

Administrative Review Report

Racine County Juvenile Detention Center

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/04/2019	12/20/2019
On-Site Review	01/07/2020	01/09/2020
Site Selection Worksheet	11/04/2019	11/04/2019
Entrance Conference	01/07/2020	01/07/2020
Exit Conference	01/09/2020	01/09/2020

Commendations:

We would like to thank the Racine County Juvenile Detention Center staff for all of their cooperation during the time we were there conducting the Administrative Review. Everyone was friendly and helpful.

Recommendations:

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

The Nutrition Program Consultant did not receive documentation for several administrative areas. These are noted as Corrective Action in this final report. When all of the corrective action is received and reviewed, we will be able to close this Administrative Review.

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	311	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/10/2020 12:58 PM	<p>Finding: Edit checks are needed for consolidation of counts to submit a claim. Edit checks have not been submitted.</p> <p>Corrective Action Needed: Submit Edit Checks for the Review Period (month of December) that were used to consolidate the claim for submission.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/07/2020 01:59 PM	<p>Finding: On the Annual Financial Report, all of the revenues and expenses were not allocated to the correct revenue and expense category (7 CFR 210.19).</p> <p>CA: Review the Annual Financial Report webcast on the DPI website then update the 2018-19 Annual Financial Report with revenues and expenses reported in the correct categories .Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/07/2020 01:41 PM	<p>Finding: The RCCI written complaint procedure does not contain the nondiscrimination statement. It is also recommended to post the USDA complaint procedure on the juvenile detention area of the webpage.</p> <p>CA: Provide a timeline for when a school meal program complaint procedure will be updated.</p>
Site Name		

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Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/07/2020 12:36 PM</p>	<p>Finding#1: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. #1: Language is required regarding the 3 yr. Triennial Assessment. Corrective Action: Add current example from Checklist on DPI website. Finding #2: Language is required regarding Marketing Food & Bev. Corrective Action: Restrict language to items in Smart Snack Rule.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/09/2020 11:02 AM</p>	<p>Finding: The verification report was submitted, however, during an Audit in January 2020, it was found to be incorrect. Corrective Action: The Supervisor at DPI was contacted, and the report was unlocked. Steps were taken at that time between the DPI consultant and the Authorized Rep. to correct and re-submit the report. It was completed on-site, nothing further needed.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/08/2020 09:24 AM</p>	<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. CA: Record training hours on a tracker which includes the name of staff person, position, brief list of responsibilities, hours scheduled, and training completed.</p>
Site Name		

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Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1402	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/08/2020 11:13 AM	<p>ARAMARK Finding: Documentation is not being kept for non-domestic products used at the juvenile facility.</p> <p>Corrective Action: Begin tracking non-domestic products used at the juvenile facility, which may include Buy American information from the vendor or distributor's website. A tracking template is available on our webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). See Buy American in a Nutshell for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf).</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	400	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flag 01/09/2020 10:10 AM	<p>ARAMARK and JDC Finding: Students must be served 1 oz. eq. grain, 1 cup fruit, and 1 cup milk daily at breakfast. Students must be served 2 oz. eq. meat/meat alternate, 2 oz. eq. grain, 1 cup fruit, 1 cup vegetable, and 1 cup milk daily at lunch. Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 30 meals on 1/8, the day with the missing milk component at breakfast.</p> <p>Corrective Action: Submit a written plan of action that will be taken when a component is missing prior to meal service.</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/24/2020 10:15 AM	<p>ARAMARK and JDC Finding: Students must be served 2 oz eq. meat/meat alternate, 2 oz. eq. grain, 1 cup fruit, 1 cup vegetable, and 1 cup milk daily at lunch. On 1/8 students were only served ½ cup of mandarin oranges. This is a repeat</p>

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		<p>shortage, therefore those 36 meals cannot be reimbursed.</p> <p>Corrective Action: Submit a written plan of action that will be taken to ensure all components are served in their full quantity at each meal service. This may include training for JDC staff.</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	403	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/09/2020 10:05 AM</p>	<p>ARAMARK and JDC Finding: It is required that schools offer two or more milk types at each meal service. RCCIs can apply for a milk-type waiver, which only requires a variety of milk types to be offered over the course of the week. JDC has not applied for a milk waiver. The milk recipe on file shows that only 1% milk is offered to students daily. The lack of variety non-compliant, whether the facility has a milk waiver or not.</p> <p>Corrective Action: Option A is to submit a request for a milk waiver, forward the approval letter to the PHN, and offer a variety of milk types over the course of the week (http://goo.gl/forms/vsmOkcQ8CY). Option B is to offer a variety of milk types at each meal service and submit a written statement agreeing to do so as well as an updated milk recipe.</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	<p>01/24/2020 10:12 AM</p>	<p>JDC Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. This will also assist JDC staff in assembling reimbursable meals. Signage must be posted visible to students. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of complete signage posted near the lunch and breakfast service line.</p>
Site Name	Racine Juvenile Detention Cent	

