

Administrative Review Report

Our Lady of Sorrows Church

Commendations:

Thank you to all staff at Our Lady of Sorrows for the flexibility and cooperation during this offsite Administrative Review (AR). Thank you to the Authorized Representative and the Food Service Director for uploading the required documentation in a timely manner and for the quick response to questions; this greatly expedited the AR. Thank you for serving healthy, nutritious meals to the students of the Ladysmith community!

Recommendations:

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 at no charge (**this year all courses are online**). Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 webpage (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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

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. General guidance for such items may be found here, in the Recommendations tab in SNACS, for future reference. Any area or item identified as warranting Technical Assistance or Corrective Action will be addressed specifically in those respective sections of the report.

Findings and Corrective Action:

Form Name	Verification (200 - 204)
Question #	200
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not select the correct number of applications for verification, as the sample required one verification and the SFA verified two.</p> <p>CA1: Watch the "Verification Process" Webinar and submit completed quiz. https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html.</p>
Form Name	Verification (200 - 204)
Question #	203
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not complete the verification process in accordance with (7 CFR 245.6(a)).</p> <p>CA: 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>

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Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
TA Log #	TA Log# exists
Corrective Action Status	CAP Accepted
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 as no labor was allocated to nonprogram foods. (7 CFR 210.19).</p> <p>CA: Review the Annual Financial Report webcast and manual on the DPI website and submit a statement of understanding that all revenues and expenditures will be allocated by program.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
TA Log #	TA Log# exists
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: Since the SFA sells snacks to 4k-1, the nonprogram food revenue tool must be completed. SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>Finding: When students do not take a reimbursable breakfast, they are charged a blanket \$.50 per item snack price and these items must be priced according to the nonprogram revenue tool ratio.</p> <p>CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year.</p> <p>CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed. CA 3: Submit plan to meet the required nonprogram food revenue ratio.</p>
Form Name	Civil Rights (800 - 807)
Question #	801
TA Log #	TA Log# exists
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: The Public Release was not distributed to the required locations as the church bulletin does not suffice the grass roots requirement.</p> <p>CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx . Provide the name and title of the SFA representative that will ensure compliance.</p>

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Form Name	Local School Wellness (1000 - 1006)
Question #	1000
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31).</p> <p>CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: From the student sample reviewed for benefit's issuance, 1 student is receiving free benefits which should be reduced.</p> <p>CA: Please notify this households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the SFA-1 form and upload completed copy as corrective action. Fiscal action will be calculated for these errors but there is a \$600.00 disregard per program before reclaim is required.</p> <p>Finding: From the student sample reviewed for benefit's issuance, 1 student is receiving reduced benefits which should be free.</p> <p>CA: Please notify this households of the increase in benefits (to take effect 3 days from the date they are notified in writing). Record date that corrective action is taken on the SFA-1 form and send completed copy as corrective action. Fiscal action will be figured for these errors but there is a \$600.00 disregard per program before recalim is required.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	128
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced price meal applications.</p> <p>CA: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.</p>
Form Name	Verification (207 - 215)
Question #	207
TA Log #	TA Log# exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA verified all applications and was only required to verify one per the sample selected. CA. Submit a statement of understanding that only the number from the sample selected for verification will be verified.</p>
Form Name	Verification (207 - 215)
Question #	208
TA Log #	TA Log# exists

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Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete a confirmation review before verifying application(s). CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
Form Name	Verification (207 - 215)
Question #	209
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Applications selected for verification were not verified correctly. The SFA used a copy of a check which shows net income rather than the required check stub to show gross income which is the income which must be used for benefits issuance (7 CFR 245.6a). CA: Notify the household that due to an audit, it was discovered that the income documentation submitted was inadequate for benefit determination, and that correct gross income documentation must be submitted.</p>
Form Name	Verification (207 - 215)
Question #	211
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not send the verification notification letter. CA1: Review the "Household Notification of Selection" section of the Eligibility Manual (pg 105-106) CA2: Submit a statement indicating that the DPI template letter will be used moving forward, or upload an updated version of the SFAs verification notification letter into SNACS for approval.</p>
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log #	TA Log# exists
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on all program materials. The website and the handbook do not contain the full long statement. CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Form Name	Professional Standards (1210 - 1219)
Question #	1219
Corrective Action Status	CAP Accepted
Corrective Action History	<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). CA: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.</p>

