

Administrative Review Report

Oconomowoc Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/10/2022	12/16/2022
On-Site Review	02/13/2023	02/14/2023
Site Selection Worksheet	10/31/2022	10/31/2022
Entrance Conference	02/13/2023	02/13/2023
Exit Conference	02/14/2023	02/14/2023

Commendations:

From the Public Health Nutritionist: Thank you to all the staff at Summit Elementary and Silver Lake Intermediate School for the warm welcome and cooperation during Oconomowoc'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 during our visit. 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	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or 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	Indirect Costs (712)
Question #	712
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin (Insert detail here).</p> <p>CA: All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs using time studies, meters, etc. 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. Any indirect costs that cannot be made into direct costs are unallowable and also need to be refunded.</p>

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Form Name	Civil Rights (800 - 807)	
Question #	801	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/10/2023 09:08 AM	Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Form Name	Civil Rights (800 - 807)	
Question #	803	
Corrective Action Status	Flagged	
Corrective Action History	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 #	807	
Corrective Action Status	Flagged	
Corrective Action History	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.	
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action Status	Flagged	
Corrective Action History	Finding: Current Local Wellness Policy (LWP) does not include all of the required content. Official responsible, Nutrition Promotion, Other School-based Strategies for Wellness (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.	
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
Corrective Action Status	Flagged	
Corrective Action History	Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	

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Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). 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 #	128
Corrective Action Status	Flagged
Corrective Action History	Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized. CA: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	138
Corrective Action Status	Flagged
Corrective Action History	Finding: The Benefit Issuance (BI) list did not accurately discontinue meal eligibility benefits for students that did not qualify after the 30-day carryover. CA 1. Notify the household of the reduction in benefits and upload a copy of the adverse action letter into SNACS. CA 2. Provide documentation that shows the BI list and POS have been updated with the correct eligibility 10 days after the notification is sent.
Form Name	Verification (207 - 215)
Question #	208
Corrective Action Status	Flagged
Corrective Action History	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.
Form Name	Verification (207 - 215)
Question #	209
Corrective Action Status	Flagged
Corrective Action History	Finding: Applications selected for verification were not verified correctly (7 CFR 245.6a). Income documentation must be received for the selected household to complete verification. CA: Notify the household that income documentation must be received for the family to maintain their benefits. Upload notification letter into SNACS and documentation of response. Have the verifying official watch the "Verification Process" webcast on the DPI website and upload a copy of the completed quiz into SNACS.
Form Name	Verification (207 - 215)
Question #	215

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Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a) CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on all program materials. CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action Status	Flagged
Corrective Action History	<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: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA safety plan at each school 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). Employee Reporting Agreements are required for all people who work in the food service. 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. Have each employee sign an employee reporting agreement and upload into SNACS.</p>
Form Name	Reporting and Recordkeeping (1500 - 1501)
Question #	1501
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA is not maintaining program records and documentation for three years plus the current school year (7 CFR 210.23(c)). CA: Provide a statement of how the record retention requirements will be met moving forward.</p>
Site Name	Silver Lake Intermediate
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	317

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Corrective Action Status	Flagged
Corrective Action History	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.
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
Corrective Action Status	Flagged
Corrective Action History	Finding : 2 non-reimbursable meals were observed at Silver Lake Intermediate during breakfast service. The meals did not contain the required ½ cup fruit, vegetable, or combination under Offer versus Serve. Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how this error will be corrected and avoided in the future.
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	Finding: At Silver Lake Intermediate, visible signage was not posted at breakfast or lunch that showed students how planned menu items contributed towards food items and/or components and what makes up a reimbursable meal. Many students struggled to build reimbursable meals from all of the options available, further highlighting the need for additional signage. Corrective Action: Post signage that shows students how to build a reimbursable meal near the breakfast and lunch service lines. Submit a picture of the posted signage.
Site Name	Summit El
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	407
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	Finding: At Summit Elementary lunch service, the corn vegetable ran out prior to the end of meal service. Staff were observed placing baby carrots into individual bags for an additional vegetable offering. The carrots were not being measured to ensure ½ cup was placed in each bag. Following the planned portion size and measuring out fruits and vegetables is required to ensure students receive the planned quantity of a food component, and that a reimbursable meal is served. Corrective Action: Submit a written statement detailing how the SFA will ensure that food items are measured to comply with planned serving sizes.
Site Name	Silver Lake Intermediate

