

Administrative Review Report

St. Sebastian School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/21/2019	01/10/2020
On-Site Review	01/21/2020	01/22/2020
Site Selection Worksheet	11/21/2019	11/21/2019
Entrance Conference	01/21/2020	01/21/2020
Exit Conference	01/22/2020	01/22/2020

Commendations:

Thank you to the FSD and staff at St. Sebastian School and St. Coletta Day School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information.

Everyone was 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.

Also, congratulations on the very low benefit issuance error rate.

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Findings and Corrective Action:

Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/10/2020 03:45 PM	Finding: SFA not covering costs of alternate meal served for student low balance in account. CA: Provide a statement for how these costs will be tracked and paid to the nonprofit school food service account going forward.
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 02:02 PM	Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 3 organizations to which the public release will be sent in the following school year (media and grassroots).
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/10/2020 12:12 PM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the USDA school meal program (FNS Instruction 113-1). CA: Provide a timeline for when a school meal program-complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 01/10/2020 12:15 PM	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and upload to SNACS as corrective action.
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 01:11 PM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (Missing: definition of Policy Leadership, Public Involvement, Food and Beverage Marketing, Update/Inform the Public) (7 CFR 210.31). CA: Submit a timeline for bringing the LWP into compliance, including the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Form Name	Professional Standards (1200 - 1209)	
Question #	1208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 02:22 PM	Finding: Documentation of school staff training is not being maintained or tracked to demonstrate compliance with annual training requirements; the tracker does not contain all the required elements. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/13/2020 10:41 AM	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). CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and timeframe for distributing SFSP outreach materials.
Form Name	Certification and Benefit Issuance (124 - 142)	

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Question #	126	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/21/2020 11:56 AM</p>	<p>One hundred fifteen (115) free and reduced-price meal application determinations were reviewed. One (1) error was identified.</p> <p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p>CA: Utilizing the SFA-1 form provided with the specific application and certification errors correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error and the letter sent to the household into SNACS. Letter was sent while reviewer still on-site, no further action needed.</p>
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/24/2020 12:14 PM</p>	<p>Finding: SFA did not select the correct number of applications for verification; 3% of sample size= .96 applications, rounded up to one. SFA verified two applications.</p> <p>CA: Watch the "Verification Process" Webinar and upload completed quiz to SNACS. https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html</p>
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2020 03:42 PM</p>	<p>Finding: The non-discrimination statement was not included on all required program materials (in handbook where reference USDA Child Nutrition Programs).</p> <p>CA: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS or provide a timeline for getting the material updated.</p>
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 04:10 PM	<p>Finding: The SFA did not have an updated, site-specific copy of the food safety plan at each school. 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).</p> <p>CA: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school. Upload the updated Facility Description page, the updated Food Safety Plan Review page(s) and the new, site-specific SOP for Time Only as Public Health Control into SNACS.</p>
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 09:59 AM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Tropical Fruit Salad (Thailand) Frozen Cauliflower (Spain)</p> <p>Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>
Form Name	St. Coletta Day School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/21/2020 10:32 AM	<p>Finding: The serving site(s), grade grouping, planned/actual # servings prepared, leftovers, and milk types/usage were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)</p> <p>Corrective Action: Submit one week of completed production records, with all required information recorded daily. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Form Name	St. Coletta Day School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	

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Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 01/21/2020 02:57 PM	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. Corrected onsite, no further action required.	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/22/2020	1409	209	Administrative Review	ALL	FSD			
Comments								
							Created By	Created Date
To determine which apps to select for verification, three sampling methods are established by USDA. All SFAs must use the Standard Sampling Method unless it qualifies to use an alternative sample size method. To utilize an alternative sample size method, a SFA must have <20% non-response rate from the prior SY verification process.								1/22/2020 11:14:11 AM
01/22/2020	1407	209	Administrative Review	ALL	FSD			
Comments								
							Created By	Created Date
The standard sample size for verification must be used by an LEA unless the LEA qualifies to use an alternate sample size. Instructions for standard and alternate sample sizes can be found in the Eligibility Manual.								1/22/2020 11:05:00 AM
01/21/2020	1396	207	Administrative Review	ALL	FSD			
Comments								
							Created By	Created Date
Verification is the process of confirming the eligibility for free and reduced price meals under the National School Lunch Program or School Breakfast Program. DPI has developed a Verification Forms Packet- Supplementary materials that may be used to complete the Verification process to meet the annual Verification requirements. The Verification Tracker Form is useful for tracking dates and deadlines in the process.								1/21/2020 4:02:28 PM
01/21/2020	1383	409	Administrative Review	St. Coletta Day School	FSD			
Comments								
							Created By	Created Date
Fluid oz. are a volume measure, while ounces are a weight measure. Spoodles measure fluid ounces, not ounces by weight. Meat/meat alternate (M/MA) is credited by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving of ground/diced/shredded meat. To ensure that students receive the proper amount of M/MA, weigh the product, then determine which scoop will hold that weight of meat.								1/21/2020 1:55:25 PM
01/21/2020	1381	133	Administrative Review	ALL	FSD			

