

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Lighthouse Church,
Inc.

Agency Code: 13-1417

Review Date(s): March 6-8 2018

Date of Exit Conference: March 8, 2018

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 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, 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 [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) 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 [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) 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 [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) 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](http://smarterlunchrooms.org) 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 Lighthouse Church, Inc. for the courtesies extended to us during the on-site review, for answering our questions, and providing additional information upon request. All employees were receptive to recommendations and guidance. The DPI review team appreciates their willingness to make changes to meet child nutrition program regulations. The staff's concern for the nutritional well-being of their students is very apparent and we commend the staff for their commitment to serving the students fresh meals every day!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

The staff have a great understanding of the application process and completed Direct Certification (DC) runs within the correct timeframes. Nice job!

Compliance Reminders:

Direct Certification (DC)

- As a reminder, you are required to run DC a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run .

Verification

Commendations:

Verification was completed using the correct sampling method.

Technical Assistance:

- The Verification process can begin as early as October 1. Starting the process earlier can prevent verification from being completed after the deadline (November 15).

Compliance Reminders:

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that appear questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- Finding #1:** Verification was not completed by November 15.

Corrective Action Needed: Please have the confirming and verifying officials watch DPI's [Verification webcast](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html) and forward the quiz completion email confirmations to the consultant assigned to your review (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html).

❑ **Finding #2:** The supporting documentation for the verified application suggests the eligibility status be changed to denied, however, it remained reduced. Fiscal action will be calculated with a \$600 disregard. The adverse action letter must be sent to the household on the day of the exit conference (March 8, 2018), and the benefits to the two students must be changed within 10 days of the adverse action letter being sent.

Corrective Action Needed: Please submit the updated benefit issuance list and adverse action letter to the consultant assigned to your review.

Meal Counting and Claiming

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #3:** Service to the classrooms for lunch, breakfast, and snack is inconsistent. For lunch, the point of service (POS) employee hands out meals to students, then leave the teachers to mark off who received a lunch. A separate POS employee comes back to the classrooms afterward to collect the lunch counts. For breakfast and snack, the teacher informs the POS employee which children are in the classroom. The POS employee then marks those students off as receiving a meal or snack, hands the components to the teachers, and then it is up to the teachers to pass out the components. The process for POS must be exactly as it is in the cafeteria where a student is given a reimbursable meal or snack, and only then are they marked off immediately after they receive the meal or snack. The review team is uncomfortable with this systemic issue and fiscal action will be considered.

Corrective Action Needed: Submit an action plan for lunch, breakfast, and snack services to the classrooms to the consultant assigned to your review.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

National School Lunch Program and School Breakfast Program

Commendations:

Thank you to the school nutrition professionals of Lighthouse Christian School for their time and cooperation during the Administrative Review. It was noted that great efforts are made to provide students with meals or components that are cooked from scratch. The school nutrition professionals

put a lot of time and care into their meals. Thank you for your hard work and dedication to your Child Nutrition Programs!

Technical Assistance:

Food Buying Guide

- The [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) (FBG) for School Meals Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the FBG and require further crediting documentation. (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).
- The FBG should also be used to determine fruit and vegetable crediting when certain fruits and vegetables do not adequately fill a portioning utensil, such as grapes or baby carrots. Portion sizes served must be full, level scoops in standardized measuring utensils.
- For example, grapes were served during the week of review. When measuring grapes, a ½ cup measuring cup does not credit as ½ cup of fruit. The FBG tells us that 1 pound of grapes, without stems, provides 11.66- ¼ cups of fruit. If we divide 11.66 by 4, this give us the total number of cups, so 1 pound (or 16 oz) = 2.915 cups. From this, the weight of a portion can be determined. For this example, ½ cup will be used as the portion.

$$\begin{array}{r} 16 \text{ oz} \\ \hline 2.915 \text{ cups} \end{array} = \begin{array}{r} X \text{ oz} \\ \hline 0.50 \text{ cup} \end{array}$$

Cross multiply, so 16 oz x 0.50 cup = 8, then divide by 2.915 cups = 2.75 oz. This means that ½ cup of grapes should weigh 2.75 oz. Based on this information, you would weigh grapes to figure out how many equal 2.75 oz. Or, grapes could be weighed until 2.75 oz is obtained and then figure out which portioning utensil 2.75 oz of grapes fits best in. Then the portioning utensil the grapes fit best in could be used to serve the grapes and credit as ½ cup fruit.

Crediting Documentation

- Any processed product that is not listed in the *USDA Food Buying Guide* (FBG) for School Meal Programs requires a current Child Nutrition (CN) label or a detailed manufacturer's Product Formulation Statement (PFS) to be credited toward the meal pattern.
- A complete CN label includes the following: CN logo, product name, ingredient statement, and inspection legend. It is important to save actual CN labels from product packaging that includes these four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.
- A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). Remember to update records when new products are purchased or when product formulations change throughout the school year. More information about crediting documentation can be found on the [Meal Pattern Components](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>).

