

Administrative Review Report

St. Joan Antida High School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/28/2022	02/27/2023
On-Site Review	02/27/2023	03/01/2023
Site Selection Worksheet	12/28/2022	12/28/2022
Entrance Conference	02/27/2023	02/27/2023
Exit Conference	02/27/2023	02/27/2023

Commendations:

Thank you for working on the offsite questionnaire and uploading documents to SNACS in advance. We appreciate your availability for conversations while State Agency staff were onsite. School staff were very welcoming, willing to answer questions, and displayed interest in promoting their school meal programs.

Recommendations:

No Recommendations found for this review.

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Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 02:54 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The funds are not being tracked.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent. It is recommended the SFA use DPI SNT Supply Chain Assistance Funds Expense Tracker. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/sca-funds-expense-tracker.xlsx)</p> <p>Finding 2: On the Annual Financial Report, labor expenses were not broken out by program (7 CFR 210.19). CA 2: Review the Annual Financial Report webcast (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story.html) or manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-manual.pdf) on the DPI website then update the 2021-22 Annual Financial Report with labor expenses broken out by program. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/20/2023 08:19 AM</p>	<p>Finding: The CEP Public Release (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.docx) was not distributed at the beginning of the school year. Corrective Action: Provide a statement of understanding that the CEP Public Release will be distributed at the beginning of the school year annually.</p>
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	<p>Flagged 03/01/2023 09:57 AM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc) was not completed by October 31.</p> <p>CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/24/2023 08:22 AM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (policy leadership, foods sold outside of the meal programs, triennial assessment, and update/inform the public). (7 CFR 210.31).</p> <p>CA: 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. Refer to the local wellness policy checklist. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf)</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 10:45 AM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WELLSAT scores into SNACs or provide a link to this document on the district website. Refer to the local wellness policy webpage for resources (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy).</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 11:02 AM</p>	<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA (https://pstrainingtracker.fns.usda.gov/) or DPI (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) professional standards training tracking tool and upload into SNACs.</p>
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	<p>Flagged 02/28/2023 11:03 AM</p>	<p>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).</p> <p>CA: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	

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Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 03:24 PM</p>	<p>Finding: Employee Reporting Agreements are required for all people who work in the food service. There were not signed employee health reporting agreements on file for the lunch servers. Corrective Action: Please read and sign the form. Upload the signed forms into SNACS.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 03:21 PM</p>	<p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).</p> <p>Finding: The following products were identified in the SFA's storage area as non-domestic/not containing a Country of Origin label (COOL) and not documented:</p> <ul style="list-style-type: none"> -Grape tomatoes (Mexico) -Bananas (Costa Rica) -Jones Chicken Sausage Patty (no COOL) -Salisbury Steak (no COOL) -Goldfish (no COOL) -Bush's vegetarian beans (no COOL) <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products. Noncompliant Product List templates can be found on the Buy American webpage. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier.</p>
Site Name	Saint Joan Antida High School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2023 09:46 AM</p>	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). On the day of onsite observation, incomplete meals were observed being claimed and are not eligible for reimbursement. CA: Discontinue claiming ineligible meals. Fiscal action will be calculated on the number of ineligible meals observed on the day of review.</p>
Site Name	Saint Joan Antida High School	

