## **USDA Child Nutrition Programs**

Commendations, Corrective Actions & Technical Assistance

School Food Authority: Central City Cyberschool Milwaukee, Inc Agency Code: 408105

School(s) Reviewed: 617-Cyberschool Preschool Review Date(s): 4/2/19

Review Team: TCB Reviewers Date of Exit Conference: 4/2/19

Corrective Actions Due Date: 5/22/19

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

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI <a href="School Nutrition Training">School Nutrition Training</a> webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI <a href="School Nutrition Training">School Nutrition Training</a> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting
  the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage.
  The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and
  serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options
   (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

# Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Central City Cyberschool Milwaukee, Inc for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The TCB review team appreciates the eagerness of the staff at Central City Cyberschool Milwaukee, Inc for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that Central City Cyberschool Milwaukee, Inc will continue to improve their knowledge and operation of child nutrition programs.

### Commendations

**Commendation #1:** Staff was friendly and positively interacted with the students.

**Commendation #2:** Staff was available throughout the review process to answer questions and provide additional information needed to complete the review.

# **Required Corrective Actions**

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

**Finding #1:** The School Nutrition Program Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30).

**Required Corrective Action #1:** Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year.

**Finding #2:** Documentation of SFA staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.

**Required Corrective Action #2:** Include all training hours completed this school year for each SFA staff (including classroom teachers who serve meals) onto the USDA or DPI professional standards training tracking tool and upload into the shared Google Administrative Review folder.

**Finding #3:** Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).

**Required Corrective Action #3:** Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.

**Finding #4:** SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.

**Required Corrective Action #4:** Upload monthly edit checks for breakfast and lunch for September 2018 thru March 2019 into the shared Google Administrative Review folder. Fiscal action will be calculated if meal counting and claiming errors are identified.

**Finding #5**: At lunch the meal counting and claiming system did not result in an accurate meal count as per 7 CFR 210.7.

**Required Corrective Action #5:** Correct the meal counting process to ensure meals are tracked accurately as the students receives their meals. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.

### **Recommended Technical Assistance**

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not correspond directly to numbered findings above.

#### **Technical Assistance #1:**

Each year School Nutrition Program Directors must complete 12 hours of annual continuing education/training (7 CFR 210.30).

#### **Technical Assistance #2:**

Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (7 CFR 210.30). Additional information on training tracking tools can be found on this DPI website regarding <a href="Professional Standards">Professional Standards</a>. (https://dpi.wi.gov/school-nutrition/professional-standards)

### **Technical Assistance #3:**

Each year, non-school nutrition staff with responsibilities for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30). Please see the link in Technical Assistance #2 for more details on training requirements and access to online and other training resources.

### **Technical Assistance #4:**

SFAs are required to have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. This includes a monthly edit check which compares each school's daily counts of free, reduced & paid lunches (or total lunches, in the case of a CEP school) against the number of children in that school currently eligible for free, reduced and paid lunches multiplied by the attendance factor (7 CFR 210.8). Additional CEP-related meal counting information can be found on this DPI Community Eligibility Provision (CEP) website. (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility)

## **Technical Assistance #5:**

The meal counting and claiming process must result in accurate meal counts by eligibility (7 CFR 210.7).

## **Technical Assistance #6:**

Mark each roster to identify the type of meal service being recorded.

## **Technical Assistance #7:**

FNS Instruction 113 requires the nondiscrimination "And Justice for All" poster to be prominently displayed in each participating school. It must be placed in a location that enables program participants to read the text of the poster without obstruction and must be  $11" \times 17"$ .

## **Technical Assistance #8:**

Production records indicate all food is transported from a production kitchen operated by the Food Service Management Company. However, most food is prepared onsite. Staff was encouraged to ensure production records accurately reflect the meal preparation.

The State Superintendent of Wisconsin Department of Public Instruction shares a vision that every student will graduate prepared for college and career. 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.

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 student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!