Crediting Grains

- Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) of the FBG (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). If a product is not on Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

K-8 Meal Pattern

- For more information on the K-8 meal pattern requirements for breakfast and lunch, please view the [5-day week meal pattern tables](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables) for the K-8 meal pattern (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

Cereal on Production Records

- A variety of cereal was offered at breakfast on Monday and Friday during the week of review. On production records, cereal is listed as “assorted cereal.” When items are listed on the menu as a general category, all types/varieties of the item need to be listed on the production record. For example, if Rice Chex, Cinnamon Toast Crunch, and Honey Nut Cheerios are offered at breakfast, all three cereals need to be listed on separate lines of the production record with all required production record information filled in.
- If it becomes too time- or labor-intensive to record cereal usage by type on production records, you may consider using a recipe. The cereal recipe would be created based on student preference and cereal usage. If utilizing a cereal recipe, the recipe should be updated twice per year or when you notice that students’ preferences have changed. The cereal recipe should list out each cereal by type and how much or many of each cereal is planned to be placed on the service line that day. At the end of service, the total amount or number of cereal used and the total amount or number of cereal left over should be recorded on the production record. Therefore, cereal usage by each type would not need to be recorded on the production record.

Standardized Recipes

- While recipes are utilized at Lighthouse Christian School, the quantity recipes utilized are not standardized to the food service operation.
- Standardized recipes are required for all menu items that have more than one ingredient, unless both ingredients are listed on the production record separately (e.g., chicken patty and bun). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes.
- Recipes should be standardized in each kitchen to reflect the products and practices that are used in that kitchen. **This same process must be done to standardize USDA quantity recipes or other quantity recipes used, especially when substitutions are made.**
- For steps on how to standardize a quantity recipe to your food service operation, please see [Recipe Standardization Steps](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/recipe-standardization-steps.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/recipe-standardization-steps.pdf>). This resource and others are available on DPI SNT’s [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Milk Cups

- Milk gallons are used instead of cartons. When serving milk, milk is poured into plastic cups. All of the plastic cups differ in size. An 8 fluid ounce (fl oz) cup is used as a portioning utensil. However, the 8 fl oz cup is not being used properly as a portioning utensil. Please see findings section for more information.
- Lighthouse Christian School should come up with a solution to make milk service easier and more consistent. In child care and preschool classrooms, milk cups have a line on them indicating what the proper pour line is for the portion size. This is a great way to ensure the proper portion size is being served. In order to ensure K-7 students are receiving 8 fl oz of milk, take a 1 cup measuring cup and fill it to the top with water. Pour the 1 cup of water into the cup the students will use. Mark the line where the water stops. Do this for all types and sizes of cups. Simply do not pour all cups to the same height, as all the cups differ in sizes in both circumference and height.

Soy Butter and Jelly Sandwich

- A soy butter and jelly sandwich is offered as an alternate meal option for students who cannot eat the main entree due to an intolerance. During the week of review, the soy butter and jelly sandwich was not served. A school nutrition professional reported that this option has not been served at all this school year.
- When the Food Service Director was asked, it was explained that the soy butter and jelly sandwich option could be requested every day by students if they wanted. Because of this, the soy butter and jelly sandwich must meet daily and weekly meal pattern requirements for grain and meat/meat alternate. In addition, a standardized recipe must be developed for the soy butter and jelly sandwich.

Identifying Whole Grain-Rich Items

- The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich (WGR). Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as WGR.
- Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. Note, a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered WGR.
- USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying WGR products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Training

- DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school’s nonprofit food service fund. Information, including dates and locations, will be posted on the DPI [training](http://dpi.wi.gov/school-nutrition/training) webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>).
- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our [training](http://dpi.wi.gov/school-nutrition/training) webpage often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](http://dpi.wi.gov/school-nutrition/directory) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ **Finding A:** Production records were missing or did not have the following information filled in based on DPI's [Production Record Requirements](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) ("Must Haves and Nice to Haves") (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>):

- Serving site
- Specific product name/description
- Planned number of portions (4K-5, 6-8, 9-12, adult, a la carte)
- Total number of purchase units prepared (2-No 10 can, 10 lb case, etc.)
- Total number of leftovers
- Milk types available and actual usage by type
- Substitutions made to the original plan

Production records are intended to be useful tools to record information prior to production, during production, and following production. While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). For more information and a complete explanation of production record categories, please see [Instruction for Completing Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Corrective Action Needed: Submit one week of completed production records for breakfast and lunch with the above information filled in.

❑ **Finding B:** Lighthouse Christian School's Food Service Director reported that Offer Versus Serve (OVS) is implemented for K-7 lunch. OVS is not being implemented correctly for K-7 lunch. Students are served a lunch tray with pre-portioned grain, meat/meat alternate, vegetable, and fruit components. Students are not allowed to deny any of these components. Students are offered milk and are allowed to deny only milk.

Technical assistance was provided to the Food Service Director explaining that OVS cannot be implemented as it is now. Students must be offered all meal components in the required daily and weekly requirements, and under OVS, students only have to select three of the five components, one of which is the required ½ cup fruit, vegetable, or combination.

Corrective Action Needed: Submit a written statement indicating whether the traditional lunch service model or OVS is going to be implemented. If choosing to do OVS, OVS training must be completed by all point-of-service (POS) staff. As corrective action, complete OVS training with POS staff and submit a signed training roster.

Please consider using the following resources for OVS training:

The [Offer Versus Serve Guidance manual](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) is available on DPI's website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>).

DPI SNT's [Training](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) webpage has a webcast available, which outlines the OVS requirements for breakfast and lunch (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

❑ **Finding C:** While signage was present for lunch, the signage did not include the required statement that ½ cup fruit, vegetable, or combination must be selected under OVS. Please add a statement to your current signage that states students must select at least ½ cup fruit, vegetable, or combination.

If you are interested in ordering free signage, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form. Examples of signage can be found and printed from our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Submit a picture or PDF of new or supplemental signage that has been posted. If choosing the traditional lunch service model as part of **Finding B**, no further action is required.

