

Administrative Review Report

Aquinas Catholic Schools, Inc.

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/21/2024	04/22/2024
On-Site Review	04/30/2024	05/01/2024

Commendations:

Thank you to all staff at Aquinas 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 and for the quick response to questions; this greatly expedited the AR. Everyone was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	103	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/09/2024 02:07 PM	<p>Finding: The SFA was not correctly using the 30 day carryover for students with an eligibility status from the previous school year. (7 CFR 245.6).</p> <p>Corrective Action: Review pages 46-47 of the Eligibility Manual for School Meals and provide a corrective action plan on how the 30 day carryover will be provided to students.</p>
Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	108	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/30/2024 04:13 PM	<p>Finding: The Hearing Official listed on the School Nutrition Contract does not match the name of the person listed as the Hearing Official on the Notification of Eligibility letters. The Hearing Official should not be a subordinate of the person serving as either the Determining Official or the Verifying Official. The Hearing Official may not be the same person as the Determining Official or the Verifying Official or the Confirming Official.</p> <p>Corrective Action: Update the name of the Hearing Official in the School Nutrition Contract and upload a screen shot of this change into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/26/2024 09:51 AM	<p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)).</p>

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		Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/30/2024 04:33 PM	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content: Policy Leadership; SFAs are required to identify the official responsible for LWP oversight in the written policy (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>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/26/2024 09:54 AM	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: 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>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/01/2024 07:53 AM	<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>

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		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.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	128	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/09/2024 02:22 PM	<p>Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized.</p> <p>Corrective Action: Review the Income Conversions section of the Eligibility Manual (page 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/09/2024 02:24 PM	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>Corrective Action: Review the verification section of the Eligibility Manual for School Meals and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	215	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR

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	05/01/2024 09:05 AM	245.6a). Corrective Action: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 05/01/2024 09:25 AM	Finding: Parent volunteers at Cathedral Elementary who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). Corrective Action: Provide a training plan for the next school year, for all non-school nutrition staff and or volunteers with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties.
Site Name	Cathedral Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/30/2024 05:40 PM	Finding: The daily minimum requirement for vegetables was not met for the K-8 grade group at lunch during the week of review. The following represents the planned portion sizes: Monday - Pancakes and ham & cheese sandwich entrée: Tri-tater (1/4 cup), cucumbers (1/4 cup), lettuce (no serving size indicated on production record). Upon onsite observation lettuce is served with a gloved hand; therefore, meal pattern contribution cannot be determined)

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	<p>Friday - Fish Sandwich entrée: Broccoli (1/4 cup), carrots (1/4 cup), lettuce (no serving size indicated on production record. Upon onsite observation lettuce is served with a gloved hand; therefore, meal pattern contribution cannot be determined)</p> <p>The daily minimum requirement for K-8 is 3/4 cup of vegetables. Future findings related to daily vegetable shortages may be subject to fiscal action.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for vegetables will be met for lunch during the days containing the shortage(e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Blessed Sacrament School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 05/01/2024 08:32 AM</p> <p>Finding: The breakfast menu consistently offers more grains than the 10 oz eq weekly recommended maximum. During the week of review, students could select up to 19 oz eq grains (and meat/meat alternates) for the week. When the amount of grains offered exceeds the recommended maximum, it is more likely that the dietary specifications for saturated fat, sodium, calories, and trans fat are also exceeded. This practice may also contribute to higher food costs and more food waste for your SFA.</p> <p>Corrective Action: Describe how the menu would be changed to decrease the weekly grain and M/MA offerings at breakfast so that the planned menu is closer to the recommended target maximum of 10 oz eq. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation if applicable.</p>

