

Administrative Review Report

Nativity Jesuit Academy

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/25/2023	11/24/2023
On-Site Review	12/06/2023	12/07/2023
Site Selection Worksheet		
Entrance Conference	12/06/2023	12/06/2023
Exit Conference	12/07/2023	12/07/2023

Commendations:

From the whole DPI review team:

Our sincere thanks to the administration and school nutrition staff of Nativity Jesuit Academy. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. **For in-depth technical assistance, including program links see the 2023-24 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) (<https://dpi.wi.gov/school-nutrition/training>).

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/07/2023 10:01 AM</p>	<p>Finding: On the Annual Financial Report, total revenue does not appear to be accurate; it is more than the Aids Register (SFA has no nonprogram foods sales and is CEP SFA-wide). (7 CFR 210.19).</p> <p>Corrective Action 1: Review the Annual Financial Report webcast or manual on the DPI website. Correct the AFR revenue.</p> <p>Corrective Action 2: Upload a copy of the corrected AFR into SNACS or email to NPC for review. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2023 06:43 PM</p>	<p>Finding: The SFA is giving nonprogram foods (individual juice cups and individually wrapped cheese sticks that are extra/not used program food components from vended-meal SBP service) to an afterschool program at no charge and not separately tracking these nonprogram food expenses and revenues from program food expenditures and revenues.</p> <p>Corrective Action: Provide a plan on how nonprogram food revenue and expenditures will be tracked.</p>
Site Name		
Form Name	Indirect Costs (712)	
Question #	712	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	<p>Flagged 12/06/2023 06:48 PM</p>	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin (non-foodservice labor for school staff who operate POS and custodial time cleaning cafeteria and garbage collection). All costs charged to the nonprofit school food service account must be made into direct costs.</p> <p>Corrective Action: Identify the indirect charges to be converted into direct costs using 2-week time study and garbage bag count. Determine what the direct cost would be. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2022-23 through the Administrative Review. Any indirect costs that cannot be made into direct costs are unallowable and also need to be refunded. Upload a statement of understanding to SNACS and the determined amounts and journal entry of refunds, if applicable.</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 12/06/2023 07:00 PM</p>	<p>Finding: The SFA does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs.</p> <p>Corrective Action: Provide a timeline for when a Special Dietary Needs procedure will be put in place. Provide the name and title of the SFA representative that will ensure compliance. It is recommended that SFAs utilize the Special Dietary Needs Policy Template (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2023 06:56 PM</p>	<p>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).</p>

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		<p>Corrective Action: Provide the civil rights training to all staff that interact with program applicants (including online contract authorized representative, staff who operate POS and others who assist in the lunchroom). The training is located here: https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). Upload the sign in sheet with the names, signatures (including FSD) and date(s) the training was provided and include the PowerPoint used (or link) into SNACS.</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	<p>Flagged 12/05/2023 01:18 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (missing content: Public Involvement, School Meals, Food and Beverage Marketing, Triennial Assessment, Update/Inform the Public, USDA Nondiscrimination Statement) (7 CFR 210.31).</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1004	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/05/2023 01:18 PM</p>	<p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.</p> <p>Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2023 10:01 AM</p>	<p>Finding: The full non-discrimination statement is not included on all required program materials (insert full nondiscrimination statement into handbook in breakfast and lunch section where federal child nutrition program is mentioned).</p> <p>Corrective Action: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS or provided a timeline for when it will be brought into compliance.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2023 09:11 AM</p>	<p>Finding: The Food Service Director was hired after July 1, 2015, and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1)).</p> <p>Corrective Action 1: Review the Professional Standards Hiring Requirements on the School Nutrition Team website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-in-a-nutshell.pdf) and submit a statement of understanding of the hiring requirements for your SFA.</p> <p>Corrective Action 2: Complete the Professional Standards Exemption form that will be provided and submit to Karrie Isaacson at karrie.isaacson@dpi.wi.gov for review.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 12/06/2023 09:14 AM</p>	<p>Finding: The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v)). Certificate of food safety training (with a passed exam) not required for USDA but is required by WI Food Code. See the Food Safety page (https://dpi.wi.gov/school-nutrition/program-requirements/food-safety), specifically the Training section,</p>

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		for more information and list of accepted courses. Corrective Action: Complete 8 hours of food safety training and provide documentation of completion by the Corrective Action due date OR provide a plan of what course and when this will be completed as soon as possible (if cannot be completed by CA due date).
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/06/2023 09:34 AM	Finding: Non, school-nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties.
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 12/06/2023 04:42 PM	Finding: Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). The plan is missing a signed Employee Reporting Agreement for the FSD. Corrective Action: Have FSD complete and sign an Employee Reporting agreement, upload to SNACS and add to food safety plan.
Site Name	Nativity Jesuit Academy	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	411	
TA Log #	No TA Log# found	

