## Administrative Review Report

St. Agnes School

#### Review Schedule:

| Schedule Type            | Start Date | End Date   |
|--------------------------|------------|------------|
| Off-Site Review          | 11/09/2022 | 12/09/2022 |
| On-Site Review           | 01/11/2023 | 01/12/2023 |
| Site Selection Worksheet | 11/09/2022 | 11/09/2022 |
| Entrance Conference      | 01/11/2023 | 01/11/2023 |
| Exit Conference          | 01/12/2023 | 01/12/2023 |

#### Commendations:

Our sincere thanks to the administration and school nutrition professionals of St. Agnes School District. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students! Your quick responses to actions needed were greatly appreciated!

### From Public Health Nutritionist:

Thank you to all food service staff at St. Agnes for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director 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 Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

Awesome job and thank you for what you do for kids!

### Recommendations:

For information on the USDA Child Nutrition Programs, visit the <u>DPI School Nutrition webpage</u>. 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).

### Findings and Corrective Action:

| Form Name                 | Maintenance of Non-Profit School Food Service Account (700 - 705) |                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
|---------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Question #                | 700                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Corrective Action Status  | Flagged                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Corrective Action History | Flagged<br>01/11/2023 02:46 PM                                    | Finding 1: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).  CA 1: Review the Annual Financial Report webcast or manual on the DPI website then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in |  |

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|                           | J.                                                                      | t. Agnes School                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                           |                                                                         | the online portal. The DPI accountant will make any adjustments after December 31. Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.  CA 2: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. |
| Form Name                 | Civil Rights (800 - 807)                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Question #                | 803                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action Status  | CAP Submitted                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action History | Flagged<br>01/11/2023 02:21 PM                                          | Findings: 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.                                                                                                                                                                          |
|                           | CAP Submitted                                                           | Used the template and created a plan specific for St Agnes. uploaded document into SNACS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Form Name                 | Civil Rights (800 - 807)                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Question #                | 806                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action Status  | Flagged                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action History | Flagged<br>01/11/2023 02:36 PM                                          | Finding: Civil Rights training did not occur or documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).  CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.                                                                                       |
| Form Name                 | Local School Wellness (1000 - 1006)                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Question #                | 1000                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action Status  | Flagged                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Corrective Action History | Flagged<br>01/11/2023 02:53 PM                                          | Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31).  CA: Provide a detailed timeline for when the Local Wellness Policy will implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.                                                                                                                                                                                          |
| Form Name                 | School Breakfast and Summer Food Service Program Outreach (1600 - 1601) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Question #                | 1601                                                                    | <u>-</u> · · · · ·                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Corrective Action Status  | CAP Submitted                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Corrective Action History | Flagged<br>01/11/2023 02:22 PM                 | 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). 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.                                                                                                                                                                                  |
|                           | CAP Submitted<br>01/12/2023 12:46 PM           | We will send out a letter via email and also include the information in our weekly Friday flyer at the end of school year                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Form Name                 | Certification and Benefit                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Question #                | 126                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action Status  | Flagged                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action History | Flagged<br>01/11/2023 01:59 PM                 | 97 free and reduced price meal determinations were reviewed, and 6 errors were identified. Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected. CA: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS. |
| Form Name                 | Certification and Benefit Issuance (124 - 142) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Question #                | 128                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action Status  | CAP Submitted                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action History | Flagged<br>01/11/2023 02:02 PM                 | Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized.  CA: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.                                                                                                                                               |
|                           | CAP Submitted<br>01/12/2023 11:04 AM           | I understand that to not all applications are to be annualized.<br>Use which ever factor they selected as pay frequency and if<br>more than one frequency was used than you can annualize.                                                                                                                                                                                                                                                                                                                                                                                                         |
| Form Name                 | Professional Standards (                       | 1210 - 1219)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Question #                | 1217                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action Status  | Flagged                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Corrective Action History | Flagged<br>01/11/2023 02:28 PM                 | Finding: 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.                                                                                                                                                                                                                                                                                                                                                                                                                      |

