

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority:** All Saints Catholic School

**Agency Code:** 305370

**DPI School Nutrition Review Team:** Lauren Troxtel and Molly Gregory

**School(s) Reviewed:** All Saints Catholic School South

**Review Date(s):** 12/18/18-12/19/18

**Date of Exit Conference:** 12/19/18

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state for \$10 for the week. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin

implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at All Saints Catholic School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

The Nutrition Program Consultant reviewed all 74 students who were receiving free and reduced benefits during the month of November. All student eligibility statuses were determined appropriately and students were receiving proper benefits.

#### **Free and Reduced Price Meal Applications**

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.

#### **Public Release**

- The Public Release was sent to multiple places for the 2018-2019 SY. Great job!

#### **Direct Certification**

- SFA was running Direct Certification matches in the required time frames.

#### **Transferring Students**

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or

at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### **Verification**

SFA had to verify one family. The student's eligibility remained the same. Remember that if a household provides check stubs with overtime listed on it, the verifying official should follow up with the family to see if the overtime is a regular occurrence or sporadic.

The Verification Collection Report was completed for the 2018-2019 SY.

### **Meal Counting and Claiming**

The claim preparer kept a manual edit check, which broke out the free, reduced and paid meals, along with adult meals and extra entrees sold every day. The counts were then entered into the software. Parameters within the software were not set up properly and the software was counting extra entrees into the paid category. Claiming extra entrees will result in fiscal action.

- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Thank you to the food service staff at All Saints Catholic and Taher, Inc for your communication and sending in requested materials before the on-site review. This expedited the review process and left more time for technical assistance. The meal service operation was executed flawlessly; the components were well-labeled and attractively presented. The food service staff has an excellent grasp of Offer versus Serve and ensures all students selected a reimbursable meal.

### **Comments/Technical Assistance/Compliance Reminders**

As a reminder, it is required for students to have access to ½ cup of legume vegetables throughout each week. Based on the monthly menus, this requirement is sometimes satisfied with a hot vegetable (refried beans) and sometimes provided on the garden bar (garbanzo beans, black beans). During the week of review, the only legume menued was black beans on the garden bar. On the production record, both ½ cup and ¼ was listed as the measure. Please ensure in the future that students have ample opportunity to select ½ of legumes.

During the Administrative Review of All Saints Catholic (South Campus) it was not deemed necessary to conduct a weighted nutrient analysis of one week of lunch menus. In a nutrient analysis, the Public Health Nutritionist would determine if the average lunch meal was between 600-650 calories, less than 10% of the calories were from saturated fat, the average meal was less than 1,230 mg of sodium and no trans fat were present. Based on the frequency of extra food items such as kettle chips, grain-based desserts and the frequency of starchy vegetables such as potato wedges and French fries, it is likely that calories would exceed the maximum allotment of 650 calories and saturated fat would exceed 10% of total calories. While no corrective action will

be assigned, our School Nutrition Team encourages the Taher employers and menu planners to decrease the frequency of these non-nutrient rich items.

The monthly menu lists the milk varieties offered at the bottom of the page and there appears to be a typo: "Milk Choice of 1% *White Skim* or Chocolate Skim". During meal service, 1% unflavored milk and fat-free flavored milk were offered. Please remove the word "skim" when describing the 1% White milk for all future menus. Thank you.

### 3. RESOURCE MANAGEMENT

#### **Nonprofit School Food Service Account**

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit School Food Service Account. Documentation was provided to support the comprehensive review and everything matched.

#### FSMC

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

#### Unpaid Meal Charge Policy

- SFA had an unpaid meal charge policy on file and was actively using it.
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

#### **Paid Lunch Equity**

SFA submitted and completed the PLE tool for the 2018-2019 SY.

#### **Revenue from Nonprogram Foods**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

### **Indirect Costs**

SFA was not charging any indirect costs to the food service account.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

SFA was following USDA civil rights regulations.

### **On-site Monitoring**

SFA completed on-site monitoring for the 2018-2019 SY.

### **Local Wellness Policy**

SFA had a local wellness policy on file that was being utilized.

