

Administrative Review Report

St. Joseph Catholic School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/19/2019	03/25/2019
On-Site Review	04/08/2019	04/09/2019
Site Selection Worksheet	02/19/2019	02/19/2019
Entrance Conference	04/08/2019	04/08/2019
Exit Conference	04/09/2019	04/09/2019

Commendations:

Thank you to the staff at St. Joseph's Catholic School for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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.

Staff at the St. Joseph's Catholic School have a great attitude and genuinely care for the wellbeing of all students. The DPI review team appreciates staff's willingness to make alterations to meet school meals program regulations. The DPI review team is confident that St. Joseph's Catholic School will continue to improve their knowledge and operation of school meal programs.

Recommendations:

- 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 at a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, 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).
- 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- Wisconsin Team Nutrition is hosting a *Teaming Up to Increase Participation* workshop on June 19, 2019 at Chula Vista Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) webpage (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

Findings and Corrective Action

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700

Administrative Review Report

St. Joseph Catholic School

Corrective Action History	<p>Finding: There is no Unpaid Meal Charge Policy in place at the SFA.</p> <p>CA: Please submit a draft policy and a timeline of when it will be implemented at St. Joseph's School. Please reference the Unpaid Meal Charge Policy "In A Nutshell" for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf).</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	705
Corrective Action History	<p>Finding: The food service director (FSD) currently has no role in the resource management of the school meals programs. Being the FSD, she must have access to any and all information needed in all areas of the program operations in order to maintain financial integrity and nutritional quality of the programs.</p> <p>CA: Please submit written procedures that include the specific role(s) the FSD will play going forward with regard to resource management.</p>
Form Name	Paid Lunch Equity (706 - 708)
Question #	706
Corrective Action History	<p>Finding: The adult meal prices at St. Joseph's School are below the requirement. The adult meal price is determined based on reimbursement and the highest paid student lunch price. Please reference the adult meal price requirements on the Financial Management webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).</p> <p>CA: Please submit what the adult meal price will be starting school year 2019-20 so that it is in line with regulations. Please submit a detailed explanation of how this price was determined.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
Corrective Action History	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p>CA: Provide a draft SFSP outreach poster. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Form Name	Meal Counting and Claiming (314 - 316)
Question #	314
Corrective Action History	<p>Finding: Field Trip meals are currently taken prior to students leaving campus for a field trip. Meal counts on or off the school's campus are to be take at the point of sale (i.e. as meals are taken by students).</p> <p>CA: Please submit a statement explaining how meals will be taken during meal service for field trips.</p>
Form Name	Civil Rights (809 - 810)
Question #	810

Administrative Review Report

St. Joseph Catholic School

Corrective Action History	<p>Finding: There are currently no Civil Rights complaint procedures in place at the SFA.</p> <p>CA: Please upload draft procedures into SNACS.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1212
Corrective Action History	<p>Finding: The food service director (FSD) did not complete 8 hours of food safety training prior to her hire as the FSD after July 1, 2015.</p> <p>CA: Please complete 8 hours of food safety training within 30 days of the receipt of this report and upload supporting documentation into SNACS.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1214
Corrective Action History	<p>Finding: The School Nutrition Program Director and food service staff member did not complete the Professional Standards training hour requirements and did not complete Professional Standards training trackers (7 CFR 210.30).</p> <p>CA: Provide a training plan for how the training hours will be met for the current school year and submit completed training trackers for the director and staff member.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action History	<p>Finding: The SFA did not have a Standard Operating Procedure (SOP) for Field Trip meals.</p> <p>CA: Upload a draft SOP into SNACS. A template for this SOP may be found on DPI SNT's food safety webpage (https://dpi.wi.gov/school-nutrition/food-safety) and this SOP should be approved by the SFA's food safety inspector</p>
Form Name	Reporting and Recordkeeping (1500 - 1501)
Question #	1501
Corrective Action History	<p>Finding: SFA is not maintaining household notification letters for free/reduced meal price applications or Verification.</p> <p>CA: Provide a statement of how you will meet the record retention requirement moving forward.</p>
Site Name	St. Joseph School
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
Corrective Action History	<p>Finding: The point of service (POS) for field trip meals may not result in accurate meal counts. Currently, counts are taken in the classroom prior to leaving on the field trip. Meal counts must be taken as students take their meals during the field trip.</p> <p>CA: Discontinue this counting method and submit a statement explaining how student meals will be recorded during the field trips going forward. Upload this statement into SNACS.</p>
Site Name	St. Joseph School

