

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: 404018 Oak Creek-Franklin School District

Administrative Review Conducted on: 1/12-13/2017

Sites Selected for Review: Forest Ridge Elementary
West Middle School

Commendations & Suggestions

Outstanding job meeting all of the meal pattern requirements for breakfast and lunch at Forest Ridge Elementary, for the week of menu review.

The SFA was incredibly well organized and prepared for the review. All documentation requested by the reviewer was separated into binders or easily produced.

The cafeterias at each school were clean well run. All inventory was sorted by dates and food safety was a high priority.

The staff at each cafeteria was friendly and interacted well with the students.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- Additional technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

803. If the SFA were to receive a complaint within the FNS School Meals Programs, they can utilize the USDA Complaint Form found on the DPI website.

1006. 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 at least once every three years. The results of the assessment must be made available to the public.

207. The SFA was reminded that the FNS-742 must be completed for the 2016-2017 school year. Please see the DPI website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>

Date Corrective Action Plan was provided to SFA: 2/3/2017

Due Date for Corrective Action Plan: 3/3/2017

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.

Finding #1
410. For the week of menu review, the 6-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent meat/meat alternate.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: 1 oz. equivalent meat/meat alternate.
SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.
SFA Response

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Finding #2

410. For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate.

Technical Assistance Provided

<p>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/</p>

Regulation / Citation and Summary
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210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: minimum of 9 oz. equivalent of meat/meat alternate per week.
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SFA Suggested Guidance for Compliance
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<p>To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for meat/meat alternates are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.</p>
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SFA Response

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Finding #3
105. The SFA took more than 10 operating days to process applications, once they were received from the household.
Technical Assistance Provided
During the review, processing applications timely was discussed with the SFA. The SFA must process applications within 10 operating days of receiving the application from the household. The 10 day period applies to complete applications. If the SFA receives an application that is missing any required information, they should contact the household and try to obtain the missing information. Once an application is complete the SFA has 10 operating days to process the application and notify the household of the eligibility status.
Regulation / Citation and Summary
245.6(c)(6) Notice of approval—(i) Income applications. The local educational agency must notify the household of the children's eligibility and provide the eligible children the benefits to which they are entitled within 10 operating days of receiving the application from the household.
SFA Suggested Guidance for Compliance
To come into compliance with requirements for processing applications timely, the SFA must provide the State Agency with a written assurance that staff administering the free and reduced lunch program understand the timeline requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency.
SFA Response

Finding #4
126. Not all selected applications were approved correctly. The SFA did not calculate the income and household size correctly.
Technical Assistance Provided
During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.
Regulation / Citation and Summary
245.6(c)(4) Calculating income. The local educational agency must use the income information

provided by the household on the application to calculate the household's total current income. When a household submits an application containing complete documentation, as defined in §245.2, and the household's total current income is at or below the eligibility limits specified in the Income Eligibility Guidelines as defined in §245.2, the children in that household must be approved for free or reduced price benefits, as applicable.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted to the State Agency. If the SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the State Agency of the date that this letter was sent.

SFA Response

Finding #5

214. When a student's eligibility changed due to verification, the SFA did not make updates of the eligibility status on the benefit issuance list.

Technical Assistance Provided

During the review, updating eligibility that changed due to verification was discussed with the SFA. The SFA must update a student's eligibility that has changed due to verification.

Regulation / Citation and Summary

245.6a(f)(7) Eligibility changes. Based on the verification activities, the local educational agency shall make appropriate modifications to the eligibility determinations made initially.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for updating eligibility that has changed due to verification, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Also, please provide evidence that the appropriate student status(es) has/have now been updated, as well as the date that they were changed.

SFA Response

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Finding #6
215. The SFA did not complete verification by November 15.
Technical Assistance Provided
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.
Regulation / Citation and Summary
245.6a(b) Deadline and extensions for local educational agencies—(1) Deadline. The local education agency must complete the verification efforts specified in paragraph (c) of this section not later than November 15 of each school year.
SFA Suggested Guidance for Compliance
To come into compliance with the due date of verification, the SFA must provide the State Agency with an assurance that staff conducting verification understand this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. This plan should include, but is not limited to include the person(s) by position(s) who will be involved, specific tasks to be completed, and dates for completion.
SFA Response

Finding #7
1000. 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 #8

1005. 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 to the state agency for review.

SFA Response

Finding #9

1221. The SFA has additional employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program who have not received applicable training.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. The DPI verification website was reviewed with staff.

Regulation / Citation and Summary

SP 39-2015: Question 29: Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only? No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

Finding #10