# Administrative Review Report

**Assumption Catholic Schools** 

### Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/24/2023	03/09/2023
On-Site Review	03/09/2023	03/10/2023
Site Selection Worksheet	01/24/2023	03/08/2023
Entrance Conference	03/09/2023	03/10/2023
Exit Conference	03/10/2023	03/10/2023

#### Commendations:

Thank you to the school staff members at the School Food Authority (SFA) for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The food service director was very receptive to feedback and eager to learn. The lunch servers were very friendly during the review and provide excellent customer service to the students. The kitchen was very clean and it was clear that food safety is valued by the servers.

### Recommendations:

It is highly recommended that the authorized representative and food service director use the <u>General Calendar of Program Requirements</u> to help keep track of tasks and due dates. The digital version of the calendar has links included, though it could also be printed and written on as tasks are completed. The calendar is designed to be fairly comprehensive and is generally organized in the order that things must be completed each year.

## Findings and Corrective Action:

Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/29/2023 03:42 PM	Finding: The revenues and expenditures for the CACFP program were not included on the Child Nutrition Program Annual Financial Report. While there is a separate CACFP financial report required for that program, the total revenues and expenditure for that program each year (July 1 to June 30) also must be reported on the Child Nutrition Program Annual Financial Report (AFR). This AFR must include all of the USDA Child Nutrition Programs the SFA participates in.  Further, the AFR for 21-22 had other errors. The operating transfer from non-food service account for NSL was not accurate, revenues and expenditures for the School Breakfast Program and Afterschool Snack Program were not broken out as require, revenue from non-program foods was inaccurate, no expenditures for non-program foods were allocated, the expenses for the WI School Day Milk Program were not accurate.  CA 1: Manually correct the AFR for 21-22 so that the CAFCP revenues and expenditures are also included from July 1, 2021June 30, 2022. Be sure to adjust the beginning fund balance on the 21-22 AFR if it is affected by the addition of the CACFP values. The Total Revenues, Total Expenditures, and Ending Fund Balance on the report will also be affected by this modification, so be sure those are manually corrected on the 21-22 AFR as well. 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.  CA 2: Provide a detailed plan on how the AFR will be completed correctly going forward. It is recommended that the Food Service Director and Comptroller complete this report together in the future. This will help ensure that the correct values are entered into the correct parts of the report. Both staff members should also complete training on the AFR prior to the next submission. The manual, webcast, and other resources under the AFR tab on the Financial Management webpage are recommended.
Site Name		
Form Name	Certification and Benefit Issuance	(100 - 121)
Question #	107	

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TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/17/2023 12:10 PM	Finding: The determining official (DO) did not keep sufficient records regarding eligibility determinations. The DO must record the eligibility determinations as follows:  Indicate the approval date; Indicate the level of benefit for each child approved; Sign or initial and date the application.  CA: Provide a plan for how this information will be documented and retained. Immediately begin tracking this information on any applications received.  Please note, that there is designated space on the back of each paper application "for school use only" to document this information. The date of approval is crucially important information to track.	
Site Name			
Form Name	Meal Counting and Claiming (30	0 - 311)	
Question #	305		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/17/2023 09:59 AM	Finding: The SFA does not have an Unpaid Meal Charge Policy in place that fulfills the USDA requirements. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually in writing (SP 46-2016).  Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.  CA: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.	
Site Name			
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)		
Question #	700		
TA Log #	No TA Log# found		
Due Date	<u> </u>		
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/21/2023 11:41 AM	Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed when receiving these funds. During the review, documentation of SCA fund tracking was not provided.  Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.  CA: If the SFA has been tracking SCA funds already, please submit the tracking tool being used. If there is no SCA fund tracking tool being used, describe the process that will be used to track how the funds are spent going forward. Please also provide a statement of understanding of what the Supply Chain Assistance Funds can be used for.	
Site Name			
Form Name	Revenue From Non-Program Foods (709 - 711)		
Question #	709		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		

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Due Date		
TA Log #	No TA Log# found	
Question #	807	
Form Name	Civil Rights (800 - 807)	
Site Name		
		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.
Corrective Action History	Flagged 03/17/2023 10:06 AM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program that complies with the USDA requirements (FNS Instruction 113-1).  Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.
Corrective Action Status	Flagged	
Due Date		
TA Log #	No TA Log# found	
Question #	803	
Form Name	Civil Rights (800 - 807)	
Site Name		
		will retail the necessary public release documentation going forward.
Corrective Action History		While it is allowable for the private school agency to be included on a combined public release with the public district, the SFA is still responsible to retain documentation that shows the public release requirements were met. Please also note that when the public release is combined, each agency's determining official must be clearly listed on the release.  CA: Obtain a copy of the 2022-23 public release that was distributed on behalf of the SFA. Upload it into SNACS. Please also provide a plan regarding how the SFA will retain the necessary public release documentation going forward.
	Flagged 03/17/2023 10:14 AM	Finding: The SFA did not have a record of the <u>public release</u> distribution on file. Per the Authorized Representative, the SFA gets included with the Wisconsin Rapids School District public release each year. However, the SFA did not retain a copy of the release, the date it was sent, or the places it was sent to.
Corrective Action Status	Flagged	
Due Date		
TA Log #	No TA Log# found	
Question #	801	
Form Name	Civil Rights (800 - 807)	
Site Name		
Corrective Action History		Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.  CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5-day reference period from the current school year.  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.  If assistance is needed on completing the non-program food revenue tool, please reach out to the nutrition program consultant. A virtual meeting with additional technical assistance is an option.
	Flagged 03/21/2023 12:14 PM	Finding: SFA did not complete the <u>DPI Nonprogram Foods Revenue Tool</u> or <u>USDA Tool</u> to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.

