

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

---

<b>School Food Authority:</b> St Croix Central School	<b>Agency Code:</b> 552422
<b>School(s) Reviewed:</b> 80-St. Croix Central Middle School	<b>Review Date(s):</b> 4/2/19
<b>Review Team:</b> TCB Reviewers	<b>Date of Exit Conference:</b> 4/2/19
<b>Corrective Actions Due Date:</b> 5/8/19	

---

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 Croix Central 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 Croix Central 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 Croix Central School will continue to improve their knowledge and operation of child nutrition programs.

<b>Commendations</b>
----------------------

**Commendation #1:** *The staff with food service responsibilities, both employees of the district and employees of the vendor, were well organized during the offsite process and in preparation for the onsite.*

**Commendation #2:** *The food service staff and school staff at the site of review exemplified great care and concern for the students. Everyone at the school whom we observed interacting with students exhibited care and compassion.*

**Commendation #3:** *The kitchen staff's teamwork set a tone that was very positive, and that carried over to the food produced and served; it looked fantastic and resulted in student and adult participation that is strong.*

## 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:** *Based on the SY 2017-18 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3-month's average expenditures. The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)).*

**Required Corrective Action #1:** *Submit a plan and timeline for reducing the net cash resources to below 3-month's operating expenditures. Please note, the State Agency will need to also be notification of the plan/report.*

**Finding #2:** *The SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.*

**Required Corrective Action #2:** *Part 1 of this Corrective Action: Complete the DPI Nonprogram Foods Revenue Tool and upload into the shared Google folder using a 5-day reference period from the current school year. Part 2: Provide a statement of understanding that this tool is required to be completed annually and is used as necessary to set nonprogram food pricing. In the plan, please include the position/role responsible for ensuring this is completed annually.*

**Finding #3:** *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. The following food storage violations were observed: Date-marking items that are removed from the original packaging is not occurring consistently.*

**Required Corrective Action #3:** *The SOP for date-marking foods was updated on the day of review. To complete this required corrective action please retrain staff on the updated SOP and provide documentation demonstrating the training has been completed.*

**Finding #4:** *The SFA did not meet the requirements of the Buy American Provision in accordance with 7 CFR 210.21(d). The SFA did not follow procedure to monitor the vendor's performance of the Buy American Provision as written in their current contracts. There were bananas and pineapples found to be non-domestic.*

**Required Corrective Action #4:** *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 contact exceptions.*

## 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:** *All SFAs must have procedures in place for handling Civil Rights complaints in regard to discrimination in the National School Lunch Program and School Breakfast Program. All verbal or written Civil Rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 5 days. The district provided multiple forms for procedures. One of them was the correct DPI form. Utilize the DPI form for receiving and processing complaints of alleged discrimination.*

**Technical Assistance #2:** *Technical assistance was provided concerning the development of a plan to spend-down the excess fund balance, and to provide the plan to DPI once developed.*

**Technical Assistance #3:** *The DPI website provides financial management resources concerning [Nonprogram Revenue](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). Scroll down about half-way to the Non-Program Food Revenue section.*

**Technical Assistance #4:** *The DPI website provides guidance regarding [Buy American](https://dpi.wi.gov/school-nutrition/procurement/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 #5:** *A Standard Operating Procedure (SOP) for date-marking was updated and included in the food safety plan on the day of review. To ensure more consistent implementation, staff should be retrained to follow the SOP more closely and follow-up should be conducted to ensure date-marking is consistent.*

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!*