

Administrative Review Report

St. Mary School

Schedule Type	Start Date	End Date
On-Site Review	11/21/2023	11/21/2023

The Public Health Nutritionist and School Nutrition Team extend heartfelt appreciation to the Food Service Director for her commitment and diligence in preparing for the audit. The documentation organization significantly streamlined the review process. We also express gratitude for her valuable time invested both before and during the onsite visit. Thank you to the Food Service Director and the kitchen staff for the warm welcome and for ensuring that the students of St. Mary's have nutritious meals served in a friendly, enjoyable environment!

Recommendations:

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition 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.

Our annual School Nutrition Summer Training will return in the Summer of 2024. Information and registration will be posted in Spring 2024. There will be in-person at several locations around the state and virtually through live, instructor-led online courses. Please see our School Nutrition Summer Training webpage to learn more (<https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training>).

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The SFA's Unpaid Meal Charge Policy needs to be updated with specific consequences for unpaid meals. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016)</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p> <p>I changed the wording and put the nondiscrimination statement from the USDA's website on the policy. It is uploaded into SNACS.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	700
Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: On the Annual Financial Report, the nonprogram food revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p>Corrective Action 1: Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)

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Question #	710
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA is not separately tracking nonprogram food revenue and expenditures from Program food revenues and expenditures.</p> <p>Corrective Action: Provide a plan on how nonprogram food revenue and expenditures will be tracked.</p>
Form Name	Civil Rights (800 - 807)
Question #	801
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Public Release was posted on the school's website.</p> <p>Corrective Action: Provide a statement of understanding that the Public Release will not be posted on the school's website.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (Marketing and Foods provided but not sold) (7 CFR 210.31).</p> <p>Corrective Action: 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.</p> <p>I will upload the new wellness policy for your approval.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
Corrective Action Status	Flagged
Corrective Action History	<p>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).</p> <p>Corrective Action: 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.</p>
Form Name	Nutrient Analysis and Validation - Part 1
Question #	a
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The printed menu should list all components included with the reimbursable meal, including milk.</p> <p>Corrective Action: Submit a copy of an updated menu that includes milk.</p>

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Form Name	Nutrient Analysis and Validation - Part 1
Question #	b
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Production Record Template Does Not Meet Requirements The planned serving size (for each grade group and adults), planned/actual servings prepared, planned/actual quantity prepared in bulk units, and any substitutions made to original plans, including alternate entrée were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (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 production records which meet the Production Record Requirements. 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	Nutrient Analysis and Validation - Part 1
Question #	d
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Standardized Recipes Do Not Meet Requirements. Recipes rendered for documentation review do not meet requirements. Key information such as ingredient details, total number of servings, total recipe yield, and total recipe by weight and volume are incomplete or missing.</p> <p>Corrective Action: Submit a corrected standardized recipe for the menu items listed below. Be sure to include all requirements of a standardized recipe, including serving size, number of portions, and recipe yields. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p> <p>Meat sauce Peanut Butter Sandwich</p>
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on the unpaid meal charge policy.</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p> <p>I cut and pasted the non-discriminations statement from the USDA on to the Policy. Uploaded into SNACS.</p>

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Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	317
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA is not in compliance with nondiscrimination requirements per 7 CFR 245.8. Students were overtly identified as free or reduced based on color coding on the check-off sheets. Provide a plan on how these practices will be modified to prevent overt identification during meal service and include the timeline.</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count due to student counts being entered into the system in the morning before the student receives the meal.</p> <p>Corrective Action: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Insufficient weekly quantity (Meat/Meat Alternate) for the week of review. Repeat finding, subject to fiscal action.</p> <p>The daily alternate entrée option, the Peanut Butter Sandwich, is offered with a #20 scoop (3-1/3 tablespoons of peanut butter) and two slices of whole grain-rich bread. Each sandwich credits as 1.5 ounce equivalents (oz eq) Meat/Meat Alternate (MMA) and 2.5 oz eq grains. Although this meets the daily MMA and grain requirements, this does not meet the minimum weekly MMA requirements. The weekly minimum MMA requirement for the K-8 age/grade group is 9 oz eq; 7.5 oz eq MMA was served (1.5 oz eq daily) for the week of review.</p> <p>Fiscal action is required for any repeat weekly insufficient quantity violations from the previous Administrative Review. During the SY 2017-18 Administrative Review, a weekly MMA shortage was found. Therefore, due to an insufficient weekly MMA quantity during the week of review (October 2-6, 2023) for the SY 2023-24 Administrative Review, fiscal action will be assessed on Friday, October 6th, the day during the week of review with the lowest participation. 103 meals will be reclaimed.</p> <p>Corrective Action: Please submit a statement which describes specifically how the weekly minimum requirement for Meat/Meat Alternate will be met and corrected for the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Form Name	Civil Rights (811-812)

