

Administrative Review Report

Cristo Rey Jesuit Milwaukee High School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/07/2023	03/01/2023
On-Site Review	03/07/2023	03/08/2023
Site Selection Worksheet	02/07/2023	02/10/2023
Entrance Conference	03/07/2023	03/07/2023
Exit Conference	03/08/2023	03/08/2023

Commendations:

Our sincere thanks to the administration and school nutrition staff of Cristo Rey High School. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

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.

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 offers [School Nutrition Summer Training](#) online and in various locations around the state. Find more information on these training opportunities on the [DPI School Nutrition Training webpage](#) (<https://dpi.wi.gov/school-nutrition/training>).

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	301	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 05:35 PM</p>	<p>Finding: Student and Family Handbook on the website references collecting meal benefit applications to determine level of assistance and that students with negative balance will be denied a meal. Free-eligible students can never be denied a meal and the school is now CEP-SFA wide and negative balances do not apply as all meals are served free to all students.</p> <p>CA: Update the handbook to reflect current CEP status and remove language referencing meal application, level of assistance and negative balance information, or submit a timeline to indicate when this will be updated along with the intended changed language.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 04:00 PM</p>	<p>Finding 1: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The funds are not being tracked separately, against the allocation.</p> <p>CA 1: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent.</p> <p>Finding 2: On the Annual Financial Report, expenses were not broken out by applicable expense category (Food and labor; not all allocated to purchased services (7 CFR 210.19)).</p> <p>CA 2: Manually, update the 2021-22 Annual Financial Report with expenses broken out by applicable expense category then upload the corrected report into SNACS. The DPI accountant will make manual adjustments after December 31.</p>
Site Name		

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Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/06/2023 09:17 PM</p>	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: Provide a timeline for when a school meal program civil rights complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.</p>
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	<p>Flagged 03/06/2023 09:22 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (full nondiscrimination statement) (7 CFR 210.31).</p> <p>CA: 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	<p>Flagged 03/06/2023 09:20 PM</p>	<p>Finding: SFA has completed a triennial assessment of the Local Wellness Policy (LWP) but did not complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement.</p> <p>CA: Complete the WellSAT assessment of model policy language for the Local Wellness Policy assessment and upload into SNACS.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1600	

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TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/06/2023 09:26 PM</p>	<p>Finding: The SFA did not adequately inform households of the availability of the School Breakfast Program. At the beginning of the school year, and intermittently throughout the school year, the SFA must notify households of the availability of the School Breakfast Program (SBP) (7 CFR 210.12).</p> <p>CA: Submit a statement describing how households will be informed of the availability of the SBP. Please include the method of communication and time frame for distributing breakfast promotion materials.</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	<p>Flagged 03/06/2023 09:27 PM</p>	<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>CA: 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>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/07/2023 04:07 PM</p>	<p>Finding: The correct non-discrimination statement was not included on all program materials--missing from the handbook where the federal child nutrition programs are referenced and the Local Wellness Policy.</p> <p>CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	

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Question #	1403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/10/2023 11:17 AM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Grape Tomatoes (Mexico)</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products: Grape Tomatoes (Mexico). Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 07:56 AM</p>	<p>Finding: The meal counting and claiming system at breakfast does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal; counts taken at beginning of line with no checking at end of line.</p> <p>CA: Correct the meal counting process at breakfast to ensure meals are tracked as the student receives their meal. 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>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/09/2023 01:45 PM</p>	<p>Finding: 7 non-reimbursable meals were observed at breakfast during meal service on Wednesday, March 8, 2023. The meals did not contain three full components and/or ½ cup fruit, required under Offer versus Serve. Examples of these non-reimbursable meals include: only one fruit and no other items taken, no fruit</p>

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		<p>taken at all, only two items taken, three fruits and no other items taken.</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future.</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/09/2023 01:56 PM</p>	<p>Finding: The daily minimum requirement for vegetables was not met for 9-12 grade group with the alternate cold lunch bagged meals during the review period and day of review. The following represent the planned portion sizes:</p> <p>½ cup baby carrots</p> <p>The daily minimum requirement for 9-12 grade is 1 cup vegetables.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for vegetables will be met for the alternate cold lunch bagged meals during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>03/10/2023 01:37 PM</p>	<p>Finding: Fiscal action is required for any repeat weekly vegetable shortage violations from the previous Administrative Review. During the 2022-2023 school year Administrative Review, a weekly vegetable shortage was found for the alternate meal bagged lunches every day. Therefore, due to an insufficient weekly quantity of vegetables during the week of review, February 6-10, 2023, fiscal action will be assessed for Monday, February 6, 2023 the day during the week of review with the lowest participation.</p>

