

# Administrative Review Report

Port Edwards School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/01/2019	11/21/2019
On-Site Review	11/19/2019	11/21/2019
Site Selection Worksheet	10/20/2019	10/31/2019
Entrance Conference	11/19/2019	11/19/2019
Exit Conference	11/21/19	11/21/19
Corrective Action Due Date	1/8/20	1/8/20

## Commendations

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### From Nutrition Program Consultant (NPC):

Thank you to the Food Service Director, Superintendent, Determining Official, Business Manager, food service staff, and district staff for the courtesies extended to us during the on-site review. Thank you for being available to answer questions and provide additional information requested. Everyone was very friendly, helpful, and receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions in SNACS as well as pulling records for the on-site portion of the review. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet School Nutrition Program regulations immediately, prior to and during the review.

### From Public Health Nutritionist (PHN):

Thank you to all staff at Port Edwards 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; this greatly expedited the AR. The Food Service Director does a nice job keeping documentation organized and kept on file. John Edwards High School had a perfect week of review for breakfast and all grains served were whole grain-rich (WGR)! At lunch, 94.2% of the grains were WGR. Production records are filled out thoroughly, which aids in forecasting for future meals while also decreasing food waste. John Edwards High School offers a daily salad bar with a variety of fresh vegetables, including radishes, cherry tomatoes, broccoli, cauliflower, and more! There is ample signage around the cafeteria showing students how to select a reimbursable meal. Food service employees attend summer DPI trainings to keep up on school nutrition topics and the Food Service Director tries new menu items to increase student participation and customer satisfaction. Thank you for serving healthy, nutritious meals to the students of Port Edwards!

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## Findings and Corrective Action:

<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	106	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/8/20	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged NPC 11/25/2019 10:23 AM</p>	<p><b>Finding:</b> The Sharing Information with Other Programs form is not being used to provide households with the understanding that their free and reduced eligible data can be shared with other programs if they have signed off on this. Currently, there is a program using a list of free and reduced eligible students without the approval from the households to share that information.</p> <p><b>Corrective Action:</b> Discontinue providing the list of free and reduced students without household approval. Begin using the Sharing Information with Other Programs form. Submit a statement of how you will handle sharing information with other programs that want free and reduced eligible student data.</p>
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	700	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/8/20	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged NPC 11/25/2019 10:26 AM</p>	<p><b>Finding:</b> On the Annual Financial Report, all of the expenses for Nonprogram foods and WSDMP were not broken out by expense category (7 CFR 210.19). Additionally, the total revenues and expenses for Fund 50 did not match the unaudited PI-1505 report.</p> <p><b>Corrective Action:</b> Review the Annual Financial Report webcast or manual on the DPI website then update the 2018-19 Annual Financial Report with expenses broken out by program and category. Update the 18-19 SY Annual Financial Report in Online Services prior to December 31 to include the updated figures for SFSP and Nonprogram foods. Anything after December 31 will need to be amended by the DPI Accountant. Submit a statement this has been completed.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	126	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/8/20	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged NPC 11/25/2019 10:27 AM</p>	<p><b>Finding:</b> One meal application was not determined in compliance with 7 CFR 245.6(a). The household's meal benefits were incorrectly calculated.</p> <p><b>Corrective Action:</b> Send a letter to the household noting a decrease in benefits from free to reduced-price. The change will take effect 10 calendar days from the date the letter is mailed to the household.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	

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Question #	133	
TA Log #	No TA Log# found	
Due Date	1/8/20	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 11/21/2019 10:08 AM	<b>Finding:</b> Three students that were directly certified free were receiving a reduced-price benefit instead. <b>Corrective Action:</b> Notify the household of the correct eligibility and change the eligibility status immediately.
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date	1/8/20	
Corrective Action Status	Flagged	
Corrective Action History	Flagged NPC 11/26/2019 07:08 AM	<b>Finding:</b> Documentation of school food service staff training does not contain all of the required fields per 7 CFR 210.30. <b>Corrective Action:</b> Include all training hours completed this school year for each school food service employee onto the DPI professional standards training tracking tool.
Site Name	John Edwards Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date	1/8/20	
Corrective Action Status	Flagged	
Corrective Action History	Flagged PHN 11/21/2019 03:57 PM	<b>Finding:</b> There was a daily meat/meat alternate shortage at lunch during the week of review. Only 1.75 oz eq meat/meat alternate was offered on Tuesday with the Chicken Alfredo, which does not meet the minimum 2.0 oz. eq. requirement for the 9-12 meal pattern. <b>Corrective Action:</b> Submit a statement explaining how this shortage will be fixed on this day during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, standardized recipes and/or crediting documentation.
Site Name	John Edwards Hi	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	TA Log# exists	
Due Date	1/8/20	
Corrective Action Status	Flagged	
Corrective Action History	Flagged PHN 11/21/2019 09:16 AM	<b>Finding:</b> Not all beverages (excluding juice and water) in the vending machine are allowable at the middle school level. Only plain water, 100% juice, or milk are allowable Smart Snack beverages for middle school students.

