Administrative Review Report

St. Andrews Congregation

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/13/2023	04/14/2023
On-Site Review	04/26/2023	04/26/2023
Site Selection Worksheet	03/13/2023	03/13/2023
Entrance Conference	04/26/2023	04/26/2023
Exit Conference	04/26/2023	04/26/2023

Commendations:
Our sincere thanks to the administration and school nutrition staff of St. Andrew's Congregation. 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).

From the Public Health Nutritionist:
Thank you to all staff at St. Andrews Parish School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the school staff for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The assistance provided to reviewers onsite was also greatly appreciated. Thank you for serving healthy, nutritious meals to your students!

Administrative Review Report

St. Andrews Congregation

Findings and Corrective Action:

Site Name		
Form Name	**Certification and Benefit Issuance (100 - 121)**	
Question #	**102**	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 04/25/2023 08:47 PM	**Finding:** 2020-21 Household Application for Meal Benefits is posted to School Resource page, under Free/Reduced Lunch. FAQs not posted with application and How to Apply. **CA:** Provide a statement of understanding regarding requirement to download and use the current school year meal application, available on DPI's SNT site by July 1 annually and provide "how to apply" and FAQs with the application.
Site Name		
Form Name	**Civil Rights (800 - 807)**	
Question #	**801**	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/10/2023 09:03 AM	**Finding**: The Public Release was not distributed to the required locations. **CA:** Provide a statement of understanding regarding the annual requirement of the Public Release and upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	**Civil Rights (800 - 807)**	
Question #	**803**	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/10/2023 09:06 AM	**Finding:** The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). **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.
Site Name		

Administrative Review Report

St. Andrews Congregation

Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/07/2023 03:35 PM	**Finding:** SFA has not completed the assessment of the Local Wellness Policy within the last three years. **CA:** Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 04/26/2023 11:19 AM	**Finding:** Applications selected for verification were not verified correctly (7 CFR 245.6a). **CA:** Have the verifying official watch the "Verification Process" webcast on the DPI website and upload a copy of the completed quiz into SNACS.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 04/26/2023 01:02 PM	**Finding**: The 2019 non-discrimination statement was not included on all required program materials (food service page of website referencing hot lunch program). **CA:** Add the Nondiscrimination statement to required program materials and upload screenshot updated materials into SNACS.
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

Administrative Review Report

St. Andrews Congregation

Corrective Action History	Flagged 04/27/2023 11:24 AM	**Finding:** The SFA copy of the food safety plan at each school does not include the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). It is missing Process 1-2-3 categorized menu items and missing Employee Reporting Agreement for FSD. **CA:** Update the food safety plan to with the Process 1-2-3 defined menu items and FSD employee reporting agreement. Upload the documents into SNACS.
Site Name		
Form Name	**Food Safety & Buy American (1400 - 1403)**	
Question #	**1403**	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/26/2023 01:28 PM	**Finding:** The following products were identified in the SFA's storage area as non-domestic and not documented: -Canned pineapple (Indonesia) -Cherry tomatoes (Mexico) -Bananas (Guatemala) **Corrective Action:** Complete and submit a Noncompliant Product List Form for the non-domestic products; canned pineapple, cherry tomatoes, and bananas. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).
Site Name	Saint Andrew Parish School	
Form Name	**Meal Components and Quantities - Day of Review (400-408)**	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/26/2023 02:21 PM	**Finding:** Bulk quantities of each menu item are sent from Delavan-Darien School District to St. Andrews Parish School daily. Most items come refrigerated or frozen and cooking of the foods occurs onsite at St. Andrews. There is currently no documentation of what is received from Delavan-Darien School District (i.e., a delivery slip). This information should be tracked by Delavan-Darien School District and confirmed by St. Andrews daily. Please add this information to the current production record or develop a separate delivery slip to send with orders.

