

# Administrative Review Report

Assumption Catholic School

Review Schedule: done offsite with March, 2020 as review period

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **Appreciation/Commendations:**

Thank you to the staff at Assumption Catholic School for the response to the off-site questions and for being available to answer questions and provide additional information. The Food Service Director and School Financial manager were very receptive to recommendations and guidance. In addition, thank you for uploading so many documents to SNACS as we conducted the Administrative Review (AR) off-site.

The DPI review team appreciates the eagerness of the staff at Assumption Catholic School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, local wellness, civil rights, precise recordkeeping and meal claiming.

The DPI review team is confident that Assumption Catholic School will continue to improve their knowledge and operation of child nutrition programs.

Special note: Twenty meal eligibility determinations were reviewed with zero errors identified. Nice work!

## **Recommendations:**

- The SFA may consider offering meals for field trip days to assist families, especially those with students eligible for free or reduced meals while at school. If you offer this option, be sure to provide it to all families and keep accurate records of the point of service for the meals.
- It is recommended for the office staff and business manager work together for accurate reporting. Note: the school milk break program is not a state or federal program, so the accounting must be separated from the school nutrition income and revenues.
- Refer to the Technical Assistance and Compliance Reminders resource sent in an email and in the SNACS Documents tab.

## **Training Opportunities**

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- 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; however, this summer of 2020 they will be held virtually. 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](http://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](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).

## Findings and Corrective Actions:

**Due Date: July 23, 2020**

Form Name	Verification (200 - 204)
Question #	203
Corrective Action #1	<p><b>Finding:</b> The SFA did not complete the verification process in accordance with (7 CFR 245.6(a)).</p> <p><b>Corrective Action:</b> Watch the verification webcast on the DPI website. Provide the process that will be used moving forward to ensure all steps of verification are completed. SFAs are strongly encouraged to use the Verification Tracking Form found on the DPI website.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action #2	<p><b>Finding:</b> On the Annual Financial Report, not all of the revenues and expenses were broken out correctly by program and expense category (7 CFR 210.19). There are amounts which do not belong to the school nutrition program.</p> <p><b>Corrective Action:</b> Review the Annual Financial Report webcast or manual on the DPI website, then correctly update the 2018-19 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the DPI accountant will make any adjustments after December 31.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action #3	<p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content, including foods sold outside of meals, food and beverages marketing, nutrition promotion, triennial assessment and ways to inform the public on LWP policy implementation.(7 CFR 210.31).</p> <p><b>Corrective Action:</b> Submit a timeline for bringing the LWP into compliance and include the title(s) of the SFA representative(s) that will ensure compliance.</p>

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Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
Question #	1601
Corrective Action #4	<p><b>Finding:</b> 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><b>Corrective Action:</b> 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.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1217
Corrective Action #5	<p><b>Finding:</b> 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><b>Corrective Action:</b> Provide a statement how all training hours completed will be tracked during the school year for each school food service employee. You may use the USDA or DPI professional standards training tracking tool or one of your own. Upload your response into SNACS.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	409
Corrective Action #6	<p><b>Finding #1 :</b> Salad Bar production records missing planned serving sizes for all food items.</p> <p><b>Corrective Action #1:</b> Send an updated template of your salad bar production records showing that a column for planned serving size was added, or send a statement that says you will plan to use one of DPIs templates (found on our webpage) and will be sure to include a planned serving size for every item offered.</p> <p><b>Finding #2:</b> Acceptable crediting documentation was not available for the tator tots. Processed foods that are not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. Refer to the technical assistance portion of the report for more information.</p> <p>You may also refer to the Crediting in a Nutshell summary page or this crediting decision making tree for additional information.</p> <p><a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf</a></p> <p><a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-decision-making-tree.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-decision-making-tree.pdf</a></p> <p><b>Corrective Action #2:</b> Submit acceptable crediting documentation for the tator tots.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410

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**Finding:** Multiple meal pattern errors found during the week of review:

- Daily fruit shortage on Thursday.
- Missing vegetable subgroup (dark green vegetables)
- Weekly meat/meat alternate shortage in alternate entree option (PBJ sandwich)
- Daily vegetable shortage for the alternate entree option (PBJ sandwich)
- Alternate entree choice (PBJ sandwich) does not meet the whole grain-rich (WGR) requirements.

Refer to the technical assistance section of the report (below) for a more detailed explanation of each finding.

**Corrective action:** Answer the following questions about how the above mentioned errors will be fixed:

1. Submit a statement that explains that at least a ½ cup of fruit will be available to all students every day. Additionally, review the Fruit in a nutshell summary page and indicate that it has been reviewed.  
<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/fruit-in-a-nutshell.pdf>
2. Submit a statement that explains how fruits (and vegetables) that are difficult to measure in a measuring cup will be portioned correctly. Include an explanation of how the serving size of the grapes on Thursday, from the week of review, will be corrected to ensure that at least ½ cup is offered.
3. Submit a statement that explains how it will be ensured that all of the vegetables subgroups are offered over the course of the week. Review Vegetables in a Nutshell summary page and indicate that it has been reviewed. <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetables-in-a-nutshell.pdf>  
  
Additionally, include the names of a few dark green vegetables that you could offer in your menus (refer to the vegetables in a nutshell document for dark green vegetable ideas).
4. Submit a statement that explains what changes will be made to the alternate PBJ option so that it offers at least 8 oz eq meat/meat alternate over the course of a week.
5. Submit a statement that explains how it will be ensured that students selecting the PBJ sandwich will have access to at least ¾ cup vegetables, every day.
6. Submit a statement that explains what changes will be made to the alternate PBJ sandwich option to ensure that at least 50% of the grains offered will be whole grain-rich. If you choose to offer another bread product submit the nutrition facts label and ingredient lists in the Documents Tab for review.

## Corrective Action #7

Form Name

Food Safety, Storage and Buy American (1404-1411)

Question #

1404

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<b>Corrective Action #8</b>	<b>Finding:</b> Employee Health Reporting Agreement forms must be completed for each person in the preparing or serving area of the school nutrition program. <b>Corrective Action:</b> Submit a statement that the Employee Health Reporting Agreement will be completed at the back-to-school meeting in the Fall of 2020 and kept on file in the food safety plan at each school or in a central office.
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)
<b>Question #</b>	1405
<b>Corrective Action #9</b>	<b>Finding:</b> Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year (7 CFR 210.13). The SFA did not receive two food safety inspections in the current or prior school year, and does not have documentation on file indicating that two inspections were requested from the local regulatory authority. <b>Corrective Action:</b> Contact the local regulatory authority to request two food safety inspections for the upcoming school year 2020-21. Submit to SNACS and retain documentation of this communication.

## Technical Assistance from Public Health Nutritionist:

### Offer versus Serve (OVS)

Through conversations with the food service director, it appears that students do have the option to select their food choices. Since OVS can be a complicated subject, it is recommended to do an OVS refresher at the beginning of each school year for persons determining reimbursable meals. Please refer to training created by the School Nutrition Team found on the Menu Planning webpage, by clicking on the Offer versus Serve dropdown. Reviewer recommends watching Meal or No Meal interactive webcast with your kitchen staff. (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning>)

### Week of Review Errors

- Daily fruit shortage on Thursday. Only 1.7oz of grapes were planned on Thursday. According to the Food Buying Guide 1.7oz of grapes is equal to  $\frac{1}{4}$  cup fruit. No other fruits were offered that day. K-5 students must have access to at least  $\frac{1}{2}$  cup fruits every day of the week.

In order to determine the amount of grapes necessary to equal a  $\frac{1}{2}$  cup serving size, slice the grapes in half and place into a  $\frac{1}{2}$  cup measuring cup. Count how many full grapes it takes to fill the  $\frac{1}{2}$  cup. This is how many grapes you must offer to students if your planned serving size is  $\frac{1}{2}$  cup. You can also refer to this  $\frac{1}{2}$  cup crediting handout to help determine how much to serve of a certain fruit (or vegetable) so that the crediting is equal to  $\frac{1}{2}$  cup. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/half-cup-fruit-veg.pdf>)

- Missing vegetable subgroup. No dark green vegetables were offered during the week.  $\frac{1}{2}$  cup of dark green vegetables must be offered every week.
- Weekly meat/meat alternate shortage for PBJ sandwich option. Only 7.5 oz eq m/ma were offered in this alternate entree line. Students are only given 1 peanut butter cup which credits as 0.5 oz eq m/ma. All students also have access to the salad bar, so they technically would have access to an additional 1 oz eq m/ma of cheese. Therefore, a student selecting this alternate entree option would have access to 1.5 oz eq m/ma daily or 7.5 oz eq meat alternate weekly. K-5 students must have access to at least 8 oz eq m/ma every week.

Additionally, only offering 1 peanut butter cup per sandwich does not meet the students' daily minimum requirement of 1 oz eq meat/meat alternate. Therefore, for example, if a student selects the PBJ sandwich (2 oz eq grain, 0.5 oz eq meat alternate) and a  $\frac{1}{2}$  cup fruit. They would not have a reimbursable meal. It may appear that

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they do, since they have 3 different components, however, 0.5 oz eq meat alternate is not enough to be considered a full component.

As mentioned, K-5 students must take at least 1 oz eq meat/meat alternate (their daily minimum requirement per the meal pattern table) in order to be considered a full component. Therefore, the reviewer suggests offering two peanut butter cups for each PBJ sandwich. In this way a student selecting the PBJ sandwich would have two full components and this entree option will meet the daily and weekly meal pattern minimums.

- Daily vegetable shortage for the alternate entree option. Students who selected the PBJ option only had access to ½ cup vegetables on the salad bar on Thursday. The peppers and onion mixture on the main line is intended for the students selecting the fajitas. All students, no matter what “line” they choose must have access to at least ¾ cup vegetables daily.
- Alternate entree choice does not meet the whole grain-rich (WGR) requirements. Meal Pattern requires that at least 50% of the grains that you offer be whole grain-rich. The PBJ sandwich is made from non-whole grain-rich bread. The reviewer recommends switching to a whole grain-rich bread.

The term “wheat” or “made with whole grains” on a label does not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which means the product is whole grain-rich. Use the Whole Grain Resource to identify whole grains (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

## Menu Planning

Refer to these menu planning resources to help plan compliant menus.

- Menu Planning worksheets (scroll down to the Menu Planning Tools dropdown and select the menu planning worksheet for the age/grade group that you serve). Menu planning worksheets are helpful tools to ensure meal pattern requirements are met, including all of the vegetable subgroups. (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning>)
- Vegetable Subgroup handout that identifies common vegetables in each of the five vegetable subgroups. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>)
- Lunch Meal Pattern Table (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>)
- Crediting decision making tree. A helpful resource to determine what crediting documentation you need based on the product you are trying to credit. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-decision-making-tree.pdf>)
- Lunch Meal Pattern webcast (15 minutes) (<https://dpi.wi.gov/school-nutrition/training/webcasts#lunch>)

## Production Records

Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. In addition, it is how the SFA documents what they offered as part of the reimbursable meals. Planned portion sizes are required for every meal component on all production records (main line and salad bar). Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take.

Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Production record templates, including for garden bars and salad bars, are available on the Production Records webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>).

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Production records do not consistently record the planned serving size for every food item and they currently do not indicate that there is an alternate entree option (PBJ sandwich). This must be added to production records to make it clear what options students have.

## Crediting Documentation

SFAs are required to document how foods offered credit towards weekly meal pattern requirements. Proper crediting documentation was not available for the tator tots. Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS) or a Child Nutrition (CN) label to document meal component crediting. Provide crediting information for the tator tots by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging. If proper documentation cannot be obtained, you should discontinue using the product.

There is a difference between product specification sheets (what was provided for the tator tots) and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing information. A PFS is crediting documentation that shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label.

## Smart Snacks

No competitive foods or beverages are sold. 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 each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser tracking tools on our Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

## Signage

The National School Lunch Program (NSLP) regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our Signage web page (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

Ensure signage indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.

## Buy American Provision

Food products used for the school meals program must have documentation if they are non-domestic. Further information can be found in Buy American in a Nutshell (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf>). Please complete non-domestic documentation for any products at the school and the off-site kitchen (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

## Technical Assistance from Nutrition Program Consultant:

### Benefit Issuance and Verification

- An application without a social security number or the box checked that the signer has no social security number is incomplete and must not be approved. Indicate that the household was contacted and information received to complete the application before determining.
- The person identified as the confirming official must check the application selected for verification only, then sign and date the application. That official must not review each application submitted.

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## Food Safety

- The SFA believes the last food safety inspection report from the county sanitarian was November, 2018. The SFA **must request** two inspections per school year- usually late autumn and mid-spring. If the health department does not come to review, at least you will have the documentation that the SFA requested it. On the annual contract, please report the actual number of inspections conducted in the previous school year. That field creates a report for DPI to communicate with Department of Health so they can be aware of county action.

## Onsite Monitoring

- The annual On-site Monitoring of the National School Lunch Program (NSLP) must be completed for each site every year by February 1. The entire meal service must be reviewed from start to meal counts.

## Civil Rights

- The Civil Rights Self-Reporting Compliance form PI-1441 must be completed in full to include the status of all applications. Indicate the number of food service staff in appropriate rows in the document and complete.
- U.S. Department of Agriculture (USDA) regulations 7 CFR Part 15b require substitutions or modifications in school meals for children whose disabilities restrict their diets. School food authorities must provide modifications for children with disabilities on a case-by-case basis when requests are supported by a written statement from a state licensed medical practitioner. The DPI website includes a template Medical Statement to provide to families requesting special dietary needs.
- Processes for complaints
  - Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
  - All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended that SFAs use the Template Civil Rights Complaint Procedures to create written procedures. An 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.
  - If a complaint of discrimination is received at your district, the following procedures should be followed:
    1. Document the complaint using the USDA Program Discrimination Complaint Form (Espanol).
    2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: [jessica.sharkus@dpi.wi.gov](mailto:jessica.sharkus@dpi.wi.gov)
    3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know.

## Local Wellness Policy

- SFAs are required to complete a LWP triennial assessment per 7 CFR 210.31(e)(2)
  - FNS recommends the WellSat Tool as a resource to conduct the LWP triennial assessment.
  - Each SFA must complete a comprehensive LWP triennial assessment by June 30, 2020 (now extended to June 30, 2021), which includes these 3 components: (1) the extent to which SFAs comply with their LWP, (2) a report on the progress made in obtaining the goals of their LWP, and (3) how the policy compares to a model policy. The School Nutrition Team encourages using the Local Wellness Policy Report Card and Online Tool. In addition, SFAs must complete the WellSAT to assess how their policy compares to a model policy.