Administrative Review Report

St. Joseph Catholic School

Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	409
Corrective Action History	<p>Finding: Production records frequently listed the incorrect crediting for many vegetables, did not provide enough information for each menu item (e.g., were cheese, carrots, tomatoes, eggs etc served whole, quartered, diced, or shredded?), and daily milk usage by milk type was not recorded.</p> <p>CA: Please send a week of completed production records, making sure to include the above mentioned information. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p> <hr/> <p>Finding: Additional training required for crediting grains and meat/meat alternates towards the meal pattern.</p> <p>CA: Please have staff involved with planning menus and crediting watch the following webcasts. Submit a log that states the name of the webcast, the date it was viewed and include the signatures of the people who attended. You may count the minutes towards professional standards training requirements.</p> <ul style="list-style-type: none"> • Grains (21 minutes) • Meat/Meat Alternate (20 minutes)
Site Name	St. Joseph School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	<p>Finding: The following meal pattern violations were identified during the week of review.</p> <ul style="list-style-type: none"> • Missing vegetable subgroup: beans/peas/legumes. None were offered the week of review. • Missing grain component on Monday, March 4th. No grains were planned/offered on the menu. • Weekly grain shortage for the week of review. It is required that 8 oz eq of grain be offered and only 7 oz eq of grain were available for students that week. • Not all grains were whole grain-rich. During school year 2018-19 it was required that all grains be whole grain-rich. The muffin that was used in the egg, muffin sandwich was not whole grain-rich. <p>The missing vegetable subgroup and weekly grain shortages are repeat findings. This means that in the previous administrative review these findings were also found. Repeat findings require Fiscal Action.</p>

CA: Submit a statement how the abovementioned violations will be fixed, including:

- What beans/peas/legumes could you offer? What serving size is required each week? The lunch meal pattern says how many beans/peas/legumes you must offer. Green beans and green peas are **not** a part of the beans/peas/legumes subgroup. Please review the vegetable subgroup handout carefully.
- If you serve the ham and scalloped potatoes dish, what grain could you offer with it? Be sure it's at least 1 oz eq grain.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the National School Lunch Program and School Breakfast Program meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

Administrative Review Report

St. Joseph Catholic School

Site Name	St. Joseph School
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	411
Corrective Action History	<p>Finding: The printed menu did not consistently list all components included with the reimbursable meal.</p> <p>CA: Submit a copy of an updated menu that includes all the required components.</p>
Site Name	St. Joseph School
Form Name	Offer vs Serve (500-502)
Question #	500
Corrective Action History	<p>Finding: Additional Offer versus Serve (OVS) training needed.</p> <p>CA: Have staff responsible for determining reimbursable meals watch the following webcasts on Offer vs. Serve and the lunch meal pattern.</p> <ul style="list-style-type: none"> • Offer vs. Serve (30 min) • Offer vs. Serve game (30 min) • Lunch meal pattern (15 min) <p>Please submit details regarding when and where the training was held, the name of the webcasts watched and the printed name and signatures of those in attendance for each webcast.</p>
Site Name	St. Joseph School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1404
Corrective Action History	<p>Finding: A kitchen use policy is currently in place, but not enforced. To ensure food safety for the children and adults served in the USDA School Meals Programs at St. Joseph' School, the enforcement of the kitchen use policy has been deemed necessary by staff and the review team. Especially considering that the kitchen is used by outside groups, not just the food service team.</p> <p>CA: Please submit an explanation of how this policy will be enforced going forward to <u>safeguard your students and adult meals.</u></p>
Site Name	St. Joseph School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1410
Corrective Action History	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: mandarin oranges (China) and Chicken of the Sea canned tuna (Thailand).</p> <p>CA: Complete and submit a non-compliant product sheet for the products below:</p> <ul style="list-style-type: none"> • Mandarin oranges – China • Canned tuna, Chicken of the Sea - Thailand

Technical Assistance

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
---------	----------	------------	---------	------	-------------

Administrative Review Report

St. Joseph Catholic School

Comments

Summer Food Service Program Outreach

A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- 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>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food webpage](http://www.fns.usda.gov/summerfoodrocks) (<http://www.fns.usda.gov/summerfoodrocks>)

To access an inclusive map of all potential participating sites in your area, see the interactive map on the [SFSP website](http://www.fns.usda.gov/capacitybuilder) (<http://www.fns.usda.gov/capacitybuilder>).

