

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

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**School Food Authority:** St Thomas Aquinas Academy

**Agency Code:** 407924

**School(s) Reviewed:** St Thomas Aquinas Academy

**Review Date(s):** January 17, 2019

**Review Team:** TCB Reviewer

**Date of Exit Conference:** 1/17/19

**Corrective Actions Due Date:** 4/15/19

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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 Thomas Aquinas Academy 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 Thomas Aquinas Academy 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 Thomas Aquinas Academy 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:** *The correct income conversion factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with one income frequency were annualized. Potential Fiscal Action will be calculated when corrective actions are received and approved.*

**Required Corrective Action #1:** *Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.*

**Finding #2:** *The SFA did not complete the verification process per 7 CFR 245.2. Verification was not started until January and the Verification Report was not completed correctly.*

**Required Corrective Action #2:** *Submit a statement of understanding that verification must be completed by November 15. Correct and re-submit the Verification Report.*

**Finding #3:** *The SFA did not complete a confirmation review before verifying the application.*

**Required Corrective Action #3:** *Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification*

**Finding: #4:** *The SFA did not use a process to ensure compliance with the revenue from nonprogram food requirements in 7 CFR 201.14(f). The nonprogram revenue tool was not completed.*

**Required Corrective Action #4:** *The SFA must submit a completed Non-Program Revenue Tool for a period of 1 month from the current school year.*

**Finding #5:** *The SFA did not have a copy of the food safety plan at each school that was site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).*

**Required Corrective Action #5:** *Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan into shared Goggle folder.*

**Finding #6:** *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. Pineapple, Mandarin Oranges; no justification.*

**Required Corrective Action #6:** *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. The SFA must also contact the vendor to obtain the country of origin information for all products. The SFA will submit a copy of the vendor's response.*

**Finding #7:** *The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).*

**Required Corrective Action #7:** *Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and timeframe for distributing SFSP outreach materials.*

**Finding #8:** *The SFA did not notify the public about the LWP in accordance with 7 CFR 210.31.*

**Required Corrective Action #8:** *Upload into shared Google folder a 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 #9:** *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 #9:** *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 shared Google folder.*

## Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. The numbers below may not correspond 1-to-1 with the numbered findings on the prior pages. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program.

**Technical Assistance #1:** Household income can only be annualized when there is more than one income frequency listed on the application. If there is only one income frequency listed, the application must be determined based on the frequency indicated and not converted to annual.

**Technical Assistance #2:** Verification is the process of confirming students free or reduced-price meal eligibility (7 CFR 245.2) More information on the verification process can be found in the Eligibility Manual.

**Technical Assistance #3:** Prior to any verification activity, the confirming official must review each application chosen for verification to ensure that the initial determination was correct. The confirming official should initial the application or use Verification Tracker Form to document that the confirmation was conducted.

**Technical Assistance #4:** The nonprogram food revenue tool is a process that must be completed annually. Resources from DPI are [available online](#) (See the “Non-Program Food Revenue Section available from this html link: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

**Technical Assistance #5:** Each SFA must have a food safety plan that is implemented and includes Standard Operating Procedures (SOP), Identify foods by process 1-2-3, critical control points, monitoring procedures and corrective action procedures (7 CFR 210.13). Multiple food safety resources are available from the DPI website’s “[Wisconsin School Food Safety](#)” page (<https://dpi.wi.gov/school-nutrition/food-safety>).

**Technical Assistance #6:** The DPI website provides guidance regarding [Buy American](#), including a template policy, the justification form called “Buy American – Noncompliant Product List” and other resources. (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>)

**Technical Assistance #7:** USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods: •Promotion of the summer meals locator on the DPI Summer Meals webpage •Promotion of calling 211 to locate meals in the area •Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area •Promotion of the [USDA Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

**Technical Assistance #8:** The SFA must inform the public about the content, implementation of, and updates to the LWP on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31).

**Technical Assistance #9:** Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (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).



*With School Nutrition Programs!*