

Administrative Review Report

St. Leonard School

Team Composition:

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/10/2022	12/14/2022
On-Site Review	01/24/2023	01/25/2023
Site Selection Worksheet	11/09/2022	11/09/2022
Entrance Conference	01/25/2023	01/25/2023
Exit Conference	01/25/2023	01/25/2023

Commendations:

Thank you to all staff at St. Leonard School for the warm welcome and cooperation during this Administrative Review (AR). The food service employee at St. Leonard exhibited exemplary customer service. Thank you to the Authorized Representative for the quick response to questions and investment in the school meal programs. Thank you for serving healthy, nutritious meals to your students.

Recommendations:

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged Finding 1: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p>CA 1: Review the Annual Financial Report webcast or manual on the DPI website then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.</p> <p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, and the funds are not being tracked separately.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
Corrective Action Status	Flagged

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Corrective Action History	Flagged	<p>Finding: 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>CA 1: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing if second entrees continue to be sold. Include the position responsible for ensuring this is completed.</p>
Form Name	Civil Rights (800 - 807)	
Question #	801	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: The Public Release was not published in the paper and was not distributed to the required locations.</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	Flagged	
Corrective Action History	Flagged	<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 civil rights 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.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (person responsible for policy oversight must be listed, marketing of food and beverages must meet Smart Snacks rule, language regarding the LWP Triennial Assessment must be included.) (7 CFR 210.31).</p> <p>CA: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>CA: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged	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 time frame for distributing SFSP outreach materials.
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	21 free and reduced price meal application determinations were reviewed, 3 errors were identified. Fiscal Action will be assessed for the application errors, but there is a \$600.00 threshold before a reclaim is necessary. Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The households meal benefits were incorrectly calculated. See the SFA-1 provided by the consultant for details. CA: Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into SNACS.
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: Two students directly certified were not receiving appropriate free or reduced meal benefits. CA: Notify the household of the correct eligibility and upload a copy of the letter and documentation verifying your system has been updated with the correct eligibility into SNACS. This was completed onsite.
Form Name	Verification (207 - 215)	
Question #	208	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	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.
Form Name	Verification (207 - 215)	
Question #	213	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: The SFA's notice of adverse action did not contain all required information (7 CFR 245.6a). CA: Review the Notice of Adverse Action section of the Eligibility Manual on pg 57. Submit a statement that either the DPI template letter will be used moving forward, or upload an updated copy of the adverse action letter that the SFA will use moving forward into SNACS for approval.
Form Name	Verification (207 - 215)	
Question #	214	
Corrective Action Status	Flagged	

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Corrective Action History	Flagged	Finding: The SFA did not provide ten calendar days notice to the household(s) when benefits are being reduced as a result of verification(7CFR 245.6a). CA: Submit a statement of understanding that ten calendar days must be provided to households prior to reducing benefits, as a result of verification.
Form Name	Verification (207 - 215)	
Question #	215	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a) CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: Food Safety Plan is missing employee reporting agreements for staff on site. CA: Complete the Employee Reporting Agreements for all staff and upload signed copies into SNACS.
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: Currently the SFA is keeping all non-compliant Buy-American food items listed on a general chart however the following information must be recorded on a Buy-American Non-Compliant Product List: 1) Date 2) Name of Product 3) Country of Origin 4) Reason a) Cost analysis b) Seasonality c) Availability d) Substitution e) Distribution f) Other Corrective Action: The recommended Buy American - Non Compliant Product List template can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).
Site Name	Saint Leonard School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	434	
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient and should be site specific. The following recipes lacked information that was specific to St, Leonard School: Hamburger/Cheeseburger: Multiple methods for preparing entrée- which one is specific for your operation? Mashed Potato Recipe- no recipe available Corrective Action: Submit updated standardized recipes for the Hamburger/ Cheeseburger and Mashed Potatoes (corrected on-site). Be sure to include all requirements of a standardized recipe that are site specific. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

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Technical Assistance Entries:
Comments
<ul style="list-style-type: none"> •Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. •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.
Comments
<ul style="list-style-type: none"> •The AIDS Register shows the amount deducted from reimbursement to pay for shipping, handling, and processing costs of USDA Foods and to track all program deposits made to the agency's account. Annual Financial Report (AFR) •The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. •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.
Comments
<p>Food Employee Reporting Agreements</p> <ul style="list-style-type: none"> •All food service employees must have a signed Food Employee Reporting Agreement on file. •There are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.
Comments
<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. •After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented.
Comments
<p>Public Release All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to:</p> <ul style="list-style-type: none"> o Local news media o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.) o Local employment office o Major employers contemplating or experiencing large layoffs <ul style="list-style-type: none"> •SFAs are allowed to, but 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.
Comments
<p>Summer Food Service Program (SFSP) Outreach</p> <ul style="list-style-type: none"> •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 by promoting the oSummer Meals Locator on the DPI Summer Meals webpage oPromotion of calling 211 to locate meals in the area oSummer Food Service Program webpage
Comments
<p>LWP Triennial Assessment</p> <ul style="list-style-type: none"> •SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)). •The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy. •Use the WellSAT Tool as a resource to conduct the LWP triennial assessment. •Assessment results and findings must be released to the public as a written report.
Comments
<p>As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas). It was observed that students needed to take two portions of bagged apple slices due to the bag stating net weight 2 ounces however there were ½ cup of apples per bag. If unsure, place item in spoodle to measure the volume and ensure it is a ½ cup portion being served.</p>

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Comments

Per the printed menu, on Monday, December 5th String Cheese was scheduled to be served with the Pancakes and Sausage Patty however string cheese was not an option to have recorded on the production record. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Moving forward make sure all items served are recorded on the production record.

Comments

Nutrition Facts labels, Child Nutrition (CN) labels, and/or product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.

Comments

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff on recording substituted food items with the corresponding portion size since this was inconsistent when production records were being completed.

Comments

30 operating day carryover is required to be extended to all students at the beginning of the school year to give time to complete a new application or determination..

- [Local Wellness Policy In a Nutshell](#) provides an overview of policy requirements.
- [Local Wellness Policy Checklist](#) is a resource that will help schools determine if all required content areas are included in their LWP.

As of June 30, 2020, SFAs must complete their first triennial assessment. **The assessment must be completed, at minimum, once every three years.** It requires SFAs to describe how the language in the SFA's LWP compares to the model LWP, measure the SFA's compliance with its LWP, and describe the SFA's progress toward meeting its LWP goals.

- [Local Wellness Policy Triennial Assessment Report Card](#) - SFAs must use the **Wisconsin Local Wellness Policy Triennial Assessment Report Card** in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. **The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team.** The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.

Local Wellness Policy Builder

[Local Wellness Policy Builder](#) is an online tool designed to assist schools/districts in creating comprehensive school wellness policies that meet the final rule established by the USDA in August 2016.

[Local Wellness Policy Builder - Full Text](#) is a compilation of all statements available in the [Local Wellness Policy Builder Online Tool](#).