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Site Name	Cathedral Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/30/2024 05:41 PM</p>	<p>Finding #1: Production records are intended to be useful tools to record production information. The lunch production record template currently used at Cathedral Elementary lacks required information: serving site, meal type, grade group, amount prepared in purchase units, and actual number of reimbursable meals served. A copy of the Production Record Requirements and templates may be found on our webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p> <p>Finding #2: There were no serving sizes on the salad bar production records at lunch. Salad bar production records must meet the same criteria as production records used to record main line items.</p> <p>Corrective Action: Submit one full week of completed lunch production records. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Cathedral Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/30/2024 05:38 PM</p>	<p>Finding: During the week of review there was a shortage of the red/orange vegetable subgroup offered at lunch. There was 1/4 cup of carrots offered to all students on Friday during the week of review, as well as an additional 1/4 cup of marinara sauce offered to students who took the Pizza Dipper lunch that day. In the K-8 lunch meal pattern all students must have access to at least</p>

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	3/4 cup of red/orange vegetables over the course of the week. Future findings related to vegetable subgroup shortages may be subject to fiscal action.
	Corrective Action: Describe specifically how the weekly minimum requirement for the red/orange vegetable subgroup will be met for lunch during the week of review (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).
Site Name	Cathedral Elementary
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 04/30/2024 12:47 PM</p> <p>Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>Corrective Action 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p>Corrective Action 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible for completing this.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/01/2024	4980	805	Administrative Review	ALL	FSD			

Special Dietary Needs

- The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.
- Policy/Procedure Requirements- At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The Special Dietary Needs Policy template can be used to create a policy/procedure for your school or district. This template should be modified to fit the needs of your school or district. If your district already has a policy in place, we

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recommend comparing it to this policy to ensure your policy includes all important information.

•Medical Statement - It is recommended, but not required, for SFAs to use the WI DPI Medical Statement - English (Spanish) (Hmong) for Special Dietary Needs found on the Special Dietary Needs webpage. At a minimum the statement must include:

1. an explanation of how the child's physical or mental impairment restricts the child's diet
2. the food(s) to be avoided

3.the food or choice of foods that must be substituted.

4.The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner.

•If further documentation or clarification is needed for a dietary request, but enough information is presented to ensure a safe meal, schools should not delay a student's meal modification while waiting for additional documentation or clarification. In this situation, document all attempts and conversations with the family until the information is received or you have exhausted all avenues.

•If a student's IEP or 504 plan contains the same information that is required on a medical statement it is not necessary to get a separate medical statement.

•Here is an example of what could be written in an IEP. "This student has autism spectrum disorder with selective eating and sensory challenges. This student should be allowed to choose whatever he wishes from the day's menu". There is an explanation of why the student needs a dietary accommodation, and what foods should be omitted and substituted which in this case is anything the student does or does not want to eat from the day's menu.

•A meal accommodation on an authorized medical statement, IEP, or 504 plan does not need to meet meal pattern requirements. A reimbursable meal is whatever is written for the dietary prescription. However, if the medical statement does not specifically state a modification for a component, the remainder of the meal pattern should be followed. For example, if there is no mention of fruits or vegetables, the student must still have the required amount of fruit or vegetable.

•A parent or guardian is ultimately responsible for their child's health. Therefore, per USDA guidance, the school is allowed to accept the parent's/guardian's request to discontinue all or part of a special dietary order without further documentation from the health care provider. It is important to have the request in writing from the parent for the meal accommodation to be discontinued. The school's healthcare team should also be notified that the parent wishes to discontinue the meal accommodation.

•SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within offer vs. serve. If an accommodation without a medical statement is made, then all similar requests for meal accommodations must be made to ensure there is no civil rights discrimination.

•SFAs may offer students a fluid milk substitute, that is nutritionally equivalent to cow's milk, with a request from a parent or guardian. For substitutions other than lactose free cow's milk, SFAs must get pre-approval from the DPI School Nutrition Team by completing the Fluid Milk Substitute Approval Form. A List of Allowable Fluid Milk Substitutes is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements.

