SFA Name:	Milwaukee Rescue Mission 401489
Administrative Review Conducted on:	2/16/2017
Sites Selected for Review:	Milwaukee Rescue Mission 401489

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### **Commendations & Suggestions**

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

During the breakfast, teachers were especially attentive to the students taking Breakfast in the Classroom. They are to be commended for the importance placed on the tally sheets and the choices the students were actually selecting. The environment in the classroom was very healthy and educational.

The school environment was very quiet and conducive to learning. Students were well behaved, friendly, conversational to guests, and polite.

Documents were well organized. With few exceptions, records were complete and included the required documentation. Suggestions and recommendations were accepted well with plans for implementation.

All employees were very professional. The cafeteria line staff were very friendly, talkative, and helpful with students.

The Director and the Operations Manager were very cooperative were very cooperative and initiated some of the corrections on the same day of the review.

There was a great assortment or fresh fruits and vegetables for the FFVP during the year. There were many opportunities for students to enjoy varieties that were likely to be new to them. A student was eager to tell me about the program as I observed.

There was bright colorful signage and student art work lining the halls of the school. It provided a pleasing atmosphere conducive to learning.

Students volunteer to cleanup tables, called servant leaders, when finished with school lunch. This activity provides students with a sense of community responsibility and pride.

In the lower grades, teacher and students together said a blessing before school lunch. Upper grades had a leader that prayed during meal service.

Thermometers should be placed in all refrigerators. The temperature gauges on the outside of the refrigerators often are not accurate and the ambient temperatures should be measured with hanging thermometers in all the units.

Temperature logs are not being maintained for all food storage areas. Temperature logs must be maintained for all potentially hazardous foods. This item was reviewed.

The food service program operated at a loss and required a general fund transfer, which is considered a risk factor. The general fund properly supports the food service program when food service cash resources are unavailable, and the SFA reports a general fund transfer on the Child Nutrition Program Report. Operating at a loss is allowed, although the SFA should reassess the financial management of the program to see if improvements could be made to help reduce or eliminate the deficit.

**Date Corrective Action Plan was provided to SFA:** 3/17/2017

**Due Date for Corrective Action Plan:** 4/14/2017

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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

The Code of Federal Regulations citation number or alternate resource citation

A summary of the regulation / requirement

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

The SFA did not have the most recent food safety inspection report posted in a publicly visible location at the serving site for the early elementary students. This site is only used as a serving site in the attached building (Boys and Girls Club).

#### **Technical Assistance Provided**

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 publicly visible location at the site. The Lower Elementary (K-3) site uses a facility that belongs to another agency. The health inspection was not posted in that site. The health inspection was posted in the Milwaukee Rescue Mission where grades 3-12 have lunch.

## **Regulation / Citation and Summary**

210.13(b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request.

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

To come into compliance with this finding the SFA must submit a statement that the SFA will post the health inspection report in a visible location at the site they serve lower elementary school lunch. The statement would also include; a statement that moving forward the most recent inspection from the Boys and Girls Club will always be posted in a visible location. Provide the date that the inspection report was posted.

## **SFA Response**

## Finding #2

The SFA has a procedure in place for handling civil rights complaints, but the procedure must be in writing that states complaints are forwarded to FNSRO, FNS Office of Civil Rights or USDA Office of Civil Rights.

#### **Technical Assistance Provided**

The alleged civil rights complaints 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 #3

The SFA did not provide the yearly civil rights training for the appropriate staff. The teachers taking the point of service for breakfast in the classroom have not completed this training.

#### **Technical Assistance Provided**

During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

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

FNS Instruction 113-1 Section XI Training is required so that people involved in all levels of administration of programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures, and directives. Persons responsible for reviewing CR compliance must receive training to assist them in performing their review responsibilities. This training may be carried out as part of ongoing technical assistance. The FNS Regional OCR and State agencies will be responsible for training State agency staffs. State agencies are responsible for training local agencies. Local agencies are responsible for training their sub recipients, including "frontline staff." "Frontline staff" who interact with program applicants or participants, and those persons who supervise "frontline staff," must be provided civil rights training on an annual basis. Specific subject matter must include, but not be limited to: A. Collection and use of data, B. Effective public notification systems, C. Complaint procedures, D. Compliance review techniques, E. Resolution of noncompliance, F. Requirements for reasonable accommodation of persons with disabilities, G. Requirements for language assistance, H. Conflict resolution, and I. Customer service.

# **SFA Suggested Guidance for Compliance**

To come into compliance with this requirement, the SFA must submit to the State Agency the process that will be put into place to ensure that the yearly civil rights training will be provided to all SFA staff and that the training will cover the required topics. Provide supporting documentation to demonstrate that the required topics will be covered, such as an agenda or a copy of the training. Include the date the training was provided to the teachers and was completed.

## **SFA Response**