For more information on Summer Feeding option contact: Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

04/09/2019	464	1004	Administrative Review	ALL	School Secretary			
------------	-----	------	-----------------------	-----	------------------	--	--	--

Comments

Local Wellness Policy

SFAs are required to develop a Local Wellness Policy (LWP) that is reviewed annually and assessed on a triennial basis using the [WellSAT](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). The LWP must be publicly available and potential stakeholders and committee members must be made aware of the opportunity to be involved in the LWP revisions. Any and all members of the community are able to participate. This includes teachers, students, staff, parents, and any other community members.

04/09/2019	463	305	Administrative Review	ALL	FSD			
------------	-----	-----	-----------------------	-----	-----	--	--	--

Comments

Counting and Claiming

Children attending school that are visiting the district may be counted and claimed for reimbursement. The student would need to pay for his or her meal and claimed in the paid category, unless F/R documentation is provided by the visiting student's school. In which case, St. Joseph's School could claim the student in his or her respective eligibility category.

04/09/2019	524	1410	Administrative Review	St. Joseph School	Secretary			
------------	-----	------	-----------------------	-------------------	-----------	--	--	--

Comments

Buy American Provision

The Buy American provision was added to the National School Lunch Act (NSLA) by Section 104(d) of the William F. Goodling Child Nutrition Reauthorization Act of 1998 (Public Law 105-336). Section 12(n) to the NSLA (42 USC 1760(n)), requiring school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product.

A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States.

"Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

Administrative Review Report

St. Joseph Catholic School

Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

The following information must be recorded on a Buy American Non-Compliant Product List. *Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - i. *Ex. Blueberries are not available domestically during the months of December – June.*
 - c. **Availability** – Product(s) is not available to purchase domestically.
 - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f. **Other**- Please provide a written explanation.
 - i. *Ex. The SFA received a donation of non-domestic oranges*
 - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Administrative Review Report

St. Joseph Catholic School

04/09/2019	523	1104	Administrative Review	St. Joseph School				
Comments								
Smart Snacks								
At the time of the on-site review there were no competitive foods or beverages sold. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).								
04/09/2019	522	400	Administrative Review	St. Joseph School				
Comments								
Preschool Students								
St. Joseph Catholic School is serving meals to preschoolers and K-8 students in the same service area at the same time. These students are considered comingled. St. Joseph Catholic School is using the USDA comingling flexibility and is serving the K-8 meal pattern for all students.								
04/09/2019	521	500	Administrative Review	St. Joseph School				
Comments								
Offer versus Serve								
Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. During lunch observation many students selecting a ½ cup strawberry cup were also required to take the steamed broccoli. Students need only to have a ½ cup of fruit or vegetable (or combination of fruit of vegetable) on their tray, along with two other full components to be a reimbursable meal. That said, it is still appropriate to encourage students to take more fruits and vegetables if they wish.								
In summary, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal at lunch. From these offering, students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.								
The Offer Versus Serve Guidance manual and the Offer Versus Serve Webcast can be used as training resources (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs; https://dpi.wi.gov/school-nutrition/training/webcasts).								
04/09/2019	520		Administrative Review	St. Joseph School				
Comments								
Training								
The Wisconsin Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Courses such as Meal Pattern, Crediting, Standardized Recipes and Offer versus Serve (OVS) are recommended for lead workers and menu planners. Information, including dates and locations, will be posted on the SNT Training webpage as they are scheduled. Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's SNT Webcasts webpage (http://dpi.wi.gov/school-nutrition/training; https://dpi.wi.gov/school-nutrition/training/webcasts).								
04/09/2019	519	411	Administrative Review	St. Joseph School				

Administrative Review Report

St. Joseph Catholic School

Comments

Vegetable Subgroups

The crediting of vegetables on production records were frequently incorrect. Refer to the [Vegetable Subgroups handout](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) from the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage to identify commonly eaten vegetables in each subgroup (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

04/09/2019

518

Administrative
Review

St. Joseph
School

Comments

Salad Bar

Produce on a garden bar can credit toward the meal pattern each day that it is offered to students (e.g., if black beans are offered daily with a planned serving size of 1/8 cup, then 5/8 cup has been offered in total each week and meets the minimum 1/2 cup requirement of beans/peas).

Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as 1/2 of the volume served.

Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) with pictures that can be posted on a salad or garden bar. This resource is found on our on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage at the bottom of the page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Additionally, add appropriate serving utensils for each item offered. Fruits and vegetables are credited by volume (cups), therefore please use spoodles, which are appropriate serving utensils (kitchen spoons do not measure a standardized volume and therefore are not appropriate utensils for use on the salad bar). Spoodles are also available with slots for food items that are served in juice or liquid.

