



SFA Name: St. Lucas Lutheran School 405640
 Administrative Review Conducted on: 1/25/2017
 Sites Selected for Review: St. Lucas Lutheran School

Date Corrective Action Plan was provided to SFA: 2/17/2017

Due Date for Corrective Action Plan: 3/17/2017

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

Commendations & Suggestions

Outstanding job meeting all of the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Thank you for being so accommodating during the review process. Your willingness to make the necessary corrections to improve your program and bring everything into compliance it appreciated.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Resource Management - Paid Lunch Equity: The SFA incorrectly completed the Paid Lunch Equity Tool. It did not affect compliance, as the SFA is charging above the federal equity price for paid lunches, but nonetheless the SFA should maintain accurate records. This includes correctly completing the Paid Lunch Equity Tool every year. The SFA did not complete the Unrounded Requirement Finder tab. The reviewer worked with the SFA to revise the tool, and sent a corrected copy to the SFA via email. Next year, the SFA should input \$2.78 into Step 1 of the SY 17-18 tool.

Wellness Policy- The assessment of the wellness policy must be made available to the public. The SFA's website may be a good place to house this assessment.

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

Finding #1

705. The SFA charged unallowable costs to the food service account.

Technical Assistance Provided

During the resource management comprehensive review, it was determined that the SFA charged unallowable costs to the food service account. The SFA is responsible for ensuring no unallowable expenses are incurred using food service funds, and should have internal controls in place to prevent such unallowable costs from occurring. Examples of internal controls include staff training on allowable costs, developing written policies & procedures so only trained, authorized personnel can approve food service expenses, and segregation of duties. An extensive list of allowable and unallowable costs can be found in 2 CFR Part 200, Subpart E.

(1) The SFA charged waste collection expenses totaling \$771.06 in SY 15-16. The SFA did not have a utility study on file or another direct basis for allocating a portion of the school's bill to the food service function. The SFA self-corrected the issue and is not charging the expense to the food service program in the current school year. The SFA must pay back the food service account for the unallowable cost charged in the review year (SY 15-16).

Regulation / Citation and Summary

7 CFR 210.14 Resource management. (a) Nonprofit school food service. School food authorities shall maintain a nonprofit school food service. Revenues received by the nonprofit school food service are to be used only for the operation or improvement of such food service, except that, such revenues shall not be used to purchase land or buildings, unless otherwise approved by FNS, or to construct buildings. Expenditures of nonprofit school food service revenues shall be in accordance with the financial management system established by the State agency under § 210.19(a) of this part. School food authorities may use facilities, equipment, and personnel supported with nonprofit school food revenues to support a nonprofit nutrition program for the elderly, including a program funded under the Older Americans Act of 1965 (42 U.S.C. 3001 et seq.).

SFA Suggested Guidance for Compliance

As the corrective action response, the SFA should provide documentation showing that the food service account was reimbursed for the unallowable expenditures. Additionally, please explain how internal controls have been improved to ensure only allowable costs are charged to food service.

SFA Response

Finding #2

702. The SFA did not record a general fund transfer to zero out the loss in the food service program.

Technical Assistance Provided

On the SFA's Child Nutrition Program Report submitted to DPI for SY 15-16, the SFA's ending balance is negative \$3,517.51. The SFA's food service program operated at a deficit and should have reported a general fund transfer to show they have zeroed out the loss in the food service account. The 2015-2016 Child Nutrition Program Report must be revised to correctly report a general fund transfer in the "Transfers from General Fund" line.

Regulation / Citation and Summary

7 CFR 210.14 (c)

Financial assurances. The school food authority shall meet the requirements of the State agency for compliance with § 210.19(a) including any separation of records of nonprofit school food service from records of any other food service which may be operated by the school food authority as provided in paragraph (a) of this section.

SFA Suggested Guidance for Compliance

As the corrective action response, please show that a general fund transfer has been made to zero out the loss in the food service program. This should include a copy of the revised Child Nutrition Program Report.

SFA Response

Finding #3

Not all selected applications were approved correctly. Not all income based applications included the last four digits of the social security number of an adult household member, or an indication of none. In addition, the SFA annualized income when it should have been determined at its stated frequency.

Technical Assistance Provided

During the review, determining applications was discussed the SFA. When determining eligibility, the SFA must **ensure that the household has included the last four digits of the social security number of an adult household member (or indication of none)**; otherwise, the application is incomplete. Additionally, when making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, **the SFA may not annualize** income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

Regulation / Citation and Summary

245.6(a)(6) Household members and social security numbers. The application must require

applicants to provide the names of all household members. In addition, the last four digits of the social security number of the adult household member who signs the application must be provided. If the adult member signing the application does not possess a social security number, the household must so indicate. **245.6 (c) (4) Calculating income.** The SFA must use the income information provided by the household on the application to calculate the household's total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the SFA totals all sources and compares the total to the IEGs.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide written 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 with the corrective action. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted as part of the corrective action.