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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>Corrective Action: Hang the USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
Corrective Action Status	CAP Submitted
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/or photo of where the most recent food safety inspection report will be posted and visible to the public.</p> <p>Completed onsite</p>

Technical Assistance Entries:								
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/21/2023	3801	410						
Comments								
Multiple Entrée Options, Meeting Daily and Weekly Requirements: The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the minimum daily meal pattern requirements as well as the minimum weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as "line," and therefore needs to meet the daily as well as the weekly requirements. Details for the weekly Meat/Meat Alternates shortage are captured in the Corrective Action portion of this report.								
11/21/2023	3776	1104						
Comments								
Smart Snacks: No competitive foods or beverages are currently sold at St. Mary's Catholic School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. Someone at each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).								
11/21/2023	3775	400						
Comments								
Milk component located after the Point of Service: Due to the physical constraints of the kitchen footprint, the milk cooler is situated outside of the meal service area. All meal pattern components must be offered prior to the Point of Service (POS). However, in this circumstance, the physical constraints of the meal service area necessitated strategic adjustments. To maintain compliance and ensure the provision of reimbursable meals, food service staff proactively relocated the milk cooler to the closest feasible proximity to the meal service area prior to meal service. Please further consider relocating the half warmer from its current location within the service area to accommodate								

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the milk cooler. If this is not feasible, milk crates can be strategically placed in a small, portable cooler on a table at the end of the service line. An additional viable option, as recommended onsite, is to have students accept or decline the milk component prior to entering the main meal service line.									
11/21/2023	3774	603							
Comments									
Portion Control: Weight vs Volume Fluid ounces are a volume measurement, while ounces are a weight measurement. Spoodles measure fluid ounces, not ounces by weight. Meat/meat alternate (M/MA) is credited by weight, so it is not appropriate to use a 2 fluid ounce spoodle for an intended 2 ounce (by weight) serving of M/MA. To ensure that students receive the proper amount of M/MA, first weigh the product, then determine which scoop will hold that weight of meat. Cycle Menu: Using a cycle menu may ease the burden of menu planning and help ensure meal pattern requirements are met after a compliant cycle has been planned. For more information and recipes, visit the Cycle Menu webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/cycle-menu).									
11/21/2023	3773	404							
Comments									
If you are interested in ordering signage from SNT, please visit the Team Nutrition webpage and complete the Resource Order Form, under the Resources heading (https://dpi.wi.gov/team-nutrition). You may also visit our Signage webpage for other resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage).									
11/21/2023	3772	a							
Comments									
The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.									
11/21/2023	3771	d							
Comments									
Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).									
11/21/2023	3770	b							
Comments									
Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. The lunch production record template currently in use is missing required information. The current template must be updated to include the following required information: planned/actual servings prepared and planned/actual quantity prepared in bulk units. Other production record requirements are listed on the current template, but do not accurately reflect meal service. Continue to work with staff to accurately record planned serving size (for each grade group and adults) and any substitutions made to original plans, including alternate entrees. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was given on using volume measures to record portion sizes of fruits and vegetables, and using weight measures to record portion sizes of M/MA and grains. While there is no required production record template, there are some examples that may be used on our Production Records webpage (http://dpi.wi.gov/school-nutrition/national-schoollunch-program/menu-planning/production-records).									