Continue to document all foods served on the salad bar and update serving sizes to at least a 1/8 cup for fruits and vegetables. You may consider using one of DPI's production record templates available on the [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage, under the Other Resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

04/09/2019

517

409

Administrative
Review

St. Joseph
School

Comments

Production Records

Be specific on production records about the identity, brand, and description of the items served. Instead of "fruit cup", list the specific type(s) of fruit offered, along with the planned portion size(s). Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records. The production record should reflect substitutions, if any are made. A list of production record requirements ("[Must Haves and Nice to Haves](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records)") and sample production record templates can be found on our [Production Records](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Milk is a required component as part of the National School Lunch Program (NSLP). You must record daily usage by milk type on your production records (e.g., skim chocolate milk, 1 percent white milk).

Ensure each menu item is written on its own line. On March 6th, nachos and chips were listed on the same line. It was difficult for the reviewer to decipher the intended serving sizes of each menu item. When each menu item has its own line, it will be clear what was served, including the intended portion size for that menu item and the accompanying

Administrative Review Report

St. Joseph Catholic School

information regarding planned amounts and leftovers. All this information will help with forecasting the amount of food to prepare based on historical data.

If the menu item has a recipe (e.g., rotini with meat sauce), each ingredient in the recipe does not need to be written out on production records. For example, on March 7th, the sauce (which is mixed into the rotini with meat) is listed on its own line. However, because the recipe states to mix the sauce into the rotini and meat, it does not need to be included on production records. If you were to serve the sauce on the side, then you would need to include it on production records with the intended serving size, amount prepared and any leftovers.

04/09/2019	516	409	Administrative Review	St. Joseph School				
------------	-----	-----	-----------------------	-------------------	--	--	--	--

Comments

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes.

Recipes should be standardized to your kitchen to reflect the products and practices that are used in your kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

For more recipe ideas, refer to [USDA's What's Cooking? Recipes](https://whatscooking.fns.usda.gov/) that include nutritional and crediting information. They are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes. Note: even though USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation. (<https://whatscooking.fns.usda.gov/>).

We also encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

The following recipes were either missing or not standardized to your kitchen. Please create and/or update the recipes in use:

- Ham scalloped potato recipe
- Egg, sausage, cheese muffin sandwich
- Nacho cheese sauce with beef
- Rotini with meat
- Tuna subs

04/09/2019	515	409	Administrative Review	St. Joseph School				
------------	-----	-----	-----------------------	-------------------	--	--	--	--

Comments

Crediting/ Food Buying Guide

SFAs are required to document how foods offered credit towards weekly meal pattern requirements.

The [USDA Food Buying Guide for Child Nutrition Programs](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the

Administrative Review Report

St. Joseph Catholic School

one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product. Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). **If the product is not listed in the FBG, additional crediting documentation is required.** (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).

Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).

If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs.

Additionally, remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

04/09/2019	514	409	Administrative Review	St. Joseph School				
------------	-----	-----	-----------------------	-------------------	--	--	--	--

Comments

Week of Review (March 4-8, 2019)

March 4-8, 2019 was chosen as the week of review. Reviewer was unable to determine meal pattern compliance due to missing and/or incomplete crediting documentation, including multiple standardized recipes.

04/09/2019	513	411	Administrative Review	St. Joseph School				
------------	-----	-----	-----------------------	-------------------	--	--	--	--

Comments

Printed Menu

The printed menu should list all components included with the reimbursable meal. Students and families must know that fruit, vegetables, grains, meat/meat alternates and milk are offered every day. A few days did not list all of the required components. For example, Monday, March 4 did not list a grain; Tuesday, March 8th did not list a vegetable; Friday, March 15th says "Cooks Choice" which did not list any of the components offered; and Tuesday, March 26th did not list a grain. Although, there is a statement at the bottom of the menu that states, "all meals include salad bar, fruit and milk" additional information in the calendar of menu items itself will be helpful to those referencing the menu for school meals.

