (3 full components) and was told to take an apple. • Middle school student went through the line with meatballs (no bun) and applesauce and told to take an apple. However, since he already had an applesauce, adding an apple still meant he only had 2 full components. The student later had a milk on his tray - so technically had a reimbursable meal, but that milk needs to be selected prior to the POS and the meal being counted. • One student had meatballs, cheese, 1/2 cup cooked carrots and 1/2 cup applesauce. For HS students, either the fruit OR the vegetable can be taken in a 1/2 cup serving and count as a full component, but the other two components must be in the full daily minimum. Therefore, this student either needed to take additional vegetable (1 cup total) OR additional fruit (1 cup total) OR 2 oz eq grain OR a milk to have a reimbursable meal. <p>The breakfast menu needs additional clarity to help students and staff know what they are able to select as</p>

Administrative Review Report

Drummond Area School District

	<p>part of their meal as well as the minimum requirements. The signage said that the frudel was 2 food items, but a student with a frudel and apple was told to take an additional item. It appeared that any student could elect a string cheese with their meal, but it was unclear if this was only intended to be paired with the menu items counting as 1 food item (cereal or pop-tart). Additionally, the menu planner needs to determine if there is a limit on the number of items students can select - for example, some students took 2 cereals, one student had 2 apple and a juice, etc.</p> <p><u>Corrective action:</u> Staff responsible for menu planning, meal service and point of service/determination of reimbursable meals must complete the Offer versus Serve training found in the DPI Online Learning Library. Please upload certificates of completion for each staff member in the Documents tab of SNACS. If the training is done as a group, upload a signed and dated training roster.</p>
Site Name	Drummond Hi
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action History	<p><u>Finding:</u> The correct size nondiscrimination "And Justice for All" poster was not located in the meal service area and/or not visible to students (FNS Instruction 113).</p> <p><u>Corrective Action:</u> Hang the correct size USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Corrected while onsite, no further action required.</p>
Site Name	Drummond Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
Corrective Action History	<p><u>Finding:</u> Section 12-201.11 (A) (2) of the Wisconsin Food Code requires that at least one person per SFA hold a Food Protection Manager Certification.</p> <p><u>Corrective Action:</u> Complete 8 hours of food safety training and provide documentation of completion.</p>
Site Name	Drummond Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1408

Administrative Review Report

Drummond Area School District

Corrective Action History	<p><u>Finding:</u> Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete.</p> <p><u>Corrective Action:</u> Upload one month of completed temperature logs into SNACS and provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.</p>
Site Name	Drummond Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1409
Corrective Action History	<p><u>Finding:</u> 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 storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.</p> <p>The following food storage violations were observed: in the freezer there were boxes that were not 6 inches off the floor, in the walk-in cooler the milk crates with milk cartons in them were not 6 inches off the floor, in the freezer the house made muffins, diced peppers and fresh tomatoes were not labeled, in dry storage spaghetti and rice that was opened and in clear plastic bags were not labeled and dated and in the cooler salad dressings and shredded cheeses that were opened were not labeled with the date they were opened.</p> <p><u>Corrective Action:</u> If possible, correct all observed storage violations during the on-site review. If the violation cannot be corrected during the on-site review, submit documentation indicating that food safety violations have been corrected.</p>
Site Name	Drummond Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	<p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. 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</p>

Administrative Review Report

Drummond Area School District

percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).

Finding: The following products were identified in the SFA's storage area as non-domestic/not containing a Country-of-Origin label (COOL) and not documented:

- Del Sol canned jalapenos (Mexico)
- Frozen sliced carrots (Canada)
- Stir fry blend vegetables (Spain/Netherlands/China)
- Sysco California blend vegetables (Spain)
- Bananas (Guatemala)
- Yellow bell peppers (Mexico)
- No COOL: Gold Medal muffin mix, golden Italian dressing, sweet pickle relish, HC Plus Apple juice, Sysco diced tomatoes, Hunts tomato paste.

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. If no country of origin is identified on the label, then the SFA must obtain documentation/ certification from the distributor or supplier.

