

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Anthony School

Agency Code: 10-7380

School(s) Reviewed: St. Anthony School

Review Date(s): 4/6/17-4/7/17

Date of Exit Conference: 4/6/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Anthony School for the courtesies extended to the State Agency during the on-site review. Staff were available to answer questions and were receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions, as well as pulling records in preparation for the on-site portion of the review. You were a pleasure to work with.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Direct Certification is run as required (at the start of the school year, 3 months after the first run and 6 months after the first run).
- Applications are approved and the families notified of their status well within the required timeframe of 10 operating days after receipt.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

8 eligibility determinations were reviewed, 1 error was identified.

Applications

When the benefit status increases, the change must take place within 3 days. When benefit status decreases, the change cannot take place before 10 calendar days written advance notice of adverse action is sent with appeal rights.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers.

Verification

The role of the confirming official was clarified. As a reminder, prior to any other verification activity, a determining official, other than the official who made the initial eligibility determination, must review each approved application selected for verification (most likely always 1 application for St. Anthony) to ensure that the initial determination was accurate.

Findings and Corrective Action Needed

Certification and Benefit Issuance

- Finding #1:** Student #1 listed on the SFA-1 form is incorrectly certified for meal benefits. Income exceeds the free eligibility guidelines.

Corrective Action Needed: Notify the household of the reduction in benefits (to take effect 10 calendar days from the date they are notified in writing). The DPI adverse action template which was shared via email can be used to communicate this change.

Record the date that corrective action is taken on the **SFA-1** form and send a completed copy of this form along with the updated benefits issuance list to the consultant via email.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

- The menu items were very appealing. Students have a nice variety of fresh fruits and vegetables.

Comments/Technical Assistance/Compliance Reminders

- **Leftover Food:** St. Anthony's School is consistently being sent more food than they need to serve reimbursable meals to students. They have been recording these leftovers on transport sheets, but it appears that Loyal School District has not adjusted the amount they are sending to reduce this excess of food. Transport sheets and production records are meant to be used not only to document the preparation and service of reimbursable meals, but also to serve as a forecasting tool. Loyal School District should be examining the completed transport sheets and adjusting what they send to St. Anthony's accordingly. Forecasting in this manner will reduce food waste and food cost.
- **Second Entrees:** Due to the excess amount of food sent to the school, St. Anthony's is giving away second entrees at no charge to students. This is strongly discouraged as it increases the amount of calories, sodium, and saturated fat that each student receives and results in the menu exceeding the dietary specifications. If the school wants to serve second entrees, they must charge students an a la carte price. Keep in mind that second entrees may be sold, but second meals may not be sold at a unit price because the meal as a unit exceeds the Smart Snacks nutrition standards for a la carte foods.

- Though St. Anthony's receives meals from Loyal School District, St. Anthony's is still ultimately responsible for ensuring that reimbursable meals are served. Make sure that any staff involved in preparing and serving meals are adequately trained. There are several webcasts on our website that you may find helpful, covering topics such as Offer versus Serve, meal pattern requirements, and portion control. See our webcast webpage for the complete listing: <https://dpi.wi.gov/school-nutrition/training/webcasts>.

Findings and Corrective Action Needed

- ❑ **Finding #1:** Production records for the daily vegetable bar are not being used to keep track of specifically which vegetables are offered. The production records currently just list that a vegetable bar is offered for a total planned portion size of ½ cup. Technical assistance was given to the food service director of the school providing St. Anthony's meals.

Corrective Action Needed: Please provide one week of completed vegetable bar production records for St. Anthony's school.

3. RESOURCE MANAGEMENT

Commendations

- Adult meal prices are set adequately at \$3.60 as indicated in the online contract by St. Anthony School to cover the per meal student reimbursements received.
 - Consider working with Loyal Public School to adjust the internal joint agreement adult meal charge. This charge should theoretically not be higher than the \$2.41 per meal student charge unless the agency is providing St. Anthony with a higher cost meal (e.g., different offerings or larger portions than what the students are receiving).
- Student paid lunch prices are set with consideration for Paid Lunch Equity.
- The new food service director has been attentive to the fiscal integrity of the food service program by working with the public school to correct inaccurate USDA Foods monthly shipping/handling charges and ensure reconciliation of the annual entitlement value. The DPI procurement staff will review charges from the 2015-16 SY and current school year to ensure accuracy within a separate offsite review.

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

Annual Financial Report (AFR):

All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. For St. Anthony School the programs are NSLP and nonprogram foods (adult meals and extra milk). The new 16-17 Annual Financial Report instructions are located on our website at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>

Revenue from Nonprogram Foods

Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Adult meals (cost and revenue), and extra milks (revenue) are not correctly reported on the 2015-16 SY Annual Financial Report (AFR).

