

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Divine Mercy

Agency Code: 407336

School(s) Reviewed: Divine Mercy

Review Date(s): 12/13/18-12/14/18

Date of Exit Conference: 12/14/18

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state for \$10 for the week. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and

research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Divine Mercy for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Every day the SFA provided 8-10 meals to the parish daycare consisting of 2-3 year olds. The SFA can count and claim these meals. If these students are co-mingled with the rest of the school, they would be under the regular meal pattern. However, if they are eating at a different time, they would need to follow CACFP meal pattern.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Free and Reduced Price Meal Applications

- Applications were approved within 10 days of receiving and all applications were approved correctly. Great job!

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are 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.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, 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.

- Applications that indicate a child is a foster child are categorically 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.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run .

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Verification

The Verification Process was properly completed before November 15th.

Reminder-Verification Collection Report is due February 1st, 2019

Meal Counting and Claiming

Meal counts were run through the software. Edit checks were being use and claims were accurate.

Field Trips

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the school nutrition professionals and dedicated staff at the Divine Mercy School. We thoroughly appreciate your time and cooperation during the Administrative Review (AR). Great effort is made to not only deliver consistent, quality meals, but to also provide students with an exceptionally clean and welcoming environment. All of the staff were very accommodating while onsite and were very receptive to feedback on ways to further improve the food program.

Thank you, also, to the Food Service Director and Assistant for sending documentation and promptly answering questions both prior to the on-site review and during the on-site review. We very much appreciate all that you do for the students of the Divine Mercy School!

Comments/Technical Assistance/Compliance Reminders

Training

Regular trainings are also offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](#) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Child and Adult Care Food Program (CACFP)

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](#) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

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-8. There was confusion onsite about whether or not pre-K students could have flavored milk. During on-site observation, 4-K students were served the K-8 menu, which is Offer Versus Serve (OVS), but were not given access to a variety of milk choices (chocolate fat-free milk was removed briefly from the serving line when the 4-K students arrived and immediately replaced when the next grade began entering the line). Under OVS, students must be offered all five components, one of which is a variety of milk.

The 4-K students at Divine Mercy School are served at the same time as grades K-8. Service had to be momentarily paused to remove and replace the chocolate milk. This is not necessary. The 4-K students are clearly co-mingled which makes the co-mingling flexibility an appropriate service model, particularly in the interest of reducing any service line interruptions.

However, if staff feels it is important to limit sugar intake for the 4-K students and is able to bear the burden of service line interruptions, 4-K students may be served the CACFP meal pattern where a variety of milk does not need to be offered. To do so, all required components in at least the minimum CACFP-meal pattern amounts must be served to students. OVS would not be implemented. Some CACFP portion sizes are smaller than the

K-8 required portions. This may reduce food cost and waste. However, it was noted onsite that the students are enthusiastic eaters. Multiple 4-K students completely finished their trays with K-8 portions. Most of the 4-K students finished at least half to three-quarters of their trays.

Jointed School Responsibility and Crediting Documentation

Although Divine Mercy School is purchasing meals through a joint agreement, it is ultimately the SFA's responsibility to ensure all meal pattern requirements are met. Information on lunch meal pattern requirements can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage

(<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted. At the time of onsite review, no crediting documentation was available onsite. Work with the Food Service Director at the vending school to compile the supporting documentation needed to ensure meal pattern requirements and crediting are appropriate.

Signage

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. Currently there is adequate signage instructing students to select at least 3 components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. However, these signs - while instructional - are generic and do not list the daily menu items. At least one of the posted signs should be updated daily to reflect that day's menu. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Point of Service

Currently, Point of Service (POS) is at the beginning of the lunch line. Line workers ensure that students do not leave the lunch line without a reimbursable meal. No non-reimbursable meals were observed and line staff have a firm understanding of OVS. However, as the lunch program continues to grow, it may be beneficial to move the POS to the end of the service line. The POS staff will be the final check that a reimbursable meal is served, helping to expedite the serving process.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

The consultant worked with the business manager to address issues within the Child Nutrition Report. Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit School Food Service Account.

