

WASHINGTON TWP BD OF ED-01505500 - Corrective Action Report

Section	Form subsection	Site Name	Question #	Due Date	Status
Revenue From Non-Program Foods	Revenue from Nonprogram Foods		710	12/10/2020	CAP Accepted
Corrective Action History	CAP Accepted Lisa Garland 03/30/2021 05:37 PM	CAP Accepted			
	CAP Submitted Jennifer Mullin 12/07/2020 03:33 PM	<p>During the review, we learned that some of our invoicing was done incorrectly. We were breaking down our foods as commodity and non commodity. However we learned that we should be breaking them down as reimbursable and non-reimbursable. We were planning to implement this at the start of this school year however because of continuing with the SSO all products we are using are reimbursable. We will implement this as soon as we switch back to NSLP.</p> <p>I will have to investigate more thoroughly the guidelines of 7 CFR 210.14(f) to insure our compliance. The Cooks and Operation's staff will be trained on the differences of program vs. non-program foods and the importance of separating the two.</p>			
	Flagged Lisa Garland 12/03/2020 01:35 AM	<p>Finding: Revenue from Non-program Foods</p> <p>Revenue Ratio DID NOT equal or exceed its Food Cost Ratio as required under 7 CFR 210.14(f).</p> <p>Additional Revenue was needed to comply.</p> <p>A Corrective Action Plan is required</p>			
Meal Components and Quantities - Review Period	Meal Components and Quantities - Review Period	BUNKER HILL MIDDLE	410	04/09/2020	CAP Accepted
	CAP Accepted Amy Martin 03/18/2021 07:41 AM	CAP Accepted			
	CAP Submitted Jennifer Mullin 03/15/2021 05:10 PM	<p>I have attached my corrected recipe to reflect that we are using 2oz of provolone and not crediting the salami or cappicola.</p> <p>We are in the process of tasting the turkey lunch meat option available from Jennie O.</p>			

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Corrective Action History	CAP Rejected Amy Martin 03/01/2021 11:28 AM	<p>Email sent directly to Jennifer to explain rationale for "not approving." Here is the cliff notes version:</p> <p>As we know the cheese credits as 1oz = 1 M/MA, but the capicola and salami can not be creditable bc they are not found as products in the FBG. Therefore, according to emails with the USDA personnel, they would require each product have a specific PFS or CN label to be creditable.</p> <p>So, how do we proceed?</p> <ul style="list-style-type: none"> -Request the manufacturer provide you with a CN label or PFS -Either add another meal, such as ham, that meets criteria and meets 1 oz M/MA -Add additional cheese that would provide an additional 1 oz M/MA -Discontinue the use of recipe.
	CAP Submitted Jennifer Mullin 01/22/2021 05:04 PM	I have adjusted the recipe to reflect comparing the capicola to mild cured pork, water added and the salami to bologna. I have attached an updated copy. It is recipe #3.
	CAP Rejected Amy Martin 01/22/2021 03:29 PM	Unfortunately due to significant nutritional differences the capicola and salami can not be compared to Turkey Ham in the Food Buying Guide. You must obtain a signed manufacturer's Product Formulation Statement (PFS) for these products or compare to like items in the FBG. In the recipe you provided, I can only validate that it provides 1oz meat/meat alternate; therefore the recipe must be changed/PFS obtained or no longer provided as a daily item to K-8 or in addition to 1oz meat/meat alternate at the 9-12 age/grade groupings.

