

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: 401384 School Food Authority: Christian Faith Academy

School(s) Reviewed: Christian Faith Academy of Higher Learning

Review Date(s): November 9-10, 2016 **Date of Exit Conference:** November 10, 2016

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you for the courtesies extended during the on-site review. Additionally, I would also like to extend a thank-you to all who assisted in the review including the food service team. They provide a respectful and engaging environment for students. It was helpful to have all of the requested documentation available and ready for the review. I appreciated the work done prior to the review in completing the Off-site Assessment Tool. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The 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 can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

Equipment Grant is available to schools. Funding is available to award another round of National School Lunch Program (NSLP) Equipment Assistance Grants. For more information go to: <http://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>

SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". 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. For more information on this initiative, please visit <http://dpi.wi.gov/statesupt/agenda-2017>.

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 your students' success.

Review Areas

1. Meal Access and Reimbursement

Comments/Technical Assistance/Compliance Reminders:

Meal counting and claiming

SFA's must have a meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals. The SFA does have good system in place for counting and claiming. Technical assistance was given regarding edit checks and how to do them correctly.

Findings and Corrective Action Needed:

Finding #1: It was found that there were some non-systemic discrepancies with the counting and claiming of meals for the review period. There were a few days there was an under claim of meals. And one day where there was an over claim of 3 meals.

Corrective Action Needed: Fiscal action will be applied as required. No further action is required.

2. Meal Pattern and Nutritional Quality

Comments/Technical Assistance/Compliance Reminders:

Commendations:

Thank you to the staff at Christian Faith Academy of Higher Learning for the warm welcomes, quick responses, and willingness to work together. This review has been very pleasant. It is great to see so many students eating the breakfast and lunch provided, and receiving the nutrition they need. Thank you also to the students for being polite and kind; specifically, the young gentleman who took our trays when we were finished. It is truly a pleasure to see such kind, respectful students.

Technical Assistance

OVS: The only problem seen with OVS and meal service was with the portion utensil for the beans and what was expected to be on trays. The requirement for K-8 students is to offer $\frac{3}{4}$ cup vegetable, but the requirement is also to have that $\frac{1}{2}$ cup fruit and/or vegetable on the tray to be a reimbursable meal. Because of these two serving sizes, the school (and MCFI) had two serving utensils. Although this is okay, they were offering the $\frac{1}{2}$ cup portion *first* and then the "larger" portion, or $\frac{3}{4}$ cup. This is also how it's displayed on the menu. Really, the $\frac{3}{4}$ cup needs to be offered first as the "regular" portion, and that $\frac{1}{2}$ cup needs to be offered as the "smaller" portion. Also, there is no OVS with the smallest students (K4), therefore that full $\frac{3}{4}$ cup needs to be on their plate, not the $\frac{1}{2}$ cup. Technical assistance was given to both MCFI and to the food service staff at Christian Faith Academy of Higher Learning. Corrective Action will be required below.

PFS: the PFS for the Totally Banana Breakfast bar was incorrect and outdated. Christian Faith now has the updated version saved on file for this product.

Spaghetti Sauce: The recipe states it credits as $\frac{1}{2}$ cup red/orange vegetable. If using $\frac{1}{2}$ of a #10 can, this would credit as $\frac{3}{8}$ cup red/orange vegetable. See math below:

- $\frac{1}{2}$ #10 can = 6 cups/16 servings = 0.375 cups/serving = $\frac{3}{8}$ cup/serving

- The recipe is updated so that it credits is 3/8 cup red/orange vegetable.

Wango Mango: Any vegetable juice that also contains fruit juice needs to be credited as *additional* vegetable and not an *other* vegetable. Therefore, on Wednesday the Wango Mango needs to be counted as additional and not an *other* vegetable. MCFI is going to stop serving this product.

