

Administrative Review Report

Arrowhead UHS

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/15/2022	05/31/2023
On-Site Review	11/15/2022	05/31/2023
Site Selection Worksheet		
Entrance Conference	01/11/2023	01/11/2023
Exit Conference	01/12/2023	01/12/2023

Commendations:

From the Nutrition Program Consultant:

Thank you to the staff at Arrowhead Union High school for the courtesies extended to everyone 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. The food service director and the food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

From the Public Health Nutritionist:

Thank you to all the staff at Arrowhead UHS for the warm welcome and cooperation during Arrowhead's Administrative Review (AR). Thank you to the FSD for being available during the on-site portion of the review and helping us to gather the needed documentation and information prior to our visit. Your menus met all meal pattern requirements, and you offered a great variety of food. Thank you for serving healthy, nutritious meals to your students!

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	110	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA's direct certification notification letter's non-discrimination statement was in a smaller font size compared to the other information listed in the letter.</p> <p>Corrective Action: Please update the font size and submit a copy of the updated letter into SNACS.</p>
		<p>Finding: The SFA's direct certification notification letter's non-discrimination statement was in an incorrect format. In addition, the non-discrimination statement was in a smaller font size compared to the other information listed in the letter.</p> <p>Corrective Action: Please update the format and font size of the non-discrimination statement and submit a copy of the updated letter into SNACS. The current statement can be found on the DPI SNT Civil Rights webpage.</p>
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	113	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The Sharing of Information letter needs to be updated to show fee waivers broken out instead of grouping them all in one paragraph with one box for parental consent.</p> <p>Corrective Action: Please submit an updated Sharing of Information letter that shows specific fee waivers are broken out individually. As an example, athletic fees with a check box, classroom fees with a check box, etc.</p>
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The SFA allows the purchase of a second meal or a hot or cold pack boat. Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as</p>

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		<p>non-program foods if they comply with the Smart Snacks requirements.</p> <p>Corrective Action: Provide a statement of how individual items will be sold to students as nonprogram foods.</p>
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	311	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The food service director employed by FSMC submits the claims for the SFA. It was found that the SFA representative did not sign off after reviewing the report with the numbers used for the claim submitted by the FSD.</p> <p>Corrective Action: Please submit a statement moving forward how this issue will be corrected. Please submit the monthly report that is used for the claim showing the SFA representative signed off on the report.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Catering was provided to groups and the school was billed for actual costs. Since the district has a fixed meal cost contract the FSMC needs to adjust catering costs to be charged based on meal equivalents per the contract. These charges and any revenues must go through Fund 50.</p> <p>Corrective Action: Please submit a statement on how the catering costs will be charged to meet compliance.</p>
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: The Public Release's non-discrimination statement is not in the correct format.</p> <p>Corrective Action: Provide a statement of understanding that the Public Release non-discrimination statement will be in the same format as required by USDA. moving forward.</p>
Form Name	Civil Rights (800 - 807)	

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Question #	805	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).</p> <p>Corrective Action: Provide a detailed statement or policy indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. 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).</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Current Local Wellness Policy (LWP) does not include all the required content. The LWP is missing a statement saying that all foods and beverages marketed during the school day will comply with Smart Snacks standards. Additionally, the LWP states that foods sold during the school day will adhere to the Dietary Guidelines for Americans, which are different than Smart Snacks standards and not specific to School Nutrition Programs (7 CFR 210.31).</p> <p>Corrective Action: Add the missing marketing policy statement and update the statement regarding foods sold during the school day to comply with Smart Snacks standards. 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>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	129	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: It was noted that some households were receiving letters that were incorrect for the type of eligibility that qualified them. A household that received a meal benefit via application was getting a <i>Direct Certification</i> letter and a</p>

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		household getting a meal benefit via direct certification was receiving an <i>Approval/Denial letter</i> used for applications. Corrective Action: Please submit a statement on how this issue will be corrected.
Form Name	Verification (207 - 215)	
Question #	211	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		Finding: The non-discrimination statement was not included on the menu signage at North campus. Corrective Action: Add the Nondiscrimination statement to the menu signage and upload a copy or picture into SNACS.
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		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). Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		Finding: The SFA did not have a food safety plan at each that was 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

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	any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).
	Corrective Action: 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. A template for a site-specific food safety plan can be found on the Wisconsin DPI SNT website at https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc .
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	317
TA Log #	No TA Log# found
Due Date	2/24/2023
Corrective Action Status	Flagged
Corrective Action History	<p>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.</p> <p>Corrective Action: Work with your software provider to ensure overt identification is not occurring. Submit a statement documenting how this was corrected.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	400
TA Log #	No TA Log# found
Due Date	2/24/2023
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At Arrowhead's North campus during lunch service, it was observed that foodservice staff working the POS system were unclear about the requirements for a reimbursable meal. Alternate entree options that met meal pattern requirements for a reimbursable meal were charged a la carte prices, or students were required to take an additional fruit and/or vegetable with their meal. The Meal Pattern webcasts on WI DPI's webpage may be used as a training resource (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns:~:text=Policy-,Meal%20Patterns,-Title%20/%20Description).</p> <p>Corrective Action: Have all staff responsible for running the POS system attend a training on meal pattern. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)

