



SFA Name: St. Charles Youth and Family Service 409173

Administrative Review Conducted on: 4/7/2017

Sites Selected for Review: Main Campus

**Date Corrective Action Plan was provided to SFA:** 5/4/2017

**Due Date for Corrective Action Plan:** 6/2/2017

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.**

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.
Great place for students to retrieve to and have help while learning and meals are served in the residences for breakfast and lunch in the cafeteria.

Other areas of Technical Assistance (NOT requiring Corrective Action)
Resource Management – Financial Reporting to DPI The SFA is currently allocating total food service expenditures between the SBP, NSLP, and dinners based on meal counts, and only reporting the expense allocations for the first two on the DPI financial report. Dinners are considered nonprogram foods as part of normal food service operations, and should be included on the DPI financial report. DPI has modified the financial report to include a “nonprogram foods” column, which is where dinners should be listed. The SFA should report all direct food service expenditures on the DPI financial report.

### Resource Management – Allowable Costs

The SFA is using square footage to allocate rent, utilities, and some maintenance costs to the food service program. DPI does not allow square footage as a method for allocating indirect expenses to the food service program. SFAs must use direct allocation methods based on separate utility meters, usage studies, time studies, actual time sheets, etc. Ultimately these costs were paid for with non-federal/general funds, as the revenues received by St. Charles' food service program are not sufficient to cover the direct costs incurred. However, the SFA should not report these unallowable costs on the DPI annual financial report. Only direct expenses such as food, food service labor, kitchen supplies, and other expenses supported by time or usage studies (janitors, administrative salaries, etc.) should be charged to the food service program. The USDA Indirect Cost Guidance manual further discusses the differences between indirect and direct costs, and how to properly determine allowable expenses ([https://www.fns.usda.gov/sites/default/files/SP41-2011\\_os.pdf](https://www.fns.usda.gov/sites/default/files/SP41-2011_os.pdf)). Please note that DPI does not allow indirect costs to be charged to the food service program.

The SFA must make the assessment tool of the wellness policy available to the public once it has been completed.

The training tracker should also include the length of the training.

### Finding #1

The SFA is using the incorrect civil rights statement.

### Technical Assistance Provided

During the review the requirement for the civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the 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 subrecipients 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 an assurance to the State Agency 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 or letter to households with the statement added to the State Agency.

### SFA Response

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<b>Finding #2</b>
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.</p> <p><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>
<p>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.</p>
<b>SFA Response</b>

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**Finding #3**

An assessment of the Local School Wellness Policy has not been completed.

**Technical Assistance Provided**

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of

**Regulation / Citation and Summary**

210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

**SFA Suggested Guidance for Compliance**

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted for review.

**SFA Response**

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**Finding #4**

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No person has been designated as food service director and the required training hours have not been completed.

#### Technical Assistance Provided

During the review, the SFA was informed that a director must be assigned and complete the required training hours as director.

#### Regulation / Citation and Summary

210.30(b) Minimum standards for all school nutrition program directors. Each school food authority must ensure that all newly hired school nutrition program directors meet minimum hiring standards, as set forth in this section.

#### SFA Suggested Guidance for Compliance

To come into compliance, one person must be assigned as food service director. Please ensure that the hiring standards and training requirements are met. Please submit a copy of all hours of training that has been completed and a plan for meeting any remaining hours of training. Submit any documentation to show that the food service director has met the hiring standards, if applicable.

#### SFA Response

#### Finding #5

Breakfast outreach did not occur throughout the school year.

#### Technical Assistance Provided

It was determined during the review that the SFA has not performed breakfast outreach. Breakfast outreach must occur prior to or at the beginning of the school year, as well as throughout the school year. Examples of outreach such as posting the menus on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

#### Regulation / Citation and Summary

210.12(d) Outreach activities. (1) To the maximum extent practicable, school food authorities must inform families about the availability breakfasts for students. Information about the School Breakfast Program must be distributed just prior to or at the beginning of the school year. In addition, schools are encouraged to send reminders regarding the availability of the School Breakfast Program multiple times throughout the school year.

#### 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 conduct outreach on the availability of breakfast prior to or at the beginning of the school year and again multiple times throughout the year. Please state the name and title of the person responsible for bringing this area into compliance.

**SFA Response**

**Finding #6**

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 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**