Corrective Action Needed: Separate out program and nonprogram cost/revenues by pulling out the cost/revenue of the nonprogram foods (milk and adult meals) from the NSLP program. Report the portion for adult meals and extra milk under Ala Carte. Update the AFR by sending a scanned paper copy to Jacque Jordee: Jacqueline.Jordee@dpi.wi.gov. Copy the consultant on the email communication. Cost = \$3.60 (vendor charge) X 915 (# of adult meals sold in the 2015-16 SY), Revenue = \$3.60 (price on online contract) X 915. To pull out the portion of revenue for extra milks, take the number sold during the 2015-16 SY X the charge \$0.35.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- Great job promoting the SFSP. The agency sends out an annual mailing around this time each school year to inform families where they can find meals while school is out for the summer. The agency works in conjunction with the Public School who participates in the SFSP.
- Great job promoting the NSLP. The public release was published in a local newspaper and posted at multiple grassroots/community locations.

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Special Dietary Needs

Medical Statement

DPI has updated the Medical Statement Form posted on our website that you may use <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>.

When the form is completed and signed by a licensed medical practitioner, the school is required to provide a meal that meets the child's needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child.

It is recommended that the agency utilize DPI's template. The current local medical statement does not include all the required information. A signed medical statement must include:

- A description of the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and
- An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).

Schools are not required to accommodate requests that are not supported by a signed statement from a licensed medical practitioner. Schools may accommodate non-disability requests if they choose to as long as accommodations are made within the meal pattern requirements. SFAs must ensure that accommodations are provided to all students equally.

For more information on this topic, see the recently posted Wisconsin Q&A:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

Local Wellness Policy (LWP)

St. Anthony School recently updated their LWP, establishing a very diverse committee of parents, administration, food service, and teachers. They have also promoted the policy well within the community and having many measurable health goals.

Despite the policy being recently updated, there is language referencing old nutrition education tools (Food Guide Pyramid), which could be updated to the MyPlate concept. The policy also does not address Food and Beverage Marketing, foods sold to students outside of the school meal program—more specifically it does not mention Smart Snacks guidelines, and is lacking language regarding the completion of a triennial assessment.

Smart Snacks in Schools

- There are currently no foods or beverages sold to students besides a la carte milk. The types and sizes of milk served with the reimbursable meal meet the Smart Snacks guidelines.
- If any groups within your school show interest in selling foods or beverages to students during the school day, please see our Smart Snacks webpage for more information on the rule including our “Smart Snacks In a Nutshell” handout, a link to the product calculator, and fundraiser tracking tool templates: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- 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 National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
 - St. Anthony School hired a new director at the start of the 2016-17 SY. This director met the educational standards for an LEA with less than 500 students, but did not meet the requirement to have at least 1 year of relevant school nutrition experience and 8 hours of food safety training. An exemption was completed and approved by the state agency on 11/11/16. The director attended the first Great Beginnings training, completed Civil Rights training, and finished ServSafe on 11/14/16.
- Nonfood service staff who have responsibilities specific to food service operation (back-up on point of sale and confirming official) must also have training in job specific areas. Consider reviewing the Eligibility Manual for School Meals confirmation review section: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf> and watch webinars related to counting and claiming/recognizing a reimbursable meal as part of OVS: <https://dpi.wi.gov/school-nutrition/training/webcasts>
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Food Safety, Storage and Buy American

- The Food Safety Plan was available for review. It was reviewed last school year, but should be updated to reflect staffing and menu changes. Temperature logs, calibration logs and sanitizing solution logs were up to date.
- All food service employees have a signed Employee Reporting Agreement on file.

Donations/ ShareTables /No Thank You Tables

- DPI no longer requires the pre-approval of Share Tables, No Thank You Tables, and for donations. This change is in response to SP 41-2106, which encourages agencies to support efforts to minimize food waste. However, focus should be first emphasized on source reduction (menu planning/forecasting, Offer vs. Serve, and Smarter Lunchroom techniques). If an SFA chooses to implement any of these options, they are accepting all liability. Leftover items that are considered wholesome may be used at a later meal service, put out the next day in a separate part of the cafeteria as an extra, free item, given out to students later in the day, given to a school nurse to hand out as needed, donated to a charitable organization or composted. Adults may not consume these items. Reviewer noted fruits and vegetables left over from NSLP service are saved and served for afternoon snack on a regular basis in an effort to decrease waste. As indicated in the meal pattern section, the public school should be evaluating transport sheets and adjusting production to decrease waste at the source.
- Schools wishing to utilize any of these options must have a site specific Standard Operation Procedure and must document the leftover items daily. Please contact your local sanitarian to assist in creating a SOP that meets the needs of your agency.
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/monitoring-log-for-no-thank-you-table.pdf>. For more information on Sharing Tables, No Thank You Tables, and donations, please see our food safety website: <http://dpi.wi.gov/school-nutrition/food-safety/>.

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

- St. Anthony School does not store food for the NSLP program beyond milk. Food is obtained from the public school daily. The public school’s storage areas were reviewed to assess compliance. Reviewer noted Broccoli from Mexico and canned pineapple from Vietnam. Work with the Public school to source a domestic broccoli. Document other noncompliant items like the canned pineapple as an exemption.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