❑ **Finding D:** There were 14 non-reimbursable meals observed during lunch on the day of observation. Ten meals were non-reimbursable because students were not offered two types of milk. Four meals were non-reimbursable because students were not offered milk at all. At the beginning of meal service, two milk types were offered, 1% white and fat-free chocolate. Towards the middle of meal service, there was only one 1% white milk on the table. Towards the end of meal service, a student took the only 1% white milk on the table, therefore, only fat-free chocolate milk was available. The next 10 students that went through the line only had one milk type available. Once the last milk was selected, four students went through the line without being offered milk at all. This was noted by a school nutrition professional and more milk was poured of each milk type after these students left the service line.

Corrective Action Needed: Please see **Finding E** and **Finding F** for corrective action needed. **Fiscal action will be assessed on these 14 non-reimbursable meals.**

❑ **Finding E:** Two milk types were not offered at lunch during meal observation. Please see **Finding D** for more information. Offering two types of milk is a requirement for the National School Lunch Program.

Corrective Action Needed: Submit a written statement detailing a plan for how this error will be corrected and avoided in the future.

Additionally, fiscal action is required for any repeat violations from the previous Administrative Review (AR). Because not serving a milk variety was a finding during the last AR as well as the current AR, fiscal action will be applied. Fiscal action will be applied, but not duplicated, based on fiscal action in Finding D. The following repeat finding was documented from the School Year 2013-14 AR:

- **“A variety of allowable milk types was not offered on the day of review and is not recorded on production records for breakfast for the week of review. At first, 2% milk in bulk (not measured) was going to be offered at breakfast on the day of review. This was somewhat corrected before service by switching to 8 fluid ounce packages of milk in two types. However, the 1% chocolate is not an allowable type.”**
- **“In one of the Pre-K classrooms on the day of review, a variety of milk was not offered to students until technical assistance was provided, at which point, the teacher started offering skim chocolate in addition to the 1% white milk.”**
- **“No milk variety was offered to students in one of the Pre-K classrooms, where it was announced that only the boys were getting chocolate milk that day. A variety of milk (at least two allowable types) must be offered to all students every day. Furthermore, gender should not be used as a determining factor for any aspects of meal service.”**

Please note, repeat violations of not offering a milk variety during subsequent Administrative Reviews may result in fiscal action.

□ **Finding F:** During on-site meal observation, it was observed that less than 8 fluid ounces (fl oz) of milk were being offered for breakfast and lunch. When asked, the school nutrition professional reported this is how milk is always served. Based on this conversation, it was determined that all milk types offered during the week of review were not offered in the 8 fl oz requirement, resulting in both daily (Monday-Friday) and weekly milk shortages for breakfast and lunch.

Lighthouse Christian School uses cups of different sizes to serve milk. When determining what 8 fl oz of milk is, an 8 fl oz glass is used to measure out the milk. However, the 8 fl oz glass is not being filled to the top. Instead, milk is filled to a line inside of the cup that is not 8 fl oz. When determining if 8 fl oz was being served during meal observation, the school nutrition professional was asked to fill the 8 fl oz glass to the usual pour line and pour it into a 1 cup measuring cup. The 1 cup measuring cup was not filled to the top, indicating that 8 fl oz of milk has not been served this school year, and therefore was not served during the week of review.

Corrective Action Needed: Submit a written statement detailing a plan for how this error will be corrected and avoided in the future.

Additionally, fiscal action is required for any repeat violations from the previous Administrative Review (AR). Because a daily milk shortage was found during the last AR as well as the current AR, fiscal action will be applied to all meals served at breakfast and lunch during the week of review, Monday-Friday, and on the day of on-site observation for lunch. Fiscal action will be applied, but not duplicated, based on Finding D. Because the milk shortage was corrected prior to breakfast observation, fiscal action will not be assessed on these meals. The following repeat finding was documented from the School Year 2013-14 AR:

- ***“Milk cartons were split between two students for some of the younger students in the Pre-K classroom. Milk must be served in at least 8 fluid ounces (daily minimum) for all students.”***

Please note, repeat violations of daily and weekly milk shortages during subsequent Administrative Reviews may result in fiscal action.

□ **Finding G:** Documentation provided for the week of review demonstrated a daily grain shortage at lunch on Wednesday. According to the label provided, 21 tortilla chips are equivalent to 1 oz by weight. When asked, the school nutrition professional reported that about 10 tortilla chips were served to each student.

Using Exhibit A, 1 oz of tortilla chips is 1.00 oz equivalent of grain. Since 10 tortilla chips were served and 21 tortilla chips equals 1 oz, only 0.25 oz eq grain was served on this day. The daily grain requirement for the K-8 meal pattern is 1.00 oz eq grain.

Corrective Action Needed: Submit a written statement explaining how you will meet the daily 1.00 oz eq grain requirement for this day during the week of review and your plan for ensuring the daily minimum grain requirement is met for future service weeks. Please include respective serving sizes and labels, if applicable.

Please note, repeat violations of daily grain shortage during subsequent Administrative Reviews may result in fiscal action.

□ **Finding H:** Non-whole grain-rich tortilla chips were served during the week of review to meet meal pattern requirements. It is required that 100% of grains offered at breakfast and lunch be whole grain-rich (WGR).

Foods that meet the WGR criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not WGR cannot be credited toward daily or weekly WGR requirements.

Corrective Action Needed: Submit a label for tortilla chips that are WGR that Lighthouse Christian School plans to replace the tortilla chips used during the week of review with and plan to use during future service weeks.