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Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	01/30/2020 10:14 AM	<p>ARAMARK and JDC Finding: Production records are not available for 35 meal services during the month of December. Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; without production records, there is no way to prove that reimbursable meals were served. Fiscal action will be assessed for those meals. Corrective Action: The following documentation is needed for a 7-day week in January 2020: •Monthly menus •Completed daily production records for breakfast and lunch •Standardized recipes for all items prepared in-house with two or more ingredients •Current Child Nutrition (CN) Labels or manufacturer's product formulation statements (PFS) to show how purchased products credit as meal components •Complete labels with nutrition facts (name of the food item, brand name, nutrition facts and ingredients) for menu items and/or ingredients in recipes •Product labels for grain products (bread, buns, rolls, etc.) used during the review week and days of on-site review that include the ready to eat weight of a serving in grams or ounces, the ingredient list, and nutrition facts</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/30/2020 10:23 AM	<p>ARAMARK Finding: Acceptable crediting documentation was not available for the beef patty, charbroiled patty, chicken patty, turkey, and meatballs. Processed foods that are not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting.</p> <p>Corrective Action: Submit crediting documentation for the items submitted for Corrective Action #409. If sufficient crediting documentation is not available, select new products that have crediting documentation or can be found in the USDA Food Buying Guide and submit crediting documentation for the products selected.</p>
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Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flag 01/30/2020 10:20 AM	<p>Finding: Production records are incomplete. The following is missing or incomplete: •Amount prepared/sent (may be completed by JDC or Aramark) •Waste/left over (completed by JDC) •Amount served (completed by JDC) •Total number of reimbursable meals distributed(completed by JDC)</p> <p>Corrective Action: Submit one week of completed breakfast and lunch production records, per #409.</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	412	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Fla 01/24/2020 10:30 AM	<p>ARAMARK Finding: 50% of grains offered at lunch over the course of the week must be whole-grain rich. The sliced wheat bread and rotini are enriched, not whole-grain rich. Less than 50% of grains offered at lunch during the week of review are whole-grain rich.</p> <p>Corrective Action: Find whole grain-rich versions of grain products so that cycle menu week #4 is at least 50% whole-grain rich. Submit the nutrition facts label.</p>
Site Name	Racine Juvenile Detention Cent	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date	March 13, 2020	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/24/2020 10:33 AM	<p>JDC Finding: Students declined some portions of the breakfast meal. Students must accept the complete meal in order to be counted and claimed as reimbursable. Each breakfast should contain (at minimum) 1 oz. eq. grain, 1 cup fruit, and 1 cup milk. Lunch should contain (at minimum) 2 oz. eq. grain, 2 oz. eq. Meat/Meat Alternate, 1 cup fruit, 1 cup vegetable, and 1 cup milk. Students who only want a portion of the meal cannot be counted and claimed for reimbursement.</p> <p>Corrective Action: Training staff to serve the planned</p>

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	portion size (per production records) of each item listed to students at each meals. Submit an outline of the training and a roster for all in attendance.
Site Name	Racine Juvenile Detention Cent
Form Name	Reporting and Recordkeeping (1502)
Question #	1502
TA Log #	No TA Log# found
Due Date	March 13, 2020
Corrective Action Status	Flagged
Corrective Action History	Flagged 02/06/2020 02:41 PM Several Documents asked for during the Administrative Review were not able to be produced.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/09/2020	1268	1400	Administrative Review	ALL				
Comments					Created By		Created Date	
Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). This RCCI has a Food Safety Binder that has all the required components in it, however, it is not kept in the kitchen. Corrective Action: Move the Food Safety Binder to the Kitchen area. Employees must be able to have access to it.							1/9/2020 1:40:18 PM	
01/08/2020	1267	409	Administrative Review	Racine Juvenile Detention Cent				
Comments					Created By		Created Date	
ARAMARK and JDC Technical Assistance: Up to 50% of the cups of fruit served at lunch over the course of a week can be 100% juice. No more than half of all cups of fruit served at lunch can be in the form of 100% juice. The same is true at breakfast.							1/9/2020 10:15:33 AM	
01/08/2020	1266	409	Administrative Review	Racine Juvenile				

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					Detention Cent					
Comments					Created By	Created Date				
ARAMARK Technical Assistance: 138 ct apple is used for the "1/2 cup equivalent fruit." A 138 ct apple actually credits as 1 cup.										
01/08/2020	1265	1107	Administrative Review	Racine Juvenile Detention Cent						
Comments					Created By	Created Date				
JDC TA: Students inquired about second servings. As a reminder, second servings at breakfast or lunch are not allowed.						1/9/2020 10:14:11 AM				
01/08/2020	1420	1411	Administrative Review	Racine Juvenile Detention Cent						
Comments					Created By	Created Date				
Moving forward, complete Non-Compliant Product Forms for all non-domestic products (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). Further information can be found in Buy American in a Nutshell (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf).						1/24/2020 10:08:20 AM				
01/07/2020	1243	803	Administrative Review	ALL						
Comments					Created By	Created Date				
Civil rights complaints that are filed with the district, must be forwarded to the Civil Rights Division of USDA FNS within five days. The policy/procedure must contain language stating that complaints will be forwarded within 5 days.						1/7/2020 1:47:43 PM				
01/07/2020	1241	1000	Administrative Review	ALL						
Comments					Created By	Created Date				
Technical Assistance was provided to the Superintendent to check DPI website beginning of June 2020 for resources for Triennial Assessment.						1/7/2020 12:39:07 PM				