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		7 alternate meals will be reclaimed at Cristo Rey Jesuit High School.
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/10/2023 11:54 AM</p>	<p>Finding: The daily minimum requirement for fruits was not met for 9-12 grade who were given the alternate bag lunch meals during the review period on Wednesday, February 8 and Friday, February 10. The following represent the planned portion sizes: - Wednesday, February 8, 2023- Orange Juice (4oz) was the only fruit given - Friday, February 10, 2023- Pear (1/2 cup) was the only fruit given the daily minimum requirement for fruit for 9-12 grade is 1 cup.</p> <p>Corrective Action: Describe specifically how the daily minimum requirement for fruit will be met for the alternate bagged lunch meal during the days containing the shortage (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
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	<p>Flagged 03/10/2023 11:59 AM</p>	<p>Finding: There was a daily grain shortage on Monday, February 6, 2023 for the alternate cold lunch bagged meal during the week of review. The Peanut Butter and Jelly Sandwich only credits as 1 oz equivalent grain and no other grain was offered with this meal. This is short of the required daily minimum of 2 oz eq. grain for grades 9-12.</p> <p>Corrective Action: Describe how the alternate cold lunch bagged meal would be changed to meet the daily minimum grain requirement. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be added or substituted on the planned menu.</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi	
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	No TA Log# found	

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Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 03/10/2023 11:20 AM</p> <p>Finding: Although no non-reimbursable lunch meals were observed during the day of onsite review, many students were made to take more than what they needed at lunch. Both the breakfast and lunch Offer versus Serve (OVS) requirements are not fully understood by all staff at the point of service. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning). The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns~:text=Policy-,Meal%20Patterns,-title%20/%20Description).</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 03/07/2023 12:20 PM</p> <p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a photo of where the most recent food safety inspection report will be posted and visible to the public.</p>
Site Name	Cristo Rey Jesuit Milwaukee Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 03/07/2023 04:25 PM</p> <p>Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the what is outlined in the site- specific SOP's for (SOP #16 Date Marking and SOP #24 Field Trip Meals/Work Study Meals).</p> <p>CA: Modify the SOP so that it aligns with actual practices or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how</p>

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practices will be adjusted to be compliant with the established SOP.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/08/2023	3109	1407	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	Authorized Representative			

Comments

Created By

Created Date

Sharing and No Thank You Tables

Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) that must be followed to safely and responsibly implement each type of table. Refer to the [Sharing and No Thank You Tables Toolkit](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/sharing-no-thank-you-toolkit.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/sharing-no-thank-you-toolkit.docx) for a comprehensive guide including standard operating procedures.

• Definitions:

- A sharing table is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.
- A no thank you table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.

• Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

• Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

3/8/2023 1:23:10 PM

03/08/2023	3113	1	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	FSD			
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Comments

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Although meals are purchased through a vended agreement, it is ultimately each **SFA's responsibility to ensure all meal pattern requirements are met** and that all required documentation must be available onsite, such as production records, standardized recipes, crediting documentation, etc. and that staff working in the kitchen have access to it.