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Public Release

All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. The Public release may not be posted on the website. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.))
- Local employment office
- Major employers contemplating or experiencing large layoffs.

SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Verification

- The verification process must be completed each year, beginning around October 1, for all SFAs with current year completed and approved applications on file.
- When an application(s) is chosen for verification, the person designated as the *Confirming Official* must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the *Confirming Official* to sign and date the back of the application.
- After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented.
- When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA.
- When a household is selected for verification, it must provide “sources of information” to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.
- Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the month prior to application and the time the household is required to provide the documentation.
- Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.
- Section 9(b)(3)(F) of the NSLA and Program regulations at 7 CFR 245.6a(g) permit LEAs to “directly” verify approved applications selected for verification. **Direct verification** involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. LEAs are not required to conduct direct verification.
- The LEA must make at least one follow-up attempt to contact the household when the household does not adequately respond to the request for verification [7 CFR 245.6a(f)(6)]. “Non-response” includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children’s eligibility for free and reduced price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- According to 7 CFR 245.7(b)(1), when a household appeals a reduction or termination of benefits within the 10 calendar day advance notice period, the LEA must continue to provide the benefits for which the child was originally approved, until a final determination is made.
- The LEA may continue to claim reimbursement at the original level during this period. When a household does not request an appeal during the 10 calendar day advance notice period, benefits must be reduced or terminated no later

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than 10 days after the notice period. If the hearing official rules that the child's benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official's decision.

- Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.
- Apart from the required verification of a specified number of approved applications, regulations at 7 CFR 245.6a(c)(7) require LEAs to verify any questionable application including, on a case-by-case basis, verifying any application for cause when the LEA is aware of additional income or persons in the household. This is known as **"verification for cause."** Determining officials are strongly encouraged to contact the household to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households. Verification for cause cannot delay the approval of applications, and LEAs can begin the verification process only after the determination of eligibility has been made. If an application is complete and indicates the child is eligible for free or reduced-price benefits, the application must be approved while the LEA begins verification for cause.

The standard sample size for verification must be used by an LEA unless the LEA qualifies to use an alternate sample size. Instructions for standard and alternate sample sizes can be found in the [Eligibility Manual](#)

Annual Financial Report (AFR)

- The [Annual Financial Report Manual](#) is located on the DPI website to assist you with completing the AFR.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance.
- The school food service fund may not have an ending fund balance more than three-month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.
 - 'Food' is expenses for edible food items and beverages.
 - 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.
 - 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.
 - 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.
 - When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Meal Counting and Claiming

- Meal benefits apply only to a reimbursable meal and must be priced as a unit. If a student decides to take only milk, this is not a reimbursable meal and milk must be charged as an a la carte item.

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- Meals must be counted at the point of service and may only be charged to a student upon receipt of a reimbursable meal.
- All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that consistently yields accurate claims. Backout counts (only marking who is absent) and forecast counts are unallowable. (7 CFR 210.7)
- Per 7CFR 210.10 meals must be offered to all students each day school is in session a full day.
- Field trip meals are highly encouraged to ensure all children have access to food and to maintain a steady revenue stream for the food service program. DPI has created [Field Trip meal resources](#) to assist schools in providing meals for field trips.
- USDA regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to submitting the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' meal counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. SFAs with computerized meal counting systems should ask software vendors about the edit check feature. DPI has created a manual [Monthly Edit Check Form](#) for SFAs using a manual counting system.
- SFAs may claim visiting students in the paid category or in the individual's benefit category with proof of eligibility documentation (unless they are from a CEP school).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy should include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a comprehensive overview including best practices and helpful materials, see the [Unpaid Meal Charges](#) section of the DPI SNT website or the [USDA Unpaid Meal Charges webpage](#).

Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage
- Promotion of calling 211 to locate meals in the area.
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area.

Promotion of the [Summer Food Service Program](#) webpage