

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Regis Catholic Schools

Agency Code: 18-6805

School(s) Reviewed: Immaculate Conception Elementary School

Review Date(s): 12/6/16 – 12/7/16

Date of Exit Conference: 12/7/16

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.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the Food Service Director, the Controller, and the food service staff for the courtesies extended during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review. All of the work done prior to the review and documentation submitted was much appreciated!

The Food Service Director has a great attitude and a willingness to learn. It is apparent she is very passionate about her job. The entire food service team is providing excellent customer service and the meals were

colorful and appetizing. Staff and students were very friendly. The Food Service Director does a fantastic job keeping up with all of the USDA regulations. She also does taste testing with the students and plans an appetizing menu. Keep up the great work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

Nothing to report. The Food Service Director is doing a superb job with determining applications, direct certification and the verification process. The October claim was reviewed and there were no issues with it.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director for sending all documentation ahead of time in such an organized manner. You are doing a great job serving healthy, well-balanced meals to students!

Comments/Technical Assistance/Compliance Reminders

Vegetable Subgroups: The mixed vegetables are credited as red/orange vegetable. Because the mix contains multiple vegetables (carrots, peas, corn, green beans, and lima beans), thus multiple vegetable subgroups, this product needs to be counted toward the *additional* vegetable category. This still counts as vegetables served for the day, but will count towards the total weekly requirement instead of a specific subgroup. Going forward, make sure this is updated on the production records.

Training: Staff at the Point of Service (POS) must know what constitutes a reimbursable meal. During the day of review, staff missed one tray, which was deemed a non-reimbursable meal. It is recommended that anyone involved with the school meals program, and especially at the POS attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Classes are provided free of charge. Numerous webcast training sessions are also available online. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the USDA requirements for the federal nutrition programs including Offer versus Serve (OVS). Information on summer classes will be sent to School Food Authorities in late spring and is also available on the DPI website at <http://dpi.wi.gov/school-nutrition/training>.

Findings and Corrective Action Needed

Finding #1: Acceptable crediting documentation was not available for the Turkey Meatballs. These processed foods must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Although a CN label was provided, it was not directly from the box. This proves this product was actually purchased and used by your food service operation.

Corrective Action Needed: Please send a CN label from the box for the Turkey Meatballs.
A picture of the CN label from the box for the Turkey Meatballs was submitted before the end of the review. No further action necessary – Corrective Action complete.

❑ **Finding #2:** There was a shortage of the *other* vegetable subgroup served during the week of review. Only a ¼ cup of cucumbers were offered on Tuesday, but a full ½ cup needs to be offered during the week as part of the K-5 meal pattern.

Corrective Action Needed: Please state what you will do to the week of review so that a full ½ cup of the *other* vegetable subgroup is offered to students.

❑ **Finding #3:** The printed menu should list all components that are included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Required Corrective Action: Please add to the menu that a variety of milk is offered daily as part of a reimbursable meal and submit a copy to me (via email).

3. RESOURCE MANAGEMENT

Commendations

A big thank you to the Controller for sending in all of the non-program foods and non-profit school food service account documents for the review. Thank you for meeting with the Food Service Director and me.

Comments/Technical Assistance/Compliance Reminders

1. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Comments/Technical Assistance/Compliance Reminders

1. When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” so that it can be printed in the same size font as the other printing in the document.
2. Signs in the cafeteria stated there was a “peanut free zone” or a “nut free zone”. Technical assistance was provided to change the wording on the signs to “peanut aware zone” instead. This was corrected on-site.

3. The wellness policy was recently updated and very well done. It includes goals but the goals are not measurable. Add measurable goals to the wellness policy such as trying smarter lunchroom techniques and participation in lunch (or breakfast if it is implemented). Be reminded that whenever the committee meets to discuss the wellness policy or if any changes are made to the policy, to update the public via newsletters, social media, email communications, etc. In addition to this, the triennial assessment must be completed sometime in the next three years.
4. The Food Service Director does a great job keeping track of her and her staff's training hours.
5. The food safety plan was well documented and is used often. All of the required components were accounted for. All temperature logs were well documented as well.
6. The most recent food safety inspection was not in a public space. This was corrected on-site.
7. Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
8. All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

Findings and Corrective Action Needed

Finding #1: The incorrect USDA non-discrimination statement was on the lunch menus.

