

Administrative Review Report

669660 St. Gabriel School

Review Schedule	Start Date	End Date
Off-Site Review	01/24/2019	02/18/2019
On-Site Review	03/20/2019	03/21/2019
Site Selection Worksheet - (4020) St. Gabriel School	N/A	N/A
Entrance Conference	03/20/2019	03/20/2019
Exit Conference	03/21/2019	03/21/2019

Commendations:

- The FSD showed a great attitude during the onsite review. Even with the many changes happening this school year and the other events coinciding with the onsite review, the FSD is managing it all very well.
- All meals observed were reimbursable. Students clearly enjoy the multiple fruit and vegetable options offered.
- The food service director has years of experience, which are an asset to the program. She regularly completes Professional Standards training hours in job specific areas, like Food Safety, Menu Planning, and Resource Management.
- The Public Release was sent to the media and to multiple grassroots organizations.
- There were no certification/benefit issuance or meal counting and claiming errors. Keep up the good work!
- There is no fiscal action for the review.

Recommendations:

- The SFA did not operate the Special Milk Program (SMP) during SY 18-19. Monthly claims were not submitted. All 4K are full day and have access to the NSLP. 4K are claimed under the NSLP. The online contract was updated on-site to remove indication of participation in SMP. The SMP was not reviewed, because there is no program in operation to audit. The SFA does not operate a nonprogram milk break.
- The SFA utilized the SY 18-19 Paid Lunch Equity Flexibility.
- The SFA is exempt from having to complete the nonprogram food revenue ratio tool. The only nonprogram food sales are adult lunch and cold lunch (extra) milk. All costs (food, labor, supplies, etc.) are covered per review of the SFAs milk vendor invoice and compliance with FNS 782-5 Rev. 1.

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Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Corrective Action	<p>Finding: The SY 17-18 Annual Financial Report (AFR) is incorrect. The following must be updated:</p> <ul style="list-style-type: none"> - Nonprogram Foods (adult lunch and extra milk) revenues and expenses must be broken out from NSL (program) revenues and expenses. See the Nonprogram Food Revenue Tool Exceptions (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) document for further guidance. - Allocate a portion of NSL food cost to Special Milk Program (SMP). This program was operated in SY 17-18. - Correct the beginning and ending fund balance. - Correct the total expenditures to include the cost of the 2nd food safety inspection report. - Re-categorize the \$1,492.20 listed under NSLP equipment by referring to the expenditure category list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc). For example, the Food Safety Inspection charges must be reported under NSL → Purchased Services. <p>CA: Review the Annual Financial Report webcast (https://dpi.wi.gov/school-nutrition/training/webcasts#afr) or manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) on the DPI website. Update the 2017-18 AFR as outlined above. Upload the corrected report into SNACS under the document s tab. Once reviewed and approved by the consultant, the DPI accountant will enter the adjustment online.</p>
Form Name	Local School Wellness (1000 - 1006)
Corrective Action	<p>Finding: Current LWP language does not include policy leadership. The LWP must identify the official responsible for the LWP oversight. The SFA may elect to include the position/title of the individual instead of a specific name.</p> <p>CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Corrective Action	<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>
Form Name	Certification and Benefit Issuance (124 - 142)
Corrective Action	<p>Finding: The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6) Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6).</p> <p>CA: Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.</p>
Form Name	Verification (207 - 215)
Corrective Action	<p>Finding: The SFA did not complete the verification process correctly. The SFA did not calculate the pool as of October 1st, which resulted in over-verifying an application.</p> <p>CA: Submit a statement acknowledging to remove current year application(s) from the verification pool when converted to DC before October 1st, or approved after October 1st. Watch the Verification Process webcast (https://dpi.wi.gov/school-nutrition/training/webcasts#fr). Submit the quiz questions as proof of completion.</p>
Form Name	Food Safety & Buy American (1400 - 1403)