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		<b>Corrective Action:</b> State what will be done with these products to comply with the Smart Snack regulations. Options may include turning the vending machine off during school hours (midnight until 30 minutes after the instructional school day); having all compliant products for both grade groups; or restricting middle school students from purchasing the products.
<b>Site Name</b>	John Edwards Hi	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>	1/8/20	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged PHN 11/26/2019 06:08 AM	<b>Finding:</b> The following products were identified in the SFA's storage area as non-domestic and not documented: - Cucumbers, fresh (Mexico) - Garlic Powder (USA and China) <b>Corrective Action:</b> Complete and submit Non-Compliant Product Forms for the products listed above ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a> ).
<b>Site Name</b>	John Edwards Hi	
<b>Form Name</b>	Wisconsin School Day Milk Program	
<b>Question #</b>	4	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>	1/8/20	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged NPC 11/21/2019 01:14 PM	<b>Finding:</b> Point of Service meal counts are not maintained to support the annual claim for reimbursement. The 17-18 SY, 18-19 SY, and part of the 19-20 SY (Sept-Nov) have no point of service records to support the claim. Fiscal action will be applied accordingly. <b>Corrective Action:</b> As soon as possible, begin using point of sale roster sheets to check off or use your software system to track which students receive a milk for milk break under the WSDMP. Submit a statement in writing in SNACS of when and how this was implemented.

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/25/2019	1030	1107	Administrative Review	John Edwards Hi	FSD			PHN

## Comments

Selling Entrees a la Carte	Created By	Created Date
The following items are exempt from meeting smart snacks standards: an entree 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).	PHN	11/25/2019 10:09:52 AM

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11/21/2019	1058	700	Administrative Review	ALL	Food Service Director			
Comments								
Annual Financial Report: Allocating Revenue and Expenses					Created By		Created Date	
When reporting figures for the Annual Financial Report, be sure to calculate the revenues and expenses of all non-program foods such as adult meals, catering, extra milk, extra entrees, and paid student milk from the WSDMP. Allocate costs to the expense categories as applicable.					NPC		11/25/2019 5:53:13 PM	
11/21/2019	1057	305	Administrative Review	ALL	Food Service Director			
Comments								
Visiting Students					Created By		Created Date	
School age students visiting for lunch, may take a reimbursable meal, be charged the student lunch price, and be claimed in the paid category. Keep documentation to support the student(s) took a reimbursable meal. If you prefer to charge the visiting student for the meal and not claim them, they do not have to take a reimbursable meal, but must be charged the adult meal price or at least charged enough to cover all costs for their items.					NPC		11/25/2019 5:40:26 PM	
11/21/2019	1027	410	Administrative Review	John Edwards Hi	FSD			PHN
Comments								
Whole Grain-Rich Grains					Created By		Created Date	
In the past, all grains offered and served had to be whole grain-rich. Now, only half of the grains offered and served have to be whole grain-rich. The Spanish Rice (which is enriched) served during the week of review may now credit towards the grain component.					PHN		11/21/2019 4:09:18 PM	
11/21/2019	1026	410	Administrative Review	John Edwards Hi	FSD			PHN
Comments								
Crediting					Created By		Created Date	
There were many crediting inconsistencies during the week of review.								
<ul style="list-style-type: none"> <li><b>Sunflower seeds:</b> 1 ounce (by weight) of sunflower seeds credits 1 oz eq meat/meat alternate (M/MA) (which you may count as a grain at breakfast). Written on production records (PRs) is 0.5 oz eq. The rule, "only half of your nuts/seeds may credit towards the M/MA component" only applies at lunch.</li> <li><b>Apple (113 ct.):</b> one credits as 1 cup (1/2 cup written on PRs)</li> <li><b>Tyson Chicken Nuggets:</b> seven credit 2.75 oz eq M/MA (2.5 oz eq written on PRs)</li> <li><b>Potato Smiles:</b> eight credit 1 cup (3/4 cup written on PRs)</li> <li><b>Tortilla Chips:</b> twelve credit 1.25 oz eq grain</li> <li><b>Cornbread:</b> one credits 1.25 oz eq grain</li> <li><b>Cheese:</b> ¼ cup credits 1 oz eq M/MA</li> <li><b>Taco Salad Recipe:</b> credits ½ cup red/orange vegetable (taco meat [1/8 c if 3.17 oz by weight], salsa [2 Tbsp = 1/8 cup], and diced tomatoes [1/4 cup] = ½ cup).</li> <li><b>Lasagne Roll:</b> credits ½ cup red/orange vegetable (says ¼ cup on PRs)</li> <li><b>Alt Chef Salad:</b> can credit 2.75 oz eq grain (croutons = 1.25 oz eq + cornbread = 1.5 oz eq)</li> </ul>					PHN		11/21/2019 4:06:30 PM	