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Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/17/2023 10:07 AM	Finding: The <u>Civil Rights Compliance Self Evaluation Form (PI-1441)</u> was not completed by October 31. The evaluation was completed late and it was not signed and dated upon completion.  CA: Provide a plan for how this form will be completed in full by the deadline going
		forward.
Site Name		
Form Name	Local School Wellness (1000 - 1	.006)
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/17/2023 08:43 AM	Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Content is lacking in the required areas of:  • policy leadership, • public involvement, • school meals, • foods sold in school, • foods provided but not sold, • food/beverage marketing, • triennial assessment, and • updating/informing the public.  Further, it is recommended to strengthen the policy content related to nutrition education, nutrition promotion, and other school-based strategies for wellness.  Please refer to the wellness policy technical assistance portion of this report for resources that can assist with this item.  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.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1002	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/17/2023 09:39 AM	Finding: The SFA is not compliant with all of the Local Wellness Policy requirements. The requirements not being met include:  • The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated.  • The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.  • SFA has not completed the assessment of the Local Wellness Policy within the last three years and did not share the results of the Local Wellness Policy (LWP) assessment with the public, since there was not policy to assess.  Please refer to the wellness policy technical assistance portion of this report for resources that can assist with this item.  CA 1: Provide a detailed plan that addresses all how each of the items above will be corrected. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.  CA 2: Complete the required assessment of the wellness policy using the LWP Triennial Assessment Report Card. Upload a copy of the completed assessment that includes WellSAT scores into SNACs or provide a link to this finished document on the agency website. Notify the public of the results of the LWP

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Site Name  Form Name  Certification and Benefit Issuance (124 - 142)  Question # 126  TA Log # No TA Log# found  Due Date
Question # 126  TA Log # No TA Log# found  Due Date
TA Log # No TA Log# found  Due Date
Due Date
Corrective Action Status Flagged
Flagged  Finding: For two households, the number of names on the application did not match the number in the Household Members box. This is considered an error since the application should not have been approved until the discrepancy was investigated and documented. Please refer to the detailed email sent by the consultant to the determining official on 3/10/23.  CA: Contact these two households and determine the correct number of households members. Document this on the application and initial and date it to record what you found out. Upload copies of the corrected applications into SNACS as corrective action. Benefit issuance errors are subject to fiscal action.
Site Name
Form Name Certification and Benefit Issuance (124 - 142)
Question # 129
TA Log # No TA Log# found
Due Date
Corrective Action Status Flagged
Flagged 03/17/2023 11:53 AM Finding: The determining official did not correctly notify households of their approval/denial of meal benefits and did not retain sufficient documentation regarding any household notification that did occur.  1. For denied applications, the adult household member who signed the application must be notified in writing (mail or email) of the denial. The notification must advise the household of the reason for denial, right to appeal, instructions on how to appeal, and the ability to reapp at any post only ear. Determining officials must keep record of the denial and notification, including the date of denial, reason, dat denial notice was sent, and signature/initials of the determining official control of the denial and notification, including the date of denial, reason, date denial notice was sent, and signature/initials of the determining official of the denial and notification, including the date of denial, reason, date denial notice was sent, and signature/initials of the determining official of the denial and notification, including the date of denial, reason, date denial notice was sent, and signature/initials of the determining official of the denial and notification in writing of their eligibility through provided the sent of the policy of the application.  2. For approved applications, buseholds must be notified in writing of their eligibility through DC. The notification must explain that the child is eligible for benefits without further application, explain that the child is eligible for benefits without further application, explain that the child is eligible for benefits without further application, explain that the child is eligible for benefits without further application, explain that the child is eligible for benefits without further application, explain that the child is eligible for benefits without further application and the provided further application and the household, how to notify the school applications and the provided further applications.  All written not
Site Name
Form Name Certification and Benefit Issuance (124 - 142)
Question # 131

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TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged	Flagged	
Corrective Action History	Flagged 03/17/2023 11:10 AM	Finding: Denied applications from the 2022-23 school year were not provided for review during the on-site visit. Per the determining official, there were some denied applications from the current school year.  CA: Upload 10 denied applications from the 2022-23 school year into SNACS for review by the nutrition program consultant. If there were fewer than 10 denied applications, upload all of them for review.	
Site Name			
Form Name	Certification and Benefit Issuance	e (124 - 142)	
Question #	137		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/17/2023 12:19 PM	Finding: There were six names on the benefit issuance list that show as Free or Reduced in the software system. However, documentation could not be found during the on-site visit that supports the eligibility status for these children. Please refer to the detailed email sent by the consultant to the determining official on 3/10/23.  CA: Locate the documentation that supports these students' benefits, and upload into SNACS. This would include a copy of an approved meal application, if applicable. If documentation cannot be found, these students will be recorded as benefit issuance errors and their benefits would need to be changed. Benefit issuance errors are subject to fiscal action.  If this is the case for any students, please work with the consultant to ensure the household is properly notified and benefits are correctly changed.	
Site Name			
Form Name	Certification and Benefit Issuance (124 - 142)		
Question #	138		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/17/2023 01:03 PM	Finding: The SFA's benefit issuance list does not contain the required elements including: the names of students eligible to receive meal benefits; the effective date; and the meal eligibility status. The benefit effective date must be included.  It is also recommended that the list indicate specifically how the benefits were determined. If this cannot be done through the software system, then a separate list should be kept so this information can be recorded properly.  CA: Update the benefit issuance list to include all required information and upload into SNACS.	
Site Name			
Form Name	Verification (207 - 215)	Verification (207 - 215)	
Question #	207		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged	Flagged	
Corrective Action History	Flagged 03/17/2023 12:22 PM	Finding: There was an application that was initially approved as Reduced and it was chosen for verification. The documents provided for verification support their Reduced status, however they were notified they were no longer eligible and were	

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Corrective Action History	03/17/2023 12:24 PM	CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.	
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).	
Corrective Action Status	Flagged	Feedback The GEA distance and the second sec	
Due Date	Flanned		
TA Log #	No TA Log# found		
Question #	215		
	, ,		
Form Name	Verification (207 - 215)		
Site Name		track the steps and dates in the verification process.	
TA Log #  Due Date  Corrective Action Status  Corrective Action History	No TA Log# found  Flagged  Flagged  03/17/2023 12:50 PM	Finding: Documentation for the verification process was insufficient. It did not appear that a <u>verification notification letter</u> meeting USDA requirements was sent to households selected for verification. The dates of the different verification steps were not clearly documented. There was not evidence of a Verifying Official's signature on the applications. The number of applications on file as of October 1 was not documented for the review.  Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.  CA 1: Review the "Verification" section of the <u>Eligibility Manual</u> and/or watch the <u>Verification webcast</u> .  CA 2: Submit a plan describing how all verification requirements will be met going forward. In SNACS, please upload a copy of the letter that will be used to notify families they are selected for verification (example: " <u>We MUST Check" letter</u> ). It is highly recommended that the SFA use the DPI Verification Tracker Form to help	
Question #	211	211	
Form Name	Verification (207 - 215)	Verification (207 - 215)	
Site Name			
Corrective Action History	Flagged 03/17/2023 12:23 PM	Finding: SFA did not complete a confirmation review before verifying application(s).  CA: Review the verification section of the <u>Eligibility Manual</u> 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.	
Corrective Action Status	Flagged		
Due Date			
TA Log #	No TA Log# found		
Question #	208		
Form Name	Verification (207 - 215)		
Site Name			
		CA: The family should be sent the "Increase in Benefits Letter" and their benefit should be changed back to Reduced in the software as soon as possible and no later than 3 days from when the letter is sent. Please upload a copy of the letter that is completed and sent to the family into SNACS in the "Documents" section.	
		determining official on 3/10/23.	

