

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Reedsville Public Schools 364760

Administrative Review Conducted on: 4/6/2017

Sites Selected for Review: Reedsville Middle School

Date Corrective Action Plan was provided to SFA: 5/4/2017

Due Date for Corrective Action Plan: 6/2/2017

The following pages address the findings that were identified during your Administrative Review.
For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding	A summary of the regulation / requirement
The Code of Federal Regulations citation number or alternate resource citation	Suggested guidance for the SFA in order to achieve compliance
	SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Commendations & Suggestions
Outstanding job meeting all of the requirements for lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
Students were all encouraged to have fruit and veggies from the bar and many of them enjoyed the warm apples.
Staff was efficient and knowledgeable.
Staff invites 1st grades students in to see kitchen and learn about new items.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- on Monday the box CN label submitted for Chicken Nuggets shows that a 4 piece serving credits at 0.75 oz. eq. grain, which would not meet the daily grain requirement. We searched online and found the current Product Formulation Statement for this product, which shows that a 4 piece serving credits at 2 oz. eq. meat/meat alternate and 1 oz. eq. whole grain-rich grains. The box CN label that was submitted appears to be outdated. Be sure to maintain current labels.

We credited the chicken nugget meal at 1 oz. eq. grains for this menu review, and daily grains are met.

There were several items that were not dated upon delivery. The SFA was informed to make sure all items are dated.

The Local Wellness Policy and the assessment tool must be made available to the public.

The SFA was reminded that if food items are sold that do not meet smart snack requirements, they may not be sold until 30 minutes past the instructional day.

Finding #1

The SFA does not have a procedure in place for handling civil rights complaints for the Child Nutrition Programs. It does not state that they will not be handled internally and forwarded to appropriate outside agency.

Technical Assistance Provided

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

Regulation / Citation and Summary

FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

SFA Suggested Guidance for Compliance

To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure to the State Agency.

SFA Response



Finding #2

1000. Finding The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include a plan for measuring implementation.

Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies.

<http://www.fns.usda.gov/tn/local-school-wellness-policy>

Regulation / Citation and Summary

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this to the State Agency. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted to the state agency for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

SFA Response

Finding #3
An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.
Regulation / Citation and Summary
210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy. (3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.
SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted for review.

SFA Response

Finding #4

The SFA has not reached out to potential stakeholders to participate in the development, review, update, and implementation of the Local School Wellness Policy.

Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate.

Regulation / Citation and Summary

210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must: (1) Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy; (2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis; (3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that moving forward the SFA will advertise the ability to participate in the development and updating of the school wellness policy. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate.

SFA Response

Finding #5
The appropriate people were not given the option to be involved in the development, implementation, periodic review, and update of the Local School Wellness Policy.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.
Regulation / Citation and Summary
210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must: (1) Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy; (2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis; (3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.
SFA Suggested Guidance for Compliance
To come into compliance with this requirement the SFA must submit a statement that moving forward the SFA will advertise the ability to participate in the development and updating of the school wellness policy. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate.
SFA Response

Finding #6
706. The SFA had an excess of three months' average expenditures in its year-end net cash resources.

Technical Assistance Provided
<p>The SFA is required to maintain a food service fund balance below 3 months' average expenditures. The food service account had an ending fund balance of \$101,022.44 and three months' average expenditures of \$74,174 (total expenses of \$222,524.53 divided by 9 operating months, multiplied by 3). Since the ending fund balance exceeds the three months' average expenditures, the SFA is out of compliance. The SFA should submit a spend down plan on how they will decrease the fund balance to an appropriate level through allowable expenses. Allowable expenditures could include new equipment purchase, updated food service software, improving food quality, costs for additional district food service training, etc.</p>
Regulation / Citation and Summary
<p>7 CFR 210.14 (b) Net cash resources. The school food authority shall limit its net cash resources to an amount that does not exceed 3 months average expenditures for its nonprofit school food service or such other amount as may be approved by the State agency in accordance with §210.19(a).</p>
SFA Suggested Guidance for Compliance
<p>As the corrective action response, please submit a detailed plan on how you will lower the nonprofit school food service fund balance to a level below 3 months' average expenditures. This should include estimated timeframes and estimated costs, and a brief description of each part of the plan. Additionally, provide assurance that internal controls have been put into place to help prevent an unapproved excess cash balance in the future.</p>
SFA Response

Finding #7
<p>Resource Management – Adult Meals The SFA priced adult meals below the cost of producing these meals.</p>
Technical Assistance Provided
<p>The SFA has not sufficiently priced their adult lunches. Adult meals must be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the review year and the current year, the SFA priced adult lunches at \$2.90, but should have charged at least</p>
Regulation / Citation and Summary
<p>FNS Instruction 782-5: Pricing of Adult Meals in the National School Lunch And School Breakfast Programs "Breakfasts and lunches served to teachers, administrators, custodians and other adults must be priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or</p>
SFA Suggested Guidance for Compliance

As the corrective action response, provide documentation showing that adult meal prices have increased as required, or show how the SFA is using non-federal funds to make up for the adult meal price deficiency. Explain the process that will be put into place to ensure that an adult meal pricing policy is established and reviewed annually. This pricing policy should establish guidelines for determining the cost of adult meals and document any sources of revenue designated specifically for the support of adult meals if the adults will be undercharged.

SFA Response

Finding #8

Resource Management Comprehensive Review – NonProgram Foods
Prior to the review, the SFA had not determined compliance with Nonprogram Food Requirements.

Technical Assistance Provided

The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year. During the review, the SFA partially completed the DPI tool. The SFA did not fill out the program food section, and did not include adult meals or extra milks in the nonprogram food section, therefore the tool did not calculate compliance. The SFA should revise the tool and resubmit a completed copy as part of this review. If the tool shows you are out of compliance, you need to increase nonprogram food prices.

Regulation / Citation and Summary

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.

(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance. Additionally, submit a completed copy of the tool. If the tool shows you are out of compliance, include a plan to increase nonprogram food prices.

SFA Response

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