

Administrative Review Report

St. Mary Parochial School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/04/2019	01/24/2020
On-Site Review	N/A	N/A
Site Selection Worksheet	12/04/2019	12/06/2019
Entrance Conference	06/03/2020	06/03/2020
Exit Conference	12/08/2020	12/8/2020

Commendations:

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. General guidance for such items may be found here, in the Recommendations tab in SNACS, for future reference. Any area or item identified as warranting Technical Assistance or Corrective Action will be addressed specifically in those respective sections of the report.

There were no benefit issuance errors -- great job managing meal benefit eligibility!

Thank you to the authorized representative for all of the hard work put in the review, as well as for the patience and flexibility while conducting the full review off-site! The staff member did an excellent job providing documentation, promptly responding to communications, and has a very positive attitude. Thank you for all you do to feed your students!

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:43 PM</p>	<p>Finding: The SFA's unpaid meal charge policy from the 2019-20 school year states, "if a student goes home prior to lunch the student will still be charged for their ordered lunch or in the event a student mistakenly marks hot lunch in the morning but has a cold lunch will still need to pay for the ordered lunch." It is not allowable to charge students for meals that they do not receive. Further, meals that are not actually served to students cannot be claimed for reimbursement.</p> <p>Corrective Action: Provide a statement of understanding that this practice must be discontinued. Please also provide a timeline that describes how and when the unpaid meal charge policy will be updated to remove this information.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/17/2020 01:22 PM</p>	<p>Finding: On the 2018-19, Annual Financial Report (AFR), all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). Allocations for non-program foods are required even if the SFA only sells adult meals and/or extra milk for non-program foods. See corresponding technical assistance section for more information.</p> <p>Corrective Action: Submit the 2019-20 AFR with correct non-program food allocations. Please also provide a statement of understanding that non-program food revenues and expenditures must be broken out and allocated separately from NSLP in the future. Please note that the online portal for the AFR closes on December 31, 2020, after which the report will need to be submitted to and entered manually by the DPI accountant. Please make every effort to submit the 2019-20 AFR prior to December 31 to streamline the reporting process, and because it is past the August 31 due date for the report.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/16/2020 11:47 AM</p>	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The policy also appears to be outdated as it references the Dietary Guidelines for Americans 2005 and the "food guide pyramid." The policy lacks the specific, required content pertaining to school meals (specifically the Healthy Hunger Free Kids Act), foods sold outside of school meals (specifically the Smart Snacks requirements), food and beverage marketing, nutrition promotion (specifically Smarter Lunchrooms techniques), the triennial assessment, and updating/informing the public.</p> <p>Corrective Action: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Please also refer to the corresponding technical assistance section for resources and other recommendations.</p>
Site Name		

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Form Name	Local School Wellness (1000 - 1006)	
Question #	1001	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:23 PM</p>	<p>Finding: The SFA did not notify the public about the Local Wellness Policy (LWP) in accordance with 7 CFR 210.31. The policy is included in the handbooks that each family receives, however the policy is not available to the public.</p> <p>Corrective Action: Submit a statement describing how the public will be notified of the LWP and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Uploading the policy to the school website would be one way to make the policy publicly available.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1004	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:29 PM</p>	<p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee, as an established wellness committee does not exist.</p> <p>Corrective Action: Provide a plan on how potential stakeholders will be notified and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. Please see the corresponding technical assistance entry for additional information.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:21 PM</p>	<p>Finding: The SFA did not complete the triennial assessment of the Local Wellness Policy (LWP) within the last three years leading up to the 6/30/20 deadline for the assessment. Additionally, the SFA did not complete the waiver in the spring to extend the deadline for the assessment to 6/30/21.</p> <p>Corrective Action: Submit a detailed plan, including a timeline, for how the assessment of the LWP will be completed in the 20-21 school year. See corresponding technical assistance for more details on assessment requirements.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:31 PM</p>	<p>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).</p> <p>Corrective Action: Provide a statement describing how households will be informed about the availability of SFSP in upcoming summers. Please include the</p>