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Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 12/06/2023 08:47 AM</p> <p>Finding: There were no starchy vegetables served during the week of review due to a menu substitution. A minimum of 1/2 cup starchy vegetables is required to be served weekly for K-8 students during the week.</p> <p>Corrective Action: Please submit a statement explaining what will happen in the future if a substitution occurs and the menu changes. Specifically, explain the communication that will occur between Nativity Jesuit and MCFI.</p>
Site Name	Nativity Jesuit Academy
Form Name	Offer vs Serve (500-502)
Question #	500
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 12/07/2023 07:48 AM</p> <p>Finding: Food service staff were unclear about the Serve requirements for lunch and breakfast. It is important for staff to understand the serve requirements and that there is no Offer Versus Serve being implemented if Nativity Jesuit intends to continue with a serve model.</p> <p>Corrective Action: Please submit a statement explaining how all staff at the POS (including MCFI server) will be trained to understand the serve model.</p>
Site Name	Nativity Jesuit Academy
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 12/06/2023 10:13 AM</p> <p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
Site Name	Nativity Jesuit Academy
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
TA Log #	No TA Log# found

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Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 12/07/2023 08:09 AM	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP's for serving and holding hot food (SOP#19 and SOP #17). Corrective Action: Modify the SOP so that it aligns with actual practices or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username
12/08/2023	3866	200	Administrative Review	ALL	FSD			

Comments

Verification Collection Report (VCR)

All SFAs are required to complete the VCR, whether verification was required or not. SFAs that are CEP district-wide are still required to submit this report. The report is due by February 1 of every year. The report collects information on student eligibility determinations and the outcome of the verification process. The Verification Collection Report (opens in a new tab) can be filled out once the verification process is completed. The VCR is submitted electronically through Online Services and will time out if the left idle for 15 minutes. We strongly recommend completing a paper copy of the VCR before submitting online. Many SFAs have software that will also assist with completing the VCR. There are detailed instructions available to walk you through each section of the report. All these resources are located on the School Nutrition Verification Webpage. All information collected is reported to USDA as part of our state agency reporting requirements.

12/8/2023 9:16:52 AM

12/07/2023	3855		Administrative Review		FSD			
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Comments

Around the World in 80 Trays

Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays. Take the pledge and use the week of January 16-20, 2023, to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students. Visit the Around the World in 80 Trays webpage (<https://dpi.wi.gov/school-nutrition/programs/national-school-lunch/around-the-world-in-80-trays>) for event information. Document the event (pictures, video, sound clips, etc.) and send to DPIFNS@dpi.wi.gov so we can share your success!

12/7/2023 9:03:27 AM

12/06/2023	3858		Administrative Review		FSD			
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Comments							
<p>Portion Size Portion sizes served must be full, level scoops in standardized measuring utensils. The pears and potatoes both had inconsistent serving sizes at lunch. Ensure that all students are receiving the same portion sizes for all fruits and vegetables.</p> <p style="text-align: right;">12/7/2023 9:23:21 AM</p>							
12/06/2023	3846		Administrative Review		FSD		
Comments							
<p>Insufficient Amount of Some Lunch Components At lunch service, the kitchen ran out of potatoes with 16 students left in line. This creates an insufficiency in offering all required meal components for reimbursable meals and could create civil rights complaints. Communication to the food vendor must ensure that running out of food does not happen during meal service.</p> <p style="text-align: right;">12/7/2023 8:00:45 AM</p>							

Hiring Requirements New Food Service Directors

Effective July 1, 2015, SFAs with enrollments of 2499 or less, new FSDs must have: High school diploma (or GED) and three (3) years of relevant food service experience.

For SFAs with an enrollment of 500 or less, the Wisconsin DPI allows a minimum of one year of relevant food service experience with this option.

State of Wisconsin DATCP [Food Manager Food Safety Certification Requirements](#)

Most licensed food establishments must have at least one manager or operator certified in food protection practices. Certification is required for most food establishments, but not all. Only DATCP establishments that engage in retail food activities are required to have a certified food protection manager. To meet regulatory requirements, required personnel must post the exam certificate, taken within the past 5 years, in public view and available for review by inspection staff. See [DATCP Food Safety Course Directory](#) for a listing of accepted courses and [Q&A for Schools](#) for more information.

Supply Chain Assistance (SCA) Funds

SCA funds are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs. The USDA [Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers](#) includes detailed information on allowable ways to utilize these funds. USDA's intent is that these funds will be used as quickly as practicable to alleviate supply chain challenges and price increases.

Once the funds are deposited into the nonprofit school food service account (Fund 50), the SFA should implement a plan and timeline for spending the funds.

- If you contract with a FSMC/Vendor/another SFA and are charged a fixed per-meal price that includes milk, request the price per carton of milk. Apply this to the number of meals invoiced each month. This information may be provided through a communication such as a letter or email from your contractor.
- Only milk served as part of a reimbursable meal under the NSLP, SBP, and ASP can be paid for using SCA funds. Milk purchased for the Special Milk Program, Wisconsin School Day Milk Program, or any other program, may not be purchased using SCA funds.
- Track monthly milk charges. The DPI SNT offers a [Spreadsheet template](#). Continue to add milk costs to the spreadsheet until your SFA has spent the full amount of SCA funds received.

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- Maintain this documentation for three years plus the current school year, as it may be reviewed as part of a future Administrative Review.
- If milk alone is insufficient or you would like to include more items, we suggest looking at the cost of fruits and vegetables.
- Documentation must be for invoices paid after the SCA funds are received. SCA funds cannot be spent before they are received.