

**USDA Child Nutrition Programs**  
*Commendations, Corrective Actions & Technical Assistance*

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**School Food Authority:** St. Catherines School  
**School(s) Reviewed:** 3410-St Catherines School  
**Review Team:** TCB Reviewer  
**Corrective Actions Due Date:** 4/17/2019

**Agency Code:** 407406  
**Review Date(s):** January 24, 2019  
**Date of Exit Conference:** 1/24/2019

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at St. Catherines School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The TCB review team appreciates the eagerness of the staff at St. Catherines School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that St. Catherines School will continue to improve their knowledge and operation of child nutrition programs.

## Required Corrective Actions

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

**Finding #1:** *SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly December claim at Breakfast. For the Month of Review – December - the SFA underclaimed Breakfast meals by a total of 338.*

**Required Corrective Action #1:** *Review and upload monthly edit checks for breakfast for January thru February into the shared Google folder. Provide a written plan to prevent this issue from occurring again in the future and upload it into the shared Google folder.*

**Finding #2:** *The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal. During breakfast in the classroom 7 meals were served to students but not counted until later (this occurred in one classroom).*

**Required Corrective Action #2:** *Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.*

**Finding #3:** *The SFA does not have signage explaining what constitutes a reimbursable breakfast to students. There is no OVS meal signage for any of the breakfast in the classroom points of service.*

**Required Corrective Action #3:** *The SFA will post OVS meal signage on the crates used to transport the meal components to the classrooms and to keep these visible to students during meal service.*

**Finding #4:** *The SFA is not implementing Offer vs. Serve properly for all its breakfast in the classroom meal services. In one classroom for breakfast in the classroom meal service, students were directed to take all items offered.*

**Required Corrective Action #4:** *The SFA cannot require students to take all offered items; breakfast in the classroom teachers/monitors must be retrained to ensure proper understanding and implementation of Offer vs Serve. Upload to the shared Google folder evidence of OVS retraining.*

**Finding #5:** *The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v)).*

**Required Corrective Action #5:** *Complete 8 hours of food safety training and provide documentation of completion. Upload documentation into the shared Google folder.*

**Finding #6:** *Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).*

**Required Corrective Action #6:** *Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.*

## Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not correspond directly to numbered findings above.

**Technical Assistance #1:** SFAs are required to have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. This includes a monthly edit check which compares each school's daily counts of free, reduced & paid lunches against the number of children in that school currently eligible for free, reduced and paid lunches multiplied by the attendance factor (7 CFR 210.8).

**Technical Assistance #2:** Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.

**Technical Assistance #3:** Ensure signage is sufficient to explain what constitutes a reimbursable meal at breakfast. The DPI website provides online resources for [signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

**Technical Assistance #4:** Each year, non-school nutrition staff with responsibilities for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30).

The State Superintendent of Wisconsin Department of Public Instruction shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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