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Question #	430	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Production records from the week of review were missing required information. Production records are intended to be useful tools to record information prior to production, during production, and following production. When additional fruit and vegetable options were handwritten onto the production records, required information was not recorded. This included descriptive product name/recipe number and serving size. Best practice is also to record the meal pattern contribution and serving utensil. The planned/actual quantity prepared in purchase units must also be recorded for each menu item and was inconsistently filled out on production records. The gluten free pizza available for students with a gluten allergy should be listed as a substitution available only for students with a documented special dietary need. Review the Production Record Requirements on our webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Submit one full week of completed breakfast and lunch production records. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Although no non-reimbursable meals were observed during the days of onsite review, some students were made to take more than what they needed at breakfast and lunch. The Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service. 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>Corrective Action: Have all staff responsible for determining reimbursable meals attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	

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TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: If students have access to food and beverages sold in vending machines during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), all items must meet Smart Snacks standards. A vending machine at Arrowhead's North Campus contains beverages that do not meet the Smart Snacks standards and turns on at 2:45pm. The end of the school day is 2:36pm, meaning this does not follow the regulation.</p> <p>Corrective Action: Submit a statement explaining how the school will comply with this Smart Snacks regulation.</p>
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>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and photo of where the most recent food safety inspection report will be posted and visible to the public.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). It was noted that at the North campus the second temperature for food items was not written down.</p> <p>Corrective Action: Upload one week of completed records into SNACS showing the second temperature being recorded and provide a statement indicating how temperatures will be monitored going forward.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1409	
TA Log #	No TA Log# found	
Due Date	2/24/2023	
Corrective Action Status	Flagged	

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Corrective Action History	<p>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: A container of potato salad with a staff-labeled "Use by" date of 1/10/23 was found in the walk-in cooler at South campus on date of review (1/11/23).</p> <p>Corrective Action: Supervisor to check walk-in coolers to verify all food items past their use by date are discarded. Additionally, review food labeling SOP with all staff. Submit documentation showing that a training occurred regarding food labeling.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
TA Log #	No TA Log# found
Due Date	2/24/2023
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: 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). SFAs must track non-domestic product(s) purchased which do not comply with the Buy American Provision. No documentation of tracking these products is kept at Arrowhead UHS.</p> <p>Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. Provide a copy of the form(s) that will be used and include any noncompliant products.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/19/2023	2704		Administrative Review					
Comments						Created By		Created Date
Smart Snacks: The following items are exempt from meeting smart								

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snacks standards: an entrée the day of and the day after it is served as part of a reimbursable meal, fresh or frozen fruits and vegetables (with no added ingredients), canned fruits (with no added ingredients) that are packed in 100 percent juice, extra light syrup or light syrup, and low sodium and no-salt added canned vegetables (with no added fat). It was found on-site that the mini corn dogs and tater tots were bundled together and sold at one unit price. When sold together, this bundled unit exceeds the Smart Snacks nutrient standards. Bundled foods may only be sold if the bundled unit meets the Smart Snacks general and nutrient standards. Please discontinue selling the bundled unit, and evaluate each food item for compliance with Smart Snacks standards before selling to students.										
01/11/2023	2687		Administrative Review							
Comments										
					Created By	Created Date				
Crediting Documentation: There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing information. Product specification sheets are not acceptable forms of crediting documentation. A PFS is considered acceptable crediting documentation and it shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label or USDA Product Information Sheet. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct.										
01/11/2023	2686		Administrative Review							
Comments										
					Created By	Created Date				
Training: Webcasts and self-guided e-learning courses are available in the Online Learning Library (https://dpi.wi.gov/school-nutrition/training/online-learning). Check our Training webpage for additional training opportunities. (https://dpi.wi.gov/school-nutrition/training). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of DPI SNT staff can be found on our website (https://dpi.wi.gov/school-nutrition/directory).										
01/11/2023	2683	404	Administrative Review	Arrowhead Hi						
Comments										
					Created By	Created Date				
Breakfast signage was posted, however it did not specify how to										

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count each food item, nor did it communicate what students need to select in order to have a reimbursable meal. There was confusion among students regarding how to build a reimbursable meal. Technical assistance was provided and I recommend updating your signage and the location. Reminder, the menu planner must determine in advance whether items crediting as 2 oz eq count as one or two food items. For example, the Apple Frudel served on the day of observation was 2 oz eq, so it could be counted as either one or two food items.										
01/11/2023	2682	1104	Administrative Review	Arrowhead Hi						
Comments					Created By	Created Date				
According to SP 24-2017 Local Wellness Policy: Guidance and Q&As, all images of food or beverage products depicted on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP24-2017.pdf). Marketing standards apply to various equipment, such as the exterior of vending machines, menu boards, coolers, trash cans, and other food service equipment. Please decide how the school will bring vending machines into compliance with this regulation and make the necessary changes.										
01/11/2023	2681	437	Administrative Review	Arrowhead Hi						
Comments					Created By	Created Date				
Since the fruit and vegetables on the salad bar are being used to meet daily and weekly meal pattern requirements, portion sizes should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.										
01/11/2023	2680	433	Administrative Review	Arrowhead Hi						
Comments					Created By	Created Date				
Crediting documentation must be available on-site in each kitchen. Currently, crediting binders are kept in the Food Service Director's office only. I recommend starting a binder for both the North and South campus locations or organizing them as digital files that the schools have access to. These records should be reviewed and updated at least twice per year and as new products are purchased.										