Resources

- [The Special Dietary Needs Flowchart](#) outlines the process of accommodation determination.
- [Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers](#)
- [USDA Special Dietary Needs Handbook](#)
- [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs \(Non-Disability\)](#)

05/01/2024	4979	801	Administrative Review	ALL	FSD			
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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. SFAs must annually distribute the Public Release to:

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- 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.
- [Spanish](#) and [Hmong](#) versions are also available.

05/01/2024	4978		Administrative Review		Verifying Official		
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Verification

- 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 on 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. DPI has created a [We MUST CHECK your application](#) sample letter for verification purposes with required documentation included.
- 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 months 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 attempt to contact the household when the household does not 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 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. DPI has created a [We HAVE CHECKED your application](#) letter template for LEAs to use after verification is completed.
- 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 than 10 operating days after the notice period. If the hearing official rules 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

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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](#).

05/01/2024	4883		Administrative Review		DO		
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Free and Reduced-Price Meal Applications

- Applications must be reviewed in a timely manner. Within 10 operating (school) days of receipt, eligibility must be determined, families must be notified of eligibility status, and the status must be implemented.
- A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which a student(s) is approved and sign or initial and date the application.
- When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) (IEG) one would look at the amount of their income under the column indicating that stated frequency.
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would thus become \$0 for the income on the application. The [verification webpage](#) includes examples of resources on current tax forms. [These forms](#) indicate which lines should be used in reporting income from self-employment or farming.

Annual Income

- USDA SP-19, 2017 on March 20, 2017, allows households to report current income as an *annual figure*.
- Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may be processed at face value.
- However, households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, e.g., weekly, biweekly, bimonthly, or monthly.

Income Eligibility Guidelines (IEG)

- The [Income Eligibility Guidelines](#) (IEG) must be used to determine applications. If applications are electronic, ensure the income levels in the software are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either.

Household Size Box

- The total household member size box includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

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Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household.
- The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial. It is recommended to use a different color pen to mark up clarifications on an application.
- Applications missing signatures must be returned to the household adult to obtain.
- Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- An application packet includes the [Free and Reduced Price Meal Eligibility application](#), the [Instructions/How to Apply](#), and the [Letter to Parents/Frequently Asked Questions](#). Note, these documents are also available in Spanish and Hmong on the [free and reduced meal applications webpage](#).
- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition Team (SNT) at the Department of Public Instruction (DPI).
- If a SFA uses an online application, the software vendor distributing these applications to households must be approved by the SNT at DPI each year.

Other Source Categorical

- If a household submits an application that indicates *Other Source Categorical Eligibility*, such as homeless, migrant, runaway or Head Start program, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency before meal benefits can be provided.
- Once confirmed, this eligibility is only available to the designated child and is **not** extended to other members of the household. The effective date is the date the Determining Official is made aware of the eligibility.
- Applications that indicate a child is a foster child are considered *Other Source Categorically* eligible and this child is eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is **not** extended to other household members.

05/01/2024	4877	430	Administrative Review	Blessed Sacrament School	FSD			
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Production records are intended to be useful tools to record production information. The production record template currently in use lacks required information: actual number of meals served and leftovers. A copy of the Production Record Requirements and templates may be found on our webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>).

05/01/2024	4875	410	Administrative Review	Blessed Sacrament School	FSD			
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The breakfast menu consistently offers more grains than the 10 oz eq weekly recommended maximum. During the week of review, students could select up to 19 oz eq grains for the week. When the amount of grains offered exceeds the recommended maximum, it is more likely that the dietary specifications for saturated fat, sodium, calories, and trans fat are also exceeded. This practice may also contribute to higher food costs and more food waste for your SFA.

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Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand to diminish any language barriers to participation for individuals with LEP.
- To assist SFAs in reaching households with LEP, the SNT provides the Wisconsinized version of the USDA Free and Reduced-Price Meal application materials in [English](#), [Spanish](#), and [Hmong](#).
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced-Price School Meals](#).

