

# Administrative Review Report

St. Adalbert School

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/03/2020	02/17/2020
On-Site Review	03/03/2020	03/04/2020
Site Selection Worksheet	01/03/2020	01/03/2020
Entrance Conference	03/04/2020	03/04/2020
Exit Conference	03/05/2020	03/05/2020

## Commendations:

Thank you to the staff involved in operating Child Nutrition Programs at St. Adalbert. Everyone was very friendly and open to feedback and recommendations provided during the on-site review. We appreciate all that you do for the children at your school!

Thank you to St. Adalbert School for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the FFVP Coordinator for providing documentation and answering questions for the claim validation. The claim validation did not result in any findings. Excellent work!

## Findings and Corrective Action:

<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	4
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> Afterschool Snack counts were incorrectly counted and claimed (7 CFR 210.10). The counts on site did not match the online claim. Fiscal Action will be applied between the difference. Technical Assistance was provided site on to double check human errors with manual counting and claiming.</p> <p><b>Corrective Action:</b> Submit a statement of understanding that counts will be double checked before submitting a claim.</p> <p><b>**The report was amended to add this CA after initial report went out. The original report was issued during COVID-19. SFA was no longer operating After School Snack Program.</b></p>

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>TA Log #</b>	No TA Log# found
<b>Corrective Action History</b>	<p><b>Finding:</b> On the Annual Financial Report (AFR), the beginning and ending fund balance did not match. The SFA will need to adjust the revenue allocations for breakfast and grants, as there appears to be a typo.</p>

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**Corrective Action:** Manually correct the 2018-2019 AFR and upload the corrected report into SNACS. Once approved, the DPI accountant will make any adjustments.

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	705
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA does not have adequate internal controls to maintain oversight of federal funds (2 CFR 200.303). SFA was being charged for snacks that were not received and was over charged \$14,000 by vendor, which has since been paid back to the SFA.</p> <p><b>Corrective Action:</b> Develop written internal controls to maintain oversight of federal funds and include the following:</p> <ol style="list-style-type: none"> <li>1. Training staff</li> <li>2. Separation of duties</li> <li>3. Policy on how to handle bad (uncollectable) debt</li> <li>4. Physical controls to ensure money is not lost or stolen. Upload into SNACS.</li> </ol>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	801
<b>Corrective Action History</b>	<p><b>Finding:</b> The Public Release did not include the required information (full non-discrimination statement).</p> <p><b>Corrective Action:</b> Provide a statement of understanding that the Public Release template found on the DPI website will be used moving forward to ensure all required information is included.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	803
<b>Corrective Action History</b>	<p><b>Findings:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Provide a timeline for when a school meal program 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>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	807
<b>Corrective Action History</b>	<p><b>Finding:</b> The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p><b>Corrective Action:</b> Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form, <a href="https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc">https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc</a> and submit as corrective action.</p>
<b>Form Name</b>	Local School Wellness (1000 - 1006)
<b>Question #</b>	1001

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Corrective Action History	<p><b>Finding:</b> The SFA did not notify the public about the Local Wellness Policy (LWP) in accordance with 7 CFR 210.31.</p> <p><b>Corrective Action:</b> Upload into SNACS a statement on how the public will be notified of the LWP, include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1004
Corrective Action History	<p><b>Finding:</b> The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.</p> <p><b>Corrective Action:</b> Provide a plan on how potential stakeholders will be notified and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action History	<p><b>Finding:</b> Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p><b>Corrective Action:</b> Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Form Name	Afterschool Snack Program
Question #	6
Corrective Action History	<p><b>Finding 1:</b> SFA was serving <math>\frac{1}{2}</math> cup of fruit instead of required <math>\frac{3}{4}</math> cup of fruit or vegetables for snack.</p> <p><b>Corrective Action #1:</b> Work with vendor to assure you are receiving the required <math>\frac{3}{4}</math> cup of fruit/vegetable per serving. Provide vendor with a sample menu of what you would like to provide for snack or ask them to provide you a list of items that they could sell you for the snack program. Once details have been discussed with the vendor, submit a one week menu for what you plan to serve for the snack program.</p> <p>After School Snacks nutshell, <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/after-school-snacks-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/after-school-snacks-in-a-nutshell.pdf</a>  Meal Pattern k-12 <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nslp-meal-pattern-for-asp.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nslp-meal-pattern-for-asp.pdf</a>  Meal Pattern pre-k and under, <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf</a></p> <p><b>Finding 2:</b> SFA was stockpiling breakfast items to serve for the after school snack program, not realizing they were being charged by their vendor for snacks but never receiving snack items. The SFA was not able to forecast and plan out a menu prior to service because of this. Menus were</p>