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Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	322	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/28/2023 11:42 AM</p>	<p>Finding: SFA did 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. The SFA is not completing monthly edit checks for each school prior to claim submission. Corrective Action: Upload monthly edit checks for lunch for September thru February into SNACS. Fiscal action will be calculated if meal counting and claiming errors are identified. It is recommended that the SFA use the DPI SNT CEP edit check (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx).</p>
Site Name	Saint Joan Antida High School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/08/2023 09:14 AM</p>	<p>Finding: Three non-reimbursable meals were observed at breakfast and two non-reimbursable meals were observed at lunch. For breakfast, the meals had 1 oz eq of grain (1 food item) and 1/2 cup of fruit (1 food item) and were therefore short of the required three food items needed for a reimbursable breakfast. For lunch, the meals only had two full components rather than the required three full components needed for a reimbursable lunch. Please note that if students leave the line without a reimbursable meal, even if asked by the server to take an additional item, that meal cannot be claimed for reimbursement.</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full components at lunch/three food items at breakfast, one of which is 1/2 cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future.</p> <p>All staff responsible for determining reimbursable meals should complete the breakfast and lunch meal pattern trainings in the School Nutrition Team Online Learning Library. Certificates of completion should be uploaded in to SNACS. It is also recommended that the servers provided by the vendor receive additional training on meal pattern requirements.</p>
Site Name	Saint Joan Antida High School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	432	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/10/2023 12:51 PM</p>	<p>Finding: The production records/transport sheets provided for the week of review were not completed with all of the necessary information to fulfill all production record requirements. Any items added for service that were not originally on the planned menu for the day must be added to the production record and include all required information. Additionally, only one milk type was documented on the production records at breakfast</p>

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		<p>despite the fact that two milk types are offered daily at breakfast and lunch. As a reminder, actual milk usage must be documented for breakfast and lunch daily. Finally, leftovers were not documented consistently; this is required information and should be documented for each item. The transport sheets requirement list can be found on our website: dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/transport-sheet-requirements.pdf</p> <p>Corrective Action: Submit one full week of completed production records/transport sheets that fulfill all production record requirements. Choose a 5-day week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Saint Joan Antida High School	
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/10/2023 12:38 PM</p>	<p>Finding: Food service staff were unclear about the Offer versus Serve (OVS) requirements for breakfast and lunch. It is important that these requirements are understood to ensure that students are selecting reimbursable meals. OVS resources on WI DPI's Menu Planning webpage may be used as training resources. The Meal Pattern e-learning resources may also be helpful.</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals complete training on OVS. Please upload certificates of completion for each staff member. Alternatively, if a group training is conducted, submit details regarding when and where the training was held, who attended, and how the training was conducted. It is also recommended that the servers provided by the vendor receive additional training on OVS.</p>
Site Name	Saint Joan Antida High 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 02/28/2023 03:05 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: 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>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/01/2023	3027		Administrative Review		FSD			
Comments								
							Created By	Created Date
Vendor Meal Agreements: SFAs entered into a vended meals agreement should work collaboratively with their vendor. SFAs are responsible in overseeing their vendor is meeting all regulations in the Child Nutrition Programs. SFAs can request menu modifications if students are not happy with their choices or low participation is noted on certain menu days. By maximizing student choices with offer versus serve (OVS) during								3/1/2023 10:11:02 AM

