

Administrative Review Report

St. Jerome School

Commendations:

Our sincere thanks to the administration and school nutrition professionals of the St. Jerome's School. 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 the Public Health Nutritionist: Thank you to all the staff at St. Jerome for the warm welcome and cooperation during St. Jerome's Administrative Review (AR). All daily and weekly lunch meal component and quantity requirements were met for the week of review, and you offered a great variety of food to your students! Thank you for serving healthy, nutritious meals!

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

Recommendations:

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>).

Administrative Review Report

St. Jerome School

Findings and Corrective Action:

Form Name	Verification (200 - 204)
Question #	200
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not select the correct number of applications for verification. Only 1 was required and 3 were verified. CA1: Watch the "Verification Process" Webinar and submit completed quiz. https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html.</p> <p>Finding: The Verification Collection Report (VCR) was not completed accurately. CA: Watch the "Submitting the Verification Collection Report" webinar (https://media.dpi.wi.gov/school-nutrition/submitting-the-verification-collection-report/story_html5.html) and review the VCR reporting instructions. Upload a copy of the report with the corrections noted into SNACS.</p>
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually. (SP 46-2016)</p> <p>CA: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action Status	Flagged
Corrective Action History	<p>Finding 1: On the Annual Financial Report, all of the revenues and expenses were not reported correctly. Nonprogram foods must be broken out by program and expense category (7 CFR 210.19).</p> <p>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 the online portal. The DPI accountant will make any adjustments after December 31.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	710
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA is not tracking nonprogram foods revenue and expenditures of milk and adult meals.</p> <p>CA: Provide a plan on how nonprogram food revenue and expenditures will be tracked.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	711
Corrective Action Status	Flagged

Administrative Review Report

St. Jerome School

Corrective Action History	Finding: Adult meal prices must run through St. Jerome's food service account. They cannot be ordered and paid for directly to Oconomowoc SD. CA 1: Notify SFA staff and update procedure. Upload the communication sent to staff into SNACS.
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action Status	Flagged
Corrective Action History	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.
Form Name	Civil Rights (800 - 807)
Question #	806
Corrective Action Status	Flagged
Corrective Action History	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	Civil Rights (800 - 807)
Question #	807
Corrective Action Status	Flagged
Corrective Action History	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31). SFA uses public school policy and it must have its own. CA: Provide a detailed timeline for when the Local Wellness Policy will be 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
Corrective Action Status	Flagged
Corrective Action History	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.

Administrative Review Report

St. Jerome School

Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action Status	Flagged
Corrective Action History	<p>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.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	128
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct income conversion 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.</p>
Form Name	Verification (207 - 215)
Question #	207
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete the verification process per 7 CFR 245.2. CA 1. Complete the verification process and upload all the completed verification documentation into SNACS. CA 2. Submit a statement of understanding that verification must be completed by November 15.</p>
Form Name	Verification (207 - 215)
Question #	208
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete a confirmation review before verifying application(s). CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Form Name	Verification (207 - 215)
Question #	211
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The verification notification letter did not contain all required information. CA1: Review the "Household Notification of Selection" section of the Eligibility Manual (pg 105-106) CA2: Submit a statement indicating that the DPI template letter will be used moving forward, or upload an updated version of the SFAs verification notification letter into SNACS for approval.</p>
Form Name	Verification (207 - 215)

Administrative Review Report

St. Jerome School

Question #	215
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a) CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1214
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The School Nutrition Program Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30). CA: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action Status	Flagged
Corrective Action History	<p>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. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1403
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. The following products were identified in the SFA's storage area (Oconomowoc High School) as non-domestic and not documented: Cucumbers- Product of Mexico Missed Pride Diced Peaches- No Country of Origin Listed Mandarin Oranges- Product of China Corrective Action: Buy American tracking sheets should be completed by the school that is purchasing the food, and then provided to the receiving school in a joint agreement. Obtain copies of the Buy American tracking forms for non-domestic products from Oconomowoc SD. This may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/certification from the distributor or supplier. Provide a copy of the form that will be used and include any noncompliant products.</p>
Form Name	Reporting and Recordkeeping (1500 - 1501)
Question #	1501
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA is not maintaining program records and documentation for three years plus the current school year (7 CFR 210.23(c)). CA: Provide a statement of how the record retention requirements will be met moving forward.</p>