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	<p>CAP Submitted Jennifer Mullin 12/07/2020 03:33 PM</p>	<p>The corrective action was implemented on January 1, 2020.</p> <p>We were offering 1/2 of the daily vegetable along with 1/2 c/2.6oz of bagged carrots. The cook mistakenly did not list the carrots on her production sheets.</p> <p>The cooks were trained during quarantine on productions and I am planning on doing another one before we go to break.</p> <p>Going forward, we may now "serve" the required amount of the vegetable of the day to make it easier for the cook's and their productions. and only offer carrots as needed.</p> <p>We are using a new recipe for our hoagie that meets the required components. I have attached a copy.</p> <p>I compared our lunch meat with a turkey ham from the USDA food buyer's guide. I felt this was comparable with our salami and capicola.</p> <p>Going forward, I am hoping to use a new menu planning system, MOSAIC, where I will be able to track components, develop recipes, check for accuracy in vegetable sub groups, all in one place. Eventually, this program will be extremely beneficial to our department.</p>			
	<p>Flagged Amy Martin 03/09/2020 10:32 AM</p>	<p>At lunch, portion sizes planned for each component must meet both daily and weekly minimum requirements for each appropriate grade group. When planning menus, refer to the Lunch Meal Pattern Charts, available on the Department of Agriculture's Form web site for specific component and minimum quantity requirements. In addition, production records must document that both daily and weekly minimum quantities for each component are offered. Other supporting documentation (including but not limited to the USDA Food Buying Guide, food labels, CN labels, manufacturers product formulation statements, standardized recipes, etc.) must be used to determine the creditable amount each menu item contributes to the meal pattern to assure that required minimum quantities are offered.</p> <p>According to the production records for the review week (11/18-11/22/2019), only 1/2 cup of vegetable was offered per day, which does not meet the daily requirement of 3/4 cup for the 6-8 age/grade grouping. Consequently this lead to the weekly vegetable subgroups requirements being short. The dark green subgroup was short 1/4 c and the additional to meet total was shy 1 cup. Also, the Italian hoagie was a daily offering for the review week, but since the meat/meat alternate only credits as 1.75 oz eq, it does not meet the minimum weekly requirements of 9 oz eq (only provides 8.75 oz eq).</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>			
<p>Dietary Specification Assessment Tool (On Site Observation)</p>	<p>Dietary Specification Assessment Tool (On Site Observation)</p>	<p>BIRCHES</p>	<p>12</p>	<p>04/09/2020</p>	<p>CAP Accepted</p>

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Corrective Action History	CAP Accepted Amy Martin 02/28/2021 08:49 AM	CAP Accepted			
	CAP Submitted Jennifer Mullin 01/22/2021 05:04 PM	When we realized that the Snack Bar could not be offered every day b/c of the designation as a "dessert grain", we started offering a choice of 2 of the following grains: .75oz goldfish, 1.76oz pop tart, or 57 gram muffin. We also have a recipe for our lunchables.			
	CAP Rejected Amy Martin 01/22/2021 03:09 PM	The corrective action was not generated due to the donuts being sold as a snack. As discussed with Marilu, it was due to the chocolate chip bar that was part of the "Yogurt Munchable" meal that was offered as a daily alternate. The chocolate chip based in classified as Group E in the Exhibit A: Grain Requirements for the Child Nutrition Programs (Form 33), which classifies as a "dessert grain" According to 210.10, grain-based desserts are only allowed to be offered in up to 2 oz equivalents per week. Therefore the bar being offered daily would exceed this. Please let me know the changes made to ensure the regulations are met.			
	CAP Submitted Jennifer Mullin 12/07/2020 03:34 PM	<p>We were selling the donuts as a snack that were leftover from breakfast. That is permitted according to the Smart Snack rules.</p> <p>We do not serve grain based desserts at lunch, ever.</p> <p>An example question:</p> <p>Can an entrée at breakfast be sold a la carte at lunch the same day? a. Yes, an entrée that is served as part of a reimbursable meal at breakfast or lunch may be sold a la carte on the day of service or the day after service in either meal program and is exempt from the nutrition standards.</p>			
	Flagged Amy Martin 03/09/2020 10:32 AM	Grain-based desserts such as doughnuts, pastries, cake, cookies, graham crackers, etc. must be limited to 2 oz. eq. per week or less at lunch. Technical assistance was provided.			
Meal Counting and Claiming - Day of Review	Meal Counting and Claiming - Day of Review	HURFFVILLE ELEM	318	04/09/2020	CAP Accepted
	CAP Accepted Lea Berry 01/22/2021 12:24 PM	CAP Accepted			

