

Administrative Review Report

St. Matthew's School

Commendations from the Public Health Nutritionist:

Thank you to all of the staff at St. Matthew's. Everyone was very accommodating and friendly during our administrative review. The pre-review process went smoothly as well. All documentation was presented to the PHN on time and in an organized manner. During meal service, you could tell that the nutrition staff really cares about the students, asking them how their weekend was and greeting them by name. It was a very great administrative review.

Commendations from the Nutrition Program Consultant:

Thank you to all the staff at St. Matthew's for being so accommodating and helpful during our administrative review. Appreciate all the time and effort put in by the Food Service Director and Authorized Representative for providing the requested documentation prior to our onsite visit. It was such a pleasure to watch lunch service and see how much the staff care about the students that attend St. Matthew's. Such a wonderful review.

Recommendations:

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 will offer [School Nutrition Summer Training](#) online and in person. Find more information on these training opportunities on the DPI School Nutrition Training Webpage.

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Findings and Corrective Action:

Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA's Unpaid Meal Charge Policy does not address how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have funds to purchase the meal at the time of meal service. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016)</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p>
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>Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). Non-program milk and adult meal expenses and revenues need to be split out from program costs.</p> <p>Corrective Action : Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. 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	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	777
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged

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Corrective Action History		<p>Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.</p> <p>Corrective Action: 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.</p>
Site Name		
Form Name	Indirect Costs (712)	
Question #	712	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin. An indirect cost for facility use for months of August -May is charged to the food service account.</p> <p>Corrective Action: All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs using time studies, meters, etc. 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.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1001	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status		
Corrective Action History		<p>Finding: The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31. It is currently posted on the Parent website that requires a password to access.</p> <p>Corrective Action: Notify the public of the LWP and upload documentation for how the public was notified. Updated while onsite. NO FURTHER ACTION REQUIRED</p>

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Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1004	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History		<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	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History		<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.</p>
Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status		
Corrective Action History		<p>Finding: The school is overcharging for reduced-price lunches. Currently, reduced price meals are being charged at \$3.25 per meal, however the maximum price USDA allows to charge for reduced-price lunch is \$0.40—refer to 7 CFR 245.2 definition of “reduced-price meal.”</p> <p>Corrective Action: 1. Immediately begin charging \$0.40 instead of \$3.25 for a reduced-price lunch.</p>

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	<p>2. Refund reduced-price eligible children the difference in price for all meals they were served this school year (i.e. a \$2.85 refund for each meal they ate).</p> <p>Submit a description of how the two items above were corrected, along with any supporting documentation.</p>
Site Name	Saint Matthew School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	
Corrective Action History	<p>Finding: There is currently no tracking being done for non domestic products.</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products; mandarin oranges. Noncompliant Product List templates can be found on the Buy American webpage.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/26/2024	4383	1005	Administrative Review	ALL	Authorized Rep			

Local Wellness Policy (LWP) Triennial Assessment

- SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)).
- The SFA's first triennial assessment must be completed by June 30, 2020 (for SFAs that were participating in 2016-2017 school year).
- The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy.
- FNS recommends the WellSAT Tool as a resource to conduct the LWP triennial assessment.
- Assessment results and findings must be released to the public as a written report. There is no required template for this report.

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Local Wellness Policy (LWP) Content

- SFAs are required to have language in their LWP that relates to all the content areas listed in the [LWP Checklist](#) found on the [Local Wellness Policy section](#) of the DPI SNT website.

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- Sample LWP language is listed below.
 - **Policy Leadership:** *The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy.*
 - **Public Involvement:** *The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy.*
 - **School Meals:** *All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010.*
 - **Foods sold outside of school meals program:** *All food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
 - **Foods provided but not sold (e.g., class parties, class snacks, rewards):** *The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations are promoted, and a list of ideas is available to staff and family members.*
 - **Food and Beverage Marketing:** *Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
 - **Nutrition Education:** *Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects.*
 - **Nutrition Promotion:** *School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school.*
 - **Physical Activity:** *The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education.*
 - **Other School-Based Strategies for Wellness:** *The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year.*
 - **Triennial Assessment:** *The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school follows the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.*
 - **Update/Inform the Public:** *The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.*

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Unpaid Meal Charge Policy

- Per USDA policy memo [SP 46-2016](#), no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review.
- The policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intends to use the money to purchase that day's meal.
- Should be implemented and enforced SFA-wide.
- Local discretion to vary policy based on student grade level.
- Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting

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the policy to the school website does not meet the requirement.

- Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. o Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.
- Policies regarding the collection of unpaid meal charges should be included in the written unpaid meal policy.
- SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless paid households have chosen to donate those funds to the school food service account. Funds remaining in a reduced student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as [unclaimed property](#).
- FNS recommends keeping low or negative account balances confidential to minimize student distress and embarrassment. Direct communications to the adult in the household privately (and ahead of time) via mail, phone, or email. If low balance reminders and/or F/R applications are sent home with the student, communicate this in a discrete manner (e.g. white paper and envelope). Consider re-evaluating current practices and centralizing communications through the determining official and/or food service director.

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Disclosure

- The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal or milk benefits.
- Each school year, the SFA must seek written consent from the parent or guardian to use the information provided on the application or through DC for non-program purposes, such as fee waivers. Detailed consent must be obtained each school year. Find the [Sharing of Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage. Also available in [Spanish](#) and [Hmong](#).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and kept on file at the district. There are two template forms available on the Free and Reduced Meal Applications and Eligibility webpage. One [for SFA staff](#) one for [outside agencies](#). Both Disclosure Agreement templates are available in English and Spanish.

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Preschool students are allowed to be served the K-8 meal pattern when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine, during meal service if a child is in preschool or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns.

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While Offer Versus Serve (OVS) is not required for grades K-8, it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, students in grades K-8 must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal, in addition to the other full components. If OVS is implemented,

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then students can choose three of the five components offered, including ½ cup of fruit and/or vegetable, to create a reimbursable meal.

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Supply Chain Assistance (SCA) Funds

- [Supply Chain Assistance \(SCA\) 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.
- SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. DPI has developed a [Supply Chain Assistance \(SCA\) Funds Expense Tracker](#) that SFAs may use to track these funds, however, SFAs may use any form of tracking.
- SCA funds are recorded under WUFAR code **717 Revenue Source - federal reimbursement and 547 Program/Project Code – National School Lunch (NSL)** . Record the entire amount into **NSL revenue** on the AFR during the year it is received and **expense it to NSL “food”** as it is used. The NSL food expense may carry over into future AFR reporting year.

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As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). Please be sure to put the volume of fruit and vegetable on production records.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to the nonprofit food service account.
- For both public and private schools in Wisconsin, any indirect type costs assessed to food service must be supported with documentation. Examples of supporting documentation for costs assessed to the nonprofit food service account could include:
 - **Rent** – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - **Utility charges** - separately metered or current usage study by the local utility company.
 - **Labor expenditures** – a time study based on actual amount of time worked specifically for the purpose of school food service.
 - **Printing/publishing** – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
 - **Waste disposal services, extermination services, and laundry services** - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.