Please note, failure to meet the 100% whole grain-rich requirement during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding I:** Documentation provided for the week of review demonstrated a daily meat/meat alternate shortage at lunch on Thursday and Friday. The breaded chicken patty served on Thursday and the chicken nuggets served on Friday did not have sufficient documentation, such as a Child Nutrition (CN) label or Product Formulation Statement (PFS), in order to credit these combined grain and meat/meat alternate items. Because it was evident that meat/meat alternate was served on these days, this is considered a shortage and not a missing component.

Because both of these foods are processed products, they cannot be credited using the USDA *Food Buying Guide* (FBG). The FBG for School Meals Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the FBG and require further documentation, a CN label or PFS, clearly detailing the ingredients and their creditable quantities in order to be served in Child Nutrition Programs.

Corrective Action Needed: Submit labels and intended portion sizes for creditable replacement products that Lighthouse Christian School plans to replace the breaded chicken patty and chicken nuggets used during the week of review with and plans to use during future service weeks. Please include recipes, if applicable.

Please note, repeat violations of a daily meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding J:** Documentation provided for the week of review demonstrated a weekly meat/meat alternate shortage at lunch. The following meat/meat alternate (M/MA) items were offered during the week of review:

- Monday- Toasted cheese sandwich (1.50 oz eq M/MA)
- Tuesday- Chicken fajitas (1.25 oz eq M/MA)
- Wednesday- Chili (2.00 oz eq M/MA)
- Thursday- Greek chicken salad with feta cheese (0.25 oz eq M/MA + uncreditable breaded chicken patty)
- Friday- Chicken nuggets (uncreditable chicken nuggets)

The total creditable amount of M/MA offered over the course of the week of review is 5.00 oz eq M/MA. The weekly M/MA requirement for the K-8 meal pattern is ≥ 9.00 oz eq M/MA.

Corrective Action Needed: Submit a written statement explaining how you will meet the weekly ≥ 9.00 oz eq M/MA requirement for the week of review and your plan for ensuring the minimum M/MA requirement is met for future service weeks. Please include respective portion sizes, labels, and recipes, if applicable from **Finding I**.

Please note, repeat violations of a weekly meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding K:** Documentation provided for the week of review demonstrated that only one milk type was served at breakfast. When asked, the school nutrition professional explained that 1% white milk and fat-free white milk were served, but usage was recorded for both milk types under 1% white milk

on the production record. An invoice was provided, demonstrating 1% white milk was purchased and served during the week of review. The Food Service Director indicated that invoices can be provided for the week of review, demonstrating fat-free white milk was purchased and served.

Corrective Action Needed: Submit invoices for fat-free white milk served at breakfast during the week of review. Further corrective action may be warranted if unable to provide invoices demonstrating fat-free white milk was purchased and served.

❑ **Finding L:** Documentation provided for the week of review demonstrated a daily and weekly fruit shortage at breakfast. Only ½ cup of fruit was served under the traditional breakfast model to K-7 students. The daily breakfast fruit requirement for the K-8 meal pattern is 1 cup. The weekly breakfast fruit requirement for the K-8 meal pattern is 5 cups.

Two 2 ounce (oz) applesauce cups were served on Monday and Friday during the week of review. According to the Food Buying Guide, 4.5 oz of applesauce credits as ½ cup fruit. Therefore, on Monday and Friday, ⅜ cup creditable fruit was served, not ½ cup.

During the day of on-site observation, technical assistance was provided to the school nutrition professional serving K-7 breakfast that 1 cup of fruit must be served to students when using the traditional breakfast model. The school nutrition professional served 1 cup of fruit during breakfast observation.

Corrective Action Needed: Submit a written statement indicating understanding that 1 cup of fruit must be served at breakfast for the K-8 meal pattern when using the traditional breakfast model.

Please note, repeat violations of a daily and weekly fruit shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding M:** Documentation provided for the week of review demonstrated a weekly grain shortage at breakfast. The minimum amount of grain served was 7.50 oz eq for the K-8 meal pattern. The minimum weekly breakfast grain requirement for the K-8 meal pattern is 8.00 oz eq.

Minimum grains offered during the week of review:

- Monday- Cereal (1.25 oz eq grain)
- Tuesday- Granola and yogurt (1.00 oz eq grain + 1.00 oz eq M/MA substituted as grain = 2.00 oz eq grain)
- Wednesday- Bagel (2.00 oz eq grain)
- Thursday- Mini muffins (1.00 oz eq grain for 2 mini muffins)
- Friday- Cereal (1.25 oz eq grain)

“Assorted cereals” were served during the week of review on Monday and Friday. According to production records, the “assorted cereals” are 1.5 oz by weight. The cereal labels provided indicate each cereal’s weight and therefore how each cereal credits when using Exhibit A:

- Total- 1.5 oz, credit as 1.50 oz eq grain
- Cheerios- 1.3 oz, credit as 1.25 oz eq grain
- Honey Nut Cheerios- 1.8 oz, credit as 1.75 oz eq grain
- Cinnamon Toast Crunch- 2 oz, credit as 2.00 oz eq grain
- Rice Chex- 1.4 oz, credit as 1.25 oz eq grain

Because all cereals are offered on Monday and Friday, 1.25 oz eq grain is the minimum amount of grain offered on Monday and Friday. Therefore, 1.25 oz eq grain counted as the minimum grain amount offered on those days when calculating the minimum weekly grain offered.

