

Administrative Review Report

Lad Lake, Inc.

Commendations:

Our sincere thanks to the staff at St. Rose Youth and Family School for your warm welcome. We appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance.

We were impressed with how dedicated and caring the staff were. Thank you for what you do!

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. More information is found on the [Training webpage](#). In addition, we encourage those involved with USDA School Meal Programs to attend Wisconsin Department of Public Instruction (DPI) trainings offered in the summer.

The DPI School Nutrition Team will host an RCCI training at two locations in the state:

Wausau – Wednesday, July 19

Waukesha – Thursday, August 10

We will email times and registration information to all RCCIs in the next two weeks. More information can be found on the [SNST Training webpage](#).

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Findings and Corrective Action:

Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 01:28 PM</p>	<p>Findings: The RCCI does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Add the following portion of the Civil Rights Complaint Policy Template to your current grievance procedures:</p> <p><i>For complaints of discrimination related to the USDA child nutrition programs:</i></p> <ol style="list-style-type: none"> 1. Document the complaint using USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to Wisconsin Department of Public Instruction (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street, Madison, WI 53707-7841 Fax: (608) 267-0363 Email: jessica.sharkus@dpi.wi.gov 3. Maintain a separate Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know. <p>Corrective Action: Upload the updated grievance procedure into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 02:00 PM</p>	<p>Finding: The RCCI's policy states "modified diet menus can be written by the resident's physician, referred dietitian, Lad Lake nurse, or Lad Lake Food Service Manager..." However, all food substitutions made outside of the meal pattern must be supported by a statement signed by a state authorized medical authority (7 CFR 210.10). A state authorized medical authority is a state licensed health care professional who is authorized to write medical prescriptions under state law. In Wisconsin, this includes physician, dentist, optometrist, podiatrist, physician assistant or nurse practitioner.</p>

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		Corrective Action: Update the above sentence to meet regulation and upload that portion of the dietetic services procedure into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 01:19 PM	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>Corrective Action: Submit a statement of understanding that this form must be completed by October 31st, every year. It is recommended the RCCI utilize the Calendar of Requirements to ensure reports are completed on time.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/05/2023 01:14 PM	<p>Finding: The RCCI does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31).</p> <p>Corrective Action: Provide a detailed timeline for when the Local Wellness Policy (LWP) will be implemented using the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the RCCI representative(s) that will ensure compliance.</p> <p>In addition, if any components of the LWP Checklist will be difficult for your RCCI to implement, call the RCCI specialists to discuss further.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	125	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	<p>Flagged</p> <p>04/05/2023 01:47 PM</p>	<p>Finding: The RCCI does not have an eligibility documentation statement on file.</p> <p>Corrective Action: Draft a statement indicating why all residents qualify for free meals, such as, <i>"All student residents placed at this facility do not receive regular earnings from employment while in our care."</i></p> <p>This should also include the current non-discrimination statement and be kept on file.</p> <p>Upload the adopted statement into SNACs.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/17/2023 09:06 AM</p>	<p>Finding: The non-discrimination statement was not included on all required program materials.</p> <p>Corrective Action: Add the Nondiscrimination statement to:</p> <ol style="list-style-type: none"> 1. the website 2. intake and outtake packets that refer in any way to meals. <p>Provide a statement:</p> <ol style="list-style-type: none"> 1. of the location of the non-discrimination statement on the website for me to view 2. that the non-discrimination statement is provided on paper materials referring to meals.
Site Name	St Rose Youth & Family School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/17/2023 09:35 AM</p>	<p>Finding: The RCCI does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Point of service (POS)/meal count sheets from the St. Rose units are not accurate in recording meals, snacks, and non-reimbursable meals served.</p> <p>Corrective Action: New point of service (POS)/meal count sheets were provided to the RCCI.</p> <ol style="list-style-type: none"> 1. Provide training on the new POS sheets.

