

# Administrative Review Report

Oostburg School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/17/2019	01/21/2020
On-Site Review	02/04/2020	02/06/2020
Site Selection Worksheet	12/17/2019	12/18/2019
Entrance Conference	02/04/2020	02/04/2020
Exit Conference	02/06/2020	02/06/2020

## Commendations:

Thank you to the staff at Oostburg School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests as well as pulling records for the on-site portion of the review.

It was a pleasure to meet and work with school nutrition staff. All staff members were kind, welcoming, and knowledgeable. Staff asked great questions that demonstrated their understanding and strong grasp on program requirements. The lunch meal was very tasty and visually appealing. The dining area was warm and inviting. It was a pleasure to visit Oostburg School District.

## Recommendations:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables,

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legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	104	
<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 electronic application process was not providing detailed information to households on how to enter a program name which is required by DPI when a case number is listed on either a paper or electronic application.</p> <p><b>CA:</b> Please correct by following the step by step guide that was provided by the consultant or reach out to the software company for help. Please submit a statement on the action taken to correct this.</p>
<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:</b> On the Annual Financial Report, labor was not broken out for the non-program foods expense category (7 CFR 210.19).</p> <p><b>CA:</b> Review the Annual Financial Report webcast or manual on the DPI website then update the 2018-19 Annual Financial Report showing labor broken out for non-program foods expense category. Upload the corrected report into SNACS. Once reviewer approves the report it will need to be updated in the online portal. Please contact the DPI accountant to make any adjustments after December 31.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<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> Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The Local Wellness policy checklist was left on-site to assist SFA in updating content.</p> <p><b>CA:</b> 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.</p>

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Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> The sharing of information letter was provided for households on the website. However, there are no fee waivers or activity waivers and so there is no need to have this letter available.</p> <p><b>CA:</b> Please remove the sharing of information letter the website. Submit a statement of understanding regarding that this form will be removed from the website. In the future if fee waivers become available it is okay to then utilize the sharing of information letter if the district chooses to do so.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> SFA did complete a confirmation review before verifying however it was conducted after notification was sent for households to submit documentation to verify what was on the application.</p> <p><b>CA:</b> Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> Application selected for verification was verified correctly (7 CFR 245.6a) per SFA. However, the original documentation was not available to confirm accuracy.</p> <p><b>CA:</b> Please reach out to household for documentation and submit a copy of the verified application and the documents used to verification to reviewer. Please submit a statement of understanding that a copy of the original documents must be kept on file.</p>

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Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> The correct non-discrimination statement was included on all program materials but the format was incorrect on the direct certification letter and the approval and denial letter.</p> <p><b>CA:</b> Update program materials to include the correct format for the non-discrimination statement. Upload into SNACS a copy of the two letters.</p>
Site Name	Oostburg Mid	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> Italian Pasta Bake recipe not standardized and missing recipe for the Chicken and Gravy recipe.</p> <p><b>CA:</b> Update and submit a standardized recipe for each recipe listed above.</p>
Site Name	Oostburg Mid	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1104	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> Insufficient Smart Snacks documentation for Shoe Box school store.</p> <p><b>CA:</b> Submit the product labels for the food and beverage items sold in the school store. Submit a statement that includes specifics on who at the school will be responsible for tracking the food and beverages at the school store and how documentation will be kept.</p>
Site Name	Oostburg Mid	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History		<p><b>Finding 1:</b> The Snyder's Olde Tyme Pretzels and Black Forest Juicy Burst Fruit Flavored Snacks do not meet Smart Snacks standards. A food must meet one of the general standards: be whole grain rich, have a fruit, vegetable, dairy product, or protein food as the first ingredient, or be a combination food with at least ¼ cup fruit and/or vegetable. These products do not meet one of the general standards.</p> <p><b>CA:</b> Submit a statement that explains what will be done with these products to comply with the Smart Snack regulations.</p> <p><b>Finding 2:</b> Coffee and G2 beverages sold in the Shoe Box school store accessible to both middle school and high school students. These beverages are not allowed at the middle school level.</p> <p><b>CA:</b> Submit a statement that explains what the school will do to ensure that middle school students are not able to purchase these items.</p>
Site Name	Oostburg Mid	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1106	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> Not all fundraisers are being tracked and checked for compliance with Smart Snacks regulations.</p> <p><b>CA:</b> Submit a statement that explains your plan to create a procedure for fundraiser approval. Include specifics on who at the school will be responsible for tracking fundraisers and how documentation will be kept.</p>
Site Name	Oostburg Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p><b>Finding:</b> The most recent food safety inspection report was not posted in a publicly visible location.</p> <p><b>CA:</b> Provide a statement of where the most recent food safety inspection report will be posted and visible to the public.</p>
Site Name	Oostburg Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	TA Log# exists	
Due Date		