Corrective Action Needed: Update the breakfast and lunch menus to have the new USDA non-discrimination statement on them: **“This institution is an equal opportunity provider.”** This was corrected on-site. No further action necessary.

Finding #2: The point of sale system overtly identifies students' meal eligibilities by showing the total cost of his or her lunch. Work with Skyward to remove the total cost for a student's meal.

Corrective Action Needed: Submit a statement in writing this has been corrected.

5. OTHER FEDERAL PROGRAMS REVIEWS

Commendations

As part of the National School Lunch Program, it is required to do SFSP outreach. Regis Catholic Schools inform the students and families of the free feeding site(s) they may have access to in the summer while school is out of session towards the end of the school year.

Comments/Technical Assistance/Compliance Reminders

There was some discussion regarding adding the School Breakfast Program.

The busy lifestyle of many families often means that breakfast is rushed or skipped at home. In addition, many children report not feeling hungry first thing in the morning, but have a better appetite later in the morning. Bus and commuting schedules may also interfere with children being fed at home. Having breakfast at school would provide these students with the morning nutrition they need to start their day.

Research shows that children who eat breakfast perform better in school, visit the school nurse less often, are absent from school less often, have a decreased risk of being overweight, eat improved quality diets, and have better behavior.

Alternative breakfast service models and financial models can be great options for programs wanting to have good participation and reduce the stigma associated with eating school breakfast.

- *Breakfast after First Period-* Breakfast after first period or second chance breakfast is a great way to increase breakfast participation, especially at the high school level. It gives students who weren't hungry first thing in the morning (or have time to get breakfast) a second chance at breakfast. It works well when combined with a grab n' go concept and offered on mobile carts or tables in high traffic areas, and students are able to grab a reimbursable breakfast on their way to class. It is also sometimes offered in the cafeteria between classes depending on what works best for the school.
- *Elimination of Reduced Price Breakfast-* By eliminating the reduced price breakfast, students who qualify for reduced price meals are offered breakfast for free. This removes any potential financial barrier to their participation in the School Breakfast Program. This option works well for schools with a high free and reduced percentage but a low participation of reduced price qualifying students. Providing free breakfast can increase participation and therefore federal reimbursement, often sufficiently to cover the cost of serving breakfast to these students for free.
- *Universal Free Breakfast-* Breakfast is offered to all students at no cost, but students continue to be claimed according to their correct eligibility category (free, reduced or paid) at the point of service). While students are not charged for their meals, the SFA is still reimbursed from the State according to the student's actual eligibility category. For example, if a student that qualifies for paid meals were to eat breakfast under UFB, they would not be charged, but the school would be reimbursed at the paid rate for that student.

A benefit of UFB is that it can reduce the stigma attached to eating breakfast at school. Often people associate school breakfast with low income families who qualify for free or reduced price meals, but providing free breakfast to all students can eliminate this association. While the amount of labor may increase, overall labor costs per meal are less. Finally, breakfast participation and therefore reimbursement can increase so significantly that a loss in revenue from otherwise paying students may not be experienced by the school.

There is no requirement for a school to have a certain percentage of students eligible for free and reduced price meals. UFB is typically most cost effective in schools with >70% of students qualify for free and reduced price meals, but schools with fewer eligible students have also operated the program successfully. Qualifying for Severe need Breakfast is beneficial as it provides additional reimbursement. UFB can be paired with any breakfast service model. The biggest determining factors in whether or not UFB will be feasible in your school are cost per meal and percentage of free and reduced students. There is a Cost Analysis Spreadsheet available on our website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/ufb-cost-analysis-spreadsheet-1617.xlsx>) that will help you take a look at the financial feasibility of implementing this option.

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.