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Corrective Action History	<p>CAP Submitted Jennifer Mullin 12/07/2020 03:32 PM</p>	<p>We took corrective action immediately after Amy explained to us why we were incorrect in our meal counting.</p> <p>Hurville serves breakfast in the classroom for all students and our Special Education classroom is served lunch as well in the classroom.</p> <p>One of our staff members delivers the bags to the classroom, the children come up to the front of the room, get their breakfast and are checked off on the roster to confirm that they are getting a reimbursable meal.</p> <p>The Special Ed teacher comes down to the cafeteria to help the staff deliver the lunches to the classroom. When they get to the classroom, our staff will check off on the roster when the student receives their reimbursable meal.</p> <p>A full, reimbursable meal is in the breakfast bags or on the cafeteria trays.</p> <p>Our staff is trained on this procedure at every school and the teachers have been taken out of the equation.</p>
	<p>Flagged Amy Martin 03/09/2020 10:31 AM</p>	<p>An accurate count of reimbursable meals served, by eligibility category, must be taken at the point of service for lunch. Point of service means that point in the food service operation where a determination can be made that a reimbursable free, reduced price or paid meal has been served to an eligible child. At lunch, a teacher from the self contained classroom picked up five (5) meals from the cafeteria and returned them to her classroom. The morning pre order form used as the POS. No roster was utilized. This is not allowed. The State Agency has determined that the inaccurate counting of meals observed at lunch is an ongoing systemic problem. The meal counting system must be corrected. Fiscal action will be taken. An over claim may be assessed.</p> <p>During breakfast, in one classroom, a new teacher was in administering breakfast. The teacher was unsure of the school's procedures or how to complete the breakfast roster properly. Since no one (zero) wanted breakfast, her counts were correct, however all teachers administering the program must be trained on how to accurately complete the roster as this is the POS.</p> <p>Explain, in detail how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>

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Section	Form subsection	Site Name	Question #	Due Date	Status
Meal Components and Quantities - Review Period	Meal Components and Quantities - Review Period	BIRCHES	409	04/09/2020	CAP Accepted
Corrective Action History	CAP Accepted Lea Berry 01/22/2021 12:22 PM	CAP Accepted			
	CAP Submitted Jennifer Mullin 12/07/2020 03:33 PM	<p>The corrective action was put into place on February 1, 2020 because Amy explained to myself and Marilu what we were doing wrong in December. The employees had to be trained on how to complete their production records correctly, so it could not be implemented immediately. All cooks are trained on completing the production records correctly.</p> <p>All cooks are now aware that if the breakfast is SERVED, the students must receive 1 c of milk, 1 cup of fruit and 1-2 oz. of grain and/or meat or meat alternate daily. This must be reflected on the production sheet as well.</p> <p>Production records are checked monthly for accuracy by the FS Supervisor. If discrepancies occur, the cook is notified and we go over how to fix their mistakes.</p> <p>We produce a monthly menu where all required components are listed and referenced when bagging up breakfasts and serving lunches. These menus are posted through out the kitchens. A menu analysis program was in use to confirm that all components and their specific quantities were being served.</p> <p>Employees are trained throughout the year on productions and meal patterns as well as access to many training sessions and materials as needed.</p> <p>Going forward, we are not going to have the teacher's involved in handing out breakfasts or lunch. We are looking into serving all breakfasts from a cart or back in the cafeteria.</p>			

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	Flagged Amy Martin 03/09/2020 10:32 AM	<p>At breakfast, all required meal components must be served to students daily. When planning menus, the SFA must make sure that all 3 components of the reimbursable breakfast, in minimum daily and weekly requirements, are offered. Daily production records and supporting documentation (including but not limited to standardized recipes, food labels, CN Labels, manufacturer product formulation statements, USDA Foods Information Sheets, etc.) must be used to make sure menus are in compliance with the meal pattern. In addition, teachers must receive training on how to accurately recognize a reimbursable breakfast and how to correctly complete the breakfast roster to ensure that only meals containing all the required components are claimed for reimbursement.</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>			
Meal Components and Quantities - Review Period	Meal Components and Quantities - Review Period	HURFFVILLE ELEM	410	04/09/2020	CAP Accepted