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**Assumption Catholic Schools** 

Form Name	Professional Standards (1210 - 1219)		
Question #	1217		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	l Flagged		
Corrective Action History	Flagged 03/21/2023 02:00 PM	Finding: During the review, the necessary school nutrition employee information related to professional standards requirements was not provided. The SFA was not able to provide an organized, comprehensive professional standards tracking tool with the necessary information. The SFA was only able to provide copies of several staff members certificates of completion from some trainings with each person's in its own folder. This did not provide enough information for the reviewer to complete the professional standards portion of the review.	
		Please refer to the corresponding technical assistance portion of this report for additional explanation and links to resources that can assist with this item.  CA: Include all training hours completed this school year for each school food service employee in the SFA (not just the review site) onto the USDA or DPI professional standards training tracking tool and upload into SNACS. Be sure that the completed tracker includes each person's name, date of hire, title/position, brief list of core duties, and employment status (full time vs part time).	
Site Name	Assumption Middle		
Form Name	Meal Counting and Claiming - Review Period (322-325)		
Question #	325		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/17/2023 01:00 PM	Finding: There are two different reports generated from the software system that provide daily lunch counts by eligibility. The counts from the two reports do not consistently matchthere are frequent discrepancies for free and paid student meals. Because of this, it is not known if the lunch counts submitted this school year are accurate or not.  The food service director was previously aware of this and had reached out to the software company multiple times for assistance. They were not able to receive a clear answer and thus have not been able to resolve this yet.  CA: The Authorized Representative must contact the software vendor to determine which report should be used for the daily lunch counts for the reimbursement claim. The discrepancy between the reports must be investigated further.  Provide documentation of this communication and the answers received from the software vendor by uploading into SNACS. Once it is determined which report is accurate for lunch counts, the SFA may need to submit additional reports from earlier in the school year.  Claims may need to be adjusted via the fiscal action process if this reporting discrepancy caused inaccurate meal reimbursements.	
Site Name	Assumption Middle		
Form Name	Meal Components and Quantities - Day of Review (400-408)		
Question #	401		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 03/10/2023 11:49 AM	Finding: One non-reimbursable meal was observed at Assumption Middle School (3/09/23) during lunch meal service. The meal did not contain three full components, required under Offer versus Serve. The meal contained a serving of pulled pork and corn.	

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		CA: Submit a statement which indicates understanding that students must select three full components at lunch, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future. This one meal is subject to fiscal action.
Site Name	Assumption Middle	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 01:21 PM	Finding: During the day of on-site breakfast observation (3/10/23), there was no planned production record available prior to meal service, and food service staff were unaware how the planned menu credited towards meal pattern, or how to count "items" to build a reimbursable meal.  The production record must be available prior to meal service to indicate all menu options, the planned serving size of menu items, and to indicate the meal pattern contribution. The menu planner has the discretion to determine how to credit certain food items at breakfast. The definition of a food item at breakfast is ½ cup fruit, 1 oz eq grain, and 1 cup milk. The crediting must be clearly communicated to both students and staff.  CA: Submit a statement explaining your understanding that a planned production record indicating serving sizes of menu items and how to count "items" at breakfast must be available prior to meal service. Additionally, submit a statement of understand that crediting documentation must be on file for all menu items prior to being served as part of a reimbursable meal.
Site Name	Assumption Middle	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 12:03 PM	Finding: Fruits and vegetables offered as part of a garden bar can credit towards the meal pattern. Even with a self-service garden bar, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 (0.125) cup each and should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Garden bar signage templates can be found on our website: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage</a> .  CA: Submit a picture of the signage that communicates the planned portion sizes of each fruit and vegetable available.
Site Name	Assumption Middle	<u> </u>
Form Name	Meal Components and Quantities	- Day of Review (400-408)
Question #	406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 11:52 AM	Finding: The same meal pattern is used for grades 6-12 at lunch. Because there is no overlap with the dietary specifications for these age groups under the NSLP, a separate 6-8 and 9-12 meal pattern must be followed. Grades 6-8 can follow the 6-8 or K-8 meal pattern.

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	be checked on the lunch production records that are submitted for corrective action.	
Site Name Assu	Assumption Middle	
Form Name Meal	al Components and Quantities - Review Period (409-412, 430-437)	
Question # 409		
TA Log # No T.	TA Log# found	
Due Date		
Corrective Action Status Flagg	gged	
Flagg 03/2  Corrective Action History	Finding: Fiscal action is required for a missing component. Therefore, fiscal action will be assessed for 84 6-8th grade entrée meals on Friday, February 10th with the missing fruit component at Assumption Catholic Middle School. Since Assumption High School receives the same menu, fiscal action will also be assessed for 70 9-12th grade meals on February 10th.  Due to the missing component, production records were reviewed for the entire review period (February) to assess for other days that may have had a missing fruit component. Per the production records, the following days in February were missing a fruit component:  • February 3rd, 2023: 154 total meals served (middle and high school)  • February 15th, 2023: 117 total meals served (middle and high school)  The planned menu did include a fruit, however the production records do not indicate that one was served. Fiscal action will be assessed for a total of 425 meals.  CA: State what will be done to correct the menu during the week of review so that a fruit component is offered to students on Friday, February 10th.	
Site Name Assu	Assumption Middle	
Form Name Meal	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question # 430	430	
TA Log # No T	No TA Log# found	
Due Date		
Corrective Action Status Flagg	   Flagged	
Flagg		
Site Name Assu	umption Middle	
Form Name Meal	al Components and Quantities - Review Period (409-412, 430-437)	