Administrative Review Report

St. Jerome School

Site Name	Saint Jerome Parish Sch
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal.</p> <p>CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Site Name	Saint Jerome Parish Sch
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu for lunch. It may either be listed daily or may be listed in one place on the menu and include a statement that states that a variety of milk is offered daily as part of the reimbursable meal. Corrective Action: Submit a copy of the updated menu that includes either milk listed daily or a statement that a variety of milk is offered daily with a reimbursable meal.</p>
Site Name	Saint Jerome Parish Sch
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	433
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Processed foods that are not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. Crediting documentation must be available on-site, and can be kept in a physical binder or electronic files. For the day of review, crediting information was not available on-site for the diced chicken product used in the nachos, or the ham used in the sub. SA was able to receive the crediting documents from Oconomowoc HS to verify crediting prior to lunch service. Although meals are purchased through a joint agreement, it is each SFA's responsibility to ensure that required documentation is available onsite. No crediting documents are currently kept on-site at St. Jerome. Corrective Action: Submit a written statement detailing how the SFA will ensure that the appropriate crediting documentation is maintained on-site.</p>
Site Name	Saint Jerome Parish Sch
Form Name	Civil Rights (811-812)
Question #	811
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The nondiscrimination "And Justice for All" poster is not the current 2019 version of the poster.</p> <p>CA: Provide a picture of the correct poster and its placement.</p>

Administrative Review Report

St. Jerome School

Site Name	Saint Jerome Parish Sch
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1409
Corrective Action Status	Flagged
Corrective Action History	<p>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 (Food on the floor in freezer and must be 6 inches off the floor).</p> <p>CA: Please submit documentation indicating that food safety violations have been corrected.</p>

Technical Assistance Entries:

Comments

•When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. DPI has created a We MUST CHECK your application sample letter for verification purposes with required documentation included. •When a household is selected for verification, it must provide “sources of information” to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.

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:

- oPromotion of the Summer Meals Locator on the DPI Summer Meals webpage
- oPromotion of calling 211 to locate meals in the area
- oPromotion of the ability to text ‘food’ (in English or Spanish) to 304-304
- oPromotion of visiting the Summer Food Service Program webpage

Comments

Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this “In A Nutshell- Training” document. •Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.). •SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool is recommended.

Comments

Unpaid Meal Charge Policy •USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. •For a snapshot of what the policy should include, see the Unpaid Meal Charges In a “Nutshell”. For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the Financial Management Webpage or the USDA Unpaid Meal Charges Webpage.

Comments

Household Size Box The total household member size box includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Administrative Review Report

St. Jerome School

Comments
<ul style="list-style-type: none"> • Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of current income. These applications may be processed at face value. • However, households that receive regular pay checks, will report income based on what is currently earned and the frequency of that pay, e.g., weekly, biweekly, bimonthly, or monthly.
Comments
When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines (IEG) one would look at the amount of their income under the column indicating that stated frequency.
Comments
All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.
Comments
Civil rights training, such as the Civil Rights webcast, must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood-service staff. The Civil Rights Self-Evaluation Compliance form must be completed by October 31 annually. This is kept on file at the SFA until requested by DPI.
Comments
All SFAs are required to distribute a Public Release before the start of the school year to inform the public that free and reduced-price meals are available. SFAs must annually distribute the Public Release to: Local news media, Grassroots organizations (e.g., food pantry, public library, post office, local church, etc.). SFAs are not required to pay to have the release published but must maintain documentation of whom it was sent.
Comments
The USDA Food Buying Guide (FBG) contains yield and crediting information for foods with a standard of identity (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. If the product is not listed in the FBG, additional crediting documentation is required.
Comments
Webcasts and self-guided e-learning courses are available in the Online Learning Library (https://dpi.wi.gov/school-nutrition/training/online-learning). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of DPI SNT staff can be found on our website (https://dpi.wi.gov/school-nutrition/directory).
Comments
Although meals are purchased through a joint agreement, it is ultimately each SFA's responsibility to ensure all meal pattern requirements are met. All required documentation must be available onsite, such as production records, transport sheets, standardized recipes, crediting documentation, etc. This requirement is outlined in #12 on the template located on the Joint Agreement webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/required-template-agreements/joint).
Comments
When additional fruit and vegetable options are handwritten onto the production records, be sure that all required information is recorded. This includes the planned portion size of the menu item and component contribution.
Comments
There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing

Administrative Review Report

St. Jerome School

information. Product specification sheets are not acceptable forms of crediting documentation. A PFS is considered acceptable crediting documentation and it shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label or USDA Product Information Sheet. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. The crediting decision-making tree (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-decision-making-tree.pdf>) helps staff determine what types of documentation are needed.

Comments

Any changes to the planned menu must be documented on the production record. A substitution should be a food that credits comparably to the original planned item, have a similar nutrition profile, and belong to the same vegetable subgroup (when applicable) to the extent practicable. It is always better to substitute something creditable, rather than have a missing component.

Comments

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).

- [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](#).