

# Administrative Review Report

Regis Catholic Schools

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/09/2023	05/01/2023
On-Site Review	05/02/2023	05/04/2023
Site Selection Worksheet	03/09/2023	03/17/2023
Entrance Conference	05/02/2023	05/02/2023
Exit Conference	05/03/2023	05/03/2023

## Commendations:

From the Nutrition Program Consultant:

Our sincere thanks to the administration and school nutrition professionals of Regis Catholic Schools. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Administrative staff have an excellent understanding of the free and reduced eligibility process.

Thank you for serving healthy, nutritious meals to your students! Your quick responses to actions needed were greatly appreciated!

From the Public Health Nutritionist:

The staff on-site was wonderful to work with. Thank you so much for having all of the meal pattern documentation and production records so well organized. Staff is doing a great job filling in production records and using historical data to forecast the amount to prepare. Additionally, they are weighing items and using yields from the Food Buying Guide to determine the correct amount to prepare.

## Recommendations:

Our annual School Nutrition Summer Training will return in the Summer of 2023. Registration opened May 1, 2023. 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>).

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Verification (200 - 204)	
<b>Question #</b>	200	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	<p>Flagged 04/25/2023 04:10 PM</p>	<p>Finding: The Verification Collection Report (VCR) was not completed accurately. The SFA listed that 1 application (4 students) was directly verified. However, direct verification was not conducted.</p> <p>Corrective Action: Review the VCR reporting instructions and submit a statement of understanding that demonstrates knowledge of what is considered direct verification. If prior to Feb 1, correct the VCR in the online portal. If after Feb 1, upload a copy of the report with the corrections noted into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (300 - 311)	
<b>Question #</b>	305	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 12:53 PM</p>	<p>Finding: All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to households annually (SP 46-2016). The current unpaid meal charge policy states that students with an account balance of -\$25 or less will not be allowed to purchase the hot meal offered for the day. However, this does not account for students who may have accrued a negative balance and then become eligible for free meals later in the year. The currently policy also does not address SFA procedure for if students with a negative balance have cash on-hand to pay for their meal for that day.</p> <p>Corrective Action: Update the unpaid meal charge policy on the website and in the handbook to include statements indicating students eligible for free meals will always be eligible to receive the standard hot meal offered for the day and also indicating that students with cash on-hand can purchase a meal for that day. Upload documentation or website URL showing that this has been updated.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	701	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/02/2023 09:28 PM</p>	<p>Finding: Based on the SY 2021-22 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3 months average expenditures (Year 2). The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)).</p> <p>Corrective Action: Submit a plan and timeline for reducing the net cash resources to below 3 months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Rejected	
<b>Corrective Action History</b>	<p>Flagged 04/25/2023 02:31 PM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool (missing food costs and revenue for program foods) (7 CFR 210.14).</p> <p>Corrective Action 1: Watch the Nonprogram Food Revenue webcast on the DPI website (<a href="https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html">https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html</a>).</p> <p>Corrective Action 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	807	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/02/2023 08:53 PM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed in entirety by October 31 (missing answers to questions 1-6 and 8-13).</p> <p>Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. This was completed onsite. No further action required.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1005	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 08:56 AM</p>	<p>Finding: SFA cannot provide documentation showing the completion of the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Upload documentation showing the triennial assessment was completed in the last three years. If an assessment has not been completed, complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACS or provide a link to this document on the district website.</p>
<b>Site Name</b>		
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
<b>Question #</b>	1601	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 01:22 PM</p>	<p>Finding: The SFA could not provide documentation that they adequately informed households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>Corrective Action: Provide documentation showing households were informed about the availability and location of free meals for students via SFSP. If families were not notified of SFSP, 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>

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<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 05/02/2023 01:35 PM</p>	<p>Finding: The non-discrimination statement was not included on all required program materials (School's food service webpage, Local Wellness Policy). Additionally, the shortened non-discrimination statement listed on the monthly menus is incorrect.</p> <p>Corrective Action: Add the non-discrimination statement to required program materials and update the statement on the monthly menus. Upload updated materials into SNACS.</p>
<b>Site Name</b>	Regis High	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	404	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 12:26 PM</p>	<p>Finding: Because the vegetables on the garden bar are being used to meet the daily and weekly vegetable requirements, portion sizes should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx</a>). Knowledge of this information is also helpful for ensuring staff are able to determine if students have selected sufficient quantity to have a reimbursable meal. The in-house yield procedure can be used to determine the number of pieces needed for the desired serving size for items that don't fit nicely in a measuring utensil (ex. grape tomatoes, baby carrots, cucumber slices). In-House Yield Study Procedures are available on the Menu Planning webpage, under the Crediting tab. (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy</a>). For the salad, the creditable amount (1/2 cup) was documented on the production record rather than the portion size (1 cup). It is important this is documented correctly going forward since a planned portion size of 1/2 cup would have resulted in a daily vegetable shortage on 4/19/23.</p> <p>Corrective Action: Submit a photo or a copy of signage that will be posted on the garden bar.</p>
<b>Site Name</b>	Regis High	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 12:13 PM</p>	<p>Finding: The daily minimum requirement for vegetables was not meet for grades 9-12 at lunch on 4/18/23. The planned vegetables were 1/4 cup of carrots and 1/2 cup of sweet potato fries for a total of 3/4 cup of vegetable which is short of the daily minimum requirement of 1 cup. There was also a red/orange vegetable subgroup shortage. The weekly red/orange subgroup requirement for grades 9-12 is 1 1/4 cups. However, only 1 1/8 cup of vegetables from the red/orange subgroup were offered.</p> <p>Corrective Action: Submit a statement explaining how the daily vegetable shortage and weekly red/orange vegetable subgroup shortage will be fixed for the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.</p>
<b>Site Name</b>	Regis High	