Corrective Action Needed: Submit a written statement explaining how you will meet the weekly 8.00 oz eq grain requirement for the week of review and your plan for ensuring the minimum grain requirement is met for future service weeks. Please include respective serving sizes and labels, if applicable.

Additionally, fiscal action is required for any repeat violations from the previous Administrative Review. Because a weekly grain shortage was found during the last AR as well as the current AR, fiscal action will be applied. Fiscal action will be applied, but not duplicated, based on Finding F. The following repeat finding was documented from the School Year 2013-14 AR:

- **A choice of one cereal or a choice of granola bar were offered daily. "Furthermore, 1 granola bar (single package of chewy granola bar (35 g.) and double package of crunchy granola bar (42 g.) only credits as 0.5 ounce equivalents, and students would have to be offered 2 granola bars (2 chewy or 2 double packages of crunchy granola bars) for those granola bars to count as 1 full grain item of at least 1.0 ounce equivalents of grain. The menu as offered of only 1 granola bar, fruit, and milk only has 2 full items (Fruit and milk) because the single granola bar is short of the 1.0 ounce equivalent daily minimum." The daily minimum of 0.5 oz eq grain over the 5-day week totals to 2.50 oz eq grain offered over the course of the week. The minimum weekly grain requirement for the K-5 meal pattern during the 2013-14 AR was 7.00 oz eq grain.**

Please note, repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.

❑ Finding N: The mini muffin variety and bagel served at breakfast during the week of review did not have labels with nutrition information, including ingredients. It cannot be determined whether these item is whole grain-rich.

Corrective Action Needed: Submit labels for each mini muffin variety and the bagel served during the week of review. Further corrective action may be needed if these products are not whole grain-rich.

❑ Finding O: Signage was not posted at breakfast to show students what constitutes a reimbursable meal.

If you are interested in ordering free signage from SNT, please visit the [Team Nutrition](http://dpi.wi.gov/team-nutrition) webpage (dpi.wi.gov/team-nutrition) and complete the Resource Order Form.

Signage examples can be found and printed off of our [Signage Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Submit a picture or PDF of new or supplemental signage that has been posted.

❑ Finding P: Posted meal signage states, "Go back for milk or water." This signage suggests that students can select water in place of milk.

Corrective Action Needed: Submit a copy of updated signage that does not include this phrase or submit a written statement detailing the plan for bringing this signage into compliance.

Child and Adult Care Food Program (CACFP) Under SBP and NSLP

Compliance Reminders:
Final Rule

- Beginning on October 1, 2017, the updated Child and Adult Care Food Program (CACFP) meal pattern replaces the current meal pattern options for School Food Authorities (SFAs) serving infants and/or children aged 1-5 years old and not yet in kindergarten. The CACFP meal pattern requirements were updated to better align them with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. Meals served under the new CACFP nutrition standards include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Whole Grain-Rich Requirement for CACFP

- At least one grain serving per day, per child, must be a whole grain-rich (WGR) item. Foods that meet the WGR criteria contain 100 percent whole grains, or contain at least 50 percent whole grains and the remaining grains are enriched. **Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as WGR.** Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Feeding Infants

- Infants enrolled for care must be offered a meal that complies with the CACFP meal pattern requirements. Infants should be served based upon the meal pattern for their age, as well as their individual eating patterns and developmental readiness. It is acceptable to follow the eating habits of each infant, as long as the required components that the infant is currently consuming are offered over the course of the day. Once an infant is developmentally ready, the infant should be offered solid foods from the components on the infant meal pattern. The serving sizes for the solid food components begin at 0 tablespoons to allow for feeding based upon the current eating habits of the infant. For more information on feeding infants, refer to USDA's [Feeding Infants: A Guide for Use in the Child Nutrition Programs](https://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs) (<https://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>).

Infant Meal Pattern

- Under the updated CACFP meal pattern, SFAs may claim infant meals if parents or guardians provide one meal component. All programs must offer a minimum one type of Iron Fortified Infant Formula. Parents and guardians have the choice to accept the formula provided, or decline it and provide their own preferred formula or breastmilk. Parents or guardians cannot be required to provide formula or breastmilk. In addition, any infant formula, whether supplied by the SFA or parent or guardian, must also be one that is regulated by the FDA; meaning it must be made in the United States.

Transition Period Between Infant and Child Meal Pattern

- For a transition period for moving from infant formula or breastmilk to whole cow's milk the age is 12-13 months. Please note that if a parent prefers breastmilk for a child over one year of age this is acceptable even after 13 months of age. Also, if a child one year of age or older has a medical statement on file supporting the need to be served formula, this is acceptable.
- If the child is not accepting whole cow's milk, it is recommend that either breastmilk and whole milk or formula and whole milk are mixed together as the infant transitions to whole cow's milk, and it would be reimbursable from 12-13 months of age.