Divine Mercy is in a joint agreement with South Milwaukee School District. The school buying meals must annually be provided information on food costs from the school providing meals. The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

Paid Lunch Equity

SFA submitted and completed the PLE tool for the 2018-2019 SY.

Revenue from Nonprogram Foods

SFA only sold extra milk and adult meals.

Indirect Costs

Indirect costs were not charged to the food service account.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

SFA staff completed the civil right training.

Civil Rights Self Compliance Form

The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Special Dietary Needs

All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

On-site Monitoring -N/A

Local Wellness Policy

SFA had a local wellness policy on file that compliant with USDA regulations. Minor adjustments could be made/taken out like information about a vending machine, snacks sold to students as neither of these occur on site.

Smart Snacks -N/A

Professional Standards.

- Annual 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Water

Water was accessible for students during lunch.

Food Safety

SFA was actively using the food safety plan and had the appropriate SOPs on file. Food safety inspections were on file.

Reporting and Recordkeeping

Records need to be on file for 3 years plus the current. To assist SFAs with reporting dates, DPI SNT has created a [calendar of requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf>).

Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach

SFA annually promotes the districts offering the Summer Food Service Program.

5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA

Corrective Action Needed

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Certification and Benefit Issuance

☐ Finding #1: Three households were issued incorrect benefits.

Corrective Action Needed #1: Send households the adverse action letter. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10

days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

☐ **Finding #2:** The SFA did not send out a public release for the 2018-2019 SY.

Corrective Action Needed #2: Submit a statement explaining where the Public Release will be sent for the 2019-2020 SY and when it will be sent.

☐ **Finding #3:** SFA had less than 10 denied applications, all were reviewed. On one of the applications, one student had a foster box checked next to their name. If the foster box is checked, students are automatically eligible for free benefits.

Corrective Action Needed #3: Send the households the adverse action letter. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10 days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

☐ **Finding #4:** In one household, one student was receiving free benefits, which should have extended to the other sibling from Direct Certification. The other sibling was in the software as paid, accumulating a large debt.

Corrective Action Needed #4: Change the student from paid back to free. The Determining Official corrected the eligibility status on site. **No further action is required. However, it would be a best practice for the SFA to absorb the meal charge cost associated to this student's account, since it was an error on the SFA's behalf. DPI will access fiscal action on this finding, which will result in an under claim for the SFA.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

Finding #5: Lunch Signage. Signage helps students understand what components make up a reimbursable meal. This signage should reflect the daily menu in addition to providing students with the guidance to select at least three full components, one of which must be at least ½-cup fruit and/or vegetable, or a combination.

Corrective Action: Finding #5: Send a picture of posted lunch signage that clearly shows the daily menu selections available to the students.

Finding #6: CACFP Co-mingling flexibility misuse. 4-K students were served the K-8 menu but were denied access to flavored milk. When 4-K students are co-mingled with the K-8 students and are served the K-8 menu, they must be offered all five components, one of which is a variety of milk.

Corrective Action: Finding #6: Submit a written statement detailing how the SFA will correct the co-mingling flexibility misuse going forward. Specifically address whether 4-K students will be co-mingled and the menu pattern that will be used for these students.

Finding #7: Missing crediting documentation. No crediting documentation is currently kept onsite. It is the SFA’s responsibility to ensure all meal pattern requirements are met and crediting information must be available onsite where meals are served.

Corrective Action: Finding #7: Submit a written statement detailing how the SFA will ensure that the appropriate crediting documentation is maintained onsite.

3. RESOURCE MANAGEMENT

Finding #8: On the Annual Financial Report, the revenues and expenses were not categorized properly.

Corrective Action Needed #8: Please resubmit your 17-18 Annual Financial Report with revenues and expenses broken out into the appropriate category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Record Retention

Finding #9: SFA had a major turnover with administrative staff for the 2018-2019 SY. A lot of food service documentation was not on file from previous years.

Corrective Action Needed #9: Submit a statement of understanding that moving forward all food service records need to be kept for at least 3 years plus the current.

5. OTHER FEDERAL PROGRAMS REVIEW-N/A

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