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<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	431	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 12:03 PM</p>	<p>Finding: The production records should reflect actual planned number of servings and leftovers for each individual menu item, which should be forecasted based on historical data. During the week of review, the breakfast production records list one number for the planned number of planned servings, number of servings prepared, planned quantity and leftovers with an arrow drawn down to cover all items except the fresh fruit and milk. It is unlikely that this is accurate, especially when considering Offer Versus Serve (OVS). This was discussed on-site. Additionally, when offering a variety (ex. breakfast kits or juice), each option should be documented on a separate line.</p> <p>Corrective Action: Submit one week of breakfast production records showing that information is being documented correctly by item.</p>
<b>Site Name</b>	Regis High	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	434	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 05/03/2023 12:08 PM</p>	<p>Finding: Great job having a hamburger recipe on file! However, the ingredients in the recipe do not match the current products used (note. Wisconsin state processed beef patty is C414 for SY22-23 and C415 for SY22-23; cheese slices if using USDA brown box is 100018; the label for the bun is bimbo 5600 which is 61g = 2 oz eq grain.</p> <p>Corrective Action: Submit an updated recipe and the labels and/or crediting documentation for the correct ingredients being used. If multiple burger patties are used, at different times, a different recipe should be developed for each (if they credit the same, the various patty options can be included on the same recipe).</p>
<b>Site Name</b>	Regis High	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	
<b>Corrective Action History</b>	<p>Flagged 05/02/2023 09:51 AM</p>	<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. This was corrected onsite, no further action required.</p>
<b>Site Name</b>	Regis High	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged	Finding: The following products were identified in the SFA's storage area as non-domestic/not containing a Country of Origin label (COOL) and not documented:
	05/03/2023 11:54 AM	<p>-Non-domestic: frozen cauliflower (Mexico), canned pineapple (Indonesia) -No COOL: Red Gold BBQ sauce cups, hot dog buns, Mrs. Clark reduced calorie ranch dressing</p> <p>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). Note For domestic products without country of origin labeling, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx</a>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision. Note that a label indicating a product is distributed, processed or packaged in the US is not sufficient to document compliance with the Buy American provision as it does not indicate where the product was grown/produced.</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage. If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/03/2023	3557		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
A few errors were noted on the production records for the week of review as noted below: - 1 banana about 3/8 cup = 1/2 cup. Bananas do credit as 1/2 cup. However, please note that when for crediting, it is always necessary to round down to the nearest 1/8 cup for fruits and vegetables (or 0.25 oz eq for grains and meat/meat alternates). -Cheese quesadilla - the production records indicates that the quesadilla has 1/8c additional vegetable. However, the current CN label for this product does not indicate that it contains any creditable vegetable. -Chicken nuggets - grain crediting for 7 nuggets is 1.25 oz eq of grain rather than 1.5 oz eq. Additionally, the breadstick offered to the high school students was not documented on the production record. As a reminder, production records are the SFA's way of proving that reimbursable meals were served; therefore, all items offered as part of the reimbursable meal must be recorded. (note that the breadstick was documented in the menu section of the production record and an invoice was provided, so this was not counted as a daily grain shortage). -The number of portions served column currently has the number of meals. This is not required information according to the DPI's Production Records Requirement List, so you don't necessarily need to fill in a number here, especially for the fruits/vegetables. - Actual usage for condiments should be documented individually.								5/3/2023 11:20:17 AM
05/03/2023	3556		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Food manufacturers continuously reformulate products used in schools. Additionally Wisconsin Processed USDA Food items change annually, and only some of the USDA Brown Box items are available to Wisconsin schools. It is important to stay current with these changes and be confident that the documentation on file (and included in standardized recipes/on the production records) matches the products in stock. Maintain and organize this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased. The potato wedges used are documented as item number 100356, which is not a product available to Wisconsin. The product actually being used is likely 100355.								5/3/2023 11:13:58 AM
05/03/2023	3555		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
The lunch production record template currently in use does meet production record requirements. However, using a different template, such as one available on the DPI								5/3/2023 11:07:30 AM

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website, may streamline the process of completing production records. Currently, items that credit towards more than one meal pattern requirement (such as pizza, chicken nuggets, etc.) are documented multiple times on the production record as it is split out by component.						
05/03/2023	3550		Administrative Review		FSD/AR	
<b>Comments</b>						
					<b>Created By</b>	<b>Created Date</b>
LWP Triennial Assessment • SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)). • The SFA's first triennial assessment must be completed by June 30, 2020. • The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy. • FNS recommends the WellSAT Tool as a resource to conduct the LWP triennial assessment. • Assessment results and findings must be released to the public as a written report. There is no required template for this report.						5/3/2023 8:59:17 AM
05/02/2023	3549		Administrative Review		FSD/AR	
<b>Comments</b>						
					<b>Created By</b>	<b>Created Date</b>
Professional Standards training tracker tools must include the employee's number of required hours of training. Required hours are as follows: FSD: 12 hours/yr Manager: 10 hours/yr Full-Time Staff (>20 hr/wk): 6 hours/yr Part-Time Staff (<20 hr/wk): 4 hours/yr						5/2/2023 2:46:13 PM