The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available

05/01/2024	4870	1601	Administrative Review	ALL	FSD			
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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 are required to inform families where to find free summer meals. It is recommended to share the following in an end of year newsletter and on the SFA website:
To find free summer meal locations:
 - Call 211 to locate meals in the area
 - Text 'food' (in English or Spanish) to 304-304
 - Check the Site Finder Map
 - [Summer Meals Site Finder](#) - English
 - [Summer Meals Site Finder](#) - Spanish
 - Visit the [Summer Food Service Program](#) webpage

04/30/2024	4861	10	Administrative Review	Cathedral Elementary	FSD			
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Sodium Target 1 was mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 and is currently in effect for the school year 2023-2024. It was observed during the week of review and onsite visit that high sodium foods (cottage cheese, pickles, deli meat, and shredded cheese) were offered regularly on the salad bar. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

04/30/2024	4860	434	Administrative Review	Cathedral Elementary	FSD			
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The recipe for chicken patty is crediting the grain component as 2 oz eq, but it should actually be crediting it as 3 oz eq; the chicken patty contributes 1 oz eq and the bun contributes 2 oz eq. The ham and cheese sandwich recipe does not list cheese as an ingredient. TA was provided that all ingredients, in a menu item with two or more ingredients, should be indicated on the standardized recipe.

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04/30/2024	4859	431	Administrative Review	Cathedral Elementary	FSD			
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Be specific on production records about the identity, brand, portion size, and description of items served. For example, instead of “yogurt”, list both “vanilla yogurt” and “strawberry yogurt” separately to clearly indicate what was served.

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Local Wellness Policy (LWP)

LWP Requirements

- The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires SFAs to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.
- SFAs are required to retain basic records demonstrating compliance with LWP requirements.
- If no LWP has been developed, the SFA must establish a written policy.
- For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A toolkit, a wellness policy builder, and wellness policy report card (for the Triennial Assessment) can be found on the [Local Wellness Policy \(LWP\)](#) webpage.

LWP Content

- SFAs are required to have language in their LWP that relates to all the content areas listed in the [LWP Checklist](#) found on the [Local Wellness Policy section](#) of the DPI SNT website.
- Sample LWP language is listed below.
 - **Policy Leadership:** *The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy.*
 - **Public Involvement:** *The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy.*
 - **School Meals:** *All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010.*
 - **Foods sold outside of school meals program:** *All food and beverages sold outside of the school meal programs shall meet the standards established in USDA’s Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
 - **Foods provided but not sold (e.g., class parties, class snacks, rewards):** *The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations are promoted, and a list of ideas is available to staff and family members.*
 - **Food and Beverage Marketing:** *Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA’s Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
 - **Nutrition Education:** *Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects.*
 - **Nutrition Promotion:** *School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school.*
 - **Physical Activity:** *The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education.*
 - **Other School-Based Strategies for Wellness:** *The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year.*
 - **Triennial Assessment:** *The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school follows the policy and how the policy compares to*

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a model policy, as established by the U.S. Department of Agriculture.

- **Update/Inform the Public:** *The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.*

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 (for SFAs that were participating in 2016-2017 school year).
- 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.

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During onsite lunch observation fresh fruits and vegetables were served with a gloved hand, which is not an appropriate serving utensil. It is recommended to use spoodles as serving utensils or conduct an in-house yield study for items that do not fit nicely into a portioning utensil such as cucumbers, carrots or celery. In-house yield may be used to credit foods towards meal pattern requirements. Original documentation of procedures used to determine yield must be completed and maintained. An in-house yield study may be warranted if yields are consistently higher or lower than specified in the USDA Food Buying Guide (FBG), or for foods or sizes not currently listed. In-House Yield Study Procedures are available on the Menu Planning webpage, under the Crediting tab. (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ihy>).

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It was observed during the onsite visit that the rib patty sandwich offered at lunch only credited as 0.75 meat/meat alternate. In the K-8 lunch meal pattern at least 1 oz eq meat/meat alternate must be offered daily. This was addressed prior to lunch meal service where a 1 oz eq string cheese was offered with the rib patty sandwich.