

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

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**School Food Authority: St. Paul Lutheran School**

**Agency Code: 32-7858**

**School(s) Reviewed: St. Paul Lutheran School**

**Review Date(s): 2/22/18**

**Date of Exit Conference: 2/22/18**

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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, 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](https://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](https://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, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>). Food Service Directors can obtain a [director level GOALS certificate](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills/certificate-levels#director) (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills/certificate-levels#director>).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at St. Paul Lutheran School for the courtesies extended to us during the on-site review. The new food service director is doing an outstanding job in the position. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Certification and Benefit Issuance**

**Commendations/Comments/Technical Assistance/Compliance Reminders**

- Of those students eligible for free/reduced price meals in January, one was possibly determined incorrectly, as more income information is required to process the application.

### **Household Size Box**

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

### **Independent Review of Applications**

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are be required to conduct a second review of applications in the following school year.
- St. Paul Lutheran School had a 6% certification error rate and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual. You will also receive a SNT memo in summer with more information.

### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

- ❑ **Finding #1:** The household member size box on 1 application did not match the number of household members listed on the application.  
**Corrective Action Needed:** Please contact this households to confirm actual number of household members and record the date of confirmation on SFA-1 and submit as corrective action.
- ❑ **Finding #2:** One household application had net income reported in the annual column of the application and the application was determined as reduced. As all income must be gross amounts, this reduced benefit calculation may be incorrect, thus, the application should not have been approved without verification of gross income.  
**Corrective Action Needed:** Please contact this household to confirm actual income is gross income. If it is indeed net income, please change to paid and notify this household of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be calculated for these error for the review period (January) and month of on-site review (February), but there is a \$600 disregard before reclaim is necessary.

### **Verification**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

### **Findings and Corrective Action Needed: Verification**

- ❑ **Finding #1:** the Verification Collection Report (VCR)  
 Section 3  
 3-1 should be not be checked as the school “is required” to do Direct Certification (DC).  
 3-2 should be the number of students who appeared on your DC run.  
 3-3 will be those certified via Medicaid for next year.  
 Section 4  
 4-1 = the number of paper applications and students categorically free eligible.  
 Section 5

5-7 = Students confirmed through direct “**verification**”, which in your SFA would be 0.

**Corrective Action Needed:** Please correct these sections of the Verification Collection Report and resubmit the report online before March 1, 2018.

## Meal Counting and Claiming

### Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals every school day (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations/Comments/Technical Assistance/Compliance Reminders

Thank you to the Food Service Director at St. Paul’s Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. Although new to the position, the Food Service Director asked insightful questions and showed great enthusiasm. It was great to hear that St. Paul’s Lutheran has over 40 volunteers who dedicate their time to the program. During lunch observation, volunteers and the Food Service Director had a great rapport with students. Thank you for all that you do to provide the students of St. Paul’s Lutheran School healthy and appealing meals!

### Training Recommendation

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check our training webpage often for current and upcoming opportunities ([dpi.wi.gov/school-nutrition/training](http://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](#) can be found on our website ([dpi.wi.gov/school-nutrition/directory](http://dpi.wi.gov/school-nutrition/directory)).

### Meal Pattern Responsibility under a Joint Agreement

- Although you are purchasing meals through a joint agreement, it is ultimately the SFA’s responsibility to ensure all meal pattern requirements are met. Information on meal pattern requirements is found on the [NSLP Meal Requirements and Nutrition Assessment](#) page of our website ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

### Crediting Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. 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). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. More information about crediting documentation can be found on the [Menu Planning](#) webpage ([dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)).

### Planned Portion Sizes

- Planned portion sizes are required for every meal component. Even in self-service, such as a fruit and vegetable bar, a specific portion size that is intended for students to take should be recorded. Please refer to the [Production Record Requirement list](#) found on our [Production Records](#) webpage

(<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). Technical assistance was given to add the planned portion sizes for the vegetables on the fruit and vegetable bar and any bulk condiments.

- Having signage that visually communicates what the planned serving size of lettuce looks like on your salad bar is great! Consider adding similar signage for the other vegetables served with tongs so students know the amount they need to take for the planned serving size.

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

**Finding #1:** Meal pattern documentation was not available on site at St. Paul’s Lutheran School. Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer’s product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.

This requirement is outlined in the joint agreement template, #12: “The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution.*”

**Corrective Action Needed:** Submit a written statement explaining your plan to maintain documentation that is accessible at St. Paul’s Lutheran School.

**Finding #2:** Milk is a required component as part of the National School Lunch Program. You must record daily usage by milk type. While you have a daily estimation of milk usage by type, it should be recorded as proof that students were offered milk varieties daily.