### **Smart Snacks**

Per the Authorized Rep and Food Service Director, there are no food sales at the SFA. No food or beverage sales take place outside the school meal. If this should change and the school would like to partake in fundraisers during the school day, please reach out to School Nutrition Team staff for guidance.

### **Professional Standards**

Professional standards requirements were being met. Multiple trackers were being used to track the training hours instead of a central tracker. The document listed the required hours needed, training received and duration of the training.

### **Water**

Water was available for breakfast and lunch.

### **Food Safety**

SFA was actively using the food safety plan and had the appropriate SOPs on file. Food safety inspections were on file.

### **Buy American**

See corrective action.

### **Reporting and Recordkeeping**

Records kept on file for 3 years plus the current.

### **Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Butternut

School District USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months.

Resources:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)

## 5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA

### Corrective Action Needed

#### 1. MEAL ACCESS AND REIMBURSEMENT

##### Findings and Corrective Action Needed: Counting and Claiming

**Finding #1:** Extra entrees were being claiming under the paid category.

**Corrective Action Needed #1:** Since the claim preparer kept an excellent record of the number of extra entrees served, it was easy to see how many extra entrees were being claimed. Please send the Nutrition Program Consultant the documentation with the extra entrée counts on it every day from September 2018-December 2018; fiscal action will be applied on the extra entrees claimed during this time frame.

#### 2. MEAL PATTERN AND NUTRITIONAL QUALITY

##### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

**Finding #2:** During meal observation, 5 non-reimbursable meals went past the point of service. This was related to less than ½ cup fruit or vegetable being on the student tray. The assistant to the head cook was unclear of the portion size of fresh fruits and vegetables needed to total to ½ cup.

**Corrective Action Needed #2:** After on-site technical assistance was given there were no further mistakes regarding reimbursable meals. By signing this report, you agree to verbally confirm portion sizes needed of fruit and vegetables from the salad bar before meal service begins.

**Finding #3:** Students ages 3 and 4 are not co-mingled with the K-8<sup>th</sup> graders, yet are not fully following the Child and Adult Care Food Program (CACFP) meal pattern. USDA recently revised the CACFP meal pattern to include a greater variety of vegetables of fruit, more whole grains, and less added sugar.

**Corrective Action Needed #3:** Please provide a detailed statement of how All Saint Catholic will proceed with serving students who are not yet in Kindergarten. The two options include (1) Co-mingling with Pre-K students with K-8 graders and serving the Pre-K students those

portion sizes. The Pre-K students would be able to participate in OVS by going through the lunch line and have access to flavored milk.

### 3. RESOURCE MANAGEMENT

#### ***Findings and Corrective Action Needed: Annual Financial Report***

**Finding #4:** Annual Financial Report does not have food, equipment purchased services and other cost associated nonprogram foods and the SFA sells adult meals, cold lunch milk and extra entrees.

**Corrective Action Needed #4:** Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a [resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

#### ***Findings and Corrective Action Needed: Nonprogram Foods***

**Finding #5:** The SFA was selling extra entrees to students, which is a nonprogram food. The Nonprogram Foods Revenue Tool has not been completed for the current school year.

**Corrective Action Needed #5:** Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for All Saints Catholic School using a 5-day reference period ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)).

### 4. GENERAL PROGRAM COMPLIANCE

#### **Findings and Corrective Action Needed: Buy American Provision**

**❑ Finding #6: There are non-domestic food products in inventory.** Under the Buy American Provision, it is required that schools purchase domestic products to the maximum extent practicable. For example, the fresh pineapple is a product of Costa Rica, the mandarin oranges are a product of China, the Olive Oil is a product of Greece, and the spices do not list a country of origin.

**Corrective Action Needed #6:** It is understood that not all commodities can be produced and purchased in the USA. When it is not practicable to purchase domestically, please complete the Buy American Noncompliant List and keep on file. **Please submit three instances of your choice documenting food items produced outside the USA.**

### 5. OTHER FEDERAL PROGRAMS REVIEWS-(NOT APPLICABLE TO SFA)

The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