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Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Fiscal action is required for a missing component. During the week of review (Tuesday, January 10th) at Silver Lake Intermediate, the hot entrée option was an egg omelet, hashbrown round, choice of fruit, carrots, and milk. Therefore, fiscal action will be assessed for 56 K-8 meals on Tuesday, January 10th with the missing grain component at Silver Lake Intermediate School. Since the same menu is served at Nature Hill Middle School, fiscal action will also be assessed for 46 K-8 meals served there. Corrective Action: State what will be done to the menu during the week of review so that a grain component is offered to students on Tuesday, January 10th. Please submit nutrition facts labels and ingredient lists for any new products you add to the menu.</p>
Site Name	Summit El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
Corrective Action Status	Flagged
Corrective Action History	<p>Finding : The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu for breakfast or lunch at Summit Elementary. It may either be listed daily or may be listed in one place on the menu and include a statement that states that a variety of milk is offered daily as part of the reimbursable meal. Corrective Action : Submit a copy the updated breakfast and lunch menus that include either milk listed daily or a statement that a variety of milk is offered daily with a reimbursable meal.</p>
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The daily minimum requirement for the vegetable component was not met for the K-8 age/grade group for lunch during the review period. Each entrée must be considered as a separate service line, and be evaluated for meal pattern compliance individually. Students must have access to $\frac{3}{4}$ cup vegetable daily regardless of which entrée option they select. The following represents the offered amounts during the week of review: Monday (1/09): The planned menu had tomatoes ($\frac{1}{2}$ cup) on the fruit/vegetable bar. Carrots were handwritten in, and the FSD stated $\frac{1}{2}$ cup serving was offered to students. The planned menu was a vegetable shortage, but the served menu met the daily requirement. Tuesday (1/10): The planned menu did not have a vegetable on the fruit/vegetable bar. Carrots were handwritten in, and FSD stated $\frac{1}{2}$ cup serving was offered. The hot entrée came with a hashbrown round ($\frac{1}{2}$ cup), which the FSD stated was available to each entrée option. The planned menu was a vegetable shortage, but the served menu met the daily requirement. Wednesday, January 11th: The planned menu had celery sticks ($\frac{1}{2}$ cup) on the fruit/vegetable bar. This results in the following shortages: -The Sunbutter and Jelly Sandwich entrees had access to $\frac{1}{2}$ cup vegetable - The Pizza entrees had access to $\frac{5}{8}$ cup vegetable - The Grill entrees (burger, chicken patty, spicy chicken patty, cheeseburger, and hot dog) had access to $\frac{1}{2}$ cup vegetable. Thursday, January 12th: The planned menu had broccoli ($\frac{1}{2}$ cup) and carrots ($\frac{1}{2}$ cup) on the fruit and vegetable bar, however broccoli</p>

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	<p>was struck out and no substitution was offered. This results in the following shortages: -The Pizza entree had access to 5/8 cup vegetable -The Grill entrees (burger, chicken patty, spicy chicken patty, and cheeseburger) had access to ½ cup vegetable. Friday, January 13th: The planned menu had cucumber (½ cup) on the fruit/vegetable bar, which would have been a daily vegetable shortage as well. The cucumbers were struck out and pears were served instead, which created a missing vegetable component (addressed in 409). The daily minimum requirement for the vegetable component for the K-8 age/grade group at lunch is ¾ cup. Corrective Action: Describe specifically how the daily minimum requirement for the vegetable component will be met for lunch during the days containing the shortage(e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Summit El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: At Summit Elementary, the daily minimum requirement for fruit was not met for K-5 for breakfast during the review period. The following represent the planned portion sizes: - Monday, January 9th: Apple, Sliced- ½ cup fruit The daily minimum requirement for K-5 is 1 cup fruit. Corrective Action: Describe specifically how the daily minimum requirement for fruit will be met for breakfast during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	411
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Fiscal action is required for a missing component. During the week of review (Friday, January 13th) at Silver Lake Intermediate, pears were substituted for the cucumbers, and therefore students who took the hot entree or grill entree items that day did not have access to a vegetable component. Therefore, fiscal action will be assessed for 223 K-8 meals on Friday, January 13th with the missing vegetable component at Silver Lake Intermediate School. Corrective Action: State what will be done to the menu during the week of review so that the vegetable component is offered to students on Friday, January 13th.</p>
Site Name	Summit El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The grade grouping (i.e., K-5 or 6-8), planned/actual quantity prepared in purchase units (2-No 10 cans, 10 lb. case, 2-96 count case), substitutions made to original plans, and number of reimbursable and non-reimbursable (adult) meals planned and served for each meal were not consistently filled in daily on production records during the week of review. When substitutions, additional cold entrees, or additional fruit/vegetable offerings are handwritten on the production record, the other columns on the production record must also be filled out. This ensures staff know the serving size and meal pattern contribution of these menu items. When a</p>