3/10/2023 12:02:29 PM

03/08/2023	3089	318	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	Authorized Representative			
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<p>Point of Service (POS) Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students (and in standard counting and claiming schools, by category, i.e., paid, reduced-price, and free).</p> <p>Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim. To do this, any school food service meal counting and claiming system must contain ALL of the basic elements listed below:</p> <ul style="list-style-type: none"> • Eligibility documentation • Collection procedures • Point of service meal counts • Reports • Claim for reimbursement • Internal controls. <p>Collection procedures refer to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange. A medium of exchange is defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal. Collection often occurs simultaneously with meal counting. With a ticket or token system, the ticket or token is presented by the student to the food service staff to obtain a meal. All tickets are tallied after the meal service to provide the count.</p> <p>The same payment options must be available to all students regardless of eligibility category. For instance, if students eligible for paid meals have the option to pay on a weekly or daily basis, students eligible for reduced-price meals must also have this option.</p> <p>All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students.</p> <p>Meals are counted at that point in the food service operation where it can be accurately determined that a reimbursable free, reduced-price or paid meal has been served to an eligible student. All meal components must be offered before the POS. With self-service salad bars, after the service line, the cashier/checker must be at the end of the line, after all meal components are offered. Only one meal per student per meal service may be claimed for reimbursement.</p>						
03/07/2023	3081	1217	Administrative Review	ALL	Authorized Representative	3/8/2023 8:59:53 AM
Comments					Created By	Created Date
<p>Professional Standards Training</p> <ul style="list-style-type: none"> • Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell- Training" document. • Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.). • SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required. 						
						3/7/2023 5:55:37 PM

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03/07/2023	3080	1212	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	
New Food Service Directors (FSD), hired after 7/1/2015, must complete at least 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v).							3/7/2023 5:49:01 PM	
03/07/2023	3079	1601	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	
Summer Food Service Program Outreach USDA requires all SFAs 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: <ul style="list-style-type: none"> •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 304-304 to locate meals in the area •Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks) 7 CFR 210.12(d) 							3/7/2023 5:43:52 PM	
03/07/2023	3078	1600	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	
School Breakfast Program Outreach At the beginning of the school year the SFA must notify households of the availability of the School Breakfast Program (SBP). Schools should also send reminders regarding the availability of the SBP multiple times throughout the school year (7 CFR 210.12).							3/7/2023 5:43:04 PM	
03/07/2023	3077	1006	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	
Local Wellness Policy Triennial Assessment SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Both the WellSAT and the report card are necessary for a complete triennial assessment. The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team. The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.							3/7/2023 5:41:03 PM	
03/07/2023	3076	314	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	
Community Eligibility Provision (CEP)								

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CEP is a four-year reimbursement option for eligible local educational agencies (LEAs) and schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high-poverty schools without collecting household meal applications. Cristo Rey is in year 4 of its CEP contract.

LEAs applying or reapplying for CEP must complete the CEP Agreement Form and CEP Eligibility Worksheet.

1. CEP Agreement Form All LEAs applying for CEP must complete the CEP Agreement Form.
2. CEP Eligibility Worksheet Complete the CEP Eligibility Worksheet and submit with the signed CEP Agreement Form.

3/7/2023 5:28:48 PM

03/07/2023	3075	111	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	

Direct Certification

Extension of Benefits through Direct Certification According to 7 CFR 245.6(b)(1), LEAs must directly certify children in SNAP households using an automated data matching technique. However, in CEP Schools, lunch and breakfast are served free to all students in participating schools, without regard to an individual student's eligibility status.

3/7/2023 5:22:30 PM

03/07/2023	3074	101	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	

Online Contract

Officials Information SFAs that participate in CEP district wide and RCCIs with only residential students (who reside at the RCCI) will not need to identify these officials and should enter "none" for each official. RCCIs with day students (those who attend school for the day but do not reside at the RCCI) will need to enter names for all listed officials.

3/7/2023 5:13:38 PM

03/07/2023	3073	805	Administrative Review	ALL	Authorized Representative			
Comments						Created By	Created Date	

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 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 School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of your school or district. If your district already has a policy in place, we 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 prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. 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

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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.

- A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.
- 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. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance.
- SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. 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. The USDA Q&A on Accommodating Special Dietary Needs resource, the USDA Special Dietary Needs Handbook and Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) contain additional detailed information.

3/7/2023 4:58:49 PM

03/07/2023	3072	809	Administrative Review	ALL	Authorized Representative		
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Comments

Created By

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Processes for Complaints

- Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.
- An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.
- If a complaint of discrimination is received at your district, the following procedures should be followed: 1. Document the complaint using the USDA Program Discrimination Complaint Form (Espanol). 2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) o Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 o Fax: (608) 267-0363 o Email: jessica.sharkus@dpi.wi.gov 3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.