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Question #	434	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 11:44 AM	Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the Raisin Bread Cheese Sandwich, served on February 7th at breakfast. There was also no standardized recipe for the Strawberry Parfait, served on February 10th at breakfast. A general recipe was on file for the parfait, but it included apples, and was not standardized to this operation.  CA: Submit a standardized recipe for the following menu items: Raisin Bread Cheese Sandwich Strawberry Parfait. Be sure to include all requirements of a standardized recipe. Templates and other resources can be found on the Standardized Recipes webpage.
Site Name	Assumption Middle	
Form Name	Meal Components and Quantit	ies - Review Period (409-412, 430-437)
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 01:03 PM	Finding: Serving sizes were not recorded for all vegetable offerings on the production record for the week of review. Since it could be determined that a vegetable was offered, it was not counted as a missing component. However, servings were entered into the USDA workbook as the minimum creditable amount, which is 1/8th (0.125) cup vegetable. There was a weekly beans/peas (legumes) and starchy vegetable shortage at lunch during the week of review:  • 1/4 (0.25) cup of beans/peas (legumes) were offered  • 1/4 (0.25) cup of starchy vegetables were offered  The minimum required amount for the beans/peas (legumes) and starchy vegetable subgroups is 1/2 (0.5) cup over the course of the week.  CA: State what will be done to the menu during the week of review so that these vegetable subgroup shortages are fixed. Additionally, include a statement of understanding that all menu items served as part of the reimbursable meal must have a planned portion size recorded on the production record.
Site Name	Assumption Middle	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 11:28 AM	Finding: Offer versus Serve (OVS) was not properly implemented at breakfast meal service. Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements.  Offer versus Serve (OVS) at breakfast requires students to select at least three food items (one must be a ½ cup fruit and/or vegetable) in order to be claimed as a reimbursable meal.  During meal service, it was observed that students were required to select the entrée, however the entrée is not a required component. All students also were given an applesauce cup, instead of being able to choose between the craisins or the applesauce, or both fruits. A student may choose to select two fruits (1/2 cup each) and a milk and have a reimbursable meal.  DPI recommends putting some of both fruit options on the top of the cart where they are easily visible to students, and so students can identify all breakfast items available. Find more information and staff training resources on the Menu Planning webpage.

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		CA: Have staff responsible for determining reimbursable meals at breakfast attend training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.				
Site Name	Assumption Middle					
Form Name	Offer vs Serve (500-502)	ffer vs Serve (500-502)				
Question #	502					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
Corrective Action History	Flagged 03/10/2023 11:38 AM	Finding: Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The breakfast signage should list the four food items available and inform students that under Offer versus Serve (OVS), they must select at least three items, one of which must be at least ½ cup fruit and/or vegetable, or a combination.  Currently, breakfast signage states "Students must take 3 of the 4 items listed." Signage examples can be found on our Signage webpage.  CA: Submit a picture of the updated breakfast signage.				
Site Name	Assumption Middle					
Form Name	SFA On-Site Monitoring (901 - 9	SFA On-Site Monitoring (901 - 904)				
Question #	901					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
Corrective Action History	Flagged 03/17/2023 09:51 AM	Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8. The middle school was the review site and shares a kitchen/POS/serving line with the high school. For this reason, the middle and high school would be reviewed together on one on-site monitoring form since there is only one serving area between the two schools.  It does not appear that on-site monitoring was conducted at either of the elementary schools in the 22-23 school year either. These should also be reviewed before the school year ends, but these do not need to be uploaded for corrective action.  CA 1: Complete the required onsite monitoring for middle/high school for the current school year and upload into SNACS. Lunch and breakfast should be assessed. If any corrective actions are found by the FSD during the on-site monitoring, they must complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.  CA 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and who will be responsible for completion.				
Site Name	Assumption Middle					
Form Name	Food Safety, Storage and Buy An	nerican (1404-1411)				
Question #	1405					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
Corrective Action History	Flagged 03/17/2023 11:07 AM	Finding: Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year (7 CFR 210.13).  Documentation of the two food safety inspections received at the middle/high school in the <b>2021-22</b> school year was not provided before or during the on-site review.  CA: Upload copies of the two food safety inspections received at the middle/high				
		or it optodu copies of the two food safety inspections received at the initiale/flight				

# Administrative Review Report

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		school in the <b>2021-22 school year</b> . If necessary, reach out to the local regulatory authority to obtain copies of the reports.				
		If two inspections were not received in the 2021-22 school year, upload copies of the inspections that were received along with documentation showing that the SFA requested two inspections from the local regulatory authority.				
		If two inspections were not received in 2021-22 school year and the SFA does not have documentation showing that they requested two, please submit a statement of understanding regarding the requirement to request two food safety inspections each year.				
Site Name	Assumption Middle					
Form Name	Food Safety, Storage and Buy Ar	merican (1404-1411)				
Question #	1406					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
Corrective Action History	Flagged 03/17/2023 10:17 AM	Finding: The most recent food safety inspection report was not posted in a publicly visible location. The location of the report posting is acceptable, but the report posted is not the most recent.				
		CA: Post the most recent food safety inspection report. 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	Assumption Middle					
Form Name	Food Safety, Storage and Buy Ar	merican (1404-1411)				
Question #	1408					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
	Flagged 03/17/2023 10:58 AM	Finding: During the on-site review, the requested temperature logs could not be located. It was observed that temperatures were being taken and recorded regularly though, as evidenced by the completed logs posted on the equipment. Food temperatures were also available on the February production records.				
Corrective Action History		Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete.				
		CA: Upload one week of completed temperature logs from February 2023 into SNACS.				
Site Name	Assumption Middle					
Form Name	Food Safety, Storage and Buy Ar	merican (1404-1411)				
Question #	1410					
TA Log #	No TA Log# found					
Due Date						
Corrective Action Status	Flagged					
Corrective Action History	Flagged 03/10/2023 11:18 AM	Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:  • Diced Pears- Product of China • Mandarin Oranges- Product of China • Diced Peaches- Product of Greece • Pineapple Tidbits- Product of Indonesia • Chunky Avocado- Product of Mexico				
		The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is				

