

WISCONSIN DEPARTMENT OF  
PUBLIC INSTRUCTION

SFA Name: St. Agnes School 677344  
 Administrative Review Conducted on: 2/8/2017  
 Sites Selected for Review: St. Agnes School

**Commendations & Suggestions**

Outstanding job meeting all of the requirements for lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

The SFA was very well organized and quick to answer any question that the reviewer had.

Staff was accepting of all technical assistance and eager for additional information to make a stronger program.

The staff does a great job interacting with the kids and helping them out as they proceed through the line. The students were polite and respectful as they came through the line.

**Other areas of Technical Assistance (NOT requiring Corrective Action)**

1006. 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 at least once every three years. The results of the assessment must be made available to the public.

1219. During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. DPI developed Microsoft Excel based tracker tool that the SFA can utilize to track the training hours of all required employees. This tool can be found at: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>  
 For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

811. During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high.

1106. During the review, fundraisers were discussed with the SFA. The SFA must ensure that all schools are observing the State defined limit on fundraisers. DPI currently allows SFAs two exempt fundraisers per school year.

1405. During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publically visible location at the site.

**Resource Management – Adult Meals:**

It is suggested that the SFA separates adult meal revenues from program revenues in their food service ledger by adding a revenue code for adult meal sales. This will make it easier to track non-program food revenues from program revenues.

**Date Corrective Action Plan was provided to SFA:**

3/3/2017

**Due Date for Corrective Action Plan:**

3/31/2017

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.**

<b>Finding #1</b>
128. The SFA annualized income when it should have been determined at its stated frequency.
<b>Technical Assistance Provided</b>
During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.
<b>Regulation / Citation and Summary</b>
245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA totals all sources and compares the total to the IEGs.
<b>SFA Suggested Guidance for Compliance</b>

To come into compliance with the requirements for determining applications, the SFA must provide written assurance that the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income.

**SFA Response**

**Finding #2**

1005. 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 and 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 copy of the assessment should be submitted to the state agency for review.

**SFA Response**

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### Finding #3

1201. No one person has been designated as the food service director. Someone must complete the training hours required for a food service director.

#### Technical Assistance Provided

During the review, the SFA was informed that a director must be assigned and complete the required training hours as director.

Please visit the site: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf> for professional standards information.

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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).

Please keep in mind that WI requires someone in the SFA to hold a certificate of Food Protective Practices when the SFA participates in NSLP. This is administered by DHS.

#### 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 completed and the dates of all future trainings.

#### SFA Response

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### Finding #4

1601. The SFA has not performed SFSP outreach.

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<b>Technical Assistance Provided</b>
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.
<b>Regulation / Citation and Summary</b>
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.
<b>SFA Response</b>

<b>Finding #5</b>
325. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. During the month of review, there was an underclaim of 100 reduced meals for lunch. This is a non-systemic error.
<b>Technical Assistance Provided</b>
During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
<b>Regulation / Citation and Summary</b>
210.7(c) Reimbursement limitations. To be entitled to reimbursement under this part, each school food authority shall ensure that Claims for Reimbursement are limited to the number of free, reduced price and paid lunches and meal supplements that are served to children eligible for free, reduced price and paid lunches and meal supplements, respectively, for each day of operation.
<b>SFA Suggested Guidance for Compliance</b>

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with 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 to the State Agency. The plan must include: an indication that the SFA has corrected inaccurate counting and/or claiming procedures, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>.

**SFA Response**

**Finding #6**