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	2. Once the counting system has been corrected, upload the POS sheets for Masana and Sienna into SNACS, for 30 consecutive days.	
Site Name	St Rose Youth & Family School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2023 04:12 PM</p>	<p>Finding: Due to a significant amount of missing crediting information since the RCCI purchases all food from a local grocery store, PHN was unable to complete a review of compliance with weekly component requirements for breakfast and lunch.</p> <p>Corrective Action: SFA will work with PHN and submit a plan of action moving forward on how meat/meat alternate and grain products will be planned and purchased to ensure that crediting information can be obtained.</p>
Site Name	St Rose Youth & Family School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/06/2023 10:38 AM</p>	<p>Finding: The production records were not consistently filled out correctly during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production.</p> <p>Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Please have all unit managers watch the Production Records webcast. (https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html).</p> <p>Please submit a document with each staff members name and date when this webcast was viewed.</p>
Site Name	St Rose Youth & Family School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/06/2023 10:42 AM</p>	<p>Finding: At least 80% of the grains offered weekly on each serving line must be whole grain-rich for both breakfast and lunch. It is unclear what percentage of items during the week of review were whole grain rich due to lack of documentation, but most grain items seen in the pantry of both units were not whole grain rich.</p> <p>Corrective Action: Describe how the menu would be changed to comply with the 80% whole grain-rich requirement. Be specific and include items that would be planned in place of enriched grain items.</p>
Site Name	St Rose Youth & Family School	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 02:07 PM</p>	<p>Finding: The RCCI did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p>Corrective Action: Submit a plan on how onsite monitoring will be completed for each site moving forward and list the name of the position responsible.</p>
Site Name	St Rose Youth & Family School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2023 09:25 AM</p>	<p>Finding: The RCCI does not have signed Employee Reporting Agreements for all employees at the St. Rose campus. A new form does not need to be signed each year; however, yearly training on the content of the form should be done.</p> <p>Corrective Action: Ensure that all employees, at all locations, have an Employee Reporting Agreement on file. Upload into SNACS a statement that all employees have a signed Employee Reporting Agreement on file and that all new employees will sign an Employee Reporting Agreement in the future.</p>
Site Name	St Rose Youth & Family School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1405	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/17/2023 09:10 AM</p>	<p>Finding: When operating USDA Child Nutrition Programs RCCIs must request two food safety inspections during each year (7 CFR 210.13). The RCCI did not receive two food safety inspections in the current or prior school year for the units at St. Rose and does not have documentation on file indicating that two inspections were requested from the local regulatory authority.</p> <p>Corrective Action: Contact the local regulatory authority to request two food safety inspections. Upload into SNACS documentation of this communication.</p>
Site Name	St Rose Youth & Family School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/05/2023 04:15 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a location that can be viewed by residents.</p> <p>Corrective Action: Provide a statement of where the most recent food safety inspection report will be posted and visible to the residents. If it will be difficult for the RCCI to comply with this regulation, please contact the RCCI Specialists to discuss.</p>
Site Name	St Rose Youth & Family School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/06/2023 10:33 AM</p>	<p>Finding: Non-domestic products are not currently being tracked nor documented at St. Rose.</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for any non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>
Site Name	St Rose Youth & Family School	
Form Name	Afterschool Snack Program	

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Question #	7	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/05/2023 04:58 PM</p>	<p>Finding: The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9).</p> <p>Corrective Action. Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year, at each site it is operated at. Once during the first four weeks of the program (July for year-round schools) plus one additional time during the program year.</p> <p>Complete and upload into SNACS one Afterschool Snack onsite monitoring form for each unit that serves afterschool snack.</p>

Technical Assistance Entries:

The school must offer the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offerings, students must select at least three full, different, food components, one of which is ½ cup fruit and/or vegetable. If the residents decide that they do not want to take a 1/2 cup of fruit or vegetable at breakfast or lunch, it is OK to not claim those meals. They should be marked in the Non-Reimbursable column on the POS/Meal Count Form.

In non-pricing RCCIs with day students, running direct certification (DC) is optional, however, if day students are on the DC list with a free or reduced benefit code, they can be claimed in the corresponding category. Running DC will likely result in higher reimbursements for the RCCI. If the RCCI chooses not to run DC, all day students should be claimed in the paid category.

At St. Rose, due to a limited number of participants, residents are able to choose what they would like for afterschool snack within the meal pattern requirements. Technical assistance was given to ensure at least 2 components were available to choose from.

Accommodations supported by an authorized medical statement do not need to follow USDA meal pattern but instead should follow what is written on the medical statement. Meal accommodation requests not supported by an authorized medical statement must meet the USDA meal pattern requirements and can be provided using offer vs serve.

If residents are discharged/released during the summer months, consider including in discharge/release paperwork information on where to find summer meals. Consider posting the following:

To find free summer meal locations:

- Call 211 to locate meals in the area
- Text 'food' (in English or Spanish) to 304-304
- Check the Site Finder Map
 - [Summer Meals Site Finder](#) - English
 - [Summer Meals Site Finder](#) - Spanish