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		method of communication and time frame for distributing SFSP outreach materials. See corresponding technical assistance for additional information.
Site Name		
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 10/13/2020 03:16 PM</p>	<p>Finding: The SFA did not attempt to complete verification as required in the school year 2019-20. There was one application approved and on file as of 10/1/19 that should have been selected for verification. The household should have been notified that they needed to submit documentation supporting their application. The student on this application was matched to direct certification (DC) for the first time on 11/11/2019. This DC match did occur before verification was due, however the SFA did not attempt to begin verification for this application prior to the 11/11/19 DC match.</p> <p>Corrective Action: Submit a statement describing how verification will be completed correctly and within the required time frames going forward. Please review the resources on the Verification webpage and the verification section of the Eligibility Manual for additional details on the verification process and the timeline (https://dpi.wi.gov/school-nutrition/program-requirements/verification ; https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf).</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/18/2020 10:22 AM</p>	<p>Finding: It is unclear who is the designated food service director for the SFA. Every SFA participating in NSLP must have a food service director designated and this person must adhere to the professional standards regulations for directors. Please see the corresponding technical assistance section for more details on this topic.</p> <p>Corrective Action: Submit a statement describing who will serve as the SFA's food service director. Please be sure to include an explanation of how this person will meet the professional standards requirements for directors.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/17/2020 11:45 AM</p>	<p>Finding: The professional standards tracking tool does not contain all required information. The tool does not specify the each person's date of hire, their position/role in food service (including full time vs part time status), or each person's required hours of training. Please reference the DPI Professional Standards webpage and the corresponding technical assistance section of this report for more information (https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards).</p> <p>Corrective Action: Please update the tracking tool so that it includes the missing information. Upload the updated tool in SNACS. Using the DPI tracking tool may assist in meeting the training tracker requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx).</p>

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Site Name	St. Mary Catholic School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	324	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/11/2020 10:09 AM</p>	<p>Finding: There was one school day during the review period where reimbursable meals were not served. On this day, a grandparent donated a pizza lunch for all students that was offered in place of the reimbursable lunch. While students were not charged for this meal and the meals were not claimed for reimbursement, this does not align with program regulations. Please see corresponding technical assistance for more details.</p> <p>Corrective Action: Please provide a statement describing how similar "special lunches" will be handled in the future so that NSLP requirements are still being met.</p>
Site Name	St. Mary Catholic School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/24/2020 12:11 PM</p>	<p>Finding: Transport sheets submitted did not fulfill all transport sheet requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/transport-sheet-requirements.pdf). The following items were missing:</p> <ul style="list-style-type: none"> • Menu items with recipe name and reference number or product name and description • Planned/actual number of servings prepared AND planned/actual quantity prepared in purchase units (both are needed, currently only one recorded) • Milk usage by type <p>Corrective Action: Submit one 5 day week of transport sheets and any supplemental records used that meet all transport sheet requirements and meal pattern requirements. Updated Excel and PDF transport sheet templates are available on the Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p>
Site Name	St. Mary Catholic School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/24/2020 11:47 AM</p>	<p>Finding: No vegetables from the bean/pea subgroup were offered during the week of review.</p> <p>Corrective Action: Submit a written statement and any necessary supporting documentation to describe how the weekly bean/pea subgroup requirement would be met if this menu was re-served. Please note that repeat violations involving missing vegetable subgroups on future administrative reviews may result in fiscal action.</p>
Site Name	St. Mary Catholic School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/24/2020 12:03 PM</p>	<p>Finding: Fruits and vegetables sent for the salad bar were not documented (on production records or transport sheets). Invoices were provided by the selling school as evidence that fruits and vegetables were purchased. It was determined that this was sufficient to indicate that fruit was offered every day and therefore there was no missing fruit component. However, it was not possible to determine which vegetables were served each day and in what portion size. Therefore, the hot vegetables served were used to evaluate the daily vegetable requirement, which resulted in daily vegetable component shortage each day during the week of review.</p> <p>Corrective Action: Submit a written statement indicating understanding that all items offered as part of the reimbursable meal must be documented either on the transport sheet or a separate production record. Additionally, please describe the plan for documenting these items going forward and indicate the planned serving size for all items typically served on the salad bar (keeping in mind that the planned serving size should reflect serving utensils used and/or the average amount taken by students).</p>
Site Name	St. Mary Catholic School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/24/2020 12:32 PM</p>	<p>Finding: Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by the foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p> <p>There was no standardized recipe provided for the green and gold beans. Additionally, the recipe for the hamburger called for a 2.05oz hamburger patty (documentation submitted was for a 2.17 oz patty) and a 2oz hamburger bun (documentation submitted for 1.5oz). While a recipe is not required for the hamburger on a bun as the items are listed separately on the transport sheet, if a recipe is used, it should reflect the actual products used to ensure accurate crediting.</p> <p>Corrective Action: Please submit a standardized recipe for the green and gold beans. Additionally, either submit an updated standardized recipe for the hamburger on a bun or indicate that these items will continue to be recorded separate on the transport sheet along with product numbers and accurate crediting information.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/24/2020	2338		Administrative Review		FSD			
Comments								
Leftover Recording						Created By		Created Date
The amount leftover for all items each day is recorded as zero. This could indicate that Offer vs Serve (OVS) may not be implemented properly or leftovers are not accurately recorded. Visit the Menu Planning webpage for OVS details and work towards recording accurate leftover information (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ovs).								11/24/2020 12:21:58 PM