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lunch service, it is possible that less staff from the vendor is needed onsite.							
03/01/2023	3026		Administrative Review	FSD			
Comments				Created By	Created Date		
<p>Engaging students in the school meals by educating them on nutrition standards and portion size can lead to lifelong healthy eating habits. Additionally, it can help students understand how to build a reimbursable meal with offer versus serve. USDA Team Nutrition resources:</p> <ul style="list-style-type: none"> • MyPlate Guide to School Lunch (https://www.fns.usda.gov/tn/myplate-guide-school-lunch) • MyPlate Guide to School Breakfast (https://www.fns.usda.gov/tn/myplate-guide-school-breakfast) 					3/1/2023 10:05:14 AM		
03/01/2023	3025		Administrative Review	FSD			
Comments				Created By	Created Date		
<p>Excellent job promoting the SBP in the beginning of the school year. Best practice is to promote the SBP throughout the school year. For example, promote the SBP at the beginning of the second semester or quarterly. Consider strategies available on the SNT Marketing Your Program Webpage.</p>					3/1/2023 10:02:34 AM		
03/01/2023	3024		Administrative Review	FSD			
Comments				Created By	Created Date		
<p>Marketing is one of the key factors to success in your school meals program. It refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. At the most basic level, the goal of marketing is to match your products and services to the customers you aim to serve. When this happens, both your SFA and students benefit. The Marketing Your Program webpage (https://dpi.wi.gov/school-nutrition/marketing) has several great resources, including:</p> <ul style="list-style-type: none"> • Customer Experience Handout (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/customer-experience-handout.pdf) • High School Student Survey (https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/files/lunch-high-school-student-survey.docx) 					3/1/2023 10:01:34 AM		
02/28/2023	3021	805	Administrative Review	ALL	FSD		
Comments				Created By	Created Date		
<p>All food substitutions made outside of the meal pattern must be supported by a signed medical statement from a licensed medical professional and include the child's physical or mental impairment and how it restricts the child's diet; accommodations needed; foods to omit and recommended alternatives. Additionally, a student's individual education plan (IEP) that addresses special dietary needs should be accepted. Food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations. (7 CFR 210.10(m)(1) and 7 CFR 210.10(m)(2)). It is recommended that the SFA utilize the Special Dietary Needs Example Policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx)</p>					2/28/2023 3:18:42 PM		
02/28/2023	3020		Administrative Review	FSD			
Comments				Created By	Created Date		
<p>Professional standard annual training requirements can be met several ways: 1. The DPI School Nutrition Team will host two live summer training courses and one virtual option. It is recommended that the FSD attends one of these training opportunities and bring staff as applicable. Additionally, the Wisconsin School Nutrition Association (WI- SNA) hosts a summer and fall conference annually. The non-profit food service account can be used to pay for foodservice staff to attend training opportunities and conferences. 2. DPI SNT has an online learning webpage (https://dpi.wi.gov/school-nutrition/training/online-learning) that includes several virtual learning opportunities.</p>					2/28/2023 3:03:18 PM		

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02/28/2023	3019	Administrative Review	FSD			
Comments						
			Created By	Created Date		
<p>National School Lunch Program (NSLP) resource management regulations at 7 CFR 210.14, 220.13(i) and OMB guidance under 2 CFR Part 200 indicate that SFAs must ensure funds support the operation and improvement of the school meals program(s) and that all expenses are allowable (i.e., necessary, reasonable, and allocable). Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by establishing requirements related to the revenue from the sale of nonprogram foods. Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:</p> <ul style="list-style-type: none"> · All revenue from the sale of nonprogram foods accrues to the non-profit school food service account; and · Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. Revenue from the nonprofit school food service account (Fund 50) cannot be used to support local initiatives, such as donating food, i.e., allowing staff to take leftovers. Food that is not part of a reimbursable meal is considered a nonprogram food. Leftover food that is discarded, becomes part of food cost/production cost of a given meal. Leftover food that is given away, becomes a nonprogram food. Non-program foods include any non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, leftovers, etc.) purchased using funds from the non-profit school food service account. All nonprogram foods costs (food, labor and other) must be recovered by the revenues received from the sale of the nonprogram foods. Leftovers from the NLSP or School Breakfast Program (SBP) can be sold to the staff as a nonprogram food. These leftovers would need to be included in the nonprogram foods revenue compliance calculation. Please see Nonprogram Foods Revenue Nutshell for more details. SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. When the SFA sells more non-program foods than adult meals and a la carte milk, the Non-program Food Revenue Tool must be completed annually. The Financial Management page of the SNT website has more resources on Allowable Costs, Budgeting and Cost Control, Nonprogram Foods and Unpaid Meal Charges. Please see the Financial Q&A for frequently asked financial questions. Lastly, leftovers in a school meal program may indicate poor forecasting and overproduction which is not an appropriate use of food service funds and taxpayer dollars. 					2/28/2023 2:59:53 PM	
02/28/2023	3018	Administrative Review	FSD			
Comments						
			Created By	Created Date		
<p>The non-profit food service account cannot have a net cash resource exceeding three months of operating expenses. Supply Chain Assistance (SCA) funds are included in the excess cash balance. A few ideas on how to spend down the excess cash balance include:</p> <ul style="list-style-type: none"> • Marketing to increase student participation. • Higher food quality items • Labor costs for food service-related tasks. Note, a time study will need to be completed annually to determine the labor costs for staff with shared responsibilities outside the food service department. It is recommended to use the DPI SNT Time Study Tool (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/time-study-tool.xlsx) • Food service equipment. Please refer to the preapproval equipment list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/Preapproved_Equipment_List_April_2022_WA.docx) and allowable costs section on the financial management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management). 					2/28/2023 2:58:23 PM	
02/28/2023	3124	Administrative Review	FSD			
Comments						
			Created By	Created Date		
<p>No competitive foods or beverages are sold at St. Joan Antida. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. Someone at the school must be responsible for documenting both exempt and compliant fundraisers as well as any other food/beverage sales. You can find fundraiser tracking tools and other resources on our Smart Snacks webpage (dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</p>					3/10/2023 2:02:33 PM	
02/28/2023	3123	Administrative Review	FSD			
Comments						
			Created By	Created Date		
<p>Currently, the majority of the student's lunches are pre-plated. During the on-site observation, students were asked if they wanted cheese, beans and were able to select a milk if they wanted. It is encouraged that students are provided additional opportunities to</p>					3/10/2023 2:00:01 PM	