3/7/2023 4:57:58 PM

03/07/2023	3070	800	Administrative Review	ALL	Authorized Representative		
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Comments

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Non-discrimination Statement (NDS)

- When including the non-discrimination statement on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current full official statement. The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.
- The abbreviated statement, "This institution is an equal opportunity provider", is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document's main text. Statement words and formatting cannot be altered.

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- Additional languages are found on the USDA FNS Non-discrimination webpage.
- If a private or Choice school is using the 2015 NDS and/or 2019 And Justice For All Poster, ask, “does religious exemption apply?”. If the answer is yes, no further action is needed. If the answer is no, CA to use the 2022 NDS and/or poster will apply.
- If a public or Charter school does not wish to use the 2022 NDS and AJFA poster due to content, CA would apply with the statement “the religious exemption does not apply to public schools. You should contact your school district legal team for further information.”

3/7/2023 4:55:18 PM

03/07/2023	3067	700	Administrative Review	ALL	Authorized Representative		
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Annual Financial Report and Vended Meal Contracts

If only food is provided by the vendor, the whole bill can be expensed in food for the respective program(s). If labor is also provided, the cost must be allocated accordingly to food and labor for the participating program(s). The whole expense is not allocated to Purchased Services. Only equipment repair, pest control, garbage/recycling service, employee travel and/or training costs (registration fees, mileage costs, lodging costs, etc.), printing and copying expenditures, the management fee for a Food Service Management Company, and include processing and handling charges for receiving USDA donated foods as they are considered a payment to the state.

3/7/2023 4:49:19 PM

03/07/2023	3066	700	Administrative Review	ALL	Authorized Representative		
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Labor Expenditures -Report all direct food service labor expenditures, both wages and fringe benefit costs for the agency, for each applicable program line.

Food Expenditures - Report all food expenditures for each applicable program line. The cash/entitlement value of USDA donated foods should be reported as a National School Lunch food expenditure on this report. Agencies purchasing meals from a vendor or another school should report the total cost of the meals purchased in the appropriate lines on the screen. Cash refunds and rebates for food received during the current school year should be subtracted as a negative food expenditure before entering food costs on this screen. -

Equipment Expenditure - Report all nonexpendable equipment rental and purchase costs. An individual item is considered nonexpendable if it costs over \$5,000 per unit (or less if it is the agency policy) and is expected to last over one year. (Equipment repair costs are considered purchased services. Expendable equipment costs (e.g., pans, serving utensils, trays) should be reported as Other Expenditures)).

Purchased Services Expenditures - Report expenditures for the purchase of services provided, including but not limited to equipment repair, pest control, garbage/recycling service, employee travel and/or training costs (registration fees, mileage costs, lodging costs, etc.), printing and copying expenditures, the management fee for a Food Service Management Company, and include processing and handling charges for receiving USDA donated foods as they are considered a payment to the state. o For SFAs under a Food Service Management Company contract, the amount recorded as Purchased Services for a Cost Reimbursable account is the management fee only, and the amount reported as Purchased Services for a Fixed Price account is the profit portion of the per meal fixed price only.

Other Expenditures - Report supply and material expenditures plus any other expenditures not reported elsewhere. These include plates, trays, flatware, napkins, soaps, cleansers, other expendable equipment, Unemployment Compensation, Worker’s Compensation, etc. Uncollectable Bad Debt that is written-off from Unpaid Meal Charges is recorded as an expense, under the NSLP in this column.

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3/7/2023 4:45:52 PM

03/07/2023	3121	400	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	FSD			
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Point of Service and Salad Bars

Although this was not observed due to no salad bar being offered the day of review it was discussed that since the salad bar is located after the food service staff and that is where the only vegetable of the day is offered, the point of service school staff must understand the portion sizes of vegetables and the meal pattern to make sure a student is taking a reimbursable meal.

3/10/2023 1:19:28 PM

03/07/2023	3119	500	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	FSD			
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Created Date

Self Service

During meal service observation, the line moved very slow. High schoolers are capable of serving themselves based on their likes and dislikes. Training and teaching are needed initially to help this change happen effectively, but just like anything else that happens in a school, it can be taught. Consider reorganizing the line, which may speed up meal service. This could mean having fruit pre-portioned in plastic dishes on the salad bar (when not in use) that students take on their own.