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	substitution is made to the planned menu, the serving size and meal pattern contribution needs to be updated to reflect the new product. Corrective Action : Submit one full week of completed production records for both Summit Elementary and Silver Lake Intermediate School, including all production record requirements recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: 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. Crediting documentation must be available on-site at each location within the school district. Multiple crediting documents submitted were from an online database and did not match the specific products used on-site. For example, the crediting information sent for the Chicken Patty reflected it credited as 1 oz eq M/MA and .25 oz eq grain. This would have led to a weekly M/MA shortage during the week of review. The Chicken Patty product was found on-site in the freezer and the CN label verified it credited as 2 oz eq M/MA and 1 oz eq grain, so there was not a component shortage. Crediting information can be kept in a physical binder or electronic files at each school. Staff must have access to the crediting documents, and these records should be reviewed and updated at least twice per year and as new products are purchased. Corrective action: Submit a written statement detailing how the SFA will ensure that the appropriate crediting documentation is maintained on-site at each school going forward.</p>
Site Name	Summit El
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Recipes should be updated to reflect current products and procedures. Standardized recipes exist, but some are not accurately reflecting what is happening in the kitchen. For example, the Meatloaf recipe served on the day of review was not reflective of the equipment used in the kitchen, and staff prepared the meatloaf in a different way than what the procedures listed. It is important that standardized recipes detail exactly how a menu item is made, so that if there is a substitute cook, the cook can easily step-in and replicate the menu item. Accurate recipes are also important to credit the recipe towards meal pattern requirements and to calculate dietary specifications, such as calories, fat, and sodium. For more information on what essential information must be on a standardized recipe, review the Standardized Recipe Checklist (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf). Corrective Action: Submit an updated Meatloaf recipe that accurately reflects the procedures and equipment used at Summit Elementary, and meets all standardized recipe requirements.</p>
Site Name	Silver Lake Intermediate
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action Status	Flagged

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Corrective Action History	<p>Finding: There was a weekly dark green and beans/peas (legumes) shortage at lunch during the week of review. On Tuesday (1/10), ¼ cup of dark green vegetable was offered as part of the turkey sub entrée. On Wednesday (1/11), ? cup of dark green vegetable was offered as part of the Chicken Teriyaki Bowl entrée. However, each entrée option offered needs to have access to all of the vegetable subgroups over the course of the week. The planned menu did include ½ cup of broccoli being served on Thursday (1/12), however it was struck out and no dark green vegetable was substituted. Zero cups of beans/peas (legumes) were offered during the week of review. The minimum for both vegetable subgroups is ½ cup vegetable. Corrective Action: State what will be done to the menu during the week of review so that these vegetable subgroup shortages are fixed.</p>
Site Name	Summit El
Form Name	Offer vs Serve (500-502)
Question #	500
Corrective Action Status	Flagged
Corrective Action History	<p>Finding : Although no non-reimbursable meals were observed during the day of onsite review at Summit Elementary, many students were made to take more than what they needed at lunch. The lunch 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). 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>
Site Name	Silver Lake Intermediate
Form Name	Offer vs Serve (500-502)
Question #	501
Corrective Action Status	Flagged
Corrective Action History	<p>Finding : Although no non-reimbursable lunch meals were observed during the day of onsite review at Silver Lake Intermediate School, there was confusion from staff at the POS regarding what menu items should be charged a la carte versus taken as part of a reimbursable meal. The lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service. Corrective Action: Have all staff responsible for determining reimbursable meals attend a training on OVS and Meal Pattern (e.g. SNT OVS and Meal Pattern webcast https://dpi.wi.gov/school-nutrition/training/online-learning). Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Silver Lake Intermediate
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action Status	Flagged
Corrective Action History	<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>
Site Name	Summit El