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- **Alt Turkey Wrap:** can credit 2.25 oz eq M/MA (4 turkey slices = 1.25 oz eq + cheese = 1 oz eq)
- **Chicken Alfredo:** 9-12 serving size credits 1.75 oz eq M/MA (recipe states 2.5 oz eq M/MA)

When determining the crediting when altering the serving size, remember the following cross-multiplication set up:

What you know    What you DO NOT know (solving for)

----- = -----  
 What you know    What you know

(then cross multiply and divide by the other)

For help crediting menu items, refer to the [Crediting In a Nutshell](#) or contact a [Public Health Nutritionist](#) for assistance (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>) (<https://dpi.wi.gov/school-nutrition/directory#PHN>).

11/21/2019	1025	1411	Administrative Review	John Edwards Hi	FSD			PHN
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## Comments

### Buy American

### Created By

### Created Date

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).

PHN

11/21/2019 3:47:08 PM

11/21/2019	1024	1411	Administrative Review	John Edwards Hi	FSD			PHN
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## Comments

### Buy American

### Created By

### Created Date

For domestic products without country of origin labeling, consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor attests that the agricultural product(s) listed are compliant with the Buy American Provision.

PHN

11/21/2019 3:46:40 PM

11/21/2019	1023	400	Administrative Review	John Edwards Hi	FSD			PHN
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## Comments

### Breakfast Menu Items

### Created By

### Created Date

The menu planner has the discretion to determine how to credit certain food items at breakfast. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. Therefore, if an apple is served that credits as 1 cup fruit, the menu planner can choose whether the apple will count as one or two items. The same goes for grains. A 2 oz eq muffin may count as one or two items. Remember, the crediting must be clearly communicated to students and staff.

PHN

11/21/2019 3:45:13 PM

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11/21/2019	1053	106	Administrative Review	ALL	Determining Official				
Comments									
Disclosure of Free and Reduced Information				Created By			Created Date		
For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and on file at the district. A template Disclosure of Free and Reduced Price Information form is located on the SNT website ( <a href="http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx">http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx</a> ).				NPC			11/25/2019 3:17:53 PM		
11/21/2019	1014	1007	Administrative Review	ALL	Food Service Director				
Comments									
Wellness Policy Triennial Assessment				Created By			Created Date		
The Wellness Policy is being updated to include all of the necessary components that are listed on the checklist. Information on how to conduct the triennial assessment was emailed to the Food Service Director.				NPC			11/21/2019 11:57:48 AM		
11/21/2019	1007		Administrative Review	John Edwards Hi	FSD			PHN	
Comments									
Around the World in 80 Trays (January 21-24, 2020)				Created By			Created Date		
Help the SNT reach our goal of 80 SFAs participating in <a href="https://dpi.wi.gov/school-nutrition/programs/national-school-lunch">Around the World in 80 Trays</a> ( <a href="https://dpi.wi.gov/school-nutrition/programs/national-school-lunch">https://dpi.wi.gov/school-nutrition/programs/national-school-lunch</a> ). Take the pledge and use the week of January 21-24, 2020 to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students. Visit the NSLP webpage for event information. Document the event (pictures, video, sound clips etc.) and send to <a href="mailto:DPIFNS@dpi.wi.gov">DPIFNS@dpi.wi.gov</a> so we can share your success on social media!				PHN			11/21/2019 9:50:26 AM		
11/21/2019	1005		Administrative Review	John Edwards Hi	FSD			PHN	
Comments									
School Breakfast Challenge				Created By			Created Date		
School Breakfast Challenge Join schools to increase breakfast participation or to start a new breakfast program. The challenge begins December 2nd, 2019. Schools with the highest increase in breakfast participation will win up to \$1,000! New this year, participate in the Big Cheese bonus round for a chance to win an additional \$1,000 for your program. Prizes are provided by No Kid Hungry. Visit <a href="http://bit.ly/SchoolBreakfastChallenge">http://bit.ly/SchoolBreakfastChallenge</a> for details.				PHN			11/21/2019 9:48:48 AM		
In addition, all schools participating in the Challenge are eligible to apply for NKH's breakfast grants. For these grants, there is no free and/or reduced price meal percentage requirement. Grants will support schools with the purchase of approved equipment, materials and program initiatives. Deadline is December 6, 2019. Visit the <a href="http://bit.ly/SchoolBreakfastChallenge">Hunger Task Force</a> ( <a href="http://bit.ly/SchoolBreakfastChallenge">http://bit.ly/SchoolBreakfastChallenge</a> ) website for details.									
11/21/2019	1003	404	Administrative Review	John Edwards Hi	FSD			PHN	