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Corrective Action	<p>Finding: The food safety plan did not contain a Standard Operating Procedure (SOP) for the Use of a Milk Barrel and for Field Trip meals.</p> <p>CA: Update the food safety plan to include both SOPs. Templates (https://dpi.wi.gov/school-nutrition/food-safety#templates) can be located on the DPI SNT Food Safety website. Train staff on procedures. Upload the SOP template that the school will begin using to the document tab in SNACS.</p>
Form Name	Civil Rights (811-812)
Corrective Action	<p>Finding: The nondiscrimination “And Justice for All” poster is not located in the meal service area and/or not visible to students (FNS Instruction 113).</p> <p>CA: Attach a photo as proof that this requirement is met once the poster is hung in a publicly visible location.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Corrective Action	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Post the most recent food safety inspection report in a publicly visible location. Provide a photo as proof that this has been completed. Upload the photo to the documents tab in SNACS, or submit via email to the consultant.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Corrective Action	<p>Finding: Missing Food Employee Reporting Agreement for the Food Service Director.</p> <p>CA: Complete the missing agreement. Submit a copy to the consultant. Completed onsite. No further action required.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Corrective Action	<p>Finding: Students have the option to occasionally select an entrée salad instead of the main entrée offered at lunch. This salad must be documented when it is offered to show that these students are offered a reimbursable meal. If the salad is made with the same ingredients each time, a standardized recipe should be created. Then only the salad as a whole would need to be recorded on the production record. If the salad ingredients vary based on what is included on the garden bar for that week, then the individual components may be documented on the production record.</p> <p>Additionally, this salad option, along with all offered sides and milk, must meet all the daily and weekly meal pattern requirements. When offering multiple entrée options, each option must be considered as a separate “line” to assess whether students have access to all the components in the required quantities. All the daily quantity requirements were met on the day of review. However, as discussed onsite, not all weekly requirements may be met, depending on how frequently the entrée salad is offered, as well as the specific weekly menu. When determining compliance with weekly requirements, it is necessary to consider the minimum quantities that students would have access to over the week. When offering the salad occasionally, this may be more a challenge to assess.</p> <p>CA: Submit a statement explaining how you plan to proceed with the salad entrée option. Please include:</p> <ul style="list-style-type: none"> • How often this option will be offered to students • How it will be documented • Planned serving sizes so the daily and weekly quantity requirements can be assessed • Documentation and planned serving sizes for any additional items that will be offered with the salad to ensure all components are offered <p><i>It was stated that this salad entrée was not offered during the week of review and therefore did not result in any meal pattern quantity findings.</i></p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Corrective Action	<p>Finding: Lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit, vegetable, or a combination. The posted lunch signage is missing the statement informing students that they must select at least three full components.</p>

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CA: Submit a photo of posted signage that contains this statement. 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>).

Technical Assistance:

TA Area: Special Dietary Needs and Food Safety

The SFA has a peanut "free" table. This practice is at the SFAs discretion and is observed more often at the EI level where children do not manage their food allergy as independently. Consider stating that the school and table are peanut "aware" rather than "free" as this may present a false sense of security for parents and students. The SFA cannot possibly check every food item brought into the school.

However, standard operating procedures can be implemented to properly clean the school environment and reduce risk of cross contact. For example, continue to discourage food sharing and encourage hand washing before and after eating. For more information see the CDC Tool kit, "[Managing Food Allergies in Schools](https://www.cdc.gov/healthyschools/foodallergies/toolkit.htm)"(<https://www.cdc.gov/healthyschools/foodallergies/toolkit.htm>)

TA Area: Food Safety

During meal observation, it was observed that the School Kitchen space is shared with the Church Parish. Non-food service staff were observed without hair restraints and non-slip shoes. As a reminder, the SFA has a Standard Operating Procedure (SOP) for Non-Food Service Staff & Other Visitors that should be enforced. When non-food service staff and visitors are present, they must adhere to safe food practices and safety precautions to protect food and prevent injury.

TA Area: Professional Standards Training Hours

The [DPI SNT Professional Standards Excel Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) can be used to track annual training hours for all staff in a central location. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>)

TA Area: Local Wellness Policy (LWP)

The triennial assessment is different than the review and update of the policy language. The triennial assessment includes how you are meeting your goals and objectives and how your policy compares to a model policy. The Report Card and WellSat tools found on the DPI SNT [LWP website](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>) can be used to complete the assessment in SY 2020-21. Once the assessment is complete, it must be made public.