# Administrative Review Report

	/\ddaga_	tion Catholic Schools
		produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).
		CA: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Noncompliant Product List templates can be found on the Buy American webpage.
Site Name	Assumption Middle	
Form Name	Wisconsin School Day Milk Progra	am
Question #	4	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
	Flagged 03/21/2023 12:07 PM	Finding: During the review, sufficient records to support the Wisconsin School Day Milk Program (WSDMP) claim for the 21-22 school year were not provided. The POS files sent to the reviewer were incomplete and more information is still needed in order for the reviewer to validate the claim. Refer to email sent by reviewer on 3/15/23.
Corrective Action History		Documentation supporting the school's cost per half-pint on the claim also was not provided. Please refer to page 4 of the <u>WSDMP claiming manual</u> for details on the milk cost.
		CA: Submit full copies of the POS records from the 2021-22 school year that support the number of milks and juices claimed on the WSDMP claim for 21-22. Submit documentation that supports the price per half-pint of milk reported on the 21-22 WSDMP claim. Any errors found in WSDMP claiming may result in fiscal action for that program.
Site Name	Assumption Middle	
Form Name	Afterschool Snack Program	
Question #	7	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/17/2023 09:54 AM	Finding: The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9). The middle school was the review site and shares a kitchen/POS/serving line with the high school. For this reason, the middle and high school would be reviewed together on one on-site monitoring form since there is only one serving area between the two schools. It does not appear that on-site monitoring was conducted at either of the elementary schools in the 22-23 school year either. These should also be reviewed before the school year ends, but these do not need to be uploaded for corrective action.  CA 1: Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at once during the first four weeks of the program plus one additional time during the program year. Please also provide a plan on how this requirement will be fulfilled in going
		forwardbe specific about timeframes and who will be responsible.  CA 2. Complete and upload into SNACS the <u>Afterschool Snack onsite monitoring</u> form for the middle/high school.
Site Name	Assumption Middle	
Form Name	Afterschool Snack Program	
Question #	8	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action Status		

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### Assumption Catholic Schools

Flagged

03/21/2023 11:37 AM

Finding: Snacks are provided and claimed for students who do not qualify to participate in the Afterschool Snack Program (ASP) since they are not participating in any afterschool enrichment activities.

During the review, it was noted that students are being served and claimed under the Afterschool Snack Program when they are taking their snacks home and not staying on-site to participate in an eligible supervised afterschool enrichment activity. Students getting snacks before the actual end of the school day are also not eligible for reimbursement.

Further, the Average Daily Attendance (ADA) used on the ASP claims is not correct. As described in the <u>claiming manual</u>, the ADA for the ASP is "the number of students attending the afterschool snack enrichment activities, not the number of students eating snacks. The ADA may be different at each site." The ADA for ASP is NOT the school day ADA. It is specific to average daily attendance at the afterschool activities. In order to obtain a proper ADA for the ASP claim, attendance must be taken for all afterschool programs to average and use on the claim for the Average Daily Attendance.

Please refer to emails sent by reviewer on March 29, 2023.

CA: Discontinue claiming snacks for students who do not qualify. Provide a description of how snack access will be limited to only students attending the afterschool enrichment activities, and how snacks will only be served AFTER the school day has ended. Please be sure to describe how the agency will prevent students from taking snacks and then leaving to go home. If there is a notice sent to households related to this change, please submit a copy of the notification. Be sure to include the date that the correction was made (i.e. when the new process begins).

After the snack service is corrected, submit 30 operating days of daily ASP counts for the middle and high school. These counts will be used to adjust ASP claims back to the beginning of the 2022-23 school year. These steps are needed to determine how many snacks may have been claimed this school year that were not rightly reimbursable.

As part of the ASP corrective action, also begin tracking attendance for the afterschool programs so an accurate ADA can be calculated for the ASP claims. Submit one week of documentation for afterschool program attendance.

A fiscal reclaim may be necessary. Fiscal action will be applied for the ASP at the middle school. Fiscal action may also need to be applied to ASP at the high school. While the middle school was the selected review site, the high school operates the ASP in the same location, at the same time, and in the same manner as the middle school.

#### **Corrective Action History**

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/27/2023	3287		Administrative Review		FSD			

#### Non-Program Foods

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. SFAs are required to annually complete the <a href="DPI Non-Program Food Revenue Tool">DPI Non-Program Food Revenue Tool</a>. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in <a href="Non-program Foods Revenue Rule SP-20-2016">Non-program Foods Revenue Rule SP-20-2016</a>. A non-program foods deficit must receive a transfer of non-federal funds into the nonprofit food service account. There are resources on this topic on the <a href="Financial Management webpage">Financial Management webpage</a>—-the <a href="Nonprogram Foods Revenue In a Nutshell">Nonprogram Foods Revenue In a Nutshell</a> and <a href="webcast">webcast</a> may be particularly helpful.

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### Annual Financial Report

The <u>Annual Financial Report Manual</u> is located on the <u>DPI website</u> 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--this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. All federal Child Nutrition Programs the SFA participates in must be included on the AFR, including the CACFP.

The ending balance on June 30 from the previous year needs to be the same as the beginning balance on July 1 for the current year. The ending balance, on June 30, can never be a negative balance. A transfer must be made from non-federal funds to bring the ending balance to \$0.00.

The categories of the AFR that should be addressed when tracking revenues and expenditures include:

- 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs.
- 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.
- 'Food' is expenses for edible food items and beverages.
- 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.

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- · Yurchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.
- 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.

When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for milk served to free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.

Please review the AFR webcast, manual, and In a Nutshell resource before the next AFR is submitted.

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## Professional Standards

#### New Food Service Director Hiring Requirements:

- Each SFA must designate one staff member as the "Food Service Director" (FSD).
- The Food Service Director performs and/or oversees areas such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and day-to-day program management.
- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the NSLP and SBP, with further flexibilities for directors hired after April 29, 2019, in SFAs with under 2500 enrollment.
- The Hiring Standards for New SFA directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food safety training. These requirements are listed in a summary document called "In a Nutshell- Hiring Requirements."

#### Training Requirements:

- Each year, staff with responsibility for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30).
- Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (7 CFR 210.30). Each year, non-school nutrition staff with responsibilities for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30).
- Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well.
- · The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- A summary of the training requirement is provided in this "In A Nutshell- Training" document.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI,USDA,SNA, ICN, in-house, etc.).
- SFAs must record training hours on a training tracker. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required. A tracking tool must include the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. It should clearly show if the employee is a full time vs part time school nutrition staff member. For professional standards purposes, staff that work 20 or more hours in school nutrition each week are "full time." Staff that work less than 20 hours each week in school nutrition are "part time." Full time staff need 6 hours of annual training, and part time staff need 4 hours of annual training. Each year School Nutrition Program Directors must complete 12 hours of annual continuing education/training (7 CFR 210.30).