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11/24/2020	2337		Administrative Review	FSD			
Comments							
Meal Pattern Simplification				Created By	Created Date		
Rather than serving a K-5 meal pattern and a 6-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-6 students. A K-8 meal pattern could streamline service and documentation. Offer versus Serve (OVS) can be used to help minimize food waste if that is a concern.					11/24/2020 12:17:17 PM		
11/23/2020	2336		Administrative Review	FSD			
Comments							
Weight vs. Volume				Created By	Created Date		
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, which makes this somewhat confusing. 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). The Weight vs. Volume webcast on the School Nutrition Team training page would be informative on this topic (https://media.dpi.wi.gov/school-nutrition/weight-versus-volume/story_html5.html).					11/24/2020 12:13:54 PM		
11/19/2020	2330	1107	Administrative Review	St. Mary Catholic School	FSD		
Comments							
Fundraisers				Created By	Created Date		
The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times. Please keep in mind that ALL food based fundraisers, exempt and non-exempt, must be tracked. Visit the Smart Snacks webpage for additional details and tracking tools (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).					11/19/2020 11:13:19 AM		
11/17/2020	2326		Administrative Review				
Comments							
Student Meal Account Deposits				Created By	Created Date		
When a student deposits funds in their lunch account, which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue for the food service account. This amount should not be recorded as revenue or part of the fund balance on the AFR until the meals are actually served/purchased.					11/17/2020 1:09:12 PM		
11/17/2020	2325		Administrative Review				
Comments							
Non-Program Food Allocations				Created By	Created Date		
Adult meals and extra milk are the only non-program foods sold at St. Mary's. The revenues and expenditures for these items must be broken out on the AFR. For directions on how to allocate extra milk and adult meals, please reference the tools and resources on the DPI SNT Financial Management webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). Of particular importance is the Non-Program Food Revenue Tool Exceptions (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).					11/17/2020 1:05:22 PM		
11/17/2020	2324		Administrative Review				
Comments							
Professional Standards—Classifications				Created By	Created Date		
As a reminder, for school nutrition professional standards purposes: <ul style="list-style-type: none"> • Full time staff work 20 or more hours in food service each week and are required to complete six hours of training annually. • Part time staff members work less than 20 hours in food service each week and are required to complete four hours of training annually. • Food service directors are required to complete 12 hours of training annually. 					11/17/2020 11:49:49 AM		

