

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: St. Leonard School

Administrative Review Conducted on: 1/11/2017

Sites Selected for Review: St. Leonard School 677622

Commendations & Suggestions

The SFA offers a great variety of fresh fruits and vegetables each day for the students. The signs in the cafeteria are bright and colorful.

The staff have a great rapport with the students. The cafeteria was a friendly place for the children to come through and have a meal.

All questions were quickly answered and information was provided. Staff was accepting of all technical assistance and eager for additional information to make a stronger program.

Other areas of Technical Assistance (NOT requiring Corrective Action)

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

Resource Management - The SFA should put internal controls in place to mitigate the risk of errors during financial recordkeeping & reporting. During this review, multiple errors were found in the SFA's revenue & expense workbook and the annual financial report submitted to DPI. The SFA should increase checks & balances, such as creating a review process for bank-to-ledger reconciliations and annual reporting so more than one person is involved in each step of the SFA's financial recordkeeping and reporting processes. These financial policies & procedures should be written down and kept on file.

Date Corrective Action Plan was provided to SFA: 2/3/2017

Due Date for Corrective Action Plan: 3/3/2017

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.

Finding #1
410. For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent meat/meat alternate. A meat/meat alternate was provided, however the minimum required portion size was not met.
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 contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size 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 what to do if a certain planned menu item is not available or if the item runs out during service. 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: K-8: 1 oz. equivalent meat/meat alternate.
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 portion sizes planned meet at least the minimum required amount 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

410. For the week of menu review, the K-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: K-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 grains 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 #3

701. The SFA incorrectly reported financial information on the annual CNP Report.

Technical Assistance Provided

On the SFA's Child Nutrition Program Report submitted to DPI for SY 15-16, the SFA reported the incorrect beginning fund balance. Additionally, the SFA double reported expenses under both labor expenditures and purchased services expenditures. These errors led to the financial report erroneously showing a negative ending fund balance. The SFA did operate at a loss, but had remaining net cash resources at year-end. The financial report should be revised with the correct beginning balance, revenues, and expenditures. The SFA also needs to put internal controls in place to mitigate the risk of misreporting financial information to DPI.

Regulation / Citation and Summary

7 CFR 210.14 (c)

Financial assurances. The school food authority shall meet the requirements of the State agency for compliance with § 210.19(a) including any separation of records of nonprofit school food service from records of any other food service which may be operated by the school food authority as provided in paragraph (a) of this section.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the reporting errors made and the steps that were taken to amend the CNP Report. Additionally, please explain the internal controls you have put in place to mitigate the risk of misreporting financial information on future financial reports.

SFA Response

Finding #4

705. The SFA charged unallowable costs to the food service account.

Technical Assistance Provided

During the resource management comprehensive review, it was determined that the SFA charged unallowable costs to the food service account. The SFA is responsible for ensuring no unallowable purchases are made using food service funds, and should have internal controls in place to prevent such unallowable costs from occurring. Examples of internal controls include staff training on allowable costs, developing written policies & procedures, and segregation of duties. An extensive list of allowable and unallowable costs can be found in 2 CFR Part 200, Subpart E. Additional technical assistance was provided in an email to the principal.

(1) The food service account spent \$300.39 on a lunch for staff members who volunteered as cafeteria helpers during the year. This is not an allowable expense to the food service program. The SFA could pay for the salaries of staff for their lunch service duties, as long as the time doing these responsibilities is clearly documented and the employee’s salary is allocated appropriately. If the SFA wants to continue to pay for a year-end lunch for the cafeteria helpers, the meal should be paid out of the general fund.

(2) The food service account was charged a \$1,836 stipend for the administrative work the Principal does for the food service program. The SFA appropriately documented the food service duties that the Principal performs, but has not done a time study to determine the proper allocation of their salary to food service. The stipend amount was previously agreed upon, but the SFA has no record of how this amount was calculated. The SFA should conduct a time study to calculate the allowable administrative salary charge, and then determine if the food service account was overcharged in SY 15-16; any overcharge must be repaid.

Regulation / Citation and Summary

7 CFR 210.14 Resource management. (a) Nonprofit school food service. School food authorities shall maintain a nonprofit school food service. Revenues received by the nonprofit school food service are to be used only for the operation or improvement of such food service, except that, such revenues shall not be used to purchase land or buildings, unless otherwise approved by FNS, or to construct buildings. Expenditures of nonprofit school food service revenues shall be in accordance with the financial management system established by the State agency under § 210.19(a) of this part. School food authorities may use facilities, equipment, and personnel supported with nonprofit school food revenues to support a nonprofit nutrition program for the elderly, including a program funded under the Older Americans Act of 1965 (42 U.S.C. 3001 et seq.).

SFA Suggested Guidance for Compliance

As the corrective action response, the SFA should provide documentation showing that the food service account was reimbursed for the unallowable expenditures. Additionally, please explain how internal controls have been improved to ensure only allowable costs are charged to food service.

SFA Response

Finding #5

Resource Management Comprehensive Review - NonProgram Foods: Prior to this review, the SFA did not determine compliance with nonprogram food revenue requirements using the USDA NonProgram Food Revenue Tool or the DPI NonProgram Food Price Calculator.

Technical Assistance Provided

The SFA has not determined compliance with nonprogram food revenue requirements. The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year. You can use a one-week reference period instead of gathering numbers for an entire year. This tool should include adult meals, extra milks, and extra entrees as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices (even if you are meeting the USDA adult meal pricing guidelines). A copy of the tool and a link to the USDA memo was sent in an email during this review. Both documents can be found on the USDA website. The SFA must complete this tool as part of their corrective action response.

Regulation / Citation and Summary

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.

(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance. Additionally, submit a completed copy of the tool. If the tool shows you are out of compliance, include a plan to increase nonprogram food prices.

SFA Response