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<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>		<p><b>Finding:</b> The SFA maintains documentation from their vendor, however, a reason for exception is needed to comply with the necessary documentation for the Buy American provision.</p> <p><b>CA:</b> Complete a non-compliant product sheet (<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>) for three products of your choosing.</p>
	CAP Submitted	uploaded into the documents tab. refer to Buy American CA and Buy American CA correspondence documents.
	CAP Accepted	CAP Accepted

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/05/2020	1641	1104	Administrative Review	Oostburg Mid				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
Smart Snacks - Shoe Box school store: Better documentation and a process for checking products is needed to ensure that all snacks are Smart Snacks compliant. In addition, coffee and G2 beverages are being sold in the store and the store is accessible to both middle school and high school students. You must ensure that only the high school students are able to purchase the coffee and G2 drinks during the school day, as those products are not allowed at the middle school level.							2/12/2020 4:28:36 PM	
02/05/2020	1640	1104	Administrative Review	Oostburg Mid				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
Smart Snacks - Middle School beverage vending machine: Beverages are being tracked, however, some products are not available to students during the school day. While this is acceptable, a note should be made on the tracking sheet that this is the case to avoid confusion about what students have access to.							2/12/2020 4:27:20 PM	
02/05/2020	1639	1104	Administrative Review	Oostburg Mid				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
Smart Snacks - Middle School snack vending machine: Better documentation and a process for checking products is needed to ensure that all snacks are Smart Snacks compliant. While onsite it was noted that the following products are non-compliant: -- Snyder's Olde Tyme Pretzels - not whole grain-rich --Black Forest Juicy Burst Fruit Flavored Snacks - sugar is the first ingredient The							2/12/2020 4:25:57 PM	

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Alliance for a Healthier Generation Smart Snacks Product Calculator is recommended to assess compliance of products sold outside the reimbursable meals ( <a href="https://foodplanner.healthiergeneration.org/calculator/">https://foodplanner.healthiergeneration.org/calculator/</a> ). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. When entering products into the calculator, be sure to read all the categories carefully. The Black Forest fruit snacks and pretzels were entered incorrectly and therefore a compliant page was generated in error.									
02/05/2020	1638	1104	Administrative Review	Oostburg Mid					
Comments					Created By	Created Date			
Smart Snacks - Fundraisers Tracking all fundraisers is crucial to ensuring compliance. While there were tracking sheets at the school not all fundraisers were on the list. While reviewers were onsite a poster was seen that indicated that non-compliant food items would be sold for a valentine fundraiser. This was not communicated to the food service director nor checked for compliance. A procedure for fundraising approval is needed. Tracking templates are available on the Smart Snacks webpage, ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a> ).						2/12/2020 4:21:37 PM			
02/05/2020	1637	1411	Administrative Review	Oostburg Mid					
Comments					Created By	Created Date			
Buy American The SFA maintains documentation from their vendor, however, a reason for exception is needed to comply with the necessary documentation for the Buy American provision. The Refer to the Buy American in a nutshell summary document for more information. 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 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands). The following information must be recorded on a Buy American Non-Compliant Product List: Date Name of product Country of origin Reason Cost analysis Seasonality Availability Substitution Distribution Other 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> ).						2/12/2020 4:18:33 PM			
02/05/2020	1636		Administrative Review						