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Section	Form subsection	Site Name	Question #	Due Date	Status
Corrective Action History	CAP Accepted Lea Berry 01/22/2021 11:58 AM	CAP Accepted			
	CAP Submitted Jennifer Mullin 12/07/2020 03:33 PM	<p>As stated, we began implementing our corrective action immediately. The cooks were retrained on productions and continue to be trained/reviewed every year. We will again train in December/January 2020.</p> <p>For when we return to in person feeding, teachers will not be involved with distributing lunches unless we can find a way to train them in offer vs serve, completing a roster and civil rights.</p> <p>We are also looking into serving breakfast from carts in the hallway. If we feed out of the hallway, a grab and go type serving line, I believe more children will participate and we will have less waste. I hope to have a POS system on the cart, eliminating the need for the roster. If no POS system, then we will have a roster, which will be operated by our staff. Our staff can assure that the students are receiving the correct amount of components as they check out.</p> <p>It is understood in all kitchens and Operations what components, their quantities, go on a tray/bag to constitute a reimbursable meal.</p>			
	Flagged Amy Martin 03/09/2020 10:33 AM	<p>Students must take the required number of components for breakfast in order for their meals to be claimed for reimbursement. Since the SFA does not have offer versus serve at breakfast, students must take all 3 components in the proper quantities. Teachers must receive training on how to accurately recognize a reimbursable breakfast and how to correctly complete the breakfast roster. On multiple days during the review week, the production records indicate that not all meal components were served. On Monday (11/19), 26 meals were claimed, but only 21 milks served (-5). On Thursday (11/21), 27 meals were claimed, but only 22 milks served (-5). On Friday (11/22), 29 meals were claimed, but only 28 milks served (-1).</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p> <p>Edit</p>			
Meal Components and Quantities - Day of Review	Meal Components and Quantities - Day of Review	BIRCHES	401	04/09/2020	CAP Accepted

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Section	Form subsection	Site Name	Question #	Due Date	Status
Corrective Action History	CAP Accepted Lea Berry 01/22/2021 11:56 AM	CAP Accepted			
	CAP Submitted Jennifer Mullin 12/07/2020 03:33 PM	<p>The corrective action was taken immediately.</p> <p>Teachers are no longer involved in meal counting.</p> <p>We are hoping to implement a new "cart" system outside of the classrooms where we will be able to "offer" breakfast. I see this as a reduction in waste, having more variety and being able to use a POS system directly on the cart.</p> <p>Our staff, who have all been trained again and again on meal components, give out the breakfasts and check off the student's name as they take/receive their full reimbursable meal.</p> <p>Our bags are stocked with all required components and rotated for freshness.</p>			
	Flagged Amy Martin 03/09/2020 10:32 AM	<p>Students must take the required number of components for breakfast in order for their meals to be claimed for reimbursement. Since the SFA does not have offer versus serve at breakfast, students must take all 3 components in the proper quantities. In one classroom, there were two (2) meals claimed for reimbursement in which the students did not take all the required components. In another classroom, although no disallowed meals were observed, the teacher had to be told that the students must take all the components to be checked on the roster (signifying a reimbursable meal). Teachers must receive training on how to accurately recognize a reimbursable breakfast and how to correctly complete the breakfast roster.</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>			
Food Safety, Storage and Buy American	Food Safety, Storage and Buy American	BUNKER HILL MIDDLE	1411	04/09/2020	CAP Removed
Corrective Action History	CAP Removed Amy Martin 03/09/2020 10:17 AM	CAP Removed			
	Flagged Amy Martin 03/09/2020 09:52 AM				
Meal Components and Quantities - Day of Review	Meal Components and Quantities - Day of Review	HURFFVILLE ELEM	401	04/09/2020	CAP Removed

