

USDA Child Nutrition Programs
Commendations, Corrective Actions & Technical Assistance

School Food Authority: St Roman School

Agency Code: 407875

School(s) Reviewed: St. Roman

Review Date(s): January 16, 2019

Review Team: TCB Reviewer

Date of Exit Conference: 1/16/19

Corrective Actions Due Date: 4/1/19

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 Romans 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 Romans 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 Romans will continue to improve their knowledge and operation of child nutrition programs.

Commendations

Commendation #1: *Staff work very hard to serve students a good meal. The program is still transitioning from being a formerly vended program to a self-operated program. With continued training, the team will continue to grow and improve their operations and meals.*

Required Corrective Actions

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

Pre-visit and On-site Procedures:

MEAL ACCESS AND REIMBURSEMENT (CRITICAL AREA-PERFORMANCE STANDARD I)

SECTION 100: CERTIFICATION AND BENEFIT ISSUANCE

- **Finding #1:** *The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The identified applications were not determined correctly due to missing/incorrect household information, including child or household name, case number, social security number, adult signature, miscategorized applications, benefit issuance errors.*

Required Corrective Action #1: *Contact household(s) with incomplete application(s) and request the missing information and/or incorrect benefit issuance. Upload a copy of the completed application(s) to the shared folder. [Each application was corrected and/or addressed on January 15, 2019; no further action is necessary].*

SECTION 400: MEAL PATTERN AND NUTRITION QUALITY (CRITICAL AREA-PERFORMANCE STANDARD II)

- **Finding #2:** *The SFA did not ensure the use of production records in accordance with 7 CFR 210.10 and 220.8. Production records did not consistently provide all crediting information and portion size information (albeit, the totality of information including usage sheets and recipes, did make determination of proper quantities possible).*

Required Corrective Action #2: *The SFA will submit a week of completed lunch production records utilizing the DPI Production Record Template.*

General Program Compliance (General Areas)

SECTION 1000: LOCAL WELLNESS POLICY

- **Finding #3:** *The SFA did not notify the public about the LWP in accordance with 7 CFR 210.31.*
Required Corrective Action #3: *Provide a written statement on how the public will be notified of the LWP, include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.*

- **Finding #4:** *The SFA does not have documentation indicating when and how the LWP is/will be reviewed and updated.*
Required Corrective Action #4: *Provide to a plan on when and how the LWP will be reviewed and updated.*

- **Finding #5:** *The SFA does not actively seek or maintain documentation to inform potential stakeholders of their ability to participate in the LWP committee.*
Required Corrective Action #5: *Provide a plan on how potential stakeholders will be notified and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.*

SECTION 1200: PROFESSIONAL STANDARDS

- **Finding #6:** *Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.*
Required Corrective Action #6: *Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into the shared folder (or provide via email). A DPI tracking document is available on the [Professional Standards](https://dpi.wi.gov/school-nutrition/professional-standards) webpage (<https://dpi.wi.gov/school-nutrition/professional-standards>).*

SECTION 1400: FOOD SAFETY, STORAGE, AND BUY AMERICAN

- **Finding #7:** *The SFA did not meet the requirements of the Buy American Provision in accordance with 7 CFR 210.21(d). The SFA does not have a procedure in place to monitor the vendor's performance of the Buy American Provision as written in their current contracts. Non-domestic items without exemption paperwork included: Pineapple and Bananas.*
Required Corrective Action #7: *The SFA must develop and submit a procedure to monitor vendor performance. The procedure must include: 1) how the SFA will monitor the country of origin on product labels when receiving deliveries in order to identify and address non-domestic products, and 2) how the SFA will periodically monitor storage facilities, refrigerators, freezers, dry storage and warehouses to ensure they are receiving domestic products or products that meet the procurement contract exceptions. For any non-compliant items, the SFA must justify the use with the Buy American exemption form. A non-compliant product form is available on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).*

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.

Technical Assistance #1: *The reviewer recommended the staff attend additional training sessions, either in-person and/or online, regarding menu planning, component crediting, and production records. The DPI [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage has numerous training and resources available (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).*

Technical Assistance #2: *The SFA is required to inform and update the public about the assessment of the implementation of the LWP. The first assessment should be completed within three years of your SFA's policy being updated but no later than June 30, 2020 to be in compliance with this rule. Following the assessment SFAs are required to retain a copy of the assessment and documentation regarding the public notification (7 CFR 210.31). Additional information and resources are available from the DPI [School Wellness](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (<https://dpi.wi.gov/school-nutrition/wellness-policy>).*

Technical Assistance #4: *The reviewer recommended the staff review resources regarding professional standards training and tracking. The DPI [Professional Standards](https://dpi.wi.gov/school-nutrition/professional-standards) webpage has additional information and resources available (<https://dpi.wi.gov/school-nutrition/professional-standards>).*

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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