

Administrative Review Report

Elmbrook School District

Sites reviewed Fairview South and Pilgrim Park

Schedule Type	Start Date	End Date
Off-Site Review	11/09/2022	12/09/2022
On-Site Review	01/09/2023	01/11/2023
Site Selection Worksheet	09/01/2022	09/30/2022
Entrance Conference	01/09/2023	01/09/2023
Exit Conference	01/11/2023	01/11/2023

Commendations:

At Fairview South, the teacher in the first room we observed that was preparing meals for the students is clearly doing what he loves to do and knows those students needs inside and out, excellent job!

From Public Health Nutritionist:

Thank you to all staff at Elmbrook School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your 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. 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.

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 01/09/2023 02:41 PM	Finding: The SFA allows the purchase of a second meal. Second meals are no longer permissible to be sold because a whole bundled meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements CA: Provide a statement of how individual items will be sold to students as nonprogram foods.
	CAP Submitted on 01/10/2023 02:03 PM	We will eliminate second meal options at all locations. This button has already been removed from screens and the teams have been instructed to charge individual a la carte for second choices.
	CAP Accepted 01/10/2023 03:42 PM	CAP Accepted

Administrative Review Report

Elmbrook School District

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/11/2023 06:33 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The funds are not being tracked separately.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide 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 Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2023 08:36 AM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool. Please add vended meals sold to St. Agnes, adult meals for breakfast and lunch, and list what items are included in "a la carte." (7 CFR 210.14).</p> <p>CA: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
Form Name	Indirect Costs (712)	
Question #	712	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2023 11:20 AM</p>	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin. Custodial wage is charged as a percentage and if it is charged to food service, a time study must be completed yearly and only the amount actually spent on food service activity may be charged to the program. CA: All costs charged to the nonprofit school food service account must be made into direct costs. Complete a 2 week time study for custodial labor to determine what the direct cost would be. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2021-22 through the Administrative Review.</p>
Form Name	Civil Rights (800 - 807)	
Question #	801	
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 01/10/2023 11:22 AM</p>	<p>Finding: The Public Release was not published in the paper or distributed to the required locations.</p> <p>CA: Supply a statement that the Public Release will be published in the paper unless there is a charge, and upload</p>

Administrative Review Report

Elmbrook School District

		into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
	CAP Submitted on 01/11/2023 11:55 AM	We will submit a public release to the local Brookfield paper as well as the journal sentinel. We will also reach out to the Waukesha County food bank and local churches to provide information about our programs.
	CAP Accepted 01/12/2023 01:30 PM	CAP Accepted
Form Name	Civil Rights (800 - 807)	
Question #	803	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/04/2023 02:42 PM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). CA: Provide a timeline for when a school meal program civil rights complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.
Form Name	Civil Rights (800 - 807)	
Question #	806	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/09/2023 02:16 PM	Finding: Civil Rights training did not occur for new hires and nonfood service staff. Documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1). CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/09/2023 11:45 AM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content; Policy is missing information on foods sold outside of the school meal programs, food provided but not sold, food and beverage marketing and the triennial assessment. (7 CFR 210.31). CA: 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.

Administrative Review Report

Elmbrook School District

	CAP Submitted on 01/16/2023 10:48 AM	We will work on adding language a submitted an updated policy to the board committee by the end of the SY.
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/09/2023 04:42 PM	Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). One application with one student was processed as categorical and no program was list for the categorical eligibility. See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected. CA: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/09/2023 11:53 AM	Finding: Eligibility documentation is not on file for a student who qualifies for DC free from another district. CA: Submit documentation to support students eligibility that was approved as free DC from other district.
	CAP Submitted on 01/11/2023 12:02 PM	This DC run from Menomonee Falls School District was submitted into SNACS.
Form Name	Verification (207 - 215)	
Question #	208	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/09/2023 12:35 PM	Finding: SFA did not complete a confirmation review before verifying application(s). CA: 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.
	CAP Submitted on 01/11/2023 12:02 PM	We understand that this must be confirmed by the confirming official when doing verification. We will use the verification checklist moving forward.
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
Corrective Action Status	CAP Accepted	