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Technical Assistance Entries:

- **Standardized Recipes:** The standardized recipe for chicken Alfredo needs to be updated. The current recipe states diced chicken is used but fajita chicken is actually used. In addition, the amount of fajita chicken used is more than stated in the recipe and this changes the overall yield of the recipe. Standardized recipes must be updated if different ingredients or portion sizes of ingredients are used as this may change the crediting of the recipe.
- **Crediting Clarification:** Cheez- It crackers, Goldfish crackers and tortilla chips only credit as 0.75 oz eq. grain without a valid Product Formulation Statement (PFS) on file. Product Formulation Statements can often be found by searching the manufacturer's webpage or by contacting the SFAs distributor.
- **Production Records:** The Quantity Prepared (in purchase units) column is not consistently completed for breakfast and lunch. This must be completed to include the number of cans, boxes, bags, or cases used at meal service. When a standardized recipe is used, the number of batches should be noted in this column. In addition, the leftovers column is not completed correctly for breakfast and lunch. The leftovers column should include leftovers after meal service in the number of servings or purchase units. For example, to document leftover carrots, record the number of ½ cup servings or the number of pounds leftover at the end of service. This includes pints of milk as well

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- Federal money is to support federal programs, not supporting overproduction to allow food to be taken home by food service workers. Production should be moderated to allow enough for student meals and not extras. Code of Federal Regulations, Title 7, Agriculture, PT. 210-299

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- When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records. Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the month prior to application and the time the household is required to provide the documentation. Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime. The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification [7 CFR 245.6a(f)(6)]. "Non-response" includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children's eligibility for free and reduced price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- According to 7 CFR 245.7(b)(1), when a household appeals a reduction or termination of benefits within the 10 calendar day advance notice period, the LEA must continue to provide the benefits for which the child was originally approved, until a final determination is made.
- The LEA may continue to claim reimbursement at the original level during this period. When a household does not request an appeal during the 10 calendar day advance notice period, benefits must be reduced or terminated no later than 10 operating days after the notice period. If the hearing official rules the child's benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official's decision.

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	<ul style="list-style-type: none"> Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications. Apart from the required verification of a specified number of approved applications, regulations at 7 CFR 245.6a(c)(7) require LEAs to verify any questionable application including, on a case-by-case basis, verifying any application for cause when the LEA is aware of additional income or persons in the household. This is known as "verification for cause." Determining officials are strongly encouraged to contact the household to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households. Verification for cause cannot delay the approval of applications, and LEAs can begin the verification process only after the determination of eligibility has been made. If an application is complete and indicates the child is eligible for free or reduced price benefits, the application must be approved while the LEA begins verification for cause. 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. 	805						
	<ul style="list-style-type: none"> All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the prototype Medical Statement for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). This flow chart gives guidance on special dietary needs, as well (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) 	801						
	<ul style="list-style-type: none"> All SFAs are required to distribute a Public Release before the start of the school year (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to: <ul style="list-style-type: none"> Local news media Grassroots organizations (local organizations providing services to populations in need) Major employers contemplating or experiencing large layoffs Local Unemployment Office (as applicable). SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. 	128						
	<ul style="list-style-type: none"> 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. 	111						
	<ul style="list-style-type: none"> A child or other household member's receipt of benefits from an Assistance Program automatically extends eligibility for free benefits to all children who are members of the household. [7 CFR 245.6(b)(7)] Foster child benefits do not extend to other students in a household. 	208						

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<ul style="list-style-type: none"> When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. 	
	700
<ul style="list-style-type: none"> All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program. The Annual Financial Report instructions are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf). 	
	709
<ul style="list-style-type: none"> If a school sells any nonprogram food other than milk and adult meals, the USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx). 	
	810
<ul style="list-style-type: none"> The full version of the USDA nondiscrimination Statement must be included on program materials including: parent handbooks, program websites, employee handbooks, free and reduced price meal applications, and letters to the households. It is not required that the nondiscrimination statement be included on every page of a program website. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information. A link on a website to the "And Justice for All Poster" does not meet this requirement. 	

USDA Non-Discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.