Meatloaf Recipe: The crediting for the egg mixture blend was included in the M/MA for the meatloaf recipe. According to the Food Buying Guide (FBG) this needs a PFS. Waiting on guidance from Julie/USDA about how a manufacturer can fill out a PFS for egg blend mixtures. Without the egg in the recipe, there is no shortage for the day or week.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** One of the signs (specifically made by MCFI), with the stars, did not contain the verbiage: ½ cup fruit and/or vegetable to also be on the tray.
Corrective Action: Please update the signage to include the verbiage along the lines of: build a complete meal by at least 3 items, including ½ cup fruit, vegetable, or a fruit/vegetable combination.
- ❑ **Finding #2:** The menu has ¾ cup vegetable as the “large” serving, and ½ cup as the “regular” serving size. Because ¾ is the required amount to be offered to students, the ¾ cup really needs to be the “regular” serving size, and the ½ cup the “small” size.
Corrective Action: Please update the menus to reflect this.

3. Resource Management

Comments/Technical Assistance/Compliance Reminders:

The area of Maintenance on the Nonprofit School Food Service Account was required to be viewed in more detailed. After reviewing documentation, everything was found to be in compliance. Thanks to the accountant for his assistance regarding this.

4. General Program Compliance

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

The civil rights self-evaluation Compliance form is required to be completed by October 31st. Please see link for further guidance: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which can be found on the website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School

Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

Food Safety

All food service employees must have a signed Employee Reporting Agreement on file. Please review website for form: <http://dpi.wi.gov/school-nutrition/food-safety>.

Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and standard operating procedures (SOP).

Technical assistance was given regarding milk refrigeration. It was noted that milk was served to Students which was not in mechanical refrigeration. It was recommended to develop a better practice of offering milk to students to ensure safer measures regarding milk temperatures.

Special Diets

All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong that you can use http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf.

When the form is completed indicating that the special dietary request, the school is required to provide a meal that meets the child's needs as documented. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

Record Retention

There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

Summer Meals

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

Professional Standards

SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Public Release

A reminder to send out to news media and grassroots organizations regarding the meal program at Christian Faith Academy of Higher Learning at or around the beginning of the school year. Please retain a copy of the public release sent to news media and grassroots organizations. Keep records of where the public release was sent.

Wellness Policy

Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.

- LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
- SFA must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
- SFA must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
- SFAs must permit parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation that all have been notified of participation availability.
- The SFA must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* (http://fns.dpi.wi.gov/fns_wellnessplcy2).

SFA is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). SFAs are required to retain a copy of the assessment. Please see review this link for assistance: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Food Waste

Food waste is a concern in schools. Please review the following links for guidance on regarding food waste: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-101116.pdf> or <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>.

Findings and Corrective Action Needed:

Finding #1: It was found that the civil rights self-evaluation compliance form was not completed.

Corrective Action Needed: Please submit a copy of a completed civil rights self-evaluation form.

- ❑ **Finding #2:** It was found that the Employee Reporting agreement was not completed.
Corrective Action Needed: Please submit a signed copy of the employee reporting agreement for all food service staff.
- ❑ **Finding #3:** It was found that tracking for professional standards has not been done.
Corrective Action Needed: Please develop a tracking tool for professional standards and submit a copy of the tracking tool with any recent trainings listed.
- ❑ **Finding #4:** It was found that manager’s Serv safe certificate has expired. As a new director, she needs to be up to date on the regulations, she is needs to complete a Serv safe class or a comparable food safety class.
Corrective Action Needed: Please submit a timeline of when food service member will plan to take the class.

5. Other Federal Programs Reviews

Comments/Technical Assistance/Compliance Reminders:

School Breakfast

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year. School handbooks, parent newsletters are just some suggested ways to address this requirement.

6. Community Eligibility Provision (CEP) and Provision 2

Comments/Technical Assistance/Compliance Reminders

You will want to make sure that you maintain all certification documents supporting your participation in CEP. Participating schools in CEP will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).

There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. 7 CFR 210.18 requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of

the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

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| | November 10, 2016 | December 19, 2016 |
| Signature of Authorized Representative | Date of Exit | Negotiated Corrective Action Date |
| Signature of Food Service Director | | |
| Signature of Nutrition Program Consultant | Signature of Public Health Nutritionist | |