TA Area: Special Dietary Needs and the Medical Statement

The following medical practitioners may sign-off on a medical statement in Wisconsin: Physician, Physician Assistant, Nurse Practitioner, Podiatrist, Dentist and Optometrist.

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 (<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.

School food service may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is 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.

TA Area: Civil Rights

- All verbal or written civil rights complaints regarding the school nutrition programs filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. A SFA may attempt to resolve a situation that is occurring in real time. However, if an individual states 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.
- "And Justice for All" posters need to be posted in public view where the program is offered.

TA Area: Certification and Benefit Issuance

As a reminder, free and reduced price benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

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TA Area: Meal Counting and Claiming

The SFA is consolidating the claim manually and using the DPI monthly edit check form. While onsite, the reviewer assisted the SFA in locating the PowerSchool detailed meal count report, which can be used to obtain monthly meal counts by category. This report is not pulling the data correctly, therefore the SFA was advised not to use the report until Power School can be contacted and the report reconciled. Continue to document the Attendance Factor (AF) calculations on the report if it is utilized in the future.

TA Area: Direct Certification

When completing a direct certification run, select "full run", when the input file includes the full enrollment for only those students that have access to the National School Lunch Program (NSLP). Select "partial run" when the input file only includes a couple students names. This may be the case for a transfer student mid-year. For details on direct certification, see the [DPI SNT website](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/dc-faq-18.pdf) and DC FAQ document (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/dc-faq-18.pdf>).

TA Area: Leftover Amounts on Production Records

Some of the fruits and vegetables had zero leftovers recorded on the production records for the week of review. It was stated that if a fruit or vegetable runs out prior to the end of meal service, students are offered the remaining fruit or vegetable options in larger serving sizes, if necessary, to ensure they are offered the full quantity required. The vegetables planned for the next day's lunch service are also available onsite. Continue to monitor quantities and adjust the total quantity ordered as needed to offer reimbursable meals. In addition to ensuring the meal pattern is met, this will also keep students satisfied with the selection at all points during lunch service. Consider also keeping additional canned or frozen vegetables on hand for such situations.

TA Area: Production Records

Most items on the production record have the number of servings prepared and the quantity prepared (in purchase units) recorded or there is additional information on the production record to determine both pieces of information. Please continue to check the production records to ensure this information is available for all menu items.

When substitutions to the planned menu are made, the planned serving size should be updated on the production record as necessary to accurately reflect what was offered to students.

The milk types and actual usage may be written in on the daily production record if that is preferred over tracking usage on a separate record.

TA Area: Serving Sizes for Fruits and Vegetables

The production records contain the number of fruit or vegetable pieces that should be served to meet the planned serving size for some menu items, such as the grape tomatoes and grapes. For other items, either a standardized measuring utensil should be used or a visual reference of the appropriate serving size should be established prior to service. This was demonstrated during the onsite review using the romaine as an example.

As a reminder, raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, ½ cup of fresh, baby spinach credits as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served. The ½ cup serving size of the romaine offered would not satisfy the full ½ cup fruit, vegetable, or combination OVS requirement and a student would need to select an additional ¼ cup fruit or vegetable.

TA Area: Methods for Crediting Grains

The chocolate chip cookie offered on the day of review credits as 0.5 oz eq grain using [Exhibit A](#) or 1.0 oz eq grain using the product formulation statement from the manufacturer (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Keep this in mind when assessing meal pattern compliance for the alternate entrée salad as one method may be more beneficial.

TA Pre-K Students

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USDA allows pre-K students to be offered the K-8 meal pattern when they eat meals at the same time and in the same place as older students under the co-mingling flexibility. The SFA is currently using this flexibility appropriately. Keep in mind that if meal times change in the future, this will need to be reassessed and pre-K students may need to be served meals using the Child and Adult Care Program (CACFP) meal pattern.

If the SFA chooses to offer the Special Milk Program next school year, pre-K students will only be allowed to be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. For additional information, review the [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

TA Area: School Breakfast Program

Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. It may be helpful to gauge student and parent interest in the program overall, as well as which particular breakfast service model may work best for your students. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (https://dpi.wi.gov/school-nutrition/school-breakfast-program).

TA Area: Smart Snacks

Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

TA Area: Buy American Provision

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

"The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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)."