Findings and Technical Assistance, No Corrective Action Required to be Submitted

Finding a: During the week of review, the following daily grain, meat/meat alternate (M/MA), fruit, and vegetable shortages were found for the 1-2 year old age group at lunch:

- Monday: Half toasted cheese sandwich, tomato soup, apple crisp
 - 0.75 oz eq M/MA
 - 1/8 cup soup crediting as 1/16 cup vegetable (not a creditable amount)
 - Apple crisp (not able to credit fruit based on the serving size provided)
- Tuesday: Chicken fajita
 - 0.50 oz eq M/MA
 - Less than 1/8 cup fruit (please see technical assistance provided on grapes at the beginning of the Meal Pattern and Nutritional Quality section of the report)
- Wednesday: Chili and tortilla chips
 - Unable to credit tortilla chips (amount served is not a creditable amount)
 - Pear (unable to credit because do not know size/case count of pear served)
 - 1/8 cup of salad credits as less than 1/8 cup of vegetable because leafy greens credit as half the amount (vegetables in chili fulfilled the requirement)
- Thursday: Greek chicken salad
 - Unable to credit breaded chicken patty, so unknown oz eq of M/MA
- Friday: Chicken nuggets
 - Unable to credit chicken nuggets, so unknown oz eq of M/MA

Technical Assistance: The [Child Meal Pattern](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) should be followed for the appropriate age group (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf). Simply serving 1/8, 1/4, or 1/2 of the amount offered to K-7 students may not be a creditable amount for the Child Meal Pattern meal pattern.

Finding b: During the week of review, the following daily grain, M/MA, fruit, and vegetable shortages were found for the 3-5 year old age group at lunch (this does not include students enrolled in kindergarten, as they follow the K-8 meal pattern):

- Monday: Half toasted cheese sandwich, tomato soup, apple crisp
 - 0.75 oz eq M/MA
 - 1/4 cup soup crediting as 1/8 cup vegetable
 - Apple crisp (not able to credit fruit based on the serving size provided)
- Tuesday: Chicken fajita
 - 0.75 oz eq M/MA
 - Less than 1/4 cup fruit (please see technical assistance provided on grapes at the beginning of the Meal Pattern and Nutritional Quality section of the report)
- Wednesday: Chili and tortilla chips
 - Unable to credit tortilla chips (amount served is not a creditable amount)
 - Pear (unable to credit because do not know size/case count of pear served)
 - 1/4 cup of salad credits as 1/8 cup of vegetable because leafy greens credit as half the amount (salad plus vegetables in chili fulfilled the vegetable requirement)
- Thursday: Greek chicken salad
 - Unable to credit breaded chicken patty, so unknown oz eq of M/MA
- Friday: Chicken nuggets
 - Unable to credit chicken nuggets, so unknown oz eq of M/MA

Technical Assistance: Please see technical assistance for *Finding a*.

Finding c: A grain-based dessert was served and credited as a grain during the week of review (apple crisp) and on the day of review (chocolate chip cookie bar).

Technical Assistance: Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Grain-based desserts are considered an “extra.”

When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Finding d: During the week of review, the following daily fruit shortages were found for the 3-5 year old age group at breakfast:

- Monday and Friday
 - 2 oz applesauce credits as 1/8 cup fruit
- Wednesday
 - 1/4 cup mandarin oranges
- Thursday
 - 1/4 cup peaches

The daily breakfast fruit requirement for the 3-5 year old age group is 1/2 cup fruit.

Technical Assistance: Please see technical assistance for **Finding a**.

Finding e: The following items served at breakfast exceed the sugar limit.

- Cinnamon Toast Crunch
- Honey Nut Cheerios
- Granola

Technical Assistance: Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children’s consumption of added sugars. The cereals listed above exceed the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Finding f: A one year old student was served soy milk provided by the parent.

Technical Assistance: Once the infant is one year of age, no components can be provided by the household. As for non-dairy substitutes, they must be nutritionally equivalent to cow’s milk, meeting the nutritional standards set by the USDA. The school does not have to provide it if they prefer not to unless there is a medical statement on file and it is not just a parental request. According to USDA memo [CACFP 17-2016](#): “Parents, guardians, adult participants, or a person on-behalf of the adult participant, must provide a written request for the non-dairy milk substitution that is nutritionally equivalent to milk. A medical statement is not required. For example, if a parent has a

child who follows a vegan diet, the parent must submit a written request to the child's center or day care home asking that soy milk be served in place of cow's milk. The written request must identify the medical or other special dietary need that restricts the diet of the child or adult. Non-dairy beverage substitutions are served at the option and the expense of the center or day care home." (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP17_2016os.pdf)

Resources:

USDA FNS CACFP Webpage

- [Child and Adult Care Food Program \(CACFP\)](https://www.fns.usda.gov/cacfp/child-and-adult-care-food-program) (<https://www.fns.usda.gov/cacfp/child-and-adult-care-food-program>)

DPI SNT Webpage with Resources

- [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>)

CACFP Meal Patterns

- [Infant Meal Pattern](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_InfantMealPattern_FactSheet_V2.pdf) (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_InfantMealPattern_FactSheet_V2.pdf)
- [Infant Meal Pattern \(Spanish\)](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_InfantMealPattern_FactSheet_SPANISH_V2.pdf) (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_InfantMealPattern_FactSheet_SPANISH_V2.pdf)
- [Child Meal Pattern](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_MealBP.pdf) (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_MealBP.pdf)
- [Child Meal Pattern \(Spanish\)](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_MealPlan_Spanish.pdf) (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_MealPlan_Spanish.pdf)

Sugar in Cereals and Yogurt

- [Choosing Breakfast Cereals Lower in Added Sugars](https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-choosebreakfast.pdf) (<https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-choosebreakfast.pdf>)
- [Calculating Sugar in Cereals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereal-sugar-calc.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereal-sugar-calc.pdf>)
- [Choose Yogurts Lower in Added Sugars](https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-chooseyogurts.pdf) (<https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-chooseyogurts.pdf>)
- [Calculation Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sugar-in-yogurt-and-cereal.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sugar-in-yogurt-and-cereal.pdf>)

Contact Information

For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Nonprofit Food Service Account

- The numbers of lunches counted and claimed matched the number of lunches purchased by the SFA from the catering service. Therefore, any extra food from the catering service may be dealt with at the discretion of the catering service. However, the review team would like to remind

the SFA that the intent of these child nutrition programs are to serve and nourish the *students*, and not staff. Continually overproducing food is not an appropriate use of food service funds and taxpayer dollars. By continuing to overproduce, it would be a violation of 7CFR 210.14 Resource Management, which states revenues received by the nonprofit food service are to be used only for the operation or improvement of such food service.

