

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

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**School Food Authority:** Holy Spirit School

**Agency Code:** 447074

**School(s) Reviewed:** 870 – Holy Spirit School S. Campus

**Review Date(s):** January 21, 2019

**Review Team:** TCB Reviewer

**Date of Exit Conference:** 1/21/2019

**Corrective Actions Due Date:** M/D/YY

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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 Holy Spirit 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 Holy Spirit 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 Holy Spirit School will continue to improve their knowledge and operation of child nutrition programs.

## Commendations

**Commendation #1:** *Signage posted is very thorough – even the next day’s menu is listed.*

**Commendation #2:** *The vegetable bar is a great option for students – it reduces waste and provides required items in a manner where students select portion sizes they intend to consume.*

**Commendation #3:** *Kitchen area is very clean and well organized; labeling and dating of products is just as it should be – thank you for ensuring product safety.*

## 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 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.*

**Required Corrective Action #1:** *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.*

**Finding #2:** *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 #2:** *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 #3:** *The salad bar production records on their own did not provide sufficient information to determine the serving size and quantity of each menu item offered.*

**Required Corrective Action #3:** *Submit a week of production records to indicate the planned servings and serving sizes, as well as the quantity of food prepared, used and left-over on the salad bar.*

**Finding #4:** *The correct non-discrimination statement was not included on all program materials.*

**Required Corrective Action #4:** *Update program materials to include the correct non-discrimination statement. Upload into shared Google folder a copy of materials updated. [Corrected prior to day of review; no further action necessary]*

**Finding #5:** *The SFA does not have procedures for handling discrimination complaints specific for the school meal program.*

**Required Corrective Action #5:** *Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. [Corrected prior to day of review; no further action necessary]*

**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.*

**Finding #7:** *The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a)*

**Required Corrective Action #7:** *Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame.*

**Finding #8:** *SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. areas. The following food storage violations were observed a case of ham was stored on the floor in the freezer.*

**Required Corrective Action #8:** *Corrected on the day of review. [No further action necessary]*

**Finding #9:** *The SFA was not implementing Offer vs Serve correctly. Staff were pre-plating ½ cup of fruit for all students, rather than allowing students to make their own selection of fruit or no fruit.*

**Required Corrective Action #9:** *Retrain staff in Offer vs Serve using online resources. Submit training confirmation to the shared Google folder once training has been completed.*

## 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:** *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 #2:** *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 #3:** *The DPI website provides guidance regarding [Salad Bars](#), including templates and training resources (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#Salad%20Bars>).*

**Technical Assistance #4:** *The DPI website provides web-based training and resources specific to topics like [Offer vs. Serve](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).*

**Technical Assistance #5:** *Ensure signage on the vegetable bar is sufficient to explain required portion sizes to students serving themselves. The DPI website provides online resources for [signage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).*

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 webpage ([dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017)).



*With School Nutrition Programs!*