Administrative Review Report

Elmbrook School District

Corrective Action History	Flagged 01/09/2023 12:03 PM	Finding: SFA is not following the current approved contract. Contract states offer vs serve and school is serve. only. There is no checklist at beginning of line. CA: Update the online contract and submit for approval.
	CAP Submitted on 01/10/2023 11:04 AM	This has been updated on the contract as of 1/10/23.
	CAP Accepted 01/12/2023 02:00 PM	CAP Accepted
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 01/05/2023 10:33 AM	Finding: The correct non-discrimination statement was not included on the Direct certification letter. CA: Update the DC letters to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated. Finding: The non-discrimination statement was not included on the food service webpage CA: Add the Nondiscrimination statement to district's food service webpage and upload updated materials into SNACS.
	CAP Submitted on 01/11/2023 12:08 PM	Both of these pieces have been updated and documentation submitted in SNACS. Here is the link to our webpage that has the Non Discrimination Statement at the bottom. https://www.elmbrookschoools.org/departments/food-service
	CAP Accepted 01/12/2023 02:02 PM	CAP Accepted
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/09/2023 04:37 PM	Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). CA: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.
	CAP Submitted on 01/10/2023 10:58 AM	All school staff have been trained on our new POS training in August of 2022. There was no sign in sheet taken. We will provide a snapshot of their time recorded in our True Time Skyward system.
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
Corrective Action Status	CAP Submitted	

Administrative Review Report

Elmbrook School District

Corrective Action History	Flagged 01/09/2023 04:43 PM	Finding: The SFA did not have a copy of the food safety plan at each school and/or was not site specific. Each school within the SFA must have a written site specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). 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). CA: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.
	CAP Submitted on 01/16/2023 10:47 AM	The Fairview south food safety plan is now uploaded into SNACS
Site Name	Pilgrim Park Mid	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 01/10/2023 07:38 AM	Finding: SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Prices for student meals are visible on the computer screen at the point of service that can be seen by students; which constitutes overt identification. CA: Work with your software provider to ensure overt identification is not occurring or install screen protectors on monitors. Submit a statement documenting how this was corrected.
	CAP Submitted on 01/10/2023 10:55 AM	This was corrected on Tuesday a.m. when DPI was onsite and our POS no longer show lunch prices or breakfast pricing.
	CAP Accepted 01/10/2023 03:44 PM	CAP Accepted
Site Name	Fairview South	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/09/2023 12:07 PM	Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) is absent and therefore did not provide a reliable or accurate meal count. CA: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.
Site Name	Fairview South	

Administrative Review Report

Elmbrook School District

Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/10/2023 01:32 PM	<p>Finding: On day of review a cheese omelet was served as the meat/meat alternate component. This product did not contain a CN label or contain any crediting documentation because it was a substitute item due to supply chain issues. Although this lack of documentation contributed to a meat/meat alternate quantity shortage for the day of review, SFA will not receive fiscal action because of the approved 2022-2023 Flexibility Waiver for Supply Chain Disruptions. Any future findings related to quantity shortages should not be considered repeat findings.</p> <p>Corrective Action: Provide documentation to support that the meal pattern shortage was due to a supply chain disruption. Examples include an email from the vendor or a note that the product was cancelled or substituted on the invoice. Upload this documentation into SNACS.</p>
Site Name	Fairview South	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/10/2023 01:34 PM	<p>Finding: Signage was not posted for breakfast or lunch to show students, teachers, and parents what makes up a reimbursable meal. Signage must be posted visible to students and teachers that indicates the offered components in each meal. 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 completed signage posted in meal service areas.</p>
	CAP Submitted on 01/11/2023 12:19 PM	Signage has now been posted and pictures have been uploaded in SNACS.
Site Name	Fairview South	

Administrative Review Report

Elmbrook School District

Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2023 01:30 PM</p>	<p>Finding: Production records for week of review (December 12-16) were not accurately reflecting the correct meal pattern for 9th -12th grade students. The production records indicated that there was a daily and weekly shortage for fruits and vegetables. There must be at least 1 cup of fruit and 1 cup of vegetables offered to students daily. It was observed on the day of review that the correct meal pattern is followed, but some components are not being recorded on the production record. Corrective Action: Submit one full week of completed production records where all fruits and vegetables are recorded daily in their correct serving sizes. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Pilgrim Park Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2023 01:57 PM</p>	<p>Finding: There were no salad bar production records on file for the week of review. Documentation of salad bar components must be documented daily. Production record templates for garden bars and salad bars are available on the Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p> <p>Corrective Action: Submit 1 week of completed production records that include items served on the daily salad bar.</p>
Site Name	Pilgrim Park Mid	
Form Name	Offer vs Serve (500-502)	
Question #	502	
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 01/10/2023 01:59 PM</p>	<p>Finding: Signage must indicate that students must select at least ½ cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, signage does not list this. In</p>