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Comments							
Signage, Ordering				Created By		Created Date	
Breakfast and lunch signage may be ordered for free through the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">signage webpage</a> (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage).				PHN		11/21/2019 9:45:04 AM	
11/21/2019	1001	1	Administrative Review	John Edwards Hi	FSD		PHN
Comments							
Production Record Templates				Created By		Created Date	
Production record templates for breakfast and lunch (including multiple grade groups) can be found on our <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">Production Records webpage</a> (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records). They are available in Excel (can edit) and PDF (cannot edit) versions.				PHN		11/21/2019 9:42:20 AM	
11/21/2019	1000	1	Administrative Review	John Edwards Hi	FSD		PHN
Comments							
Sodium				Created By		Created Date	
The dietary specifications are based on a daily average, meaning some days may be higher in calories, sodium, and saturated fat, while others may be lower; just so that the average over the course of the week is within the appropriate range per age/grade group. On Thursday during the week of review, the Maxx Mini Tacos, Spanish Rice, and Refried Beans were high in sodium (2,070mg). As a reference, the daily average sodium for high school students is 1,420 mg.				PHN		11/21/2019 9:41:05 AM	
11/21/2019	999	410	Administrative Review	John Edwards Hi	FSD		PHN
Comments							
Weekly Grains				Created By		Created Date	
During the lunch week of review, the total maximum weekly grains a student could select were 20.25 oz eq (with the maximum suggestion being 12 oz eq). Although maximums are not enforced for meal components, they are still a good frame a reference to make sure the dietary specifications are being met. Consider decreasing the amount of grain options available daily to students, while still meeting the minimum 1 oz eq grain daily for middle school and 2 oz eq grain for high school.				PHN		11/21/2019 9:35:28 AM	
11/21/2019	998	409	Administrative Review	John Edwards Hi	FSD		PHN
Comments							
Production Records, Purchase Units				Created By		Created Date	
Be specific with purchase units on breakfast production records. Instead of writing, "1" make sure to clarify if this is case, #10 can, etc.				PHN		11/21/2019 9:29:51 AM	
11/21/2019	995	1106	Administrative Review	John Edwards Hi	FSD		PHN
Comments							
Smart Snacks, Fundraisers				Created By		Created Date	
Great job tracking exempt fundraisers at John Edwards High School! Although fundraisers are being tracked, make sure to thoroughly fill out all information. The location(s) for the 2019-20 SY were not filled in. As a				PHN		11/21/2019 9:05:22 AM	



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reminder, exempt fundraisers (meaning products do not meet Smart Snacks) cannot be sold in the meal service area during meal service time.								
11/21/2019	994	1105	Administrative Review	John Edwards Hi	FSD			PHN
Comments								
Smart Snacks, Beverages					Created By		Created Date	
If multiple grades have access to beverage vending machines, products must meet Smart Snacks standards for the youngest grade group. For example, if a beverage vending machine is available to 5-12th graders, beverages must meet Smart Snacks standards for the 6-8 grade group. Therefore, items like caffeinated, low-calorie (=5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (<5 kcal/8 fluid oz; =10 kcal/20 fluid oz.) flat or carbonated beverages are not allowable.					PHN		11/21/2019 9:01:54 AM	
11/20/2019	1055	107	Administrative Review	ALL	Determining Official			
Comments								
Transferring Students and Eligibility					Created By		Created Date	
When a child transfers in to the school midyear, the Determining Official (DO) can request a copy of the approved application or a copy of the Direct Certification output match file from the prior school. When you receive the prior application, the DO must re-determine it, sign, and date it. A notification letter must go out to the household notifying the benefit and start date of eligibility. The start date of eligibility is the date the DO re-determined the application.					NPC		11/25/2019 5:30:13 PM	
11/20/2019	1051	113	Administrative Review	ALL	Determining Official			
Comments								
Sharing Form with Other Programs					Created By		Created Date	
When using free or reduced student level data for something other than the school nutrition programs, reporting to DPI, or another federal program, you must send out the Sharing Form with Other Programs to all free and reduced-price eligible households to complete.					NPC		11/25/2019 3:04:54 PM	
11/19/2019	1050	137	Administrative Review	ALL	Determining Official			
Comments								
Direct Certification					Created By		Created Date	
Regarding direct certification and benefit issuance, always make sure you are running direct certification and uploading the output match file into your software system. Double check the benefit issuance list to see that students found on direct certification to be getting a better benefit, are notified of this and updated in the system.					NPC		11/25/2019 2:50:27 PM	