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<ul style="list-style-type: none"> Non-school nutrition staff members with regular duties in the school nutrition programs should complete annual civil rights training and professional standards training. Because the teachers in the school regularly oversee the lunch point of service (POS), they should each receive a total of four training hour each year. 							
Please refer to the Professional Standards webpage and the " Training Requirements in a Nutshell " resource (https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards ; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf).							
11/17/2020	2323		Administrative Review				
Comments							
Professional Standard—Tracking Tool				Created By	Created Date		
<p>The tracking tool used to document professional standards hours is missing required information. The tracking tool must include, at minimum:</p> <ul style="list-style-type: none"> Person's name Date of hire Position/role (including full time or part time status) Number of required training hours <p>In addition to the employee information and training hours completed, the tool would also ideally document the Key Areas, Training Topics, and Learning Objectives as listed in the Professional Standards Learning Objectives and Topics with Codes. The Learning Objectives can be found on the USDA Professional Standards Website (https://www.fns.usda.gov/schoolmeals/professional-standards).</p>					11/17/2020 11:35:44 AM		
11/17/2020	2322		Administrative Review				
Comments							
Temperature Logs				Created By	Created Date		
<p>A temperature log for the freezer for February 2020 was not available. If the freezer is used to store foods for service in the National School Lunch Program (NSLP), then daily temperature log should be kept for the freezer and the log should be retained according to NSLP records retention requirements. If the freezer is not used for NSLP food, it is still advisable to keep a temperature log for it. Tracking the freezer temperature will help ensure that any issues with the freezer's temperature control can be promptly addressed to prevent food from becoming unsafe or being potentially wasted.</p>					11/17/2020 11:14:46 AM		
11/11/2020	2303		Administrative Review				
Comments							
Certified Food Protection Manager				Created By	Created Date		
<p>An outstanding concern is how the state certified food protection manager requirement written in ATCP 75 Appendix 12-201.11 (A) (2) will be met (https://docs.legis.wisconsin.gov/code/admin_code/atcp/055/75_.pdf). There is no person on staff at St. Mary's that is a certificate holder. In the past, the local sanitarian conducting inspections has accepted the certification from the public school's food service director to fulfill this requirement. It is recommended to discuss this requirement and food service director designation with the sanitarian to ensure compliance. It is also strongly recommended that the authorized representative at St. Mary's become a certified food manager. This would help ensure the requirement is met and would allow this person to have better oversight for the food safety in the operation.</p>					11/11/2020 10:44:33 AM		
11/11/2020	2302		Administrative Review				
Comments							
Food Service Director Designation				Created By	Created Date		
<p>Each SFA must designate at least one staff member as a program "director." A program "director" is the person designated to perform or oversee the majority of the program duties such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and other general day-to-day program management.</p> <p>During the review, it was stated that the St. Mary's food service director (i.e. program director) is the food service director at the public school that sells the SFA meals via joint agreement. However, this person is not a staff member at St. Mary's, does not complete on-site tasks at St. Mary's, and does not perform most of the duties listed above for St. Mary's. The individual(s) who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program is generally considered the school nutrition program director.</p>					11/11/2020 10:36:06 AM		

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For these reasons, it would likely make more sense to designate the St. Mary's authorized representative as the food service director, as is currently indicated on the online contract. This St. Mary's staff member has worked at the school and has been involved in the school nutrition programs for several years prior to July 1, 2015 when the minimum hiring standards for new food service directors became effective. The online contract has had several different people listed as the "food service director" in the last few years, but the authorized representative has primarily fulfilled the food service director duties over the years. For this reason, this staff member can be considered "grandfathered" in for minimum hiring standards.