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	<p>developed after snack service.</p> <p><b>Corrective Action #2:</b> Figure out the details for purchasing snacks with the vendor. Submit an explanation of the process the SFA will use to order snacks moving forward so that the correct amounts of snacks are ordered and the vendor is charging the SFA the agreed upon amount.</p>
<b>Form Name</b>	Afterschool Snack Program
<b>Question #</b>	7
<b>Corrective Action History</b>	<p><b>Finding:</b> The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9)</p> <p><b>Corrective Action #1:</b> Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at. Once during the first four weeks of the program plus one additional time during the program year.</p> <p><b>Corrective Action #2:</b> Complete and upload into SNACS the Afterschool Snack onsite monitoring forms for each afterschool snack service location.</p>

<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)
<b>Question #</b>	1402
<b>TA Log #</b>	TA Log# exists
<b>Corrective Action History</b>	<p><b>Finding:</b> The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent:</p> <ul style="list-style-type: none"> <li>-diced peaches (Greece)</li> <li>-pineapple tidbits (Thailand)</li> <li>-avocados (Mexico)</li> <li>-snow peas (Guatemala)</li> <li>-cantaloupe (Guatemala)</li> <li>-watermelon (Mexico)</li> <li>-broccoli (Mexico)</li> </ul> <p><b>Corrective Action:</b> Complete and submit <a href="#">Non-Compliant Product Forms</a> for the products listed above (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a>).</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)
<b>Question #</b>	409
<b>Corrective Action History</b>	<p><b>Finding:</b> Between production kitchen records and transport sheets, all <a href="#">production record requirements</a> must be met (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/productionrecord-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/productionrecord-requirements.pdf</a>).</p> <p>The templates currently in use lack the following required information:</p>

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	<ul style="list-style-type: none"> <li>-Grade grouping(s)</li> <li>-Amount leftover (this can be in number of servings or purchase units)</li> <li>-Milk types available and actual usage by type</li> <li>-Planned serving size and usage for condiments and any extra menu items</li> <li>-Substitutions made to original plans (including field trip meals)</li> <li>-Substitutions made for students with special dietary needs (keep dietary request form on file as supporting documentation)</li> </ul> <p>A copy of the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">Production Record Requirements and templates</a> may be found on our webpage (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a>).</p> <p>Be specific on production records about the identity, variety, brand, portion size, and description of items served. Instead of “cereal”, list both toasted oats and bunch o’ cinnamon squares separately to clearly indicate what was served. If a variety is offered, the planned number of servings and leftovers should be recorded for each.</p> <p><b>Corrective Action:</b> Submit one week of completed production records that fulfill all production record requirements. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p> <p><i>Note:</i> FSD began using a separate milk tracking sheet during the on-site review and is now tracking milk usage by type. This is acceptable.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)
<b>Question #</b>	410
<b>Corrective Action History</b>	<p><b>Finding:</b> K4 students eat breakfast in their classroom and therefore must follow the updated CACFP meal pattern. This includes limiting the amount of sugar in cereal and avoiding offering grain based desserts.</p> <p>The following items are <b>unallowable</b> under the updated CACFP meal pattern:</p> <ul style="list-style-type: none"> <li>-bunch o’ cinnamon cereal (exceeds the sugar requirement)</li> <li>-cinnamon raisin biscuits (grain-based dessert)</li> <li>-applesauce cake (grain-based dessert) (note: this was not actually served during the week of review, but it was on the planned menu for Friday had there been school on 2/14/20)</li> </ul> <p><b>Corrective Action:</b> Review the <a href="https://dpi.wi.gov/school-nutrition/training/webcasts#Preschool%20meal%20pattern">Preschool Meal Pattern webcast</a> (<a href="https://dpi.wi.gov/school-nutrition/training/webcasts#Preschool%20meal%20pattern">https://dpi.wi.gov/school-nutrition/training/webcasts#Preschool%20meal%20pattern</a>) and submit email confirmation of your completion of the training. Additionally, submit a written statement regarding how the menu will be changed to comply with the updated CACFP meal pattern requirements. This could include changing the menu for all students or offering the 4K students a different entrée option on the days a grain-based dessert is planned at breakfast. In order to correct the week of review, specifically indicate the menu items and portion sizes that would be served in place of the cinnamon raisin biscuit and applesauce. Provide any necessary crediting documentation for these items.</p>
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)
<b>Question #</b>	411