Administrative Review Report

St. Andrews Congregation

	Corrective Action: Send a sample of the delivery slip or updated production record demonstrating this information is tracked.
Site Name	Saint Andrew Parish School
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	Flagged 04/27/2023 08:28 AM	**Finding:** The SFA is using a hybrid of Serve versus Offer versus Serve (OVS) at lunch meal service. Students are required to take all components; however, vegetables are portioned in ½ cup portions and students are only required to take one of the two vegetable offerings on the line. Therefore, students are not required to take ¾ cup vegetable per Serve requirements. When the Serve model is utilized, all components in the minimum serving sizes per the K-8 meal pattern (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf) must be selected by students. The SFA plans to implement OVS going forward which only requires students to select at least three full components, one of which is ½ cup fruit, vegetable, or combination. **Corrective Action**: All food service staff and point of service personnel must complete training on OVS requirements. Please reference the OVS *In a Nutshell* document (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-in-a-nutshell.pdf) and complete the OVS – Meal or No Meal webcast (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story.html). The full OVS webcast (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) provides additional information, if needed. In the corrective action statement, include who completed the training and the date the training was completed.
Site Name	Saint Andrew Parish School
Form Name	**Meal Components and Quantities - Review Period (409-412, 430-437)**
Question #	**411**
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 04/26/2023 09:06 AM	**Finding:** Under the National School Lunch Program (NSLP) meal pattern, up to 2 oz eq. of grain-based desserts per week are allowed to be served. The menu for the week of review (3/6-3/10/23) exceeded the grain-based dessert limit. 1.0 oz eq. of graham crackers were offered with the Uncrustable

Administrative Review Report

St. Andrews Congregation

	alternate entrée every day that week. As graham crackers are considered a grain-based dessert in the NSLP, a total of 5.0 oz eq. grain-based desserts were offered over the course of the review week. **Corrective Action**: Submit a statement that explains your plan to reduce the amount of grain-based desserts offered at lunch during the review week (3/6-3/10/23).
Site Name	Saint Andrew Parish School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	**1406**
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Submitted
Corrective Action History	Flagged 04/27/2023 11:15 AM	**Finding:** The most recent food safety inspection report was not posted in a publicly visible location. **CA:** Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.
Site Name	Saint Andrew Parish School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	**1407**
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 04/27/2023 11:19 AM	**Finding:** Each SFA must have a food safety plan that includes Standard Operating Procedures (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP's for (#10 label when received and using FIFO). Broccoli out of original box in freezer without receiving date. **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 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
04/26/2023	3508		Administrative Review		FSD			

Comments

Administrative Review Report

St. Andrews Congregation

Technical Assistance: Although meals are purchased through a joint agreement, it is ultimately the SFA's responsibility to ensure all meal pattern requirements are met. DPI recommends that the Food Service Director complete NSLP meal pattern training to gain a basic understanding of meal pattern requirements. Beneficial resources include the Lunch Meal Pattern webcast (https://media.dpi.wi.gov/school-nutrition/lunch-meal-pattern/story.html) and Lunch Meal Pattern table (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf). Other training can be found on the Online Learning Library webpage (https://dpi.wi.gov/school-nutrition/training/online-learning).

4/26/2023 1:36:28 PM

04/26/2023	3506	431	Administrative Review	Saint Andrew Parish School	FSD			
Comments								

Technical Assistance: The Purchase Unit Prepared column is not consistently completed on the production records. The Purchase Unit Prepared column should include the number of pounds, cans, boxes, bags, etc. of each menu item used to prepare the specified number of servings. The # of Prepared Meals column should be written as a number on production records. Purchase units are sometimes recorded in this column but should be recorded in the Purchase Unit Prepared column instead. Remember to record leftovers for each menu item daily, including the alternate entrées and milk.

4/26/2023 9:19:48 AM

04/09/2023	3405	1601	Administrative Review	ALL	Authorized Representative			
Comments								

Summer Food Service Program (SFSP) Outreach
• A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round.
• The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months.
• SFAs can inform families of summer meals by promoting the following methods:
o Promotion of the Summer Meals Locator on the DPI Summer Meals webpage
o Promotion of calling 211 to locate meals in the area
o Promotion of the ability to text 'food' (in English or Spanish) to 304-304
o Promotion of visiting the Summer Food Service Program webpage. This is reverenced in the Local Wellness Policy.