It is still possible to have the public school director as St. Mary's director, though this is not recommended since this person does not spend time at St. Mary's and is not involved with St. Mary's school nutrition programs aside from sending over the meals in accordance with the joint agreement.

11/11/2020

2300

Administrative Review

Comments

Special Lunches Outside of NSLP

Created By

Created Date

There was one day in February 2020 on the edit check where zero meals were served. The food service director explained that on this day that a pizza lunch was donated by a grandparent for all students to eat for free. On this day, the school did not charge any students and did not claim any meals for reimbursement. Serving a special lunch like this in place of the reimbursable lunches is not allowable when participating in NSLP. When schools sign up to participate in the National School Lunch Program (NSLP), they agree to provide reimbursable meals to students each school day. Please reference [7 CFR 210.1](https://www.fns.usda.gov/part-210%E2%80%94national-school-lunch-program) (<https://www.fns.usda.gov/part-210%E2%80%94national-school-lunch-program>).

Whenever there will be alternate arrangements for lunch (such as this donated pizza lunch), the meals provided to students must still meet the meal pattern requirements if they will be the only meals available. Additionally, menus and production records documenting the meal pattern was met must be kept. Of particular importance anytime these types of special/alternative lunches are served, schools must remember their obligation to provide meals free or at a reduced priced for children eligible for the benefits without overtly identifying those children. Further, it is important to remember that Smart Snacks rules apply to foods sold outside of the reimbursable meals on the school campus during the school day. The only exception to this rule is exempt fundraisers that comply with the [exempt fundraiser requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>). If foods outside of the reimbursable meals will be sold on the school campus during the school day in the future, please ensure that Smart Snacks requirements are met.

Here are some specific considerations when special lunches may be offered in the future:

- If the special lunch will not be planned to meet USDA meal pattern regulations, then it may not be offered completely in place of the normal reimbursable lunch. SFAs may not simply "shut down" the normal lunch service for the day and only offer the non-reimbursable special lunch. When schools choose to participate in the National School Lunch Program (NSLP), they agree to serve meals meeting USDA meal pattern requirements each day school is in session and that these meals will be served free or at a reduced price to eligible students without overtly identifying them. Offering the normal reimbursable lunch at the free, reduced-price, or paid rate alongside the free special lunch would ensure that the preceding requirements are met.
- If the special lunch will be offered at no charge to students, the special lunch would not need to meet Smart Snacks requirements. Smart Snacks requirements apply to foods sold to students on campus during the school day outside of the reimbursable meals. If the special lunch would be sold to students, then the foods WOULD need to comply with Smart Snacks requirements.
- If the special lunch would not be sold, then it would not be considered a fundraiser, so there is no prohibition from the special lunch being served in the cafeteria at the same time as the regular reimbursable lunch. However, the special lunch would then be directly competing with NSLP which is not encouraged.
- The school's local wellness policy should be referenced when determining if/how to offer this special lunch. The special lunch should not conflict with the established wellness policy.
- Offering this special lunch at the same time as the normal reimbursable lunch will likely drop NSLP participation for the day. This means that you would be losing out on reimbursement dollars and household payments for this day.
- If the special lunch does not adhere to the meal pattern, then it cannot be claimed for reimbursement.
- The intent of the NSLP is to provide all students with a nutritious meal every day school is in session. If special lunches become too frequent, they would likely detract from the purpose of the NSLP and, as mentioned, would result in a loss of food service revenue.