SFA Response

Finding #4

Changes are not being made to the point of service benefit issuance document in a correct manner to reflect the 30 days of carryover eligibility. The SFA is not allowing students a full 30 operating days of carryover eligibility before the SFA is changing the eligibility.

Technical Assistance Provided

During the review, updating the point of service and allowing a full 30 days of prior eligibility was discussed with the SFA. Students must be allowed a full 30 operating days of prior eligibility, and when this expires, the SFA must make the appropriate updates at the point of service.

Regulation / Citation and Summary

245.6(c)(2) Applications and documentation of direct certification from the preceding year shall be used only to determine eligibility for the first 30 operating days following the first operating day at the beginning of the school year, or until a new eligibility determination is made in the current school year, whichever comes first.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for carryover benefits and for updating eligibility at the point of service, the SFA must put a plan in place to ensure future compliance. The plan should include: a statement that the SFA understands the requirements for 30 day carryover benefits and updating eligibility status, a process that will be implemented to ensure that all students eligibility for carryover status are provided that benefit, a statement that the 30 day carryover period will not be less than or exceed 30 days, a statement that once a new determination has been made for the student the new eligibility will take precedence over the carryover status, a statement that the benefit issuance list and the point of service documents will be updated as needed to reflect accurate eligibility determinations. In addition the plan should include the name and title of the SFA representative that will ensure compliance with this area. The SFA also needs to provide additional training to all applicable staff. Please submit the plan to the State Agency. Eligibility statuses found to be incorrectly listed during the review must be corrected, and the date of the correction must be submitted to the State Agency.

SFA Response

Finding #5

Not all applications selected for review were verified correctly. The SFA did not determine the correct eligibility based on household income and size. The SFA was also incorrectly converting all income on applications to a total annual income when only one frequency of income was listed.

Technical Assistance Provided

During the review, properly determining the correct eligibility, based on household income and size, was discussed with the SFA. To determine eligibility, the SFA must follow the procedures for processing applications and submitted eligibility documents as outlined in the Eligibility Manual for School Meals, Chapter 3, as well as the procedures for verifying applications as outlined in Chapter 4. The SFA was informed that income should only be annualized when more than one frequency of income is listed on the application.

Regulation / Citation and Summary

245.6a(f)(2) Documentation timeframe. Households selected and notified of their selection for verification must provide documentation of income. The documentation must indicate the source, amount and frequency of all income and can be for any point in time between the month prior to application for school meal benefits and the time the household is requested to provide income documentation.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for obtaining written evidence of the income frequency, the SFA must provide written 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 as corrective action.

SFA Response

Finding #6

The confirming official may not also be the determining official.

Technical Assistance Provided

During the review the SFA was informed that the confirming official may not also be the determining official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official. Recommend visiting the DPI website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>

Regulation / Citation and Summary

CFR 245.6a(e)(1)(i) Confirmation of a household's initial eligibility. Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. If the initial determination was correct, the local educational agency shall verify the approved application.

SFA Suggested Guidance for Compliance

To bring this area into compliance the SFA must provide written assurance that the staff understands this requirement. The SFA must submit the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.

SFA Response

Finding #7

The SFA's public release did not contain the most current non-discrimination statement.

Technical Assistance Provided

During the review the required components of the public release were discussed with the SFA. The letter of notice must contain the most current non-discrimination statement.
Regulation / Citation and Summary
FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.
SFA Suggested Guidance for Compliance
To come into compliance with civil rights requirements, the SFA must submit written assurance that the public release now contains all required information, along with a copy of the corrected public release.
SFA Response

Finding #8
The Local School Wellness Policy has not been made available to the public and has not included language permitting the public to participate in development, implementation and review of the policy.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The Wellness Policy should include language related to permitting the public to participate in the development, implementation and review of the policy. Additionally, the Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter. Recommend visiting the DPI website: https://dpi.wi.gov/school-nutrition/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 be in compliance the SFA must provide a statement that the wellness policy has been made public. In addition please submit documentation to support the statement, if the policy was posted to the website please provide the link, if it was sent out in a newsletter please provide a copy of the newsletter.

SFA Response

Finding #9

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.

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 written 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 as corrective action, indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

Finding #10

No person has been designated as the Food Service Director. The person who is assuming the role of, School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. Recommend visiting the DPI website: <https://dpi.wi.gov/school-nutrition/training>

Regulation / Citation and Summary
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210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. For the school year beginning July 1, 2015, program directors must complete eight hours of annual training. Beginning July 1, 2016, twelve hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.

SFA Suggested Guidance for Compliance
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To come into compliance with the requirements for Professional Standards, the SFA must provide provide who will be the Food Service Director as well as written 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 as part of the corrective action, indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

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Finding #11

The SFA has not performed SFSP outreach.
Technical Assistance Provided
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.
Regulation / Citation and Summary
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.
SFA Suggested Guidance for Compliance
To come into compliance with this requirement, the SFA must submit written assurance that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.
SFA Response

Finding #12