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<p><b>Corrective Action History</b></p>	<p><b>Finding:</b> Confusion with weight vs. volume resulted in a number of inaccurate standardized recipes. For example, recipe #1043 for brown rice has a yield of 414 1/2 cups. To determine the amount of rice needed for this recipe, 414 servings was multiplied by 4 oz rather than 1/2 cup which resulted in 103.5lbs of dry rice needed (which would yield 452.8 cups of cooked rice). When done correctly, using the Food Buying Guide, 207 cups of cooked rice is needed, which means that 47.31lbs of dry rice should be used.</p> <p>As a reminder, in most cases 1oz of a meat product does not provide 1oz eq meat/meat alternate (m/ma). For example, using the Food Buying Guide, 1lb of chicken drumsticks credits as 7.84 oz eq m/ma. A serving of two Tyson drumsticks is 138g (4.86oz). Therefore, applying the crediting from the Food Buying Guide, two drumsticks credits as 2.25 oz eq m/ma. For a 414 serving standardized recipe, 126lbs of chicken drumsticks would be needed rather than 52lbs + 13oz shown in the recipe. (When updating this recipe, consider the amount of Ms. Dash used as well as it seems exceptionally high.)</p> <p>Additionally, it is important that the recipes are prepared the same way every time to ensure a consistent product and yield. The cinnamon raisin biscuit recipe currently provides multiple options for cutting the biscuits that would likely result in different yields (using a biscuit cutter vs. cutting into squares).</p> <p><b>Corrective action:</b> Please update and submit the following standardized recipes:</p> <ul style="list-style-type: none"> <li>-Carrot coins</li> <li>-Green beans</li> <li>-Salad mix with garnish (#1576 and #1530)</li> <li>-Cinnamon raisin biscuits</li> <li>-Baked Chicken</li> </ul>							
<p><b>Form Name</b></p>	<p>Meal Components and Quantities - Review Period (409-412)</p>							
<p><b>Question #</b></p>	<p>412</p>							
<p><b>Corrective Action History</b></p>	<p><b>Finding:</b> There was no school on Friday, February 14th. However, in order to complete the USDA workbook and fully evaluate the week of review for compliance with meal pattern requirements, a 5-day week was requested. The planned menu of chicken and rice, wheat bread slice, carrot and peas and fruit will be used. A planned production record was provided, but the necessary crediting documentation was not.</p> <p><b>Corrective Action:</b> Submit a recipe and labels (nutrition fact, CN, PFS) as appropriate for the chicken, gravy and carrots &amp; peas.</p> <p><i>Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.</i></p>							
<p><b>Technical Assistance Entries:</b></p>								
<p>TA Date</p>	<p>TA Log #</p>	<p>Question #</p>	<p>TA Area</p>	<p>Site</p>	<p>SFA Contact</p>	<p>Email</p>	<p>Phone</p>	<p>User Name</p>