Administrative Review Report

Drummond Area School District

Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
11/15/23	3786	409	Administrative Review	Drummond Hi	FSD
Comments					
<p>There were some crediting discrepancies found between the production record and documentation provided.</p> <ol style="list-style-type: none"> 1. Chicken nuggets. The serving size for 9-12 is 8 nuggets and the production record says that credits as 2.5 oz eq m/ma, 1 oz eq grain. However, based on the CN label provided, 5 nuggets = 2 oz eq m/ma, 1 oz eq grain; therefore, 8 nuggets would be 3 oz eq m/ma, 1.5 oz eq grain. 2. Brown rice pilaf - a 1/2 cup serving is credited as 2 oz eq grain on the production record. However, using both the recipe and exhibit A, 1/2 cup of rice would credit as 1 oz eq grain. 3. The hoagie bun (for the ham sub) - 1 roll = 108g which credits as 3.75 oz eq grain (not whole grain-rich) 					
11/15/23	3785	430	Administrative Review	Drummond Hi	FSD
Comments					
<p>Overall, production records were fairly complete. Improvements were made to the production records both prior to and during the on-site review. There are a few additional tweaks that will help ensure that all requirements are being met.</p> <ol style="list-style-type: none"> 1. Ensure that the planned quantity/planned number of servings for each menu item as well as the planned number of meals are documented on the production record prior to production. This will help determine the amount of food to prepare. Forecasting is being done using historical data but is not being documented. 2. For breakfast, be sure to document the planned/actual number of servings AND planned/actual quantity for each menu item. Additionally actual usage for condiments must be recorded (this can be done by weight or volume) 3. For milk, only the actual usage needs to be documented. This must be done separately for breakfast and lunch but can be done for all grade groups at the end of lunch service. 4. Juice and cereal varieties are offered, but each type is not documented on the production record separately. TA was provided during the pre-review phone call and variety recipes for these items were submitted prior to the on-site review. 					
11/15/23	3784	1106	Administrative Review	Drummond Hi	FSD
Comments					
<p>The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but this may not occur in the meal service area during meal service times. The Smart Snacks Standards represent the minimum standards, and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the</p>					

Administrative Review Report

Drummond Area School District

discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

Fundraisers are currently being tracked and none have occurred during the school day. However, the tracking form does not request some required information. Information that must be tracked for any fundraisers that occur during the school day (defined as midnight through 30 minutes after the end of the instructional day) includes:

- the time of the fundraiser
- description of items sold
- the specific location of the fundraiser (ex. if occurring in the school, will it be in the cafeteria, the hallway, the gym, etc.).

If it is a non-exempt fundraiser selling Smart Snacks compliant items, product labels and/or recipes must be provided to confirm compliance. It is recommended that the Student Fundraising Request form be updated to provide the additional information needed. Additionally, while not required, the use of the fundraiser tracking tools on our Smart Snacks webpage is encouraged. <https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks#:~:text=Resources-,Tracking%20Tools,-Use%20these%20tools>

11/15/23	3699		Administrative Review		FSD
Comments					
The applesauce cup is recorded on the production record as 4 oz. Please note that while the cup may be 4 fl oz and credit as 1/2 cup of fruit, the applesauce cup being used is actually 4.5oz. It is important to document this accurately as a 4oz applesauce cup does not actually credit as 1/2 cup of fruit.					
11/15/23	3744		Administrative Review		FSD
Comments					
Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually.					
11/15/23	3743		Administrative Review		FSD
Comments					
The free and reduced price meal application and notification that is on the school food service website should be removed as it is no longer relevant since the SFA is CEP-SFA wide and no households need to submit this application.					
11/15/23	3742	805	Administrative Review	ALL	FSD
Comments					
The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan. It is best practice to have this procedure/policy easily accessible for households, either by sending with welcome back letters at the beginning of the school year or on the school food service website. SFAs are not required to accommodate special dietary requests without a signed medical statement on file but can if they choose. The SFA should have a policy in place that addresses whether these requests are accommodated to avoid potential discrimination or civil rights issues. If					

Administrative Review Report

Drummond Area School District

accommodating a request, the student's meal must meet meal pattern requirements. The request may be accommodated using OVS or offering the student an alternative option that is creditable towards meal pattern requirements and ensures that daily and weekly requirements continue to be met.

11/14/23	3698	1217	Administrative Review	ALL	FSD
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Comments

SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required.

11/14/23	3696		Administrative Review		FSD
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Comments

DC notification letters are not required to be sent out for CEP SFA-wide schools.

10/30/2023	3787		Administrative Review		FSD
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Comments

The menu current indicates that "low fat milk" is offered. This should be updated to correctly reflect the variety of milk available by changing this to "milk variety" or "choice of milk."

10/30/23	3783	24	Administrative Review	Drummond Hi	FSD
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Comments

Currently, salt is available for students to use in the serving line. The salt is used infrequently, and salt-free seasons are offered on the garden bar. However, to ensure compliance with the dietary specifications of the meal pattern, specifically the sodium target, it is recommended that salt is not available to students.