

# WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: St. Rafael the Archangel 407096

Administrative Review Conducted on: 2/9/2017

Sites Selected for Review: St. Rafael , South Campus

### Commendations & Suggestions

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

The salad bar was colorful and nice to see fresh fruits and vegetables offered.

### Other areas of Technical Assistance (NOT requiring Corrective Action)

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

Menu Review- Please note that you need to round up to 11 chips per serving on Tuesday with the Nachos meal to meet the minimum 1 oz. equivalent daily grain requirement. This was included as part of the analysis.

Wellness Policy- It is recommended that the wellness policy is addressed at least once per year. Recommend adding the date for when the policy is updated somewhere on the policy. Once an assessment of the policy is complete, it must be made available to the public.

Food Safety- All food in dry storage and in the refrigerators should be dated.

Professional Standards - The SFA should ensure that all required staff receive the appropriate hours of training completed/planned. DPI does allow the SFA flexibility to complete annual training requirements over a 2 year period.

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

**Due Date for Corrective Action Plan:** 3/31/2017

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.**

<b>Finding #1</b>
410. For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 3/4 cup vegetable. Vegetables were provided, however the minimum required portion size was not met.
<b>Technical Assistance Provided</b>
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. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a>
<b>Regulation / Citation and Summary</b>
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 3/4 cup of vegetable.
<b>SFA Suggested Guidance for Compliance</b>
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.
<b>SFA Response</b>

<b>Finding #2</b>
410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 1/2 cup starchy vegetable subgroup.
<b>Technical Assistance Provided</b>
<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 contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group 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.</p> <p><a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a></p>
<b>Regulation / Citation and Summary</b>
210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C starchy.
<b>SFA Suggested Guidance for Compliance</b>
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 vegetable subgroups 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.
<b>SFA Response</b>

<b>Finding #3</b>
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404. Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast. The lunch sign did not have correct information for offer vs serve.

#### Technical Assistance Provided

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

Requirements under Offer vs. Serve include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

#### Regulation / Citation and Summary

220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

#### SFA Suggested Guidance for Compliance

To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.

#### SFA Response

#### Finding #4

501. The cafeteria staff taking the point of service has not been trained on Offer versus Serve.

#### Technical Assistance Provided

If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures. It was determined during the review that the SFA is not offering training on Offer vs. Serve to the cafeteria staff. Visit this website for trainings: <https://dpi.wi.gov/school-nutrition/training>

#### Regulation / Citation and Summary

210.10 (e) Offer versus serve. School lunches must offer daily the five food components specified in

the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two items at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve. Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written process that has been put in to place to ensure Offer vs Serve is now being implemented correctly at the senior high school(s). In addition to the new process the SFA must also provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the new process and the date the training was completed.

#### **SFA Response**

#### **Finding #5**

1005. An assessment of the Local School Wellness Policy has not been completed. Stakeholders have not been notified that they may participate in the updating and implementation of the wellness policy.

#### **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.

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.

Please visit this website for additional wellness policy information: <https://dpi.wi.gov/school-nutrition/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 and must be made available to the public. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate and of the wellness policy assessment.

**SFA Response**

**Finding #6**

1215. The food service director has not completed the required food safety training.

**Technical Assistance Provided**

To be in compliance, the SFA must ensure that any new director meets the new Professional Standards, including completing food safety training. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

**Regulation / Citation and Summary**

210.30(b)(1)(v) School nutrition program directors for all local educational agency sizes. All school nutrition program directors, for all local educational agency sizes, must have completed at least eight hours of food safety training within five years prior to their starting date or complete eight hours of food safety training within 30 calendar days of their starting date. At the discretion of the State agency, all school nutrition program directors, regardless of their starting date, may be required to complete eight hours of food safety training every five years.

<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the Nutrition Program Director understands 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, indicating how the SFA will ensure that the food safety training is completed.
<b>SFA Response</b>

<b>Finding #7</b>
1219. The SFA is not tracking training hours.
<b>Technical Assistance Provided</b>
During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
<b>Regulation / Citation and Summary</b>
210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.
<b>SFA Suggested Guidance for Compliance</b>
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 training is now being tracked. A completed tracker must be submitted to the State Agency that includes all employees.
<b>SFA Response</b>

<b>Finding #8</b>
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1217/1221. The SFA has full time staff and 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. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. The SFA should oversee that all Fresh and Safe employees have completed their hours of training and keep/maintain copies of all trackers.

#### Regulation / Citation and Summary

210.30(c) Continuing education/training standards for all school nutrition program managers. Each school year, the school food authority must ensure that all school nutrition program managers have completed annual continuing education/training. For the school year beginning July 1, 2015, program managers must complete six hours of annual training. Beginning July 1, 2016, ten hours of annual training are required. The annual training must include, but is not limited to, the following topics, as applicable: (1) Administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures); (2) The identification of reimbursable meals at the point of service; (3) Nutrition; (4) Health and safety standards; and (5) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Please refer to SP 39-2015 Q and A for additional information.