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Form Name	Civil Rights (811-812)
Question #	811
Corrective Action Status	Flagged
Corrective Action History	<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).</p> <p>CA: Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required.</p>
Site Name	Silver Lake Intermediate
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>CA 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p>CA 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.</p>
Site Name	Summit El
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>CA 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p>CA 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.</p>
Site Name	Silver Lake Intermediate
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The beverage products: Tropicana Cranberry, Apple, and Orange Juice and Izze Sparkling Juice are not allowable at the elementary school level. Only plain water (all sizes), 100% juice/diluted juice (8 fluid ounces or less), or milk (8 fluid ounces or less) are allowable Smart Snacks beverages in elementary schools. Since this school includes both elementary (5th grade) and middle school (6-8th grade), the beverages must meet the requirements for the youngest age. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks). Corrective Action: State what will be done with these products to comply with the Smart Snack regulations.</p>

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Site Name	Silver Lake Intermediate
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
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>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Summit El
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
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>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Silver Lake Intermediate
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1410
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Mandarin Oranges- Product of China Ore Ida Hash Browns- Product of Canada Bananas- Product of Guatemala Ripe Olives- Product of Spain Chunk Light Tuna- Product of Thailand</p> <p>Corrective Action: Complete and submit a district-wide noncompliant product list form for the non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>

Technical Assistance Entries:

Comments

•Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed(<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Comments

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).

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Comments
At Silver Lake Intermediate, because the vegetables on the salad bar are being used to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each 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).
Comments
Food Safety Inspections •Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site’s food safety plan. •The most recent food safety inspection report must be posted in public view. •If you request a food safety inspection but are not able to obtain one, document the request date and retain any correspondence (email, letters, phone call details) with the local regulatory authority that conducts inspections. SFAs are responsible for requesting food safety inspections from the local regulatory authority and documenting their efforts.
Comments
On-site Monitoring •Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP. • Monitoring is due by February 1. • The NSLP On-Site Monitoring Form and the SBP On-Site Monitoring Form forms are on the Onsite Monitoring section of the DPI SNT website.
Comments
Indirect Costs •DPI does not allow the annual assigned indirect cost rate to be applied to the nonprofit food service account. •For both public and private schools in Wisconsin, any indirect type costs assessed to food service must be supported with documentation. Examples of supporting documentation for costs assessed to the nonprofit food service account could include: o Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities). o Utility charges - separately metered or current usage study by the local utility company. o Labor expenditures – a time study based on actual amount of time worked specifically for the purpose of school food service. o Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume. o Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.
Comments
•Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this “In A Nutshell- Training” document. •Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.). •SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool
Comments
Employee Reporting Agreements •All food service employees must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. •There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.
Comments
Food Safety Plans •SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs. •Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. •Schools must have a comprehensive, site-specific food safety plan which

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includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. •All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.

Comments

When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines (IEG) one would look at the amount of their income under the column indicating that stated frequency.

Comments

“And Justice for All” posters must be posted where the program is offered (lunchroom, classrooms) and in easy view of the students, staff, and public. •The “And Justice for All” poster was updated in 2022, we do not have professionally printed posters from USDA. Schools will need to post the USDA 2019 AJFA poster until the professionally printed USDA 2022 posters are available. o The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: <https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf>. All “And Justice for All” posters must be printed at 11” width x 17” height. The minimum text size to be used on the posters is 14-point.

Comments

Signage helps students understand what components make up a reimbursable meal. Please add a statement to your current signage that states the student must take at least ½ cup fruit and/or vegetable, or a combination.

Comments

Production records are intended to be useful tools to record production information. They document that reimbursable meals were planned and served, and must be kept on file for three years plus the current school year. A copy of the Production Record Requirements and templates may be found on our webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>).

Comments

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. The crediting decision-making tree (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-decision-making-tree.pdf>) helps staff determine what types of documentation are needed.

Comments

During the day of on-site visit at Summit Elementary, there was not enough corn prepared, and broccoli and carrots were substituted. Any changes to the planned menu must be documented on the production record. A substitution should also be a food that credits comparably, and belongs in the same vegetable subgroup (when possible) to ensure the menu continues to meet the weekly vegetable subgroup requirement. It is always better to substitute some type of vegetable, rather than have a vegetable shortage or missing component.