

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. John Lutheran School

Review Date(s): December 19, 2018

Agency Code: 357534

Date of Exit Conference: December 19, 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 St. John Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. Thank you for taking the time to respond to the off-site requests, as well as pulling records for the on-site portion of the review. The food service director and administrative assistance understand program requirements and are very motivated to be successful. Staff attend SNSDC trainings annually and make every effort to diligently follow requirements.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

All applications were appropriately approved and denied. All students' eligibilities are correctly recorded on the benefit issuance list. Direct Certification (DC) is run in the required timeframes and maintained on file at the SFA. The most current Income Eligibility Guidelines are utilized while assessing applications. The correct DC, Verification, and meal eligibility notification letters are sent home. Thank you!

Technical Assistance:

- The income on applications is only to be assessed annually if there are multiple incomes reported on the application with more than one type of frequency (e.g. bi-weekly, monthly). If there is one income or multiple incomes reported but with the same frequency, the application should be assessed based on that frequency.

Compliance Reminders:

- In order for a SFA to share eligibility information with other programs or organizations within their school, [Sharing Information](#) must be completed, signed, and dated by each household for children with an approved free and reduced application or found on DC (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>).

Verification

Commendations:

Verification was completed by November 15. All income documentation was accurately verified and the Confirming and Verifying Officials reviewed the process. The Verification Collection Report (VCR) was also completed prior to the February 1 deadline. Great work!

Compliance Reminders:

- The Standard Sampling Method is only required for Verification if the non-response rate in the previous school year was 20% or greater.

Meal Counting and Claiming

Commendations:

Edit checks are completed monthly. The business manager utilizes tracking charts and a count check system to accurately produce counts for the claim for reimbursement. All meals served during the week of review and day of review were reimbursable. Really great work!

Technical Assistance:

- The Point of Service (POS) was located before the "choice table" where students had access to additional vegetables (see *Meal Pattern and Nutritional Quality* for more details). The POS changed to after the "choice table" during the day of review, per the reviewers' request. All meals observed were reimbursable.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of St. John Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service

Director is friendly and composed. She is also receptive to feedback and asks thoughtful questions. She works efficiently with another school nutrition professional in a very clean and well-organized kitchen. The cafeteria is welcoming, brightly painted and festively decorated. Student workers cleaned tables between shifts. Congratulations on your farm to school efforts, including harvest of the month the vertical lettuce garden in the library!

Technical Assistance and Program Requirement Reminders

National School Lunch Program (NSLP)

At St. John Lutheran School, the choice table (i.e. fresh fruits and vegetables for self-service) was at the end of the reimbursable meal service line. Students entered the cafeteria and proceeded through the meal service line (offering 5/8 cup of vegetables) and the choice table (offering 1/4 cup of vegetable). The School Administrative Assistant determined if each student selected a reimbursable meal before he or she had access to the choice table, which was not allowable. The School Administrative Assistant relocated to the end of the choice table, and subsequently, all students had access to 3/4 cup of vegetables or more as part of their reimbursable meals.

Production Records

Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates (m/ma) and grains.

Most fruits and vegetables credit by volume served (e.g. 1/2 cup broccoli credits as 1/2 cup dark green vegetable), and the USDA *Food Buying Guide* for Child Nutrition Programs (FBG) will note if the crediting is different based on volume served (e.g. one medium banana credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](#) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). If the product is not listed in the FBG, additional crediting documentation is required.

Signage is especially helpful when students are self-serving foods, such as fruits and vegetables from the choice table. When vegetables offered for self-service contribute towards weekly vegetable subgroup requirements, portion sizes of at least 1/8 cup each must be communicated to students. Proper portion size utensils, such as spoodles, encourage students to take the planned portion and the amount required as part of a reimbursable meal. Consider adding signage to the meal service line, like the SNT [Salad Bar Signage](#), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

Crediting

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements (PFS), standardized recipes, or the Food Buying Guide (FBG). Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff.

The following discrepancies were identified in crediting recipes from the review period:

- Cheesy Refried Beans – 3/8 cup of beans and peas (legumes), 0.75 ounce equivalent (oz eq) of m/ma per 1/2 cup portion
- Blueberry Muffins – 1.25 oz eq of grain per 1 muffin serving (based on 9.5 cups [1187.5 grams] of enriched flour and 10.5 cups [1260 grams] of whole wheat flour per recipe)

Food Buying Guide

The [USDA Food Buying Guide for Child Nutrition Programs \(FBG\)](#) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the FBG. After logging in to the FBG, click on “food items search” and type in a specific food

in the “keywords” search box. Many different options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP_t3D7AYAM) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (https://www.fns.usda.gov/tn/food-buying-guide-goes-digital).

Crediting Documentation

Any processed product that is not listed in the FBG requires a current CN label or a detailed PFS to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and 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. Documentation should be 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 FBG, it may not be credited when served as part of the USDA School Meal Programs.

School Breakfast Program (SBP)

St. John Lutheran School does not currently participate in the SBP. Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Furthermore, providing students with breakfast in the classroom is associated with lower tardy rates and fewer disciplinary referrals. Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or starting a program, contact the [School Breakfast Program Specialists](mailto:DPISBP@dpi.wi.gov) (DPISBP@dpi.wi.gov).

Child and Adult Care Food Program Meal Pattern for Pre-Kindergarten Students

Pre-kindergarten students are allowed to be served the K-8 menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in pre-kindergarten or K-8. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found on the [Infants and Preschool in NSLP and SBP webpage](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). The co-mingling flexibility is used appropriately at St. John Lutheran School.

Training

Offer versus Serve

School nutrition professionals may benefit from additional OVS training. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) may be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts). Additionally, [Meal or No Meal](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx), a training resource inspired by a game show, may be used for staff determining reimbursable meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx). Practice OVS in the context of St. John Lutheran School’s planned menus.

Small Victories (SV)

SV training is designed to celebrate the unique environment that is specific to schools with small student enrollments. The tools found on the [SV webpage](#) are meant to assist foodservice professionals working in small

schools as they create their own *Small Victories*. Attending in-person trainings and watching available webcasts count toward [GOALS requirements](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Corrective Action

Meal Pattern Finding #1: Missing crediting documentation for Fish Patty Precooked Brd 4Z – CRCAPN 3250 B8F3 (47360), offered during the review period on Friday, November 16.

Required Corrective Action: Submit a PFS for this item. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

Meal Pattern Finding #2: Daily and weekly minimum requirements for m/ma were not met for lunch during the review period due to missing crediting documentation for fish patty (refer to Meal Pattern Finding #1). The daily minimum requirement is 1.0 oz eq, and the weekly minimum requirement is 9.0 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily and weekly minimum requirements for m/ma will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address fish patty in your reply.

Meal Pattern Finding #3: Daily minimum requirement for vegetables were not met for lunch during the review period due to inaccurate crediting of Cheesy Refried Beans standardized recipe. The daily minimum requirement is 3/4 cup. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Describe **specifically** how the daily minimum requirement for vegetables will be met for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address Cheesy Refried Beans in your reply.

Buy American

For domestic products without country of origin labeling (COOL), consider the [Buy American Provision Attestation for Agricultural Product\(s\) Purchased Between School and Contractor](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d). For more information, visit the [Buy American Provision webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

The food service account maintains a non-profit status with its ending fund balance not exceeding three months operating costs. Checks and balances are in place to ensure indirect costs are not made to the food service account. Unpaid meal charge policy is in place to handle situations if students do not have money in their accounts. Bad debts are also handled appropriately.

Technical Assistance:

- The fiscal year is June 30 of the previous year (e.g. 2017) to July 1 of the current year (e.