

W I S C O N S I N D E P A R T M E N T O F
P U B L I C I N S T R U C T I O N

SFA Name: St. Margaret Mary School 407636
 Administrative Review Conducted on: 2/8/2017
 Sites Selected for Review: St. Margaret Mary 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, for lunch.

The cafeteria Valentine's Day decorations were sweet and show the food service directors commitment to the students.

The kitchen staff are fairly new to St. Margaret Mary, but work very well together.

The food presentation looked very appetizing, including the fruit and veggie bar. Well done.

Other areas of Technical Assistance (NOT requiring Corrective Action)

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

Breakfast - Technical assistance provided regarding the yogurt parfait recipe. The recipe should be followed and possible updated to include 1/2 cup of fruit. That way it would be a stand alone reimbursable meal.

Point of Service - Several breakfast meals were non-reimbursable and were not counted. Technical assistance provided to teach the teachers taking the meal counts to encourage students to include items so that all meals can be counted for reimbursement.

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.

Finding #1
<p>410. For the week of menu review, the K-8 breakfast menu did not meet milk requirements for a variety of milk types served. Only one milk type was served for breakfast Monday through Thursday. On Friday both 1% white and fat free chocolate milk were served. The same finding was noted on the Day of Review.</p>
Technical Assistance Provided
<p>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals served meet the correct portion sizes. For all grade groups 8 ounces of milk must be offered to every student. Low-fat unflavored and Fat-Free flavored or unflavored milk may be offered. A minimum of two different types of milk must be provided. If the sites opts to participate in Offer vs Serve they still must be able to provide a milk to every student that elects to take a milk as one of their components. 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/</p>
Regulation / Citation and Summary
<p>220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. All age/grade groups: 1 cup of milk daily and off an assortment of at least two milk types daily.</p>
SFA Suggested Guidance for Compliance
<p>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 low-fat and/or Fat- Free milk will be available to all students throughout the meal service, a statement that at a minimum there will be two different varieties of milk available, a process for sites to reference when they do not have two or more types of milk or if they run out of milk during meal service, 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.</p>
SFA Response

Finding #2
Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.
Technical Assistance Provided
During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal. Someone should be assigned to make sure the poster is flipped from breakfast to lunch each day.
Regulation / Citation and Summary
220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).
SFA Suggested Guidance for Compliance
To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.
SFA Response

Finding #3
The SFA and SA claims do not match. The SFA has a non-systematic claiming error.
Technical Assistance Provided
During the review, claiming was discussed with the SFA. The SFA and State Agency claims do not match. The SFA has a non-systemic claiming error. To be in compliance, the SFA must ensure that claims are being filed accurately. The SFA must correctly consolidate the claim based on the edit checks from each site. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation and Summary
210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum:(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.
SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must submit a revised claim for reimbursement. Further, provide written assurance that the appropriate staff understand the meal counting and claiming requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan as part of the corrective action. The SFA must also advise CN Resource that the discrepancy has been corrected.

SFA Response

Finding #4

The SFA did not submit a public release.

Technical Assistance Provided

During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.

Regulation / Citation and Summary

§245.5(a)(1) After the State agency, or FNSRO where applicable, notifies the local educational agency (as defined in §245.2) that its criteria for determining the eligibility of children for free and reduced price meals and for free milk have

§245.2) that its criteria for determining the eligibility of children for free and reduced price meals and for free milk have been approved, the local educational agency (as defined in §245.2) shall publicly announce such criteria: Provided however, that no such public announcement shall be required for boarding schools, residential child care institutions (see §210.2 of this chapter, definition of Schools), or a school which includes food service fees in its tuition, where all attending children are provided the same meals or milk. Such announcements shall be made at the beginning of each school year or, if notice of approval is given thereafter, within 10 days after the notice is received. The public announcement of such criteria, as a minimum, shall include the following: (1) Except as provided in §245.6(b), a letter or notice and application distributed on or about the beginning of each school year, to the parents of all children in attendance at school. The letter or notice shall contain the following information: (i) In schools participating in a meal service program, the eligibility criteria for reduced price benefits with an explanation that households with incomes less than or equal to the reduced price criteria would be eligible for either free or reduced price meals, or in schools participating in the free milk option, the eligibility criteria for free milk benefits; (ii) How a household may make application for free or reduced price meals or for free milk for its children; (iii) An explanation that an application for free or reduced price benefits cannot be approved unless it contains complete information as described in paragraph (1)(i) of the definition of Documentation in §245.2; (iv) An explanation that households with children who are members of currently certified SNAP, FDPIR or TANF households may submit applications for these children with the abbreviated information described in paragraph (2)(ii) of the definition of Documentation in §245.2; (v) An explanation that the information on the application may be verified at any time during the school year; (vi) How a household may apply for benefits at any time during the school year as circumstances change; (vii) A statement to the effect that children having parents or guardians who become unemployed are eligible for free or reduced price meals or for free milk during the period of unemployment, Provided, that the loss of income causes the household income during the period of unemployment to be within the eligibility criteria; (viii) The statement: "In the operation of child feeding programs, no child will be discriminated against because of race, sex, color, national origin, age or disability."; (ix) An explanation that Head Start enrollees and foster, homeless, migrant, and runaway children, as defined in §245.2, are categorically eligible for free meals and free milk and their families should contact the school for more information; (x) How a household may appeal the decision of the local educational agency with respect to the application under the hearing procedure set forth in §245.7. The letter or notice shall be accompanied by a copy of the application form required under §245.6; (xi) A statement to the effect that the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) participants may be eligible for free or reduced price meals.

