

# Administrative Review Report

Bruce School District

## Commendations:

Thank you for a wonderful visit to the Bruce School District. Staff were very welcoming, hospitable and passionate about feeding nutritious meals to the students. The staff is doing a great job. Keep up the good work!

From the PHN:

## 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. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays the week of January 16-20, 2023. Take the pledge to participate in any capacity from adding a new dip or seasoning to showcasing several new dishes. It is up to you! Visit the [Around the World in 80 Trays webpage](#) to take the pledge and find more event information. Document the event (pictures, video, sound clips, etc.) and send to [DPIFNS@dpi.wi.gov](mailto:DPIFNS@dpi.wi.gov) so we can share your success!

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## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<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), labor is not being broken out for each program.</p> <p><u>Corrective Action:</u> Update the 21-22 SY Annual Financial Report to break out labor for NSLP, SBP, ASP, FFVP, and WSDMP. Upload the corrected report into SNACS and notify the consultant by email this has been completed. Once approved, the DPI accountant will make adjustments in the system to correct errors after December 31.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>Corrective Action History</b>		<p><u>Finding 1:</u> Paid student milks from the WSDMP are being paid for by the school district, but a transfer was not made to Fund 50 to cover the cost of these milks during the 21-22 SY.</p> <p><u>Corrective Action 1:</u> For the 21-22 SY, take the total paid student milks served within the WSDMP, multiply by the cost of the milk and transfer that amount plus any labor associated with those paid milks served. Submit a copy of the General Ledger to verify this transfer from Fund 10 to Fund 50 has occurred.</p> <p><u>Finding 2:</u> Cost of paid student milk and the labor for those milks must be accounted for under Nonprogram Foods transfer.</p> <p><u>Corrective Action 2:</u> Update the Annual Financial Report under the Reported Revenues for the WMMP (Wisconsin School Day Milk Program) under the column for Operating Transfer from Non-Foodservice Account. Then update the Reported Expenditures to include the labor and food expenses for WMMP (WSDMP). Submit changes to Nutrition Program Consultant in SNACS and email a copy for approval. Consultant will work with DPI accountant to update AFR after December 31st.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>Corrective Action History</b>		<p><u>Finding:</u> Current Local Wellness Policy (LWP) does not include information regarding the triennial assessment (7 CFR 210.31).</p> <p><u>Corrective Action:</u> Provide a statement when you plan to have the Local Wellness Policy updated to include the triennial assessment language within the 22-23 SY.</p>
<b>Site Name</b>	Bruce El	
<b>Form Name</b>	Dietary Specification Assessment Tool (Off Site Review)	
<b>Question #</b>	19	
<b>Corrective Action History</b>		<p><u>Finding:</u> Standardized recipes are required for all menu items made in-house with more than one ingredient. The Mostaccioli and the Bunkhouse Beans recipes are not standardized.</p> <p><u>Corrective Action:</u> Submit a standardized recipe for the Mostaccioli and the Bunkhouse Beans. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the standardized recipe webpage (<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>)</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1007)	
<b>Question #</b>	1007	
<b>Corrective Action History</b>		<p><u>Finding:</u> SFA has not completed a triennial assessment of the Local Wellness Policy within the last three years.</p>

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		<p><u>Corrective Action:</u> Complete the assessment of the Local Wellness Policy and notify the public of the results on the school website or other means. Upload the results into SNACS or send the Nutrition Program Consultant a link to the results on the school website.</p>
<b>Site Name</b>		
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1400	
<b>Corrective Action History</b>		<p><u>Finding:</u> The SFA did not have a copy of the site specific Standard Operating Procedures (SOPs) for the <a href="#">Afterschool Snack Program</a>, <a href="#">Sharing/No Thank you table</a>, and <a href="#">Temperature Control for Safety (TCS) foods</a>. The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p><u>Corrective Action:</u> Update the food safety plan to be specific for the district. Submit a statement in SNACS that these SOPs have been added to the Food Safety Manual.</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	403	
<b>Corrective Action History</b>		<p><u>Finding:</u> A milk variety was not offered to students participating in the School Breakfast Program. Only 1% plain milk was offered to students. Students participating in the NSLP and SBP must be offered a milk variety (at least two allowable milk types). Allowable milk types in Child Nutrition Programs include fat-free (skim) and low-fat (1 percent) flavored/unflavored milk, and lactose-free or lactose-reduced fat-free or low-fat milk.</p> <p><u>Corrective Action:</u> Please submit a week of breakfast production records documenting milk usage to show that a milk variety is offered.</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	404	
<b>Corrective Action History</b>		<p><u>Finding:</u> Signage was not posted at breakfast and lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our signage webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a>).</p> <p><u>Corrective Action:</u> Submit a picture of completed signage posted near the lunch and breakfast service line.</p>
<b>Site Name</b>	Bruce EI	
<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> The daily minimum requirement for vegetables was not met for elementary school for lunch during the week of review (October 17-24, 2022). The following represent the planned portion sizes: Tuesday 1/2 cup green beans was offered and Friday only 1/2 cup of broccoli was offered. Both Tuesday and Friday were short 1/4 cup of vegetables.</p> <p><u>Corrective Action:</u> Describe specifically how the daily minimum requirement for vegetables will be met for lunch during the days containing the shortage (e.g., portion sizes increased, additional menu items, product replacements, etc.).</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	500	