11/11/2020 9:41:39 AM

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<ul style="list-style-type: none"> If the purpose of this special lunch is a treat/reward, donors could consider offering a smaller food item, such as a free snack, in the afternoon. Non-food rewards could also be explored. 							
10/16/2020	2252	1000	Administrative Review	ALL			
Comments							
Local Wellness Policy—Content				Created By	Created Date		
<p>It is highly recommended to closely review the language in the wellness policy to ensure it is up-to-date and is specific enough. The content related to foods provided but not sold at school could be improved by being more descriptive. Further, the policy should include clear, measurable goals that apply specifically to St. Mary's. Please also remember that the policy must be reviewed and updated "periodically," which is recommended to occur annually.</p> <p>As the district works on updating and improving the wellness policy, it is recommended to review the resources on the Local Wellness Policy webpage (https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy). Of particular interest may be:</p> <ul style="list-style-type: none"> The Local Wellness Policy Builder which contains sample language that can be used when updating a policy The Local Wellness Policy Checklist which provides a summary of required content areas that must be included in the policy 					10/16/2020 11:51:50 AM		
10/16/2020	2251	120	Administrative Review	ALL			
Comments							
Benefit Issuance List Updates				Created By	Created Date		
<p>The SFA indicated that updates to the benefit issuance list are made at the beginning of each school year and then monthly for any transfer, withdrawn, or new students. Please note that the benefit issuance list must be updated in a timely manner upon receipt of new meal benefit information, which is likely to occur more frequently than monthly. The SFA's benefit issuance list updating process and meal billing process must ensure students are charged and claimed appropriately based on their benefit effective dates. When a student is matched on direct certification, the effective date of the benefit is the day of the direct certification run. When an application is submitted, it must be processed and the household notified within 10 operating days of receipt. When an application is approved, the effective date for the benefits is the date of application approval.</p>					10/16/2020 10:48:20 AM		
10/16/2020	2250	305	Administrative Review	ALL			
Comments							
Unpaid Meal Charge Policy				Created By	Created Date		
<p>The SFA's unpaid meal charge policy specifies that if a student's lunch account is more than one month behind, the student will be given a peanut butter and jelly sandwich with milk for lunch and will be charged \$3.25 for the meal. Please note that there are specific requirements about alternate meals offered in place of the normal reimbursable meal for unpaid meal charge. Alternate meals that are charged to households and not claimed for reimbursement must have each item priced individually, each item must meet Smart Snacks requirements, and the items are subject to non-program foods regulations. The SFA should ensure these requirements are met for the alternate meal, or should discontinue the alternate meal that is charge and not claimed in favor of a different practice. Please review the unpaid meal charge policy resources on the Financial Management webpage for more information (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management).</p>					10/16/2020 10:36:49 AM		
10/16/2020	2249	207	Administrative Review	ALL			
Comments							
Verification				Created By	Created Date		
<p>Because the SFA is small and may not have many (if any) applications to verify each year, it is recommended to review the verification resources each year (https://dpi.wi.gov/school-nutrition/program-requirements/verification). The SFA may also consult with DPI School Nutrition Team staff when it is time for verification each year for guidance. The verification process can begin as early as October 1 and must be completed by November 15 each year when NSLP is operating normally.</p>					10/16/2020 10:25:04 AM		
10/16/2020	2248	1207	Administrative Review	ALL			