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select/decline food items as possible. Some items, such as whole fruits, juice, pre-packed foods could easily be put out for self service (on the table after the serving line, but prior to the point of service). This would also likely decrease the labor needed to serve lunch. Currently there are three staff members from the vendor serving lunch in addition to the school staff operating the point of service.								
02/28/2023	3122		Administrative Review		FSD			
Comments								
					Created By	Created Date		
<ul style="list-style-type: none"> Although meals are purchased through a vended meals agreement, it is ultimately each SFA's responsibility to ensure all meal pattern requirements are met. This requirement is outlined under C.2 of the PI-6302 Vended Meals Agreement Template located on the Vended Meals Agreement webpage where the SFA agrees to have a trained SFA representative available at the delivery site to receive, inspect and sign for the requested number of meals. (dpi.wi.gov/school-nutrition/program-requirements/procurement/required-template-agreements/vended-meals) 						3/10/2023 1:55:49 PM		
02/28/2023	3118		Administrative Review		FSD			
Comments								
					Created By	Created Date		
The milk types on the printed menu do not accurately reflect the milk types offered at the school. The menu indicates skim white, low-fat white and skim chocolate. However, low-fat white is not available.						3/10/2023 1:04:20 PM		
02/28/2023	3117		Administrative Review		FSD			
Comments								
					Created By	Created Date		
No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and still meet the 50 percent juice limit, as long as it is offered along with fruit (fresh, frozen, dried, or canned). With this set up, students must not be able to select two juices. The juice limit is assessed separately for breakfast and lunch. To calculate the percentage of juice offered, first the total amount of juice available each day of the week is added together to get a weekly juice total. The weekly juice total is then divided by the total weekly fruit offering..						3/10/2023 1:03:15 PM		
02/28/2023	3116		Administrative Review		FSD			
Comments								
					Created By	Created Date		
Leftovers from one meal are being put out as an option at meals on other days. It is important to ensure that this practice does not affect compliance with meal pattern requirements. Most likely, if additional grain options that all credit the same are added as choices as breakfast, this should be acceptable. However, if making substitutions or additions with products that credit differently, it is encouraged to confirm with the menu planner that it is an acceptable change to the planned menu. For example, substituting juice in place of fruit could affect the weekly juice limit. It is also important to be mindful of whole grain-rich requirements, weekly minimums, vegetable subgroups, etc.						3/10/2023 12:57:55 PM		