**Corrective Action Needed:** Submit a written statement stating that you will record total milk usage by type for each meal going forward.

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

#### **Commendations/Comments/Technical Assistance/Compliance Reminders**

##### **Annual Financial Report (AFR):**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. 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 our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found our Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

**Finding #1:** Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk.

**Corrective Action Needed:** Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram

foods line on the annual financial report. We have a [resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

## Revenue from Nonprogram Foods

### Commendations/Comments/Technical Assistance/Compliance Reminders

- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- Since the school, at this time, does not sell any other nonprogram foods than milk and adult meals completion of the nonprogram food revenue tool is not required. If the changes and the school decides to sell more nonprogram foods, the USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

### Commendations/Comments/Technical Assistance/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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

### Local Wellness Policy

### Commendations/Comments/Technical Assistance/Compliance Reminders

- Local wellness policy is outstanding!

### Smart Snacks

### **Comments/Technical Assistance/Compliance Reminders**

- At the time of the on-site review, a la carte milk was the only food or beverage sold at St. Paul's Lutheran 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 each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

### **Professional Standards**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

- Tracking for Professional Standards is excellent as all training is being tracked including volunteers.

### **Food Safety, Storage and Buy American**

### **Commendations/Comments/Technical Assistance/Compliance Reminders**

[A Flash of Food Safety](http://www.fns.usda.gov/ofs/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

### **Food Safety Plans**

- Food Safety inspections must be posted in a publically visible location.
- All food service employees must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf). Currently, food service volunteers sign off on a training roster to acknowledge the agreement content, but do not individually sign an agreement to keep on file. During the next round of training for volunteers, each volunteer should sign an agreement that will be retained by the Food Service Director. It may be helpful for each volunteer to receive a copy of the agreement as a reference in the event of illness prior to an upcoming food service shift.

### **Food Waste and Leftovers**

- Leftover, unserved foods not listed on the TCS food list below may be able to be saved and served on following days. Leftover milk in milk barrels can be saved if its temperature is checked and found to be under 41 degrees in accordance with the corresponding SOP (see corrective action below). TCS food on the salad bar is not held under mechanical refrigeration during service, is subject to the time as a public health control SOP, and cannot be saved at the end of meal service. Hot TCS items are outside of mechanical temperature control during transport from the production site, and thus cannot be saved at the end of meal service. Non-TCS foods leftover on the salad bar may be saved for future service if they are determined to be in wholesome condition. From a quality perspective, it is recommended to put out smaller quantities of food on the salad bar and refill throughout service, rather than putting out larger quantities and saving all items leftover on the salad bar. If non-TCS foods will be saved from the salad bar, a corresponding SOP should be developed. This SOP should outline which items will be saved, how they will be labelled and stored, and when they must be served by.

### **Time Temperature Control for Safety**

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 or other soy protein  
Sprouts and seed sprouts  
Sliced melons  
Cut tomatoes  
Cut leafy greens  
Untreated garlic-and-oil mixtures

### **Time as Public Health Control**

- When using “Time as a Public Health Control:”
  - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
  - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### **Findings and Corrective Action: Food Safety**

- **Finding #1:** The current Food Safety inspection not posted in publically visible location.  
**Corrective Action Needed:** Please post the current food safety inspection in a publically visible location. Corrected on-site, no further action required.
- **Finding #2:** The SFA utilizes milk barrels for lunch service, but does not currently have a corresponding Standard Operating Procedure (SOP) in the food safety plan.  
**Corrective Action Needed:** Please submit a copy of an SOP for milk barrels that will be added to the food safety plan. Be sure to include the temperature log template that will be used for taking temperatures of milks in milk barrels before returning them to the milk cooler for future use. DPI has a [template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx) that can be helpful when developing this site-specific SOP: (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-barrel-temperature.docx>).

### **Buy American**

- The USDA requires that an 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.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and Buy American monitoring procedures. **Holmen the supplying district does an excellent job with this requirement!**
- **Label does not identify country of origin:**  
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 TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

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

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Lake Geneva Genoa, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
  - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
  - Promotion of calling 211 to locate meals in the area
  - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
  - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

### Findings and Corrective Action: SFSP Outreach

- ❑ **Finding #1:** No summer food service outreach was provided to students.  
**Corrective Action Needed:** Please provide a statement that St. Paul Lutheran School will do summer food service outreach for the 17-18 school year.

## Special Milk Program

### Commendations/Comments/Technical Assistance/Compliance Reminders



- As of October 1, 2017 schools, which serve meals and milk to children in pre-K programs that are not comingled with other students, must follow the CACFP meal pattern, and the CACFP meal pattern does not allow the service of flavored milk.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

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 your students’ 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).