

W I S C O N S I N D E P A R T M E N T O F
P U B L I C I N S T R U C T I O N

SFA Name: St. Clare Catholic School # 57795
 Administrative Review Conducted on: 3/16/2017
 Sites Selected for Review: St. Clare Catholic School # 57795

Date Corrective Action Plan was provided to SFA: 4/19/2017

Due Date for Corrective Action Plan: 5/18/2017

Commendations & Suggestions

Outstanding job meeting all of the requirements for grade group K-5. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for grades K-5.

Documents were organized and records were complete and included required documentation. Suggestions and recommendations were accepted with plans for implementation.

The staff was very professional and had good interaction with the students. Parent volunteers are gracious and giving of their time to assist with the point of service check off list.

The dining and serving area were conducive to students eating well, Students were allowed to socialize to make meal time enjoyable.

Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

Storage violations were observed on-site. The SFA had food that was not dated upon delivery. During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

Resource Management – Nonprogram Food Revenue Tool

In the review year (SY 15-16), the SFA's only nonprogram foods were adult meals and extra milks. Per DPI, the SFA was not required to complete the DPI NonProgram Price Calculator (or USDA NonProgram Food Revenue Tool). Since the SFA started to sell extra entrees in the current school year, the tool will need to be completed annually, starting this year. A copy of the tool was sent to the SFA along with additional technical assistance on how to complete the tool.

Resource Management - NonProgram Food Revenue

It is suggested that the SFA separates the revenues for adult meals, extra milks, and extra entrees from reimbursable meal sales. Adult meals, extra milks, and extra entrees are considered nonprogram foods, and should be tracked separately from program sales. Ideally the SFA would have separate revenue accounts in their general ledger to easily track nonprogram and program sales. The SFA could also track adult meal deposits separately (such as notating "adult" on deposit slips).

Once the assessment of the Local Wellness Policy (LWP) has been completed, the assessment must be made available to the public. The easiest way to do this is to post the assessment and the LWP on the school district website.

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

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.

Finding #1
For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate.
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 meet the weekly requirements as well as the daily requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement 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 how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
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: 6-8: minimum of 9 oz. equivalent of meat/meat alternate per week.
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 weekly requirements for meat/meat alternates are met 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #2
The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.
Technical Assistance Provided
During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. Please visit the DPI website for professional standards: https://dpi.wi.gov/school-nutrition/professional-standards
Regulation / Citation and Summary
SP 39-2015: Question 29: Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only? No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform.
SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide 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, indicating how the SFA will ensure that the appropriate training is completed and the dates of all future trainings.

SFA Response

Finding #3

Verification was not completed by the SFA.

Technical Assistance Provided

During the review, completing verification was reviewed with the SFA. The SFA was informed that they must complete verification according to regulations and within the correct timeframe. The SFA should review the current Income Eligibility Manual for additional verification information.

Please visit the DPI website on verification requirements: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>

Regulation / Citation and Summary

CFR 245.6a(C)(1) General. The local educational agency must verify eligibility of children in a sample of household applications approved for free and reduced price meal benefits for that school year.

SFA Suggested Guidance for Compliance

To come into compliance the SFA must provide the State Agency with an assurance that staff conducting verification understand that verification must be completed each year. The SFA must put a plan in place to ensure that verification is completed correctly and within the correct timeframe. The plan should include when verification will begin and end, the process for completing verification, the person by position who will oversee verification, and how and where paperwork will be maintained.

SFA Response

Finding #4
An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
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.
Regulation / Citation and Summary
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 an 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 a copy of the assessment should be submitted to the state agency for review.
SFA Response

Finding # 5
The SFA does not have their own Local Wellness Policy.
Technical Assistance Provided

The local policy should not be another SFA's wellness policy. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources.

Additional information about the wellness policy can be found here: <https://dpi.wi.gov/school-nutrition/wellness-policy> AND <http://www.fns.usda.gov/tn/local-school-wellness-policy>

Regulation / Citation and Summary

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this to the State Agency. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted to the state agency for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

SFA Response

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Finding #6
No SFA employee has been designated as food service director and the required training hours have not been completed.
Technical Assistance Provided
During the review, the SFA was informed that a director must be assigned and complete the required training hours as director. This person should be an employee of the school district.
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