

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: St. Charles Borromeo School

Administrative Review Conducted on: 1/10/2017

Sites Selected for Review: St. Charles Borromeo School 407410

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.

Nice variety of fresh fruits and vegetables offered throughout the week.

There were no meal benefit application errors. The paperwork was well organized and ready for review.

The staff was helpful and quick to answer any questions.

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

Recommend taking note of when changes to the eligibility status of a student changes on the master benefit issuance list.

As of now the school does not have any students with special dietary needs. The SFA was reminded that if in the future they have students will special dietary needs that accommodations are made only with a note from a recognized medical authority.

Recommend looking into starting the Special Milk Program for the PreK-3 students at the school. Contact Wisconsin DPI to inquire.

Food Safety at Vending School:

- All boxes and containers and trash should be off the kitchen floor as well as the dry storage room floor.
- All boxes and containers must be dated upon receipt. If a case of #10 cans has been broken down, those individual cans should be dated as well.
- There are milk crates being used as means to have all boxes off the floor which is not allowed.

Food Safety at St. Charles Borromeo

- Handwashing should be reviewed with all staff.

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:

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| 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.

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| Finding #1 |
| 128. The SFA annualized income when it should have been determined at its stated frequency. |
| Technical Assistance Provided |
| During the review, 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(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. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA 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 the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income. |
| SFA Response |
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| Finding #2 |
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| 402. On the day of review, the K-8 lunch menu did not meet the 1/2 cup daily fruit requirement. A fruit was provided, however the minimum required portion size was not met. Also, on the day of review, the menu did not meet the 3/4 cup daily vegetable requirement. |
| 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/ . The SFA was also informed to not change the portion size as planned on the production record. |
| 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: K-8: 1/2 cup of fruit. 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. |
| 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 day of review with the corrections that were made to the menu to bring it into compliance moving forward. |
| SFA Response |
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| Finding #3 |
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| 500. Offer versus Serve is not being implemented correctly. |
| Technical Assistance Provided |

Requirements under Offer vs. Serve include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. During the review, it was determined that the SFA is not following these requirements. The requirement as well as examples of the findings and possible solutions were reviewed with the SFA.

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 #4 |
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| 501. The cafeteria staff has not been trained on Offer vs. 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. Offer vs. Serve training should be found on the DPI website and/or the USDA website. |
| Regulation / Citation and Summary |
| Offer vs. Serve Guidance Manual (Page 4) Schools are expected to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements. |
| SFA Suggested Guidance for Compliance |

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written statement that training for all kitchen staff will be provided.. In addition 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 date the training was completed.

SFA Response

Finding #5

502. Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance Provided

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

210.10 (a)(2) 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 requirements of Offer vs. Serve, the SFA must state that reimbursable meal signage is now posted for the students and provide the location where it was posted.

SFA Response

Finding #6

402. Production records are not completed correctly.

Technical Assistance Provided

During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.

Regulation / Citation and Summary

210.10(a)(3) Production and menu records. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance.

SFA Suggested Guidance for Compliance

To bring this area into compliance the SFA must submit a written assurance that includes; a statement that the SFA is aware of the production records requirement, a statement that production records will be maintained for all meals produced, a process for completing the productions records, and a statement that additional training will be provided to the SFA staff, include the training outline and the dates that the trainings will be held. 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 a week of completed production records for review.

SFA Response

Finding #7

Prior to this review, the SFA did not determine compliance with nonprogram food revenue requirements using the USDA Nonprogram Food Revenue Tool or the DPI Nonprogram Food Price Calculator.

Technical Assistance Provided

The SFA did not determine compliance with nonprogram food revenue requirements. The Nonprogram Food Revenue Tool should be completed every year. The SFA completed the tool during the review and submitted it to the reviewer, but the tool was only partially completed. The SFA did

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

Finding #8

803. The SFA does not have a procedure in place for handling civil rights complaints.

Technical Assistance Provided

During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

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 #9

1201/13. No one person has been designated as the food service director. Someone must complete the training hours required for a food service director.

Technical Assistance Provided

During the review, the SFA was informed that a director must be assigned and complete the required training hours as director.

Please visit the site: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf> for professional standards information.

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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 webpage dpi.wi.gov/school-nutrition/training.

Please keep in mind that WI requires someone in the SFA to hold a certificate of Food Protective Practices when the SFA participates in NSLP. This is administered by DHS.

Regulation / Citation and Summary

210.30(b) Minimum standards for all school nutrition program directors. Each school food authority must ensure that all newly hired school nutrition program directors meet minimum hiring standards, as set forth in this section.

SFA Suggested Guidance for Compliance

To come into compliance, one person must be assigned as food service director. Please ensure that the hiring standards and training requirements are met. Please submit a copy of all hours of training that has been completed and a plan for meeting any remaining hours of training. Submit any documentation to show that the food service director has met the hiring standards, if applicable.

SFA Response

Finding #10

1213. The employee list as determined on the day of review did not match the SFA's employee information given on the off-site assessment tool. Two staff were incorrectly determined as non nutrition staff with nutrition program duties. These two staff members should be considered part time nutrition employees and complete the required number of hours of training.

Technical Assistance Provided

During the on-site review, Professional Standards requirements were discussed with the SFA. To be in compliance, the SFA must ensure that all staff are meeting the training requirements. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

The LEA's employee list on the day of review did not match the SFA employee information given on the off-site assessment tool. This results in non-compliance as, based on the actual employee list, the professional standards as described in 210.30(b-e) are not being met.

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 re-categorize all employees and ensure the correct employees have met the correct hiring requirements and the required hours of training have been or will be completed.

SFA Response

Finding #11

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| 1219. The SFA is not tracking training hours. |
| Technical Assistance Provided |
| 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. |
| Regulation / Citation and Summary |
| 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 |
| 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 training is now being tracked. A completed tracker must be submitted to the State Agency that includes all employees. |
| SFA Response |
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| Finding #12 |
| 1404. The SFA did not request that 2 health inspection reports are completed. |
| Technical Assistance Provided |
| During the review, requesting 2 health inspection reports was discussed with the SFA. The SFA must contact the health department to request 2 visits are completed each school year if two visits were not completed the year before and/or if it becomes late in the school year and a second visit has not been completed. This record of communication must be maintained on file. |
| Regulation / Citation and Summary |
| 210.13(b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request. |
| SFA Suggested Guidance for Compliance |
| To come into compliance with this finding the SFA must submit a statement that the SFA will contact the local health department and request 2 visits per school year. The SFA must submit a copy of the communication and the date it was completed. |

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| SFA Response |
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| Finding #13 |
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1601. SFSP outreach has not been completed.

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| Technical Assistance Provided |
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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.

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| Regulation / Citation and Summary |
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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.

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| SFA Suggested Guidance for Compliance |
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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.

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| SFA Response |
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| Finding #14 |
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1005. An assessment of the Local Wellness Policy has not been completed.

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| Technical Assistance Provided |
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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.

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| Regulation / Citation and Summary |
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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