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Comments						
Professional Standards—Two Year Flexibility				Created By	Created Date	
SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years, however some training must be completed each year. For example, a full time staff member could complete 12 hours of training over the defined two year period. This option does not require additional approval from the state agency.					10/16/2020 10:20:20 AM	
10/16/2020	2247	900	Administrative Review	ALL		
Comments						
On-Site Monitoring				Created By	Created Date	
Because the SFA consists of only one school site, completion to the annual on-site monitoring forms is not required. However, the forms can be completed at the SFA's discretion if it will help maintain program oversight.					10/16/2020 10:19:17 AM	
10/16/2020	2246	1601	Administrative Review	ALL		
Comments						
Summer Food Service Program Promotion				Created By	Created Date	
<p>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 via the following methods:</p> <ul style="list-style-type: none"> • Promotion of the USDA's Capacity Builder Map on the DPI Summer Meals webpage (http://www.fns.usda.gov/capacitybuilder; https://dpi.wi.gov/community-nutrition/sfsp) • Promotion of calling 211 to locate meals in the area • Promotion of the ability to text 'food' to 877-877 to locate meals in the area • Promotion of the USDA Summer Food Service Program webpage (https://www.fns.usda.gov/sfsp/household) 					10/16/2020 10:14:52 AM	
10/13/2020	2242	805	Administrative Review	ALL		
Comments						
Special Dietary Needs				Created By	Created Date	
<p>The SFA is not currently making any accommodations for special dietary needs requests outside of the meal pattern. However, if families inquire about such accommodations in the future, it is recommended that the food service director review the Special Dietary Needs webpage and contact the DPI School Nutrition Team for additional guidance, as needed (https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs).</p> <p>A signed medical statement from a licensed medical practitioner (in Wisconsin anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong. SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.</p>					10/13/2020 4:01:26 PM	
10/13/2020	2241	801	Administrative Review	ALL		
Comments						
Public Release				Created By	Created Date	
<p>The SFA collaborates with the Hilbert School District to send out one public release each year with information for both SFAs. The purpose of the public release is to inform the public that free and reduced price meals are available at the school. SFAs must annually distribute the public release to:</p> <ul style="list-style-type: none"> • Local news media • Grassroots organizations (local organizations providing services to populations in need such as a food pantry, public library, post office, local church, etc.) • Local employment office • Major employers contemplating or experiencing large layoffs <p>SFAs are allowed to, but not required to, pay to have the public release published. SFAs must maintain documentation of whom the public release was sent to along with the</p>					10/13/2020 3:58:28 PM	

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specific materials distributed. The public release was sent to the local newspaper and to St. Vincent de Paul for the 2019-20 school year. This meets the requirement to send the public release to a media outlet and a grassroots organization. Please ensure that it is documented annually where the public release is sent/posted.								
10/13/2020	2240	1001	Administrative Review	ALL				
Comments								
Local Wellness Policy—Public Notification				Created By	Created Date			
The SFA must inform the public about the content, implementation of, and updates to the 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, website postings, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31).					10/13/2020 3:55:47 PM			
10/13/2020	2239	1003	Administrative Review	ALL				
Comments								
Local Wellness Policy—Public Involvement				Created By	Created Date			
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 who participated in the review and update of the LWP (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. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31).					10/13/2020 3:55:09 PM			
10/13/2020	2238	1005	Administrative Review	ALL				
Comments								
Local Wellness Policy—Triennial Assessment				Created By	Created Date			
SFAs must complete an assessment of their local wellness policy (LWP) at least once every three years. Additionally, SFAs must review and update the content of the policy periodically (annually is recommended). This suggested annual review and policy update is separate from the triennial assessment.					10/13/2020 3:53:01 PM			
The SFA did not complete the assessment by the 6/30/20 due date and did not complete waiver to extend the due date of the triennial assessment to 6/30/2021. The assessment must measure the SFA's compliance with their LWP, a description of the SFA's progress toward meeting LWP goals, and how the LWP compares to a model policy. A report must be developed and released to the public. SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card in order to fulfill the triennial assessment requirement which can be found on the Local Wellness Policy webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx). 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.								
12/4/2020			Administrative Review	ALL				
Comments								
Food Service Account Transfers				Created By	Created Date			
The SFA makes a fund transfer each year to cover food service account deficits, as is required by the USDA. However, the accounting process for this transfer could be improved to more clearly show that the food service account has a balance of at least \$0.00 at the end of each school year.					12/4/2020 2:29:01 PM			
Currently, food service revenues and expenses are recorded under a specific code under the school's account. Each year the school's total fund is negative and requires a transfer from another source (a donor fund). This annual transfer has always been in excess of the amount that the lunch account is negative each year. Therefore, the lump transfer is sufficient to cover the losses in the lunch account. However, the amount of the transfer delegated to the lunch account is not currently recorded separately as a lunch revenue. It is strongly recommended to code part of this lump transfer to the lunch account each year to clearly show that the losses are being covered by a non-federal funding source.								

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