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03/09/2020	1910	Administrative Review	FSD	PHN
<b>Comments</b>				
<b>Production Record Requirements</b>				
Leftovers must be tracked as indicated on the Production Records Requirements list. This information should aid in forecasting future meals. If significant quantities are left over on a regular basis, consider decreasing the number of meals ordered from the vendor.				
03/04/2020	1847	Administrative Review	Vendor/FSD	PHN
<b>Comments</b>				
<b>Standardized Recipes</b>				
Use of standardized recipes is another important part of USDA School Meals Programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the Standardized Recipes webpage ( <a href="https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes</a> ). We encourage viewing the webcast, What's the Yield with Standardized Recipes?, which guides the viewer through the recipe standardization process ( <a href="https://dpi.wi.gov/school-nutrition/training/webcasts#sr">https://dpi.wi.gov/school-nutrition/training/webcasts#sr</a> ).				
If the actual ingredient used can vary based on availability (ex. the deli meat used in a sandwich), it is important that standardized recipes reflect the actual product being used. This may mean developing multiple standardized recipes for the same menu item to ensure crediting towards meal pattern requirements is accurately calculated.				
As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example, which makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). The serving notes on the production record state that each student should be served 8 oz of cereal when bulk cereal is provided. For comparison, a standard box of Cheerios is approximately 12 oz, which is about 9 cups of cereal in each box. This means that an 8 oz serving for breakfast cereal is approximately 6 cups. This is why it is important to remember that weight and volume measures are different.				
Grain products made in-house, from-scratch may be credited using Exhibit A and the baked weight of the finished product. Alternatively, they may be credited using the amount of creditable grain in the recipe itself. To do this, take the total grams of creditable grain in the recipe and divide by the number of servings to get the amount of creditable grain per serving. Then, divide the grams of creditable grain per serving by 16 grams per ounce equivalent. For assistance with this process, check out the grains section on the Food Buying Guide website ( <a href="https://foodbuyingguide.fns.usda.gov/Home/Home">https://foodbuyingguide.fns.usda.gov/Home/Home</a> ). Click on the tab "Worksheet for Calculating Grains Contribution Using Grams of Creditable Grains," which provides step-by-step instructions. This will help determine the oz eq grain per serving of the product.				
03/04/2020	1844	Administrative Review	FSD	PHN
<b>Comments</b>				
<b>Milk Variety</b>				

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A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. While a variety of milk types were available, a reminder that students served in their classroom should be offered a choice rather than being handed a milk.

03/04/2020	1842		Administrative Review		FSD			
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## Comments

### Portion Sizes

Be mindful that full, level scoops are provided to ensure a consistent portion size for all students and to meet the minimum requirements of a reimbursable meal.

03/04/2020	1841		Administrative Review		Vendor/FSD			PHN
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## Comments

### Infant and Preschool in NSLP/SBP

#### *Co-mingling flexibility - misuse*

Preschool students are allowed to be served the K-8 menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in preschool or K-5. During on-site observation, preschool students were served the K-8 menu, but were served in their classroom, and therefore not at the same time and in the same place as the rest of the K-8 students. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found on the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

#### *Sugar in cereal for preschoolers*

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. As long as a cereal is below the sugar limit using any of the three methods, then it is acceptable to serve. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

#### *Grain-based desserts for preschoolers*

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as sweet scones/sweet rolls, breadsticks with sweet filling, cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>) or review the "[Is it a Grain-Based Dessert?](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/grain-based-desserts.pdf)" document on the DPI webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/grain-based-desserts.pdf>).

While sweet crackers are technically allowable for preschool School Breakfast Program (SBP) meals, the State Agency recommends considering lower sugar options and offering sweet crackers (such as grahams) only occasionally to remain consistent with the intent of the meal pattern designed for this population.