3/10/2023 1:05:24 PM

03/07/2023	3115	431	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	FSD			
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Production Records

Be specific on production records about the food item, portion size, and description of items served when adding site specific information to the production records that your vendor does not include. For example: what fruit is being given in bagged meals.

3/10/2023 12:40:45 PM

03/07/2023	3114	431	Administrative Review	Cristo Rey Jesuit Milwaukee Hi	FSD			
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On March 7, 2023 it was observed that Cinnamon Bun Crackers were added to the alternate meal cold bagged lunches however this was not written on the menu or production record by the meal planner or staff. It is important to follow the planned menu written by the menu planner.

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3/10/2023 12:36:28 PM

NONPROGRAM FOODS REVENUE REQUIREMENTS, USE OF NONPROFIT SCHOOL FOOD SERVICE ACCOUNT, SMART SNACKS AND PRIVATE SCHOOLS (WITH NOTE ON PUBLIC SCHOOLS AND WUFAR CODING)

NONPROGRAM FOOD REVENUE REQUIREMENTS

Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by establishing requirements related to the revenue from the sale of nonprogram foods. Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:

- All revenue from the sale of nonprogram foods accrues to the non-profit school food service account; and
- Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods.

Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account. This encompasses all foods sold in schools as well as adult meals, foods sold outside of school hours, or any foods used for catering or vending activities. For the majority of SFAs, a la carte foods offered during meal service are the largest share of nonprogram foods.

Compliance with the nonprogram food revenue requirement is measured by determining if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs of nonprogram foods. For example, if the costs of nonprogram food are 25 percent of the SFA's total food costs, then the amount of revenue generated from the sale of these nonprogram foods must be at least 25 percent of the total revenue in the school food service account.

USDA Food and Nutrition Service (FNS) understands there is wide variation in the capabilities of systems and mechanisms SFAs employ to maintain and monitor their school food service accounts. Separating out the SFA's costs for nonprogram foods from the costs for program food may be particularly difficult. In recognition of the current variations in system capabilities, FNS is providing a simplified approach for SFAs to assess compliance with this requirement going forward.

The simplified approach, while still requiring SFAs to separate their nonprogram food costs from their program food costs, allows SFAs to select a reference period by which compliance will be assessed. Rather than separating all costs for the entire year, SFAs will separate their nonprogram food costs from their program food costs for a period of at least 5 consecutive operating days. SFAs with the capacity to obtain separate nonprogram and program food cost and revenue data for a period longer than 5 consecutive days (e.g., monthly, annual, biweekly) are strongly encouraged to do so.

If the SFA is able to show that the percentage of nonprogram revenue generated is at least as great as the percentage of nonprogram food costs incurred during the reference period (e.g., 5 consecutive days, monthly, annual, biweekly), the SFA is in compliance with federal requirements.

To assist SFAs in meeting this requirement, the School Nutrition Team (SNT) has created a [Nonprogram Food Revenue Tool/Price Calculator](#). This tool can assist SFAs in pricing nonprogram foods and calculating total nonprogram expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA Nonprogram Food Revenue Tool and compares revenue and food cost ratios to measure compliance. It's an exciting new tool, and we strongly encourage SFAs to utilize it when determining compliance.

The [USDA Policy Memorandum SP 20-2016](#) includes a Q&A section to better define these nonprogram food requirements.

With a vended meals agreement, it might be easiest for the SFA to purchase nonprogram foods outside of the vended meals agreement, directly from outlets such as Costco, Sam's Club, etc. **When the nonprofit school food service account is used to purchase and provide nonprogram foods, all revenue from the sale of those purchases must return to the nonprofit school food**

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service account. Additionally, the student lunch accounts can be used to purchase nonprogram food items and food service staff time and resources can be used to make, serve, and sell those foods.

SMART SNACKS REGULATIONS

USDA regulations require that **all foods and beverages**, other than foods sold under the lunch and breakfast programs, **sold on the school campus (including a la carte, in school stores, snack bars, or vending machines as well as food produced during culinary classes that is sold to students), during the school day must comply with the Federal nutrition standards—Smart Snack Standards.** See the [Smart Snacks Nutshell](#) for more details.