4/10/2023 9:16:53 AM

04/07/2023	3403	712	Administrative Review	ALL	Authorized Representative			
Comments								

Indirect Costs
2 CFR 200.56 describes indirect costs as those "incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved." Costs that can be allocated to multiple programs or other cost objectives are always classified as indirect costs. Indirect costs are necessary to operate the school food service, even though a direct relationship to that activity cannot be shown. In determining whether a cost should be charged as direct or indirect, the SFA is required to treat each item of cost in a consistent manner as a direct or indirect cost in accordance with the Federal cost principles.

A cost may be assigned to the nonprofit school food service as a direct cost only if that cost item under the same circumstances has not been charged to other programs or cost objectives as an indirect cost (2 CFR 200.412). For

Administrative Review Report

St. Andrews Congregation

example, it is appropriate for a SFA that has relocated its school food service and several other of its activities from the main school building to an annex, to charge rent on the annex to the NSFSA only if the other activities relocated there are similarly charged. Custodial expenses Custodial expenses generally include the costs of cleaning the entire school. The food service benefits from custodial services because the kitchen, food preparation, and food serving areas are also cleaned. However, the question arises of whether the custodial expense can be charged as a direct or indirect expense.

As was stated earlier, for the custodial expense to be a direct cost, the cost must be identified specifically with a particular cost objective. How would an SFA charge custodial expenses directly? Some SFAs document the hours that custodians work cleaning food service areas such as the kitchen, food preparation, and food serving areas through a time reporting system, such as that described in 2 CFR 200.430. The time reporting system provides the exact hours a custodian cleans the food service area and the rest of the school. The SFA then charges the custodial expenses for cleaning the school food service area as a direct expense.

4/7/2023 4:54:20 PM

04/07/2023	3401	112	Administrative Review	ALL	Authorized Representative			
Comments								

The Benefit Issuance documentation/list should contain:
• The name and benefit status for all free and reduced-price eligible students in the SFA (all schools within your SFA).
• Be generated from point of service system used in each school within the meal count system to deliver the benefits to children (e.g., rosters, master lists).
• Includes student name, school name, eligibility status, date of approval, method of certification (i.e., application, DC), and total number of eligible students.
• The student names should be listed in any order (e.g., alphabetically, by building, by ID number), but it is preferred that the list not be grouped by benefit status.
• Not have duplicate names on the list; list each student only one time.
• Example BI list: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/beniss_ex.pdf

4/7/2023 11:08:43 AM

04/07/2023	3400	105	Administrative Review	ALL	Authorized Representative			
Comments								

Timeframe to determine applications.
Schools must process applications as they are received and promptly notify households of their eligibility status. Within 10 days of receiving the application, the LEA must make an application determination and notify the household of its eligibility status [7 CFR 245.6(c)(6)].

4/7/2023 10:58:15 AM

04/07/2023	3399	103	Administrative Review	ALL	Authorized Representative			
Comments								

Carryover
For purposes of the CNPs, carryover refers to a child's eligibility from the previous school year being carried over into the current or new school year. According to 7 CFR 245.6(c)(2), an individual student's eligibility from the previous school year (before July 1) carries over for up to 30 operating days into the new school year, or until a new eligibility determination is made, whichever comes first.

The 30 operating days begins on the first operating day of school. Operating days are the days on which reimbursable meals or milk are provided by a school or another program sponsor [7 CFR 245.2]. Carryover applies to eligibility

Administrative Review Report

St. Andrews Congregation

established through a household application or through direct certification. Meals served during the carryover period are claimed at the appropriate rate, depending on the individual child's eligibility status from the previous school year.

Carryover allows students to continue receiving school meal benefits while families complete and submit, and schools process, applications. The carryover period is not intended to delay processing of applications. Instead, schools must process applications as they are received and promptly notify households of their eligibility status. Within 10 days of receiving the application, the LEA must make an application determination and notify the household of its eligibility status [7 CFR 245.6(c)(6)].

4/7/2023 10:55:23 AM