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### Afterschool Snack Program (ASP)

#### Area Eligibility:

To qualify for area eligibility for afterschool snack, the site must be located in a school, or in the attendance area of a school, where at least 50 percent of enrolled students are eligible for free or reduced-price school meals based on the most recent October lunch claim. Area eligibility is reviewed during contract approval. Once approved, they qualify for five years. CEP sites are determined by the individual school ISP multiplied by 1.6. SFAs should retain documentation showing how they were approved for area eligibility.

#### **Enrichment Activities:**

Eligible schools operating the Afterschool Snack program may be reimbursed for one snack served to a child participating in the afterschool enrichment activity/program.

Students are only eligible to receive snacks under ASP on the days they attend supervised afterschool enrichment activities. Snacks served and claimed under ASP for students leaving to go home after school (instead of staying for activities) are not eligible for reimbursement. Students getting snacks before the actual end of the school day are also not eligible for reimbursement.

The key for allowing a snack to be served during the programs is that they are afterschool, and provide organized, adult-supervised enrichment activities. There must at least one afterschool enrichment activity that is open to all students at the site operating the Afterschool Program.

#### Reimbursable Snacks:

A reimbursable snack must contain two different components in the minimum quantities according to 7 CFR 210.10. Schools must meet the Afterschool Snack Program meal pattern requirements, including providing a minimum of two different components in the minimum quantities. In addition, production and menu records must be maintained to show how the snacks provided contribute to the meal pattern requirements. 7 CFR 210.10. The FSD should review the planned snack menus to ensure all portion sizes are appropriate, specifically for the grains and meat/meat alternate.

#### On-Site Monitoring:

Complete onsite monitoring of each Afterschool Snack Program site two times a year. The first review must be made during the first four weeks of program operation and a second time later in the school year. 7 CFR 210.9

#### As a reminder:

- Organized, structured, and supervised environment with educational or enrichment activities must be provided.
- Enrichment activity must be inclusive to all students.

# Administrative Review Report

## **Assumption Catholic Schools**

- Reimbursable snacks should be served every day the educational or enrichment programs are offered. If there are days when there is no supervised
  enrichment activity offered afterschool, then the ASP cannot be served and claimed those days.
- Snack must be served after the school day has ended. No snacks may be offered before the school day is over.
- Only students participating in the afterschool enrichment programs may be offered a snack. Students getting on the bus or otherwise leaving to go home right afterschool may not get a snack to take with them.
- Sanctioned sports do not qualify on their own to participate in the ASP. In order for sanctioned sports to participate, there must be another adult-supervised afterschool enrichment activity, that is inclusive to all students, occurring at the same time the sports team is practicing or has a game.

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### Wisconsin School Day Milk Program (WSDMP)

The Wisconsin School Day Milk Program (WSDMP) reimburses schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced-price meals. One half-pint of milk may be claimed per eligible student each school day for students identified as free or reduced-price status. Milk served to students with paid eligibility status is counted as a non-program food cost and revenue, and they should be charged for their milk.

The Point Of Service for the Wisconsin School Day Program must be recorded by who "did" take milk not by marking who "did not" take one. This POS tracking must occur at the point is can be verified that an eligible child received their milk.

Per the Agreement for the WSDMP, schools are required to serve Wisconsin-produced milk. Check with your distributor to verify it is WI produced milk and consider including that stipulation in the SFA's milk bid.

Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable. When a milk substitution is made in WSDMP, a statement from a medical provider for a substitute is not required since this language is not included in the statute, so the request may be accepted from anyone. The reason does need to be for an allergy, metabolic disorder or other condition that prohibits him/her from drinking milk as stated in the statute. A parent note that my child does not like milk as a preference, would not be acceptable.

On the annual claim, when determining the cost per half pint of milk, use the monthly milk invoices and take the total dollar amount spent on milk that month divided by the total number of milks purchased. This is the weighted average cost per half pint of milk for that month. When submitting the annual claim, use the monthly averages for the year to get an average cost per 1/2 pint for the entire year that is used in the Wisconsin School Day Milk Program (WSDMP) claim.

The FSD should review all WSDMP requirements and check on how this program is operating at the elementary schools to ensure compliance.

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## Civil Rights Training and Complaints of Discrimination

<u>Civil rights training</u> must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. The required civil rights training is available on the SNT website, as well as a sign in sheet. This should be completed near the start of each school year.

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 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 <u>USDA Program Discrimination Complaint Form</u>.
- 2. Submit complaints within five days of receiving the complaint to:
  - Wisconsin Department of Public Instruction (DPI)
    - o Mail: Director, School Nutrition Team
    - 125 S. Webster Street Madison, WI 53707-7841
    - o Fax: (608) 267-0363
    - o Email: jessica.sharkus@dpi.wi.gov
- 3. Maintain a <u>Civil Rights complaint log</u> 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 with a legitimate need-to-know.

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### Public Release

All SFAs are required to distribute a <u>Public Release</u> before the start of the school year. 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:

- local news media,
- grassroots organizations,
- 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. The SFA must retain documentation each year showing that this requirement was fulfilled, even if the public school district sent out a combined release that included Assumption.

release that included Assumption.										
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### Summer Food Service Program Promotion

USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months through the Summer Food Service Program (SFSP). This is true even when the SFA itself may not participate in SFSP. Each year SFAs must retain documentation supporting that this outreach has been completed.

SFAs can inform families of summer meals via the following methods:

- Promotion of the summer meals locator on the DPI Summer Meals webpage
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 304-304 to locate meals in the area
- Promotion of the USDA Summer Food website (http://www.fns.usda.gov/summerfoodrocks)

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#### **On-Site Monitoring**

Each SFA with more than one school operating the NSLP must perform at least one on-site review by February 1 of each school year. On-site monitoring is required to be completed at all sites participating in NSLP, and 50% of the sites participating in SBP. A minimum of 50 percent of schools operating SBP must be monitored at least once every two years (7 CFR 210.8(a)(1).

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#### Temperature Logs

Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily and serves as documentation that critical limits were achieved and that corrective action was taken when necessary (7 CFR 210.13). Temperature logs must be retained for at least six months (7 CFR 210.15).

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#### Supply Chain Assistance Funds

Supply Chain Assistance (SCA) Funds are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs. The USDA Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers includes detailed information on allowable ways to utilize these funds.

SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. DPI has developed a <u>Supply Chain Assistance (SCA) Funds Expense Tracker</u> that SFAs may use to track these funds, however, SFAs may use any form of tracking.

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#### Local Wellness Policy

SFAs are required to retain basic records demonstrating compliance with local wellness policy (LWP) requirements. For assistance in the creation and updates of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A summarized "In a Nutshell" resource, policy content checklist, a wellness policy builder, and wellness policy report card found on the LWP webpage. The policy builder contains a variety of sample language that SFAs can adopt and modify to suit their needs instead of needing to come up with language from scratch.

The SFA must review and update the local school wellness policy (LWP) on a periodic basis. The frequency of updates is a local decision and is based on the content and structure of the plan (7 CFR 210.31). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. The SFA must permit parents, students, physical education teachers, school health professionals, school administrators, school board members, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders invited to participate in the committee, their relationship to the SFA, and those who participated in the review and update of the LWP (7 CFR 210.31). SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31). Suggestions for including a variety of stakeholders include:

- sending a letter to parents/families;
- providing status updates in teacher/staff trainings;
- posting a call for volunteers on the LEA website;
- including a blurb on the school, LEA, or local community newspaper, newsletter, and/or blog;
- partnering with community organizations to spread the information; and
- posting information about the process on social media.

SFAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). The SFA must inform the public about the content, implementation of, and updates to the Local Wellness Policy (LWP) on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31).

An assessment of the Local Wellness Policy (LWP) must be conducted once every three years, with the first assessment completed no later than June 30, 2021. 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.

SFAs must use the <u>Wisconsin Local Wellness Policy Triennial Assessment Report Card</u> 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. The SFA is required to inform and update the public about triennial assessment. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public including: mailing flyers, newsletters, emails, website postings, and newspaper articles.

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#### Records Retention

SFAs are required to maintain program records and documentation for three years plus the current school year (7 CFR 210.23(c)). This is especially important to remember when there is staff turnover.

All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents. Other examples of program records that must be kept for three years plus the current year are:

- Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters)
- Meal count participation data by school
- · Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data
- If applicable, currently approved and denied certification documentation for free and reduced-price lunches and a description of the verification
- Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established
- Agreements and free and reduced-price policy statements
- Approved and denied free and reduced price meal applications
- Procedures and documentation for direct certification for free meals, if applicable
- Procedures for alternate point-of-service meal counts, if applicable
- Menu and food production records and, if applicable, nutrient analysis records
- All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements)
- Documentation associated with the local school wellness policy
- Number of food safety inspections obtained per school year by each school
- Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year
- Records from the most recent food safety inspection
- Documents demonstrating compliance with Civil Rights requirements
- Audit reports and written responses and any related corrective action

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### Meal Counting, Claiming, Edit Checks

SFAs are required to have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. This includes a monthly edit check which compares each school's daily counts of free, reduced & paid lunches against the number of children in that school currently eligible for free, reduced and paid lunches multiplied by the attendance factor (7 CFR 210.8). The U. S. Department of Agriculture (USDA) regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made.

For breakfast, although it is not required to complete an edit check incorporating an attendance factor, USDA regulations prohibit claiming for free and reduced price breakfasts in excess of the number of children approved for free and reduced price breakfasts. Please refer to the Edit Check template for an example. For further assistance understanding edit check requirements, it is recommended to review the Edit Check section of the Site-Based Claiming webcast or the Counting/Claiming/POS webcast. Ensure that the breakfast counts for each school are checked in accordance to these procedures prior to each month's claim submission.

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# Unpaid Meal Charge Policy

Per <u>USDA policy memo SP 46-2016</u>, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review. The policy must be communicated and distributed to the households, annually.

For a snapshot of what the policy should include, see the <u>Unpaid Meal Charges In a "Nutshell"</u>. For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the <u>Financial Management Webpage</u> or the <u>USDA Unpaid Meal Charges Webpage</u>.

### The policy:

- Must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service.
- Must allow a child who has money in-hand to purchase a reduced-price or paid meal at the time of the meal service to be provided a meal. SFAs may
  not use the child's money to repay unpaid charges if the child intended to use the money to purchase that day's meal.
- Should be implemented and enforced SFA-wide.
- May be subject to local discretion to vary based on student grade level.
- Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to
  households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement.
- Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information
  about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of
  unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.

# Administrative Review Report

			Assur	nption Catholic S	Schools			
Polices regardin regular basis (e			l charges should be incl	uded in the written u	npaid meal policy	/. SFAs are enc	ouraged to review th	ne policy on a
03/27/2023	3272		Administrative Review		FSD			
Verification								
			er 1 and must be comple ended to use the <u>Verifica</u>				vith verification on th	ne <u>DPI SNT</u>
was accurate. T must review eac	his must be do th application (	one by an individual chosen for verifi	ation, the confirming off dual other than the one ication to ensure that the at the confirmation was	who made the initial e initial determinatio	determination. P	rior to any veri	fication activity, the	confirming official
	ce the househo	old must submit	the SFA must inform the to the LEA. DPI has cre					
"Non-response"	includes no re	sponse and inco	ontact the household whomplete or ambiguous renay be in writing (mail o	esponses that do not	permit the SFA t	o resolve childi		( ) ( ) -
When a benefit	eligibility statu	is increases, the	e change must take place	e within three days.				
procedures. Whethan 10 operations school year, and circumstances (verification or verification or verification)	en a household ng days after t I schools shou i.e., household erification for d	d does not requive notice period ld remind famili l size goes up o cause process a	e cannot take place beforest an appeal during the directed be se their children may be r income goes down). He the household reapplat the time of reapplicat	10-calendar day ady y a reduction or tern come eligible for me owever, if benefits to ies in the same scho	vance notice peri- nination of benefi al benefits if the o a household hav ol year, the hous	od, benefits mu ts may reapply household unit ve been termina ehold is require	ast be reduced or ter for benefits at any t experiences a chang ated because of failured to submit income	minated no later ime during the le in financial re to complete the
	g verification,	the SFA should	only verify the number	<del></del>		·	al applications shoul	d not be selected
03/27/2023	3271		Administrative Review		FSD			
Direct Certific	cation							
timeline:  • 1st: b • 2nd: t	eginning of th	e year (betweer after first run (b	g in the National School n July 1 - first day of sch netween October - Decer ween January - March)	nool)	equired to run fu	ll enrollment st	udent input files acc	ording to this
	nat the first dir	ect certification	(for CEP proxy report) (DC) match is always or	ompleted before the	first day of schoo	ol (but after Jul	y 1). Ensure families	are properly
03/27/2023	3270		Administrative Review		FSD			
Independent I	Review of A <sub>l</sub>	pplications						
independent rev	riew of application o	tions in the follo rom DPI during	more error rate during a wing school year. More the summer following the s.	information on the In	ndependent Revie	ew of Applicatio	ns is found in the El	gibility Manual.
03/27/2023	3269	,,	Administrative Review		FSD			
Application P	acket							
			educed Price Meal Eligib vailable in Spanish and H					/Frequently Asked
03/27/2023	3268		Administrative Review		FSD			