03/04/2020	1838		Administrative Review		FSD			
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Comments							
Signage was posted for both breakfast and lunch. However, the templates used are intended for operations utilizing Offer versus Serve (OVS). As St. Adalbert does not use OVS, it is recommended that signage reflects that students must select all five components at lunch and all planned menu items at breakfast. Templates for No OVS are available on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">Signage page</a> of the DPI SNT website ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage</a> )							
03/04/2020	1837		Administrative Review		Vendor/FSD		PHN
Comments							
Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file 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.							
03/03/2020	1827	1909	Administrative Review	Saint Adalbert Grade Sch	AR		PHN
Comments							
Teachers can play a valuable role in modeling fruit and vegetable consumption. Therefore, it is allowable for teachers to consume fruits and vegetables as part of the FFVP under the following conditions: -Only teachers who are directly responsible for serving the fruit and/or vegetable to their students in a classroom setting may partake of the fruit and/or vegetable. -The program is not available to the general teacher population and other adults in the school. -Teachers choosing to participate with their students are strongly encouraged to include a nutrition education component to enhance their positive role modeling. -No additional FFVP funds will be provided. Schools must stay within their per student allocation.							
03/03/2020	1826	1402	Administrative Review	ALL	Vendor		PHN
Comments							
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). Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted within an email. For domestic products without country of origin labeling, consider the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx">Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor</a> ( <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							

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Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision.

The following products were found without a clear country of origin indicated on the product or product packaging: white corn tortillas, Hospitality brand cereal, MJM strawberry waffles, BBQ sauce, Ortega salsa, Apple & Eve juice, Roseli string cheese

01/09/2020	1264	1901	Administrative Review	Saint Adalbert Grade Sch	Person responsible for FFVP			FFVP Coordinator
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## Comments

Administrative labor that is invoiced to St. Adalbert School, does need to be tracked on a timesheet by Fresh and Safe. This should be tracked for each date that time is spent on FFVP. One time sheet can be used for the year.

## Equipment

SFA was interested in purchasing equipment in the future. Before purchasing, SFA should check the pre-approval equipment list- <https://dpi.wi.gov/school-nutrition/program-requirements/procurement/equipment-preapproval>

## CEP Alternate Household Application

SFA requested more information on the CEP Alternate Household Applications. While this is not a requirement for CEP schools to have households complete, many SFAs choose to send these applications out [Alternate Household Income Application \(Spanish\)](#) [\(Hmong\)](#). It is a way to collect socioeconomic data from students in CEP schools. This application has been designed to be easy to complete, which assists in increasing the response rate from households. More information can be found on the CEP website, <https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision>

## Special Dietary Needs

A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. This [flow chart](#) gives guidance on special dietary needs. The [USDA Q&A on Accommodating Special Dietary Needs resource](#) and the [USDA Special Dietary Needs Handbook](#) contains even more detailed information.

It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.

SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations **must meet the USDA meal pattern requirements** in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a [fluid milk substitute](#) the SFA wishes to provide for students must be approved by the SNT office. Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable.

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## Onsite Monitoring Forms

SFA completed onsite monitoring forms for lunch and breakfast. However, on-site monitoring is only required for SFAs with **more than one school site** operating the National School Lunch Program (NSLP), School Breakfast Program (SBP). St. Adalbert is a single site location and does not need to complete onsite monitoring for lunch and breakfast.

SFA is operating the Afterschool Snack Program (ASP), which has different requirements. Every school in ASP is required to complete on-site monitoring two time per year.

## Food Safety

### Time as Public Health Control

Time/temperature control for safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called “Time as a Public Health Control.” Please refer to the [Wisconsin Food Code Fact Sheet: Time as a Public Health Control](#)” for detailed procedures regarding this practice. TCS foods include:

- Milk and dairy products
- Shell eggs
- Meat (beef, pork, and lamb)
- Poultry
- Fish
- Shellfish and crustaceans
- Baked potatoes
- Heat-treated plant food, such as cooked rice, beans, and vegetables
- Tofu and other soy protein
- Sprouts and seed sprouts
- Sliced melons
- Cut tomatoes
- Cut leafy greens
- Untreated garlic-and-oil mixtures
- Synthetic ingredients, such as textured soy protein in meat alternatives

To utilize “Time as a Public Health Control,” the school must have a corresponding SOPs in the site-specific food safety plan. Template SOPs are available on the [SNT Food Safety](#) webpage.

If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

## Sharing and No Thank You Tables

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.

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)

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to address regulations that must be followed to safely and responsibly implement each type of table. Refer to the [Sharing and No Thank You Tables Toolkit](#) for a comprehensive guide including standard operating procedures.

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.