Annual Financial Report (AFR)

- The AFR does not separate out food and labor costs for each program. Additionally, adult meals must be categorized within “non-program foods” and not “NSLP”. After speaking with the business manager on-site, staff were not aware of these requirements. Resources and technical assistance were provided on-site to complete the AFR correctly for the current school year. No further corrective action is required.

Vended Meal Agreement

- The current vended meal agreement includes milk as a part of the fixed meal cost for lunch. However, the school also purchases milk for lunch through Sysco. To reduce expenditures, in the next school year, the SFA could revise its contract with the vendor to exclude milk. Therefore, the SFA could purchase all milk for lunch through Sysco.

USDA Foods

- In conjunction with the SFA’s vended meals agreement, utilizing USDA Foods could significantly reduce costs related to food purchasing. Additional information on USDA Foods can be found on DPI’s [USDA Foods webpage](https://dpi.wi.gov/school-nutrition/usda). (<https://dpi.wi.gov/school-nutrition/usda>).

Compliance Reminders:

Annual Financial Report

- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Other:
 - Expenses for paper supplies, chemicals, thermometers, etc.
 - Utensils, pans, and smaller equipment such as a cart.
 - Food
 - Only expenses for edible food items and beverages.
 - Equipment
 - Should reflect major purchases of equipment.
 - Purchases Services
 - Report any time you pay someone for services provided such as equipment repair and health inspections.
 - Ala Carte
 - Expenses for any food items served to students not claimed as a part of the reimbursable meal.
 - Revenues and expenses from adult meals.

Resources:

- The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Paid Lunch Equity (PLE)

Commendations:

The PLE tool was completed correctly. Nice job!

Revenue from Non-program Foods

Commendations:

No issues were observed regarding non-program foods. Only adult meals are sold at the SFA, and therefore, the non-program food revenue tool is not required.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

Thank you for completing the Civil Rights Self-Compliance Form and for having free, potable water accessible to all students!

Technical Assistance:

Special Dietary Needs

- During meal service, as there is a student with disabilities, an [individualized education plan \(IEP\)](#) is to be utilized. An IEP is a written statement for a student with a disability that is developed, reviewed, and revised by a team of people, including the student's family, that outlines an educational plan for the student (<https://dpi.wi.gov/families-students/student-success/ccr-iep>).
- It is recommended that the SFA develop a special dietary needs policy for handling different types of accommodations to ensure that requests are equitable for everyone.

Compliance Reminders:

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI SNT website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be

approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Nondiscrimination Statement

- 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 updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used: “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

Findings and Corrective Action Needed: Civil Rights

Finding #4: The non-discrimination statement on outreach materials and other documents used to convey program information. Specifically, these items include the menus for breakfast, lunch, and snack, and field trip and summer meals materials.

Corrective Action Needed: Please send updated documents and materials to the consultant assigned to your review.

Finding #5: Civil Rights training was not completed for teachers, the food service director, one vended foodservice employee, and three additional non-foodservice employees with responsibilities related to the child nutrition programs.

Corrective Action Needed: Please have these individuals review the civil rights information and submit the sign-off sheet to the consultant assigned to your review.

Local Wellness Policy

Commendations:

The SFA has a wonderful wellness policy including all of the important areas. Great job!

Smart Snacks in Schools

Compliance Reminders:

Final Rule

- At the time of the on-site review there were no competitive foods or beverages sold at Lighthouse Christian School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at the school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales.

Fundraisers

- If Lighthouse Christian School chooses to have fundraisers in the future, please note WI DPI allows two fundraiser exemptions per student organization per school per school year, not to

exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

Resources:

Smart Snacks Product Calculator

- If Lighthouse Christian School chooses to serve snacks outside of SBP, NSLP, or Afterschool Snack, it is highly recommended to use the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Professional Standards

Compliance Reminders:

- The SFA director must ensure that vendors providing meals for the child nutrition programs have the knowledge and skills to supply safe and nutritious meals that meet the meal patterns and dietary specifications.

Findings and Corrective Action Needed: Professional Standards

Finding #6: The foodservice director, one vended staff member, and one non-foodservice staff member do not have professional standards trainings tracked.

Corrective Action Needed: For these three individuals, please track and submit training hour tracking documents to the consultant assigned to your review.

Finding #7: Teachers are not receiving professional standards training even though they are portioning food items and serving students their meals and snacks. Findings #3 and #11 explain how if the POS is altered, teachers may no longer require professional standards trainings.

Corrective Action Needed: Please submit a statement to the consultant assigned to your review detailing the teachers' responsibilities after altering the POS.

Possible further corrective action needed: If the teachers' responsibilities are beyond simply marking students as they receive meals and snacks, send the professional standards training tracker for each teacher to the consultant assigned

to your review. These trainings must pertain to the teachers' child nutrition program responsibilities and four hours of training per teacher will be required each school year.