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Section	Form subsection	Site Name	Question #	Due Date	Status
Corrective Action History	CAP Removed Amy Martin 12/30/2019 12:20 PM	CAP Removed			
	Flagged Amy Martin 12/30/2019 12:17 PM	<p>Students must take the required number of components for breakfast in order for their meals to be claimed for reimbursement. Since the SFA does not have offer versus serve at breakfast, students must take all 3 components in the proper quantities. Teachers must receive training on how to accurately recognize a reimbursable breakfast and how to correctly complete the breakfast roster. On multiple days during the review week, the production records indicate that not all meal components were served. On Monday (11/19), 26 meals were claimed, but only 21 milks served (-5). On Thursday (11/21), 27 meals were claimed, but only 22 milks served (-5). On Friday (11/22), 29 meals were claimed, but only 28 milks served (-1).</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>			
Dietary Specifications and Nutrient Analysis	Dietary Specifications and Nutrient Analysis	BIRCHES	603	04/09/2020	CAP Removed
Corrective Action History	CAP Removed Amy Martin 12/30/2019 10:54 AM	CAP Removed			
	Flagged Amy Martin 12/16/2019 12:29 PM				
Meal Counting and Claiming - Day of Review	Meal Counting and Claiming - Day of Review	BIRCHES	318	04/09/2020	CAP Removed
Corrective Action History	CAP Removed Amy Martin 12/16/2019 10:55 AM	CAP Removed			
	Flagged Amy Martin 12/16/2019 08:29 AM	<p>An accurate count of reimbursable meals served, by eligibility category, must be taken at the point of service for breakfast. Point of service means that point in the food service operation where a determination can be made that a reimbursable free, reduced price or paid meal has been served to an eligible child. For breakfast the site participates in serve only. In one classroom, there were two (2) meals claimed for reimbursement in which the students did not take all the required components. In another classroom, although no disallowed meals were observed, the teacher had to be told that the students must take all the components to be checked on the roster (signifying a reimbursable meal). Explain, in detail how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation..</p>			
Group 1: CA Count (2)				04/09/2020	CAP Accepted
	Section	Form subsection	Site	Question #	
	Meal Components and Quantities - Day of Review	Meal Components and Quantities - Day of Review	BUNKER HILL MIDDLE	404	
	Offer vs Serve - Day of Review	Offer vs Serve - Day of Review	BUNKER HILL MIDDLE	502	

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Corrective Action History	CAP Accepted Lea Berry 01/22/2021 11:52 AM	CAP Accepted
	CAP Submitted Jennifer Mullin 12/08/2020 12:02 PM	<p>We have just implemented on December 1st, SERVING 3/4 C OR 1 C of our vegetable of the day, realizing that there may have been some confusion at the serving line about what the students could have with their meal. I feel this is the best way to serve/offer the correct amount of the vegetable component. We will still have other varieties of vegetables along with the fruit component available daily.</p> <p>We will continue having signage on our lines explaining what the students can have and what they must have on their tray. The NJDA site and many others offer signage that we have used and will use in the future.</p>

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	<p>Flagged Amy Martin 03/09/2020 10:33 AM</p>	<p>Each serving line/serving area must have signage posted at or near the beginning of the serving line (or in classrooms, if applicable) identifying what constitutes a reimbursable meal. Schools using offer versus serve must identify what a student must select, including the requirement to take at least 1/2 cup fruit or vegetable.</p> <p>There is signage explaining what constitutes a reimbursable meal, however signage must be added explaining to the students they are allowed to take two servings of vegetables due to the fact that vegetables are served in a half cup portion when the minimum requirement is 3/4 cup.</p> <p>Explain in detail, how the finding was corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p> <p>Signage must be posted at or near the beginning of the serving line/serving area (including classrooms, if applicable) identifying the components of the reimbursable lunch. Posting only a menu does not meet this requirement.</p> <p>There is signage explaining what constitutes a reimbursable meal, however signage must be added explaining to the students they are allowed to take two servings of vegetables due to the fact that vegetables are served in 1/2 portions when the requirement is 3/4 cup portion.</p> <p>Explain in detail, how the finding will be corrected and the measures taken to ensure that it will not reoccur in the future. Indicate the date of implementation.</p>
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