# **Incomplete Applications**

The total household member size box on a meal benefit application includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

# Administrative Review Report

## **Assumption Catholic Schools**

Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

O3/27/2023 3267 Administrative Review FSD

Eligibility Dates
A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which a student(s) is approved and sign or initial and date the application.

O3/27/2023 3266 Administrative Review FSD

Household Annual Income

Household income can only be annualized when there is more than one income frequency listed on the application. If there is only one income frequency listed, the application must be determined based on the frequency indicated and not converted to an annual figure.

03/27/2023 3265 Administrative Review FSD

#### Household Notification of Meal Benefits

Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application. (7 CFR 245.6(c)(6)).

The SFA must notify households, in writing, of eligibility through direct certification. The notification must explain that the child is eligible for free benefits without further application; free meal benefits extend to all school-aged children in the household; how to notify the SFA of any additional school-aged children in the household not listed on the notification and explain how the household can decline the benefit (7 CFR 245.6).

Households who apply and are denied benefits must receive prompt, written notification of their denial (7 CFR 245.6). The notification must advise the household of reason for denial of benefits, right to appeal, instructions on how to appeal and ability to reapply for free and reduced-price benefits at any time during the school year. (7 CFR 245.6). Refer to the Eligibility Manual for additional details.

during the school year. (7 CFR 245.6). Refer to the Eligibility Manual for additional details.

03/27/2023 3264 Administrative Review FSD

## Direct Certification Benefit Extension

Eligibility for free/reduced-price meals is extended to all children in a household if any member has been identified through the direct certification process as eligible for benefits under the eligible assistance programs. These children are also considered directly certified. SFAs are encouraged to take appropriate steps to identify children who are part of a household on an assistance program but were not identified through direct certification through available means, such as through the use of school district enrollment records. SFAs should keep records of how and when the benefit extension was established, including documentation showing which child(ren) they share a household with.

Please begin keeping clearer documentation on file that supports benefit extensions among household members. Refer to the Eligibility Manual for additional details on benefit extensions.

details on benefit extensions.

03/27/2023 3263 Administrative Review FSD

## Benefit Issuance List

A benefit issuance list must identify names of students eligible to receive meal benefits, the effective date, and the meal eligibility. The benefit issuance list should also include how the benefits were determined, for example, through direct certification or by application. The effective eligibility date for a directly certified student is the date of the original output file. The effective eligibility date for a student eligible by application is the date the application is approved-not the date the application is received.

03/17/2023 3188 Administrative Review AR

### Non-Compliant Pizza Meal

During the review of the middle school, it was discovered that there is a non-compliant pizza meal offered for some high school students. Each week, a group of high schoolers can have a special pizza lunch as part of a lunchtime Bible study. There is no crediting documentation on file for the pizza, and it is likely not creditable in the NSLP. The pizza has been offered with other meal components, but overall, the meal is not reimbursable since the current pizza offering does not meet the meal pattern requirements. The SFA has been claiming these meals for reimbursements.

The SFA should stop offering this pizza meal in this manner. There are a few options:

- 1. The SFA could find a creditable pizza product (or other entrée) and offer that for the Bible study along with all of the other meal pattern components in their required portions. If the meal is fully compliant with meal pattern, it can continue to be claimed for reimbursement.
- The SFA could stop claiming the pizza meals for reimbursement but continue to offer it. If the meal was going to be sold to students and not
  claimed for reimbursement, then each part of the meal would need to meet <u>Smart Snacks requirements</u> and be priced individually according to <u>non-program food pricing requirements</u>.
- 3. The SFA could stop claiming the pizza meals for reimbursement but continue to offer it. If the meal is going to be offered to the students for **free and not claimed for reimbursement**, then Smart Snacks and meal pattern would not apply. In this case, the food service fund would need to be paid back, in full, the cost of providing these meals if the food service fund had purchased the food initially. The sponsoring group would essentially buy the food from the food service department and then give it to the Bible study attendees for free. If the food service department/fund will no longer buy the

# Administrative Review Report

**Assumption Catholic Schools** 

food for these pizza meals at all, the sponsoring group could fully purchase and provide the meals for free to the group, cover that whole cost, and the meals would not be claimed for any reimbursement. The SFA is encouraged to reach out to the reviewers if assistance is needed in resolving this issue with the pizza lunch at the high school (non-review site). 03/13/2023 3129 FSD Administrative Review **Production Records** Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that they intend students to take. Be specific on production records about the identity, brand, portion size, and description of items served. Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records. 03/13/2023 Administrative Review **FSD** Condiment Usage Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school's condiment usage and communicate appropriate portion sizes to students, as condiments can be a significant source of calories, saturated fat, and sodium 03/13/2023 3127 Administrative Review **FSD** Weight vs Volume - Applesauce Cups When packaged by weight, 4.0 ounces of applesauce does not equal 4.0 fluid ounces (1/2 cup) fruit. A 4.0 ounce applesauce cup must be paired with another fruit to satisfy the required ½ cup fruit and/or vegetable requirement for a reimbursable meal. If you want one applesauce cup to meet the ½ cup fruit requirement, find applesauce cups that are at least than 4.5 ounces by weight, such as the 4.5 ounce applesauce cup offered by USDA 03/13/2023 3126 Administrative Review FSD

## Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Note that any combination of dark green, red/orange, beans/peas (legumes) and/or other vegetables may credit towards the "other" vegetable subgroup. A combination of dark green, red/orange, beans/peas (legumes) and/or other that includes starchy vegetables may only credit towards "additional" vegetables. Refer to the Vegetable Subgroups handout to identify vegetables in each subgroup.

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