

Administrative Review Report

Friedens Lutheran School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/06/2019	01/17/2020
On-Site Review	01/28/2020	01/29/2020
Site Selection Worksheet	12/06/2019	12/06/2019
Entrance Conference	01/28/2020	01/28/2020
Exit Conference	01/29/2020	01/29/2020

Commendations:

Thank you to the FSD and staff at Friedens Lutheran for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. The Food Service Director and Administrative Assistant were receptive and open to Technical Assistance. We also wanted to thank the kitchen staff and commend them for being so friendly and warm when serving the students. They did such a wonderful job and were also very pleasant to work with. Thank you for the work that you do to serve your students healthy meals.

Recommendations:

Free and Reduced

- The Benefit Issuance list should only include students with access to the National School Lunch Program at participating SFA.
- When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) (IEG) one would look at the amount of their income under the column indicating that stated frequency.
- The SA recommends watching the [Free and Reduced Price Meal Eligibility webcasts](#).

Direct Certification (DC)

- A full enrollment [Direct Certification](#) run must be completed a minimum of three times per year: at or near the beginning of the school year, three months after the initial run and six months after the initial run near the end of March. However, DPI recommends running DC more often than three times a year.
- A DC match should be completed when you receive a new student.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- DC runs are only for school nutrition and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition programs. A DC run should not be completed specifically for students in parochial schools to identify eligibility for other funding sources (i.e., Title 1).

New Food Service Director Hiring Requirements

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the NSLP and SBP, with further flexibilities for directors hired after April 29, 2019 in SFAs with under 2500 enrollment.
- The Hiring Standards for New SFA directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food safety training. These requirements are listed in a summary document called "[In a Nutshell- Hiring Requirements](#)".
- Per SP 38-2016, SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet the hiring standards.
- Additional resources may be found on the [Professional Standards page](#) of the DPI SNT website.
- Each SFA must designate at least one staff member as a program "director". A program "director" is the person

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designated to perform or oversee the majority of the program duties such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and other general day-to-day program management.

Training Requirements

- Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this ["In A Nutshell- Training"](#) document.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. [The DPI Professional Standards Tracking Tool](#) or the [USDA Professional Standards Tracking Tool](#) are encouraged but not required.

Special Dietary Needs

- A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. This [flow chart](#) gives guidance on special dietary needs. The [USDA Q&A on Accommodating Special Dietary Needs resource](#) and the [USDA Special Dietary Needs Handbook](#) contains even more detailed information.
- It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.
- SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations **must meet the USDA meal pattern requirements** in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a [fluid milk substitute](#) the SFA wishes to provide for students must be approved by the SNT office. Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable.

Time as Public Health Control

- Time/temperature control for safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called "Time as a Public Health Control." Please refer to the [Wisconsin Food Code Fact Sheet: Time as a Public Health Control](#) for detailed procedures regarding this practice. TCS foods include:
 - Milk and dairy products
 - Shell eggs
 - Meat (beef, pork, and lamb)
 - Poultry
 - Fish
 - Shellfish and crustaceans
 - Baked potatoes
 - Heat-treated plant food, such as cooked rice, beans, and vegetables
 - Tofu and other soy protein
 - Sprouts and seed sprouts
 - Sliced melons
 - Cut tomatoes
 - Cut leafy greens
 - Untreated garlic-and-oil mixtures

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- Synthetic ingredients, such as textured soy
- protein in meat alternatives
- To utilize “Time as a Public Health Control,” the school must have a corresponding SOPs in the site-specific food safety plan. Template SOPs are available on the [SNT Food Safety](#) webpage.
- If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
Corrective Action History	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually.</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action History	<p>Finding: On the Annual Financial Report (AFR), the revenues and expenses were not broken out for Nonprogram Foods (SFA had adult meals and extra milk).</p> <p>Corrective Action: Review the Annual Financial Report webcast or manual on the DPI Financial Management Webpage then update the 2018-19 Annual Financial Report with revenues and expenses broken out for Nonprogram Foods. Edits will have to be made manually to the 2018-2019 AFR. Uploaded the revised copy into SNACS.</p>
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action History	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.</p>
Form Name	Civil Rights (800 - 807)
Question #	807
Corrective Action History	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000

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Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include information about the triennial assessment (7 CFR 210.31).</p> <p>Corrective Action: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	126
Corrective Action History	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The households meal benefits were incorrectly calculated. .</p> <p>Corrective Action: Notify the household of the correct meal benefit, per program requirements. Corrected on site. No further action required.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	128
Corrective Action History	<p>Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized.</p> <p>Corrective Action: Review the Income Conversions section of the Eligibility Manual (pg 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced price meal application.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	134
Corrective Action History	<p>Finding: The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6) Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6).</p> <p>Corrective Action: Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	138
Corrective Action History	<p>Finding: The SFA did not effectively update student eligibility changes to benefit issuance list (BI) or the point of service (POS) for students who were new, transferred, or withdrawn.</p> <p>Corrective Action: Provide a process that the SFA will use to ensure student meal eligibility will be updated accurately and timely to the BI list and the POS.</p>
Form Name	Verification (207 - 215)
Question #	207
Corrective Action History	<p>Finding: SFA did not complete the verification process per 7 CFR 245.2.</p> <p>Corrective Action #1: Complete the verification process and upload all the completed verification documentation into SNACS.</p>

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	Corrective Action #2: Submit a statement of understanding that verification must be completed by November 15.
Form Name	Professional Standards (1210 - 1219)
Question #	1212
Corrective Action History	<p>Finding: The Food Service Director was hired after July 1, 2015 and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1).</p> <p>Corrective Action #1: Review the Professional Standards hiring requirements on the School Nutrition Team website and submit a statement of understanding of the hiring requirements for your SFA.</p> <p>Corrective Action #2: Complete the Professional Standards Exemption form and submit to DPI SNT for review.</p>
Form Name	Meal Counting and Claiming - Review Period (322-325)
Question #	322
Corrective Action History	<p>Finding #1: SFA did 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.</p> <ul style="list-style-type: none"> A. There is a systemic issue of claiming all of the free and reduced students in the free category on the breakfast claims, exceeding the amount of free eligible. B. There is a systemic claim consolidation error. SFA is entering the incorrect numbers from the edit check into the claim. <p>Finding #2: SFA was utilizing the SNT edit checks but did not fill out the approved for free/reduced/paid section to see if there was an over claim.</p> <p>Corrective Action #1A: Upload monthly edit checks for breakfast and lunch for September thru December into SNACS. Documentation provided on site. No further action needed.</p> <p>Corrective Action # 1B: Upload 30 operating dates of clean counts, starting on the first operating day in January for breakfast, breaking out the free/reduced/paid numbers. Fiscal action will be assessed on the number of ineligible meals by comparing the 30 operating dates of clean information to the claims submitted from August until December.</p> <p>Corrective Action # 2: Upload completed edits checks for the month of January and February for breakfast and lunch.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
Corrective Action History	<p>Finding: The Pre-K students are not being distinguished on the production records.</p> <p>Corrective Action: Submit Pre-K Production record that will be used to distinguish their separate meals moving forward.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	<p>Finding: Production records in use lack required information. The planned number of servings per menu item and a serving size for the milk are not included on breakfast or lunch production records.</p>

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	<p>Corrective Action: Submit an updated template of a breakfast production record and submit an updated template of a lunch production record into the documents tab that include the required information specified above.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Honeydew Melon (Guatemala)</p> <p>Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).</p>