#### 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 #9

900. The on-site monitoring form for the breakfast program was not completed.

#### Technical Assistance Provided

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA did not complete on-site monitoring by February 1st and an extension was not requested. Since the SFA has multiple sites they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year unless an extension was requested by the SFA and approved by the State Agency. Review the memo for monitoring form templates: <https://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>

**Regulation / Citation and Summary**

SP56-2016 Every school year (as defined in 7 CFR Part 210.2, July 1 to June 30), each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA.

**SFA Suggested Guidance for Compliance**

As the corrective action response the SFA must complete the monitoring review for all sites within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that all on-site reviews are completed prior to February 1st of each year. Additionally, please submit a process that will be put in place should an extension need to be requested from the State Agency. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring.

**SFA Response**

**Finding #10**

1400. A current HACCP plan was not available on-site.

**Technical Assistance Provided**

During the review, the food safety plan was discussed with the SFA. The SFA must have a current food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.

**Regulation / Citation and Summary**

210.13(c) Food safety program. The school food authority must develop a written food safety

program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. In addition to the assurance an electronic copy of the food safety plan must be submitted for review once it has been updated and completed.

**SFA Response**

**Finding #11**

1601. 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 an assurance to the State Agency 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**

1901. The Fresh Fruit and Vegetable Program's cost documentation does not support the school's claim for reimbursement. Unclear of any administrative costs for the program and unclear of hours spent for the program's operation.

**Technical Assistance Provided**

During the review, proper claiming was discussed with the SFA. To be in compliance, the school participating in the FFVP must ensure that it claims reimbursement only for allowable items for which it has maintained the proper documentation. The SFA was informed of how all documentation and invoices must support the claim for reimbursement. The SFA was informed to review the current year's FFVP Handbook for additional guidance.

**Regulation / Citation and Summary**

Fresh Fruit and Vegetable Program, a Handbook for Schools: Schools are responsible for ensuring that all claims are correct and appropriate; include only those costs related to the FFVP on the claim form. Operating costs are the costs of running the FFVP service. These are documented expenses for acquiring, delivering, preparing, and serving fruits and vegetables. They include the FFVP portion of the goods and services the school pays for: Buying fruits, vegetables, low-fat or non-fat dip for vegetables only, Buying nonfood items like napkins, paper plates, serving bowls and trays, cleaning supplies, and trash bags, Value added services such as pre-cut produce, ready-made produce trays, and delivery charges, Salaries and fringe benefits for employees who do such tasks as washing and chopping produce, preparing trays, distributing produce to classrooms, setting up kiosks, restocking vending machines, and cleaning up.

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for the FFVP, the SFA must provide the State Agency with an assurance that staff administering the FFVP 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. The SFA must also submit detailed invoices that show the specific fruits, vegetables, and dips purchased for the month of December to support the claim for reimbursement. The SFA must also submit the number of hours charged for operating and administering the program. This must include Fresh and Safe employees as well as SFA employees.

SFA Response

Finding #13
1907. The school is offering dip in an amount greater than two (2) tablespoons and is full fat.
Technical Assistance Provided
During the review, dip with vegetables was discussed with the SFA. To be in compliance, the school participating in the FFVP must ensure that dip is not offered in an amount greater than two tablespoons. The SFA was informed to review the current year's FFVP Handbook for additional guidance. To be in compliance, the school participating in the FFVP must ensure that dip is either low-fat or non-fat. The SFA was informed to review the current year's FFVP Handbook for additional guidance. Please visit this website for additional information: <a href="https://dpi.wi.gov/school-nutrition/ffvp">https://dpi.wi.gov/school-nutrition/ffvp</a>
Regulation / Citation and Summary
Fresh Fruit and Vegetable Program, a Handbook for Schools: If the school chooses to serve dip with vegetables, be sure to offer only low-fat yogurt-based or other low-fat or non-fat dips. The amount used should be what is commonly noted as a "serving size" for condiments, as shown on Nutrition Facts Labels" 1 to 2 tablespoons.  Fresh Fruit and Vegetable Program, a Handbook for Schools: If the school chooses to serve dip with vegetables, be sure to offer only low-fat yogurt-based or other low-fat or non-fat dips.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for the FFVP, the SFA must provide the State Agency with an assurance that staff administering the FFVP 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 is now ensuring that no dips are offered in excess of two tablespoons per serving and will be low or non-fat. Include the person by position who will oversee the FFVP.
SFA Response

Finding #14
1908. The school is offering cooked vegetables but is not conducting a nutrition lesson.
Technical Assistance Provided

During the on-site review, cooked vegetables were discussed with the SFA. To be in compliance, the school participating in the FFVP must ensure, if cooked vegetables are offered, that a nutrition lesson is also provided to the students in conjunction with this. The SFA was informed to review the current year's FFVP Handbook for additional guidance.

#### **Regulation / Citation and Summary**

Fresh Fruit and Vegetable Program, a Handbook for Schools: Fresh (not canned, frozen, dried, or otherwise processed) vegetables that are cooked must be limited to once-a-week and must always include a nutrition education lesson related to the prepared item.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for the FFVP, the SFA must provide the State Agency with an assurance that staff administering the FFVP 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 is now ensuring that cooked vegetables are offered no more than once per week. Include the person by position who will oversee the program.

#### **SFA Response**