The school campus includes all areas of the property under the jurisdiction of the school that are accessible to students during the school day. This does not include teacher's lounges or other areas that are restricted to students. It is important to note that foods sold on the school campus that cannot be consumed onsite are exempt from this rule (e.g., frozen pizza fundraisers). **The school day is defined as the time period from midnight through 30 minutes after the end of the official day.**

As SFAs typically sell entrees, snacks, and beverages for consumption during the school day, understanding the regulations is very important. While the restrictions seem complicated at first, systems can be set up school-wide to help all involved decide what can be sold. **The Alliance for a Healthier Generation's [Smart Snacks Product Calculator](#)** helps take the guesswork out of determining whether a food or beverage is compliant with the standards. It also makes record keeping easy by allowing schools to print out a report of the qualifications for documentation as SFAs are required to maintain records documenting compliance with the Smart Snacks requirements. Documents will be reviewed during Administrative Reviews.

PRIVATE SCHOOLS ONLY: SELLING NONPROGRAM FOODS OUTSIDE OF THE NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

The General Fund or the School Operations Account (not the nonprofit school food service account) can be used to purchase nonprogram foods for sale during the school day and sold on campus. The foods and beverages sold would still need to meet Smart Snacks rules. If the General Fund or School Operations Account is used to purchase these foods, the revenue generated from the sale of those foods would NOT need to be returned to the nonprofit school food service account. However, please note, that **if the General Fund or Operations Account is used to purchase goods/supplies, no food service time or resources can be used** to order, stock, inventory, make or package foods/drinks, or sell those foods. All purchases and sales would occur without food service department help.

Additionally, **if nonprogram foods were to be sold with purchases made from the General/Operating account, the students WOULD NOT be able to use their lunch accounts for those purchases.** Those purchases would need to be made in cash or some other way (mobile payment system), UNASSOCIATED with the student lunch account.

*****PUBLIC SCHOOLS IN WISCONSIN, WUFAR AND FUND 50 (NONPROFIT SCHOOL FOOD SERVICE ACCOUNT)**

For public schools in Wisconsin, all food/beverage purchases and revenue from the sale of foods/beverages must be coded to Fund 50 per Wisconsin Uniform Financial Accounting Requirements (WUFAR), even if the school does not participate in the federal child nutrition programs.

The WUFAR provides for the recording of all financial transactions inherent in the management of Wisconsin's public school systems to administer the state's school aid programs. School district officers and employees are required to maintain this uniform recording of accounting per Wis. Stats. § 115.30(1). The WUFAR can also be used to meet part of the financial management requirements of 2 CFR 200.302 related to federal grant programs.

Beyond these purposes, the WUFAR is also used to promote uniformity important for the facilitation of financial accounting, reporting, data processing, auditing, and inter-district comparisons. A uniform accounting system eases the transition for personnel moving from one district to another. The account code hierarchy of the WUFAR is designed to balance the need for uniformity with the flexibility needed to suit local needs by allowing the use of more detailed local optional coding. The WUFAR is designed to be used in large, medium, or small districts; in rural, suburban, or urban settings; in common, unified, or first class city school districts; and in districts with different kinds of accounting equipment, software or procedures

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Financial administration requires that each transaction be identified for administrative and accounting purposes. The first identification is by “fund” which is an independent fiscal and accounting entity, requiring its own set of books, in accordance with special regulations, restrictions, and limitations that earmark each fund for a specific activity or for attaining certain objectives. Each fund must be so accounted for that the identity of its resources and obligations and its revenues and expenditures is continually maintained.

All funds used by Wisconsin school districts must be classified into one of nine “fund types”. The major fund types are:

- The General Fund (10),
- Special Revenue Fund (20),
- Debt Service Fund (30),
- Capital Projects Fund (40),
- Food Service Fund (50),
- Custodial Fund (60),
- Trust Fund (70),
- Community Service Fund (80), and
- Package and Cooperative Program Fund (90).

Wisconsin school districts may not need all of these fund groups at any given time. The General, Special Revenue, Debt Service, and Food Service will undoubtedly encompass the majority of the transactional activity that will occur in the school district. The remaining fund groups, however, are still material to the overall presentation of the financial position of the school district and as such should be maintained and reported accordingly.