04/09/2019	512	409	Administrative Review	St. Joseph School				
------------	-----	-----	-----------------------	-------------------	--	--	--	--

Comments

Field trip lunches

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a

Administrative Review Report

St. Joseph Catholic School

<p>way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the Meals on Field Trips overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).</p>								
04/09/2019	456	803	Administrative Review	ALL	School Secretary			
Comments								
<p>Direct Certification DC runs are to be completed at or prior to the beginning of the school year, three months after the initial run, and then six months after the initial run. If the third run is not completed near April 1, a fourth run close to or on April 1 must be completed.</p> <p>DC runs must be maintained on file at the SFA. These runs expire after 14 days, therefore, retaining them electronically or as a hard copy is required.</p>								
04/09/2019	448	130	Administrative Review	ALL	School Secretary			
Comments								
<p>Free and Reduced Price Meal Applications The household notification letters must be sent to households in writing if there is a denial of benefits. For approved benefits, written or verbal notification is sufficient. Household notification letters also must be maintained on file. Consider scanning handwritten copies or completing the letters electronically.</p> <p>Incomes on free and reduced price meal applications should not be annualized on an application if there is one income frequency (e.g. three incomes are all bi-weekly). The incomes would simply be added together and reported on the backside of the application as bi-weekly.</p>								
04/09/2019	447	128	Administrative Review	ALL	School Secretary			
Comments								
<p>Record Retention All records must be maintained for the required three years plus the current school year.</p>								
04/08/2019	539	810	Administrative Review	ALL	Secretary			
Comments								
<p>Special Dietary Needs School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable.</p> <p>All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.</p>								
04/08/2019	538	810	Administrative Review	ALL	Secretary			

Administrative Review Report

St. Joseph Catholic School

Comments

Civil Rights

Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.

The non-discrimination statement is required on any communication with the public regarding the USDA School Meals Programs (e.g. notification letters, menus, unpaid meal charge policy, etc.). The SFA may use the shortened or [full-length statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). The shortened statement is as follows: *This institution is an equal opportunity provider.*

Civil Rights Complaint Procedures

Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.

The SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

04/08/2019	537	700	Administrative Review	ALL	Secretary			
------------	-----	-----	-----------------------	-----	-----------	--	--	--

Comments

Allowable Expenses

Food service utilizes Scrips at nearby stores for food purchases. Scrips are beneficial for the school as they refund an amount of credit for shopping at a particular store. These refunds must be put back into food service, not the general school fund.

04/08/2019	536	700	Administrative Review	ALL	Secretary			
------------	-----	-----	-----------------------	-----	-----------	--	--	--

Comments

Student Debt

Bad Debt is when local officials determine further collection efforts for delinquent debt are useless or too costly. When this uncollectible debt becomes bad debt, it is written off as an operating loss. Food service funds may not be used to cover costs related to the bad debt. These losses must be restored using non-federal funds such as the school district's general fund, so a transfer must be made into the Nonprofit School Food Service Account to cover the loss. Once delinquent meal charges a

Delinquent debt is when payment is overdue and the debt is classified as delinquent as long as it is considered collectable and efforts are being made to collect it. A debt owed to the Nonprofit School Food Service Account remains on the accounting documents until it is either collected or is determined to be uncollectable and written off. The debt may be carried over from year to year.

04/08/2019	535	700	Administrative Review	ALL	School Secretary			
------------	-----	-----	-----------------------	-----	------------------	--	--	--

Comments

Annual Financial Report

The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from DPI's [Online Services webpage](http://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School Purchased Services Expenditure.

Administrative Review Report

St. Joseph Catholic School

04/08/2019	534	315	Administrative Review	ALL	School Secretary			
Comments								
Edit Checks								
Please consider utilizing the School Nutrition Team's edit check form (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc). While the review team is confident in current meal counting and claiming procedures, the current process has numerous steps and may be time-consuming for staff and be unsustainable for future staff.								
04/08/2019	529	215	Administrative Review	ALL	School Secretary			
Comments								
Verification:								
Please see the Verification Tracker Packet and Form on the School Nutrition Team's Verification webpage (dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms-packet-1819.docx).								
If meal benefits change due to the results of Verification, the SFA has no later than 3 days to increase a benefit (e.g. paid to free) and no later than 10 days to decrease a benefit (e.g. free to paid).								
The Verification process requires that the Confirmation Official (CO) and Verifying Official (VO) confirm and verify the application(s) and household income. Their signatures are only required during the Verification process and not during the initial approval and denial of free/reduced applications. The CO and VO cannot be the same individual.								
The annual Verification process is completed once the final "we have checked" letter is sent to the household. This letter must be dated and sent out no later than November 15.								
For Verification, there are "we must check" and "we have checked" notification letters sent to the households. These must be maintained on file at the SFA either electronically or a hard copy. The Verification process first requires the Verifying Official (VO) to pick the application(s) to verify. The Confirming Official (CO) then confirms the initial eligibility determination of the chosen application(s). The VO will then continue with the notification letters and income verification.								
03/28/2019	380	704	Administrative Review	ALL	FSD			
Comments								
Financial findings were in the previous Administrative Review. A comprehensive review of this area was required and has been completed. No further action is required.								