SFA Suggested Guidance for Compliance

To come into compliance with civil rights requirements, the SFA must indicate that the public release will be sent to the local media at the beginning of the school year. Additionally, the SFA must identify the name(s) and title(s) of the person(s) who will be responsible for submitting the public release for publishing. Please submit the assurance and plan with the corrective action.

SFA Response

Finding #5

The SFA does not have a procedure in place for handling civil rights complaints.

Technical Assistance Provided

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 as the corrective action.

SFA Response

Finding #6

The SFA did not complete Civil Rights Training.

Technical Assistance Provided

During the on-site review the required civil rights training were discussed with the SFA. Civil rights topics should include, but are not limited to: collection and use of data; effective public notification systems; complaint procedures; compliance review techniques; resolution of noncompliance; requirements for reasonable accommodation of persons with disabilities; requirements for language assistance; conflict resolution; customer service.

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.

SFA Response

Finding #7

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials including the monthly menu.

Technical Assistance Provided

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material.

Regulation / Citation and Summary

FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.

SFA Suggested Guidance for Compliance

To come into compliance with civil rights requirements, the SFA must submit written assurance that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu with the statement added as part of the corrective action.

SFA Response

Finding #8

The school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. Recommend visiting the DPI website on professional standards: <https://dpi.wi.gov/school-nutrition/professional-standards>. DPI also has a great website for trainings which is found here: <https://dpi.wi.gov/school-nutrition/training>

Regulation / Citation and Summary

210.30(d) Continuing education/training standards for all staff with responsibility for school nutrition programs. Each school year, the school food authority must ensure that all staff with responsibility for school nutrition programs that work an average of at least 20 hours per week, other than school nutrition program directors and managers, completes annual training in areas applicable to their job. Beginning July 1, 2016, six hours of annual training are required. Part-time staff working an average of less than 20 hours per week must complete four hours of annual training beginning July 1, 2015. The annual training must include, but is not limited to, the following topics, as applicable to their position and responsibilities: (1) Free and reduced price eligibility; (2) Application, certification, and verification procedures; (3) The identification of reimbursable meals at the point of service; (4) Nutrition; (5) Health and safety standards; and (6) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide written 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 indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

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Finding #9
The SFA is not tracking training hours.
Technical Assistance Provided
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. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
Regulation / Citation and Summary
210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for Professional Standards, the SFA must provide written 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 indicating how the SFA will ensure that training is now being tracked.
SFA Response

Finding #10
Storage violations were observed on-site. The SFA had food that was not dated upon delivery.
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.
Regulation / Citation and Summary
210.13(a) Health standards. The school food authority shall ensure that food storage, preparation

and service is in accordance with the sanitation and health standards established under State and local law and regulations.

210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.

SFA Suggested Guidance for Compliance

To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food items will be dated with the delivery date as well as the date the product was opened.

SFA Response

Finding #11

The SFA does not have documentation to show that two required health inspections were completed in the current or past school year.

Technical Assistance Provided

Records of Food Safety inspections must be retained like all other records for three (3) years plus the current year. Recommend checking online for previous health inspection reports.

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. Sites participating in more than one child nutrition program shall only be required to obtain two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for food safety, the SFA must provide written assurance that the appropriate staff understand the requirements for food safety inspections and record maintenance. Please contact the appropriate Health Department and request the records from the past school year. Submit copies of the health inspections from the school years 2015-16 and 2016-17.

SFA Response

Finding #12
The SFA's food safety plan does not contain the required elements including foods categorized into the Process Categories.
Technical Assistance Provided
During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.
Regulation / Citation and Summary
210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories ; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for food safety, the SFA must provide written assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. Please submit a copy of a list of foods served grouped according into the process categories.
SFA Response
Finding #13
701. The SFA incorrectly reported financial information on the annual CNP Report.