Resources:

- [Professional Standards In a “Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards Training Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf)

Food Safety and Storage

Technical Assistance:

- The cover page of the food safety plan dates back to the 2015-16 school year. The food safety plan must be updated each school year and the cover page should be changed to reflect that the plan is the most current version.
- The food safety plan is meant to be a “living and breathing” document that foodservice employees use on a regular basis. The plan is in English, however, most foodservice employees speak Spanish as their primary language. Accommodating these employees with trainings and educational materials in Spanish is very beneficial for all aspects of the SFA’s child nutrition programs.
- Sanitization strips need to be used to monitor the sanitization concentration on a regular basis.

Compliance Reminders:

Sharing Tables

- A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

Findings and Corrective Action Needed: Food Safety and Storage

Finding #8: Milk jugs and portioned milk cups are not kept on cooling instruments. In this situation, “Time as a Public Health Control” standard operating procedure (SOP) is required, but not currently in place. With the current situation, all milk jugs and portioned cups must be tossed and cannot be placed back in the refrigerator for future service. If milk jugs are placed immediately back into the refrigerator after portioning milk cups, they may be put back into service for another day.

Corrective Action Needed: Please write and implement an SOP with the collaboration of your local sanitarian. Submit the written SOP to the consultant assigned to your review.

❑ **Finding #9:** Boxes filled with fruit were stored directly on the floor of the kitchen. These boxes must be stored at least six inches above the ground as stated in the SFA's "Storing Food" SOP.

Corrective Action Needed: Corrected on site. Submit a written statement to the consultant assigned to your review detailing your understanding of this requirement.

❑ **Finding #10:** Sharing tables are currently being utilized incorrectly within the cafeteria. Open cups of milk and fruit were observed on the sharing table during breakfast service on the day of review. The same table was also labeled as "trash", and no staff member was present to monitor what was placed on and taken off of the table. Either an SOP for sharing tables must be developed and implemented with your local sanitarian, or the sharing tables may not be utilized at the SFA.

Corrective Action Needed: Submit an action plan to the consultant assigned to your review. If an SOP is developed, please submit the SOP to the consultant.

❑ **Finding #11:** During the service of lunch, Breakfast to the Classroom (BITC) and Afterschool Snack (ASP), carts are used to transport foods to the classrooms. The food items for all programs do not have any coverings while being transported throughout the school. These situations pose food safety risks, and especially since the students in the classrooms are a high-risk population, this is extremely important to resolve. Breakfast, lunch, and snacks should be pre-portioned onto plates and covered with plastic wrap or foil. Additionally, for snack, teachers are provided the individual components to pass out to the children. For breakfast, teachers assemble the meals in a non-designated food prep area. Food prep and assembly is the responsibility of the foodservice employees as the teachers do not have food safety training or job-specific training for serving CACFP breakfasts.

Corrective Action Needed: Please submit an action plan detailing how these food safety issues have been resolved to the consultant assigned to your review.

Buy American

Compliance Reminders:

The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers, and provides healthy choices for children in the School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.
- What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

Finding #12: The following products were identified in the SFA's storage area as non-domestic. Lighthouse Church, Inc. does not have a Buy American – Noncompliant List or SFA equivalent form.

Pasta- product of Italy; Canned pineapple- product of Philippines; Frozen, chopped spinach- product of Mexico; Frozen California blend- product of Mexico

Corrective Action Needed: Begin using a Noncompliant Product List for tracking non-domestic products. Provide a copy of the form that will be used and include any non-compliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Finding #13: The following products identified in the SFA's storage did not have proper labeling to identify the country of origin.

Wheat crackers distributed IL; Dark brown sugar- distributed NY; Cinnamon, sage, ground ginger- packed in USA; Lemon juice- distributed NJ; Canned tomatoes- distributed MI; Chicken breast- distributed MN; Chicken nuggets- manufactured NJ; Cheddar cheese slices- distributed MI; String cheese- distributed TX

Technical Assistance, No Corrective Action Needed: In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the Technical Assistance section above for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

Reporting and Recordkeeping

Commendations:

Records are retained for the correct length of time. Thank you!

Compliance Reminders:

- All records pertaining to the child nutrition programs are to be kept on file for three years plus the current school year. Temperature logs may be kept for only six months. These records may also be retained electronically.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations:

The SFA does a wonderful job for SBP and SFSP outreach. Thank you!

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snack Program (ASP)

Commendations:

The SFA completed the first onsite monitoring form for the school year and provides great enrichment activities along with ASP. Great work!

Technical Assistance:

- For the K-8 ASP meal pattern, 1 ounce of a meat/meat alternate is required to be offered. While corrected onsite, only 0.8 ounce cheese sticks were set to be offered to the students. These are not the usual cheese sticks offered and the issue was resolved onsite, and therefore, the review team is not requiring any corrective action.

Compliance Reminders:

- Each site participating in ASP must complete an onsite monitoring review within the first four weeks of operation, and a second review at any other point within the school year. The review form to complete is located on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

Findings and Corrective Action Needed: Afterschool Snack Program

❑ **Finding #14:** On the ASP production records for both the CACFP and K-8 meal patterns, “½ or ¾ cup” was written for the fruit requirement. ½ cup fruit is required for CACFP and ¾ cup fruit is required for K-8. To avoid confusion, please have “½ cup fruit” only written on the CACFP ASP production record and “¾ cup fruit” only written on the K-8 ASP production record.

Corrective Action Needed: Please provide a week’s worth of production records with this change to the consultant assigned to your review.

Dr. Tony Evers, 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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!