

WISCONSIN DEPARTMENT OF  
PUBLIC INSTRUCTION

SFA Name: St. Mary's Visitation School-677674  
 Administrative Review Conducted on: 2/8/2017  
 Sites Selected for Review: St. Mary's Visitation 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.

Thank you for be so well prepared!

The kitchen staff was kind and courteous and interacted well with the students.

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

208. The SFA completed a confirmation review but was not aware of how to document the confirmation review. The confirming official should sign the bottom of the application after it is reviewed. If the status changes from reduced to free, benefits must be increase immediately, family is notified and the application is then verified. If the status changes from free to reduced, the SFA does not change the status but does verify the application. If the status changes from free or reduced to paid, the SFA sends a notice of adverse action, does not verify the application, selects a similar application and follows the confirmation pcedures for the new application

Professional Standards- any non-nutriton staff that have duties related to the programs, such as verification must have the appropriate training completed. Recommend at least civil rights training and verification.

**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>
1000. The SFA does not have a Local School Wellness Policy.
<b>Technical Assistance Provided</b>
<p>During the review, Local Wellness Policies were discussed with the SFA. 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. The SFA was provided with the USDA link for Wellness Policies.  <a href="http://www.fns.usda.gov/tn/local-school-wellness-policy">http://www.fns.usda.gov/tn/local-school-wellness-policy</a></p>
<b>Regulation / Citation and Summary</b>
<p>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.</p>
<b>SFA Suggested Guidance for Compliance</b>

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**

**Finding #2**

1601. The SFA has not performed SFSP outreach.

**Technical Assistance Provided**

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.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: [www.fns.usda.gov/summerfoodrocks](http://www.fns.usda.gov/summerfoodrocks) (note, this replaces the [whyhunger.org](http://whyhunger.org) website)
- Use the site locator for smartphones - [Rangeapp.org](http://Rangeapp.org)

**Regulation / Citation and Summary**

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.

**SFA Suggested Guidance for Compliance**

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.

**SFA Response**

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<b>Finding #3</b>
215. Verification was not completed by November 15th.
<b>Technical Assistance Provided</b>
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15. Recommend visiting the DPI website for verification: <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification</a>
<b>Regulation / Citation and Summary</b>
245.6a(b) Deadline and extensions for local educational agencies—(1) Deadline. The local education agency must complete the verification efforts specified in paragraph (c) of this section not later than November 15 of each school year.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the due date of verification, the SFA must provide the State Agency with an assurance that staff conducting verification understand this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. This plan should include, but is not limited to include the person(s) by position(s) who will be involved, specific tasks to be completed, and dates for completion.
<b>SFA Response</b>

<b>Finding #4</b>
803. There is no written policy in place that states that alleged civil rights complaints will not be handled by the SFA and will be forwarded to DPI or USDA.
<b>Technical Assistance Provided</b>

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

#### **Regulation / Citation and Summary**

FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure to the State Agency.

#### **SFA Response**

#### **Finding #5**

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 made several errors. (1) They did not include all of the food service expenditures on the report. During the comprehensive review, it was determined that the SFA should have included an additional \$1,330.63 for inspection fees and kitchen supplies paid in SY 15-16. Additionally, the \$30 in bank fees from bounced checks should have been included in expenses. (2) The revenues reported do not match the revenues record in the SFA's ledger. Revenues should have totaled \$59,731.27 (actual deposits of \$60,586.52, minus the \$36.25 in refunds and \$819.00 in bounced checks). (3) The incorrect beginning balance was entered. The balance should have been \$23,537.02, which was the book balance as of July 1, 2015. The financial report should be revised to correctly report revenues, expenditures, and beginning balance. Additional detail was sent to the SFA in an email.

<b>Regulation / Citation and Summary</b>
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.
<b>SFA Suggested Guidance for Compliance</b>
As the corrective action response, provide documentation showing the report has been amended and resubmitted. Additionally, please explain the internal controls you have put in place to mitigate the risk of misreporting financial information on future financial reports.
<b>SFA Response</b>

<b>Finding #6</b>
704. The SFA's ending net cash resource balance exceeded the 3-month average expenses limitation.
<b>Technical Assistance Provided</b>
The food service program should be operated on a non-profit basis, and therefore should not accumulate an unnecessarily large fund balance. An SFA can keep up to 3-month average expenses in an ending balance in order to pay for ongoing operations. Any excess profits should be put back into the program through improvements such as improved quality and variety of foods offered, updating kitchen equipment, increasing marketing of the program to increase participation, providing additional training to staff, offering more local products, etc. The SFA's ending net cash resource balance was \$31,803.32, and the 3-month average expenses were \$17,154.99 (total expenditures of \$51,464.97 divided by 9 annual operating months, multiplied by 3 months). This is an excess balance of \$14,648.33. The SFA must submit a detailed plan on how to spend down this excess balance and prevent excess balances from occurring in the future.
<b>Regulation / Citation and Summary</b>
7 CFR 210.14 (b) Net cash resources. The school food authority shall limit its net cash resources to an amount that does not exceed 3 months average expenditures for its nonprofit school food service or such other amount as may be approved by the State agency in accordance with § 210.19(a).
<b>SFA Suggested Guidance for Compliance</b>

As the corrective action response, provide a detailed plan on how the excess balance will be spent. This should include estimated costs for each proposed expenditure, as well as a timeline for when the expenditures will be incurred. Additionally, explain how internal controls have been put into place to ensure the food service balance will be kept under the 3-month average expense limitation.

**SFA Response**

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