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|                           |                                | CA: Include all training hours completed this school year for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                           |                                | each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Form Name                 | Food Safety & Buy Amer         | rican (1400 - 1403)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Question #                | 1400                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action Status  | Flagged                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action History | Flagged<br>01/11/2023 03:08 PM | Finding: The SFA was missing components of the Food Safety Plan. Items needed are equipment list and Time as a Public Health Control SOP. CA: Update the food safety plan with these SOP and upload the updated food safety plan(s) into SNACS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Site Name                 | Saint Agnes School             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Form Name                 | Meal Components and C          | Quantities - Day of Review (400-408)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Question #                | 404                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action Status  | Flagged                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action History | Flagged 01/11/2023 12:24 PM    | Finding: Signage was not posted at lunch to show students what makes up a reimbursable meal. 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. The 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 and/or vegetable, or a combination. Signage examples can be found on our Signage webpage ( https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage ).  Corrective Action: Submit a picture of completed signage posted near the lunch service line. |
| Site Name                 | Saint Agnes School             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Form Name                 | Civil Rights (811-812)         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Question #                | 811                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action Status  | Flagged                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Corrective Action History | Flagged<br>01/11/2023 02:32 PM | 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).  CA: Provide a statement and or image of how this requirement will be met. If corrected while onsite, no further action required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| Site Name                 | Saint Agnes School                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| Form Name                 | Food Safety, Storage and Buy American (1404-1411) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Question #                | 1406                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action Status  | Flagged                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action History | Flagged<br>01/11/2023 03:14 PM                    | 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 Agnes School                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Form Name                 | Food Safety, Storage and Buy American (1404-1411) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Question #                | 1409                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action Status  | CAP Submitted                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action History | Flagged<br>01/11/2023 03:19 PM                    | Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed Milk was on the floor and all product must be 6 inches off the floor.  CA: Submit documentation in the form of a picture indicating that food safety violations have been corrected. |
|                           | CAP Submitted                                     | pictured submitted into snacs with the milk crate on the shelve and not on the floor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Site Name                 | Saint Agnes School                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Form Name                 | Food Safety, Storage and                          | Buy American (1404-1411)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Question #                | 1411                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action Status  | CAP Submitted                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Corrective Action History | Flagged<br>01/11/2023 04:15 PM                    | Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Bananas Pineapple Mandarin Oranges  Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products; Bananas, pineapple, mandarin oranges. Noncompliant Product List templates can be found on the Buy American webpage                                                                                                                                                                            |
| Technical Assistance Entr | CAP Submitted 01/12/2023 11:29 AM ries:           | (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).  Filled out the Noncompliant List Form and have uploaded it into snacs                                                                                                                                                                                                                                                                                                                                                                                            |

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| St. Agnes School                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| The Food Safety Plan must be kept in the kitchen for staff to access whenever necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| SFAs with only 1 school site are not required to complete onsite monitoring.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) to identify vegetables in each subgroup. Please make sure if substitutions are being made to a planned vegetable that the menu is still meeting the required vegetable subgroup amounts for the week. |

#### **Comments**

Be sure to track condiment usage on production records. Production records currently indicate the number of preportioned condiments put out each day, but no leftovers are being recorded.

#### **Comments**

Food service staff did not have a clear understanding of the Offer Versus Serve (OVS) requirements for lunch. Although all students observed took a reimbursable meal, it is important for staff to understand OVS requirements. Visit our Online Learning Library for opportunities (https://dpi.wi.gov/school-nutrition/training/online-learning).

- Local Wellness Policy In a Nutshell provides an overview of policy requirements.
- Local Wellness Policy Checklist is a resource that will help schools determine if all required content areas are included in their LWP.

As of June 30, 2020, SFAs must complete their first triennial assessment. The assessment must be completed, at minimum, once every three years. It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.

 Local Wellness Policy Triennial Assessment Report Card - SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team. The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.

### **Local Wellness Policy Builder**

Local Wellness Policy Builder is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.

Local Wellness Policy Builder - Full Text is a compilation of all statements available in the Local Wellness Policy Builder Online Tool.