Administrative Review Report

Elmbrook School District

		<p>addition, signage does not clearly illustrate the components of 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 (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of the supplementary signage.</p>
	<p>CAP Submitted on 01/11/2023 12:20 PM</p>	<p>Signage has been uploaded into SNACS and hung a PPMS.</p>
Site Name	Pilgrim Park Mid	
Form Name	Civil Rights (811-812)	
Question #	811	
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 01/10/2023 07:34 AM</p>	<p>Finding: The nondiscrimination “And Justice for All” poster is not the correct poster. CA: Print off and post the 2019 version of the "And Justice for All" poster. Please take a picture and upload into SNACS.</p>
	<p>CAP Submitted on 01/11/2023 12:03 PM</p>	<p>Pictures have been uploaded in SNACS of the correct posters hanging up.</p>
	<p>CAP Accepted 01/12/2023 02:01 PM</p>	<p>CAP Accepted</p>
Site Name	Fairview South	
Form Name	Civil Rights (811-812)	
Question #	811	
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 01/09/2023 12:38 PM</p>	<p>Finding: The nondiscrimination “And Justice for All” poster is not located in the meal service area and/or not visible to students (FNS Instruction 113). CA: Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required.</p>

Administrative Review Report

Elmbrook School District

	CAP Submitted on 01/10/2023 02:07 PM	We have printed and posted the 2019 and justice for all posters that are required in the servery areas at FVS.
	CAP Accepted 01/12/2023 02:01 PM	CAP Accepted
Site Name	Pilgrim Park Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/10/2023 07:51 AM	Finding: Food Safety Plan at Pilgrim does not have all Process 1, 2, 3 items listed. Missing some employee reporting agreements for staff on site. CA: Update plan and Upload into SNACS the list of Process 1, 2, 3 items at Pilgrim and have all staff complete the Employee Reporting Agreement and upload signed copies into SNACS.
Site Name	Pilgrim Park Mid	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/10/2023 07:57 AM	Finding: 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 and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed Milk was sitting on the floor in the walk-in cooler. CA: Submit documentation indicating that food safety violations have been corrected.
	CAP Submitted on 01/16/2023 10:49 AM	Food is now stored above 6 inches off of the floor, an empty milk crate is on the bottom.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/10/2023	2655	404	Administrative Review	Pilgrim Park Mid	FSD			
Comments								
There appeared to be quite a bit of confusion among students at breakfast regarding the 6 fl. oz. juice box intended for a la carte and the 4 fl. oz. juice box intended for a reimbursable breakfast. It may be helpful to include a picture of the 4 fl. oz. juice on the breakfast signage or eliminate the 6 fl. oz. juice box for a la carte purchases (there are several other juice options available to purchase a la carte).								
01/10/2023	2654	6	Administrative Review	Pilgrim Park Mid	FSD			

Administrative Review Report

Elmbrook School District

Comments						
Condiments served in the NSLP must contain zero grams of trans fat per serving (less than 0.5 grams per serving). Some condiments observed on the day of observation were not low fat/fat free (ranch dressing, Italian dressing).						
01/10/2023	2653	430	Administrative Review	Pilgrim Park Mid	FSD	
Comments						
Production records should indicate appropriate serving sizes for fruits and vegetables. Production records for week of review listed apple slices as (1) as the serving size. If apple slices are individually packaged, indicating as "apple slice 4 oz. package" with a serving of (1) would be appropriate. If apple slices are not pre-packaged, a serving size of 4 oz. should be indicated instead of (1).						
01/10/2023	2652	435	Administrative Review	Pilgrim Park Mid	FSD	
Comments					Created By	Created Date
Chef salad recipe indicates a service size for diced ham as (1) serving. The recipe should more accurately describe what one serving of ham is (e.g. 2 oz. serving).						1/10/2023 2:12:49 PM
01/10/2023	2651	1104	Administrative Review	Pilgrim Park Mid	FSD	
Comments						
Vending machine available to students starting at 2:30 PM daily contained beverages that are not Smart Snacks compliant. Discussed with FSD to communicate with person in charge of vending machine to keep vending machine unavailable to students until at least 30 minutes after the school day.						
Comments						
All food substitutions made outside of the meal pattern must be supported by a signed medical statement from a licensed medical professional (7 CFR 210.10). See the SNT Special Dietary Needs example policy for assistance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).						

- [Local Wellness Policy In a Nutshell](#) provides an overview of policy requirements.
- [Local Wellness Policy Checklist](#) is a resource that will help schools determine if all required content areas are included in their LWP.

As of June 30, 2020, SFAs must complete their first triennial assessment. **The assessment must be completed, at minimum, once every three years.** It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.

- [Local Wellness Policy Triennial Assessment Report Card](#) - SFAs must use the **Wisconsin Local Wellness Policy Triennial Assessment Report Card** in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. **The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition**

Administrative Review Report

Elmbrook School District

Team. The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.

Local Wellness Policy Builder

Local Wellness Policy Builder is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.

Local Wellness Policy Builder - Full Text is a compilation of all statements available in the *Local Wellness Policy Builder Online Tool*.