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Comments						Created By		Created Date	
A full enrollment Direct Certification run must be completed a minimum of three times per year. DPI recommends running DC more often than three times a year. A DC match should be completed when you receive a new student. The effective eligibility date for a DC eligible student is the date of the original output file. A DC run should not be completed specifically for students in parochial schools to identify eligibility for other funding sources (i.e., Title 1).								1/21/2020 11:32:24 AM	
01/21/2020	1380	410	Administrative Review	St. Coletta Day School	FSD				
Comments						Created By		Created Date	
You may consider using a Milk Recipe to document average milk usage by meal and grade group. When a milk recipe is on file, total milk usage must be recorded on production records. Milk recipes must be updated twice per year or when you notice that students' preferences have changed. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/milk-recipe-instructions.pdf)								1/21/2020 10:34:45 AM	
01/21/2020	1379	1403	Administrative Review	ALL	FSD				
Comments						Created By		Created Date	
For domestic products without country of origin labeling, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision.								1/21/2020 10:04:26 AM	
01/21/2020	1378	126	Administrative Review	ALL	FSD				
Comments						Created By		Created Date	
When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines (IEG), one would look at the amount of their income under the column indicating that stated frequency.								1/21/2020 9:20:22 AM	
01/21/2020	1377	126	Administrative Review	ALL	FSD				
Comments						Created By		Created Date	
Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the household adult								1/21/2020 9:17:19 AM	

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to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.										
01/13/2020	1291	1601	Administrative Review	ALL	FSD					
Comments										
						Created By	Created Date			
A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via various methods.							1/13/2020 10:43:51 AM			
01/13/2020	1290	1216	Administrative Review	ALL	FSD					
Comments										
						Created By	Created Date			
Annual Professional Standards Training must be job-specific. The required annual hours vary according to the employee's role in management and operation of the school nutrition program. A summary of the requirements is available in "In A Nutshell- Training" document. SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. DPI or USDA tracker contains all elements.							1/13/2020 10:39:41 AM			
01/13/2020	1287	1000	Administrative Review	ALL	FSD					
Comments										
						Created By	Created Date			
SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist, including: Policy Leadership, School Meals Foods sold outside of school meals program, Foods provided but not sold, Food and Beverage Marketing, Nutrition Education, Nutrition Promotion, Physical Activity, Other School-Based Strategies for Wellness Triennial Assessment, and Update/Inform the Public.							1/13/2020 10:19:35 AM			
01/10/2020	1286	709	Administrative Review	ALL	FSD					
Comments										
						Created By	Created Date			
SFAs that sell only nonprogram milk and adult meals are exempt from completing the Nonprogram Food Revenue Tool. All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals. A nonprogram foods deficit must receive a transfer of non-federal funds into the nonprofit food service account.							1/10/2020 3:48:11 PM			
01/10/2020	1285	810	Administrative Review	ALL	FSD					
Comments										
						Created By	Created Date			

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Full Non Discrimination Statement (NDS) must be included on letters/menus/website/other documents getting program information to the public. The current NDS must be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc). With limited space (menus/low balance notices) abbreviated NDS may be used, "This institution is an equal opportunity provider." Both NDS must be same size font as document text. Full NDS must be included on outreach materials when notifying households of benefits.										1/10/2020 3:40:48 PM
01/10/2020	1283	805	Administrative Review	ALL	FSD					
Comments										
					Created By			Created Date		
Substitutions made outside of meal pattern must be supported by a signed medical statement from licensed medical professional & 1) include the child's physical or mental impairment & how it restricts the child's diet 2) accommodations needed & 3) foods to omit & recommended alternatives. Staff may make substitutions to accommodate without a signed medical statement. Accommodations made for students must meet meal pattern to be reimbursable. Recommend to develop policy for handling these accommodations.								1/10/2020 12:33:04 PM		
01/10/2020	1282	803	Administrative Review	ALL	FSD					
Comments										
					Created By			Created Date		
All SFAs must have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast 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 or State Agency within 5 days.								1/10/2020 12:19:23 PM		
01/10/2020	1281	802	Administrative Review	ALL	FSD					
Comments										
					Created By			Created Date		
Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency. SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.								1/10/2020 12:17:55 PM		
01/10/2020	1280	807	Administrative Review	ALL	FSD					
Comments										
					Created By			Created Date		
807c: The SFA must collect racial/ethnic data on an annual basis. The Civil Rights Compliance Self Evaluation Form (PI-1441) must also be completed annually by October 31 as a way to ensure compliance with civil rights compliance.								1/10/2020 12:16:53 PM		
01/10/2020	1278	706	Administrative Review	ALL	FSD					

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Comments						Created By		Created Date	
SFAs with a positive or \$0 balance on 12-31-2018, are exempt from completing the PLE tool; a price increase was optional. It is unknown if this USDA flexibility will be available in the 2020-21 SY. The following are reminders: The Paid Lunch Equity tool must be completed annually & prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price). Refer to the DPI SNT Financial Webpage for guidance including PLE 'In a Nutshell' and instructions for completing the PLE tool.								1/10/2020 10:54:55 AM	
01/10/2020	1272	305	Administrative Review	ALL	FSD				
Comments						Created By		Created Date	
SFAs may claim visiting students in the paid category or the individual's category with documentation.								1/10/2020 9:40:17 AM	
01/10/2020	1271	103	Administrative Review	ALL	FSD				
Comments						Created By		Created Date	
Students eligibility as determined in the previous school year must remain in effect for up to 30 operating days in the subsequent school year, or until a new determination is made (7 CFR 245.6) Any student without documentation to support a meal eligibility is claimed at the paid rate.								1/10/2020 9:08:39 AM	