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<b>Corrective Action History</b>		<p><u>Finding:</u> Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at both breakfast and lunch. The breakfast and lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service.</p> <p><u>Corrective Action:</u> All school nutrition professionals are responsible for determining reimbursable meals and need to attend additional training on OVS. Please submit details regarding when and where the training was held, who attended, how the training was conducted, and how often training will be repeated. Posting USDA Team Nutrition OVS posters and conversations with teachers and the district administrator should help teachers understand and support the child nutrition programs at Bruce School District.</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1106	
<b>Corrective Action History</b>		<p><u>Finding:</u> A teacher on staff works with students to sell non-compliant food to all students (K-12) during the school day and does not abide by the two-week exempt fundraiser limit. The following are non-compliant: Popcorn on Fridays and bottled water with flavor packs. These non-compliant products need to follow the exempt fundraiser two-week limit per student organization, per school, per school year, or be discontinued. See WI DPI's Smart Snacks webpage for more information (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>)</p> <p><u>Corrective Action:</u> Submit a written statement outlining who will be responsible for oversight of Smart Snack regulations within Bruce School District. Include examples of education provided to all involved with the sales of foods and beverages in the school district and include details as to how groups will ensure compliance with these regulations. Additionally, please address how current food and beverages not meeting Smart Snack standards will be made to comply with these regulations.</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1408	
<b>Corrective Action History</b>		<p><u>Finding:</u> At the elementary school breakfast service, milk was not temperature controlled using a refrigerated cooler, ice packs, or ice. It is simply placed in a crate. The milk temperature is not monitored and recorded upon return to the kitchen. This practice does not adhere to the Time as a Public Health Control SOP in the food safety plan.</p> <p><u>Corrective Action:</u> Milk, cheese, and other dairy products are considered time/temperature control for safety (TCS) foods, and thus must be held under temperature control or be handled using time as a public health control procedure. Saving and re-servicing TCS foods held outside of temperature control is not allowable per the Wisconsin Food Code, although local enforcement by the sanitarian conducting food safety inspections may vary. Regardless of which option for serving TCS foods is used, a corresponding SOP must be included in the site-specific food safety plan and adhered to. Consider the following options to modify the current procedures: Utilize time as a public health control (TPHC) procedures. Utilize ice-lined milk bags, barrels, or containers so that temperature control is used, along with monitoring of temperatures. Work with local regulatory authority/sanitarian to develop an alternative, approved method for re-servicing milk and other TCS foods that have been held outside of temperature control during meal service. It was recommended to purchase a refrigerated breakfast cart or to use ice/ice packs for the milk, cheese sticks, yogurt, etc., during meal service. It is recommended to consult with the local sanitarian to establish procedures for appropriately saving these leftover, unserved items. Submit a statement, describing how TCS food items held outside of temperature control during service, will be kept cold during meal service or thrown away immediately after meal service.</p>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>Corrective Action History</b>		<p><u>Finding:</u> The Buy American Provision is not being observed.</p> <p><u>Corrective Action:</u> Work with your distributor to ensure products are purchased that are compliant and any food items that are not compliant must be tracked using the Noncompliant Product List Form for the non-domestic products.</p>

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		Noncompliant Product List templates can be found on the Buy American webpage <a href="https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american">https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american</a>
<b>Site Name</b>	Bruce EI	
<b>Form Name</b>	Afterschool Snack Program	
<b>Question #</b>	6	
<b>Corrective Action History</b>	<p><u>Finding 1:</u> Snacks provided for the Afterschool Snack Program did not meet the minimum meal pattern requirements of offering two different components.</p> <p><u>Corrective Action 1:</u> Review the Afterschool Snack Program meal pattern on the Afterschool Snack webpage at <a href="https://dpi.wi.gov/school-nutrition/programs/afterschool-snack">https://dpi.wi.gov/school-nutrition/programs/afterschool-snack</a> Submit an updated Afterschool Snack menu of 4 weeks that includes two different components each day. Show the portion sizes and how each one credits. Upload this under the Documents tab in SNACS. Fiscal action will apply to non-reimbursable snacks claimed during the review month and day of observation if students only took one component.</p> <p><u>Finding 2:</u> Snacks provided for the Afterschool Snack Program were not offered in the minimum portion sizes.</p> <p><u>Corrective Action 2:</u> Review the Afterschool Snack Program meal pattern on the Afterschool Snack webpage at <a href="https://dpi.wi.gov/school-nutrition/programs/afterschool-snack">https://dpi.wi.gov/school-nutrition/programs/afterschool-snack</a>. Provide an updated Afterschool Snack menu that includes two different components each day with the minimum portion sizes required per the meal pattern. Since you will upload a copy of this for Corrective Action 1, no need to send another copy.</p>	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/09/2022	2691		Administrative Review		FSD			
Per the Agreement for the WSDMP, schools are required to serve Wisconsin-produced milk. Check with your distributor to verify it is WI produced milk and consider including that stipulation in the SFA's milk bid.								

11/09/2022	2690	805	Administrative Review	ALL	FSD			
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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.

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. The School Nutrition Team has created a [Special Dietary Needs Policy template](#) 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.

SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within offer vs. serve. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian.

SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. SFAs must get pre-approval from the DPI School Nutrition Team by completing the [Fluid Milk Substitute Approval Form](#). A [List of Allowable Fluid Milk Substitutes](#) is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements