Administrative Review Report

SienaCatholicSchools of Racine

Thank you to the staff at Sienna Catholic Schools for the courtesies extended to everyone during the on-site review and for being available to answer questions and provide additional information. All were 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. The food service director and the food service team do a nice job of offering nutritional meals to students. It was a pleasure to work with everyone!

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Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	107	
TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	,	
Corrective Action Status Corrective Action History	Finding: It was noted that the notification letter used for the approval of meal benefits Nondiscrimination statement (NDS) was not in the same font size as the rest of the body of the letter. Corrective Action: Provide a statement that the SNT Letter Template will be used moving forward or update the current approval letter template with NDS font size corrected and upload into SNACS.	
Site Name	June 12, 2023	
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	Flagged	
Corrective Action History	Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge Policy in place that is communicated and distributed to the households, annually. (SP 46-2016) (The agency has two of their eight schools not participating in CEP.) Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.	
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	Flagged	
Corrective Action History	Finding: The Public Release was not distributed to the required locations. Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.	
Site Name	June 12, 2023	
Form Name	Civil Rights (800 - 807)	
Question #	803	

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TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: Provide a timeline for when a school meal program Civil Rights complaint policy or procedure will be put in place or included in an existing policy. Provide the name and title of the SFA representative that will ensure compliance.
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31). Corrective Action: Provide a detailed timeline for when the Local Wellness Policy will be implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Form Name	Local School Wellness (1000 - 1006)
Question #	1004
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee. Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate.
Form Name	Local School Wellness (1000 - 1006)
Question #	1006
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA did not complete a triennial assessment as there was no wellness policy to assess.

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	Corrective Action: Submit a plan and a timeline as to when the school will be in compliance with the triennial assessment.
Site Name	SAINT LUCY
Form Name	Meal Compliance
Question #	2
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: During the week of review, the cereal served to preschool students was above the sugar limit. The infant and preschool meal patterns require cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. For more information, including the sugar limit charts, the calculation formula, and cereals that meet the sugar requirements, please refer to the Infants and Preschool in NSLP and SBP webpage. Corrective Action: Discontinue serving any cereals that exceeds the sugar limit and replace it with a variety that meets the sugar limit. Submit the Nutrition Facts labels for all cereals served to preschool students to confirm all cereals being served to preschool students (K3/K4) contain no more than 6 grams of total sugars per dry ounce.
Site Name	SAINT LUCY
Form Name	Dietary Specification Assessment Tool (On Site Observation)
Question #	3
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: On the day of review at John Paul II Academy, it was observed at lunch that the milk was positioned after the school nutrition staff member which did not allow staff to guarantee all students received their milk component which is required by the school's contract of Serve Only. In addition, all components must be made available prior to the last school nutrition staff member on the serving line. Corrective Action: Submit a picture of the serving line with milk being available to students prior to the last school nutrition staff member on the line.
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	141
TA Log #	No TA Log# found

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Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA incorrectly extended free meal benefits to 8 students who did not qualify for the benefit. Corrective Action: Provide the Notification of Adverse Action letter to the household and upload a copy of the letter into SNACS.
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The Nondiscrimination statement was not included on all required program materials this included the student handbook and the school website where the lunch program is mentioned. Corrective Action: Submit a statement on how the handbook will be corrected moving forward. Add the Nondiscrimination statement to the school nutrition webpage that will be used moving forward. Provide the link in the corrective action tab in SNACS to the NDS on the school nutrition webpage.
Form Name	Professional Standards (1210 - 1219)
Question #	1214
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The Authorized Representative did not complete the 12 hours of annual continuing education/training for the current school year. The Authorized Representative is required to have 12 hours of training as the SFA is in a FSMC agreement. (7 CFR 210.30). Corrective Action: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year and what tracking mechanism will be used to track trainings each year.
Form Name	Professional Standards (1210 - 1219)
Question #	1219
TA Log #	No TA Log# found
Due Date	1
Corrective Action Status	Flagged
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Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).
Corrective Action: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.
Food Safety & Buy American (1400 - 1403)
1400
No TA Log# found
June 12, 2023
Flagged
Finding: The SFA did have a copy of the food safety plan at each school but was not site specific. 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). Corrective Action: Update the food safety plan to be specific for each participating school in the SFA, upload the updated Food Safety Plan(s) into SNACS. Finding: There were no Employee Reporting Agreements completed for food service staff. Corrective Action: Please have food service staff complete the Employee Reporting Agreements and submit copies into SNACS.
Food Safety & Buy American (1400 - 1403)
1403
No TA Log# found
June 12, 2023
CAP Accepted
Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Ardmore Farms Juices (USA, Belize, Costa Rica, Mexico, Brazil) Corrective Action: Complete and submit a Noncompliant
Product List Form for the non-domestic products: Ardmore Farms Juices. Noncompliant Product List templates can be found on the Buy American webpage . This item has been corrected on-site.

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	The Ardmore Farms Juices noncompliant product list tracking tool form was corrected on-site.
	CAP Accepted
Site Name	SAINT LUCY
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The point of service (POS) software presented issues being at the beginning of the line as students went through. Food service staff are required to watch the screen as students entered pin numbers. However, in watching the process it was noted that when food service staff were busy serving food items there was some struggle to stay on task with monitoring the software for a meal charge. Corrective Action: Provide a statement on how this will be corrected. It is encouraged to adjust serving line logistics so that the POS is handled at the end of the line. This may be more helpful to food service staff to monitor software and assist with serving. Provide a plan on how the POS process will be corrected.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Counting and Claiming - Review Period (322-325)
Question #	322
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	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 August thru March into SNACS. Fiscal action will be calculated if meal counting and claiming errors are identified.
Site Name	SAINT LUCY
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged

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Corrective Action History	Finding: Fiscal action will be assessed for the 8 non-reimbursable meals observed on the day of review at St. Lucy's due to students not selecting milk when required by their contract which indicates they are a serve everything site.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: Fiscal action will be assessed for the 17 non-reimbursable meals observed on the day of review at John Paul II Academy due to students not selecting milk when required by their contract which indicates they are a serve everything site.
Site Name	SAINT LUCY
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	403
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: Students at St. Lucy were only offered 1% White Milk during breakfast on the day of review. Grades K-8 must be offered a variety of milk, at least two allowable milk types at breakfast. Allowable milk types in USDA School Meals Programs are low-fat and fat-free flavored or unflavored milk and lactose-free or lactose-reduced fat-free or low-fat milk. Corrective Action: Please submit a statement of understanding that students must be offered a variety of milk at breakfast time and include a plan as to how you will ensure this happens.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	403
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: Students who are self-serving themselves Lactaid Milk from the half gallon container must pour themselves a full 1 cup portion of Lactaid milk. During the day of review, it was observed that one student only took ½ cup of Lactaid

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	milk and another student only took ¾ cup of milk which resulted in a milk quantity shortage.
	Corrective Action: Submit a statement on how food service staff will ensure that all students who are self-serving themselves Lactaid milk will serve 1 cup of Lactaid milk.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	409
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: During the week of review, it was noticed that students were not always taking their milk component at lunch time per the production records. While onsite, it was observed that several students refused to take milk. Since the schools' contract indicates they are not offer vs. serve but rather serve only sites, all components must be served to the students to be able to claim the meal as a reimbursable meal. Corrective Action: Submit a plan indicating how the food service and school staff will ensure all students receive all required components on their meal tray.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The weekly minimum requirement for vegetables was not met for K-8 grade students for lunch during the review period. The following represent the planned portion sizes: Monday, 3/6- ¾ cup Tuesday, 3/7- ¾ cup Wednesday, 3/8- ¾ cup Thursday, 3/9- ¾ cup Friday,

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	The weekly minimum requirement for K-8 grade students is 3 3/4 cup vegetables. Corrective Action: Describe specifically how the weekly minimum requirement for vegetables will be met for lunch during the review period (e.g., portion sizes increased,
	additional menu items, product replacements, etc.)
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	411
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The daily minimum requirement for vegetables was not met for K-8 grade students for lunch during the review period. The following represent the planned portion sizes: Friday, March 10- ¾ cup of Caesar Salad which credits as ¼ cup dark green vegetables and ¼ cup celery sticks totaling ½ cup of vegetables. The daily minimum requirement for K-8 grade students is 3/4 cup per day. Corrective Action: Describe specifically how the daily minimum requirement for vegetables will be met for lunch during the review period.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	430
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: During the week of review, it was observed that both John Paul II Academy and St. Lucy had incomplete and/or inaccurate production records. Some areas of concern were missing serving sizes, not listing specific menu items, not listing substituted menu items, not listing condiment usage etc. Corrective Action: Submit one week of fully completed lunch production records from both sites. This should take place on
	a Monday-Friday after the closing conference has occurred and before the corrective action is due.
Site Name	SAINT LUCY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431

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TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: The production record did not list the portion size for several menu items (examples- broccoli, celery), list chocolate milk or list specific cereal choices during the review week and/or day 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 . Corrective Action: Submit a statement indicating understanding that all menu items must be specifically listed on the production record and include their portion size.
Site Name	JOHN PAUL II ACADEMY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: Substituted menu items, such as Lactaid Milk or Apple Slices (when regular apples ran out), were not recorded on the production record during the day of review. Any changes to the planned menu must be documented on the production record. When documenting substitutions be specific about the identity, portion size and description of the item. Corrective Action: Submit a statement which indicates understanding that all substituted menu items will be documented on the production record in detail with what food is being served, portion size and any necessary description.
Site Name	SAINT LUCY
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: A few recipes used during the review week were incorrect or lacked pieces of information necessary for standardized recipes. This is needed for menu planning to ensure that the portions offered are actually what is intended and ensures the meal item meets the correct meal pattern.