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Comments					Created By	Created Date
<p>Breakfast It is strongly encouraged that the SFA explore the option of Breakfast After The Bell (BATB), both to reach more students and to increase revenue from a boost to the number of reimbursable meals sold. BATB can be structured in a variety of ways and tailored to best meet the needs of your students and staff. Most importantly, BATB ensures access to breakfast for all students, including those who may not arrive at school early enough to participate in the traditional breakfast in the cafeteria. Many schools utilize a Grab'n'Go style of service at the Middle School level for BATB. Students can quickly select a portable reimbursable meal during passing times. Some schools opt to extend the passing time between first and second periods to allow for a "Nutrition Break," which is another option to consider. With support from food service staff, administration, custodial services, and teachers, BATB can be executed with minimal-to-no impact to the regular school day. Review the Serving Up A Successful School Breakfast Program toolkit for more information on getting started. This and other resources on found on the School Breakfast Program webpage (<a href="https://dpi.wi.gov/school-nutrition/programs/school-breakfast">https://dpi.wi.gov/school-nutrition/programs/school-breakfast</a>; <a href="https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources">https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources</a>).</p>						2/12/2020 4:17:14 PM
02/05/2020	1635	409	Administrative Review	Oostburg Mid		
Comments					Created By	Created Date
<p>Crediting and Rounding Crediting for meat/meat alternate (M/MA) and grain products must always be rounded down to the nearest quarter (0.25) ounce equivalent (oz eq). For example, if the diced chicken in the Chicken and Gravy recipe credits as 1.47 ounce equivalent (oz eq), this amount must be rounded down to 1.25 oz eq, not up to 1.5 oz eq. Here are a few ways in order to determine the crediting of a meat product such as the diced chicken. One way is to determine what the intended serving size is (e.g., ½ cup, 2 oz spoodle etc). Take the serving utensil, fill it with a level scoop of the diced chicken and put that amount of meat on a kitchen scale to determine the ounces of meat that fills the serving utensil. Then refer to the crediting documentation for the diced chicken to determine how to credit the product. If, for example, a ½ cup of diced chicken weighs 4 ounces and the crediting documentation says that it takes 1.15 ounces of meat to credit as 1 ounce equivalent (oz eq) then some simple math must be done to figure out how many oz eq are in 4 ounces of diced chicken. By doing cross multiplication, it is revealed that 4 ounces of meat, in a ½ cup serving size credits as 3.25 oz eq meat. *this is just an example and not intended to be used as actual crediting. Another way to determine the crediting of a meat product per serving is to look at the recipe (if one is used). First determine how much meat is in the entire recipe. Convert that number into ounces, if not already. Divide by the number of servings in the recipe and compare it to the</p>						2/12/2020 4:15:15 PM

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crediting documentation to determine the correct crediting. For example, there is 50 pounds of diced chicken in a recipe. 50 lbs = 800 ounces. The recipe makes 350 servings, so divide 350 into 800 ounces. Therefore, there is 2.285 ounces of meat per serving. If the crediting documentation states that 1.15 ounces of meat equals 1 oz eq meat/meat alternate then each serving of this recipe provides 1.75 oz eq meat /meat alternate.								
02/05/2020	1634	409	Administrative Review	Oostburg Mid				
Comments								
				Created By	Created Date			
<p>Standardized Recipes Standardized recipes are required for all menu items that have more than one ingredient (e.g., diced chicken and gravy, grilled cheese or a peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Technical assistance was provided for the recipe standardization process. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources (<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>) Consider using the Recipe Analysis Workbook (RAW) found in Exhibit A of the Food Buying Guide (<a href="https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs">https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs</a>). The Recipe Analysis Workbook is a tool used to determine the expected meal pattern contribution and crediting statement for a recipe. Determining meal pattern contributions for recipes is an important step in ensuring that meals served are nutritious and meet Federal meal pattern requirements. The Recipe Analysis Workbook provides the specifics for determining the meal pattern contribution of a recipe served in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The information may also be used to determine the meal pattern contribution of recipes served in the Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), and NSLP Afterschool Snack Service. The total amount from each of the vegetable subgroups can be combined to determine the vegetable component for the CACFP meal pattern. The Italian Pasta Bake recipe contained multiple post-its notes attached with additional notes about the preparation of the recipe. Additionally the recipe calls for 80/20 ground beef but crediting for beef crumbles was attached to the recipe. Caution should be exercised when using products interchangeably due to the difference in crediting. Ensure the recipe states exactly what product is used. If both products will be used then a note should be added to the directions to indicate</p>								2/12/2020 3:47:11 PM

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what amount of each product is required to credit the recipe as intended.		
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