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	Macaroni and Cheese- directions should be site specific and indicate Method 1 or Method 2 (not both) on the recipe; meal pattern crediting is incorrect and is 1.5 grain
	Egg and Cheese Bagel- directions state to put bacon on sandwich however bacon is not a listed ingredient and should be removed; the meal pattern crediting is incorrect and is 1.25 m/ma
	Popcorn Chicken Bowl will need a separate mashed potatoes and gravy recipe rather than stating to refer to package instructions.
	Corrective Action: Submit updated standardized recipes for Macaroni and Cheese, Egg and Cheese Bagel and Popcorn Chicken Bowl/Mashed Potatoes and Gravy.
Site Name	SAINT LUCY
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
TA Log#	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1. Corrective Action: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.
Site Name	JOHN PAUL II ACADEMY
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
TA Log #	No TA Log# found
Due Date	June 12, 2023
Corrective Action Status	Flagged
Corrective Action History	Finding: SFA did not meet on-site monitoring requirements per 7 CFR 210.8 prior to February 1. Corrective Action: Provide a statement of understanding that on-site monitoring is required to be completed prior to February 1 and include the position responsible for completing this.
Site Name	JOHN PAUL II ACADEMY
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1406
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TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	Flagged	
Corrective Action History	Finding: The most recent food safety inspection report was not posted in a publicly visible location. Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.	
Site Name	SAINT LUCY	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	Flagged	
Corrective Action History	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOPs for glove handling. Corrective Action: Provide training and submit a statement describing how practices will be adjusted to be compliant with the established SOP.	
Site Name	SAINT LUCY	
Form Name	Afterschool Snack Program	
Question #	6	
TA Log #	No TA Log# found	
Due Date	June 12, 2023	
Corrective Action Status	Flagged	
Corrective Action History	Finding: Snacks provided for the Afterschool Snack Program were not offered in the minimum portion sizes. It was also found that there were missing components for three days of the review period. In addition, staff that oversee the Afterschool Snack Program were somewhat unsure of what makes a reimbursable snack. Corrective Action 1: Review the Afterschool Snack Program meal pattern on the Afterschool Snack webpage. Provide an updated Afterschool Snack menu that includes two different components each day with the minimum portion sizes required per the meal pattern. Fiscal action will apply for missing components.	

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	Corrective action 2: Submit a statement on a plan moving forward on how the SFA will provide a training each year for the staff that oversee the Afterschool Snack Program on what makes a reimbursable snack.						
Site Name	JOHN PAUL II ACADEMY						
Form Name	Afterschool Snack Program						
Question #	6						
TA Log #	No TA Log# found						
Due Date	June 12, 2023						
Corrective Action Status	Flagged						
Corrective Action History	Finding: Production Records for the Afterschool Snack Program were incomplete. Corrective Action: Review the Afterschool Snack production record resources on the Afterschool Snack webpage. Provide two weeks of completed Afterschool Snack production records. Finding: Snacks provided for the Afterschool Snack Program were not offered in the minimum portion sizes. It was also found that there were missing components for three days of the review period. In addition, staff that oversee the Afterschool Snack Program were somewhat unsure of what makes a reimbursable snack. Corrective Action 1: Review the Afterschool Snack Program meal pattern on the Afterschool Snack webpage. Provide an updated Afterschool Snack menu that includes two different components each day with the minimum portion sizes required per the meal pattern. Fiscal action will apply for missing components. Corrective action 2: Submit a statement on a plan moving forward on how the SFA will provide a training each year for the staff that oversee the Afterschool Snack Program on what makes a reimbursable snack.						
Site Name	JOHN PAUL II ACADEMY						
Form Name	Afterschool Snack Program						
Question #	7						
TA Log #	No TA Log# found						
Due Date	June 12, 2023						
Corrective Action Status	Flagged						
Corrective Action History	Finding: The Afterschool Snack Onsite Monitoring was not completed within the required timeframes. (7 CFR 210.9) Corrective Action: Provide a statement of understanding that the Afterschool Snack Program must be monitored twice						

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each year at each site it is operated at. Once during the firs four weeks of the program plus one additional time during the program year.									
Corrective Action: Complete and upload into SNACS the Afterschool Snack onsite monitoring forms for each afterschool snack service location.									
Technical As	sistance E	ntries:							
TA Date	TA Log#	Question #	TA Area	Site	SFA Contact	Email	F	Phone	User Name
04/19/2023	3481	437	Administrative Review	JOHN PAUL II ACADEMY	FSD				
				Comments					
				Created By			Created Date		
Crediting fruits and vegetables must always be rounded down to the nearest quarter (1/4) cup. Raw, uncooked leafy greens or iceberg lettuce are credited as half the volume served, when offered in their fresh forms. For example, ¾ cup of romaine lettuce credits as ¼ cup of dark green vegetable and not 1/3 cup of vegetable as written on the production record.									
04/19/2023	3479	500	Administrative Review	SAINT LUCY	FSD				
				Comments					
					Created By			Created Date	
encouraged i making healt grades K-8 m fruit to creat components.	in order to thy meal ch nust be ser e a reimbu . If OVS is i	reduce food oices. With ved 1 cup m rsable meal mplemente	not required for g d waste and devel out OVS in place, ilk, ¾ cup vegetal , in addition to the d, then students c ed, including ½ cu	lop skills in students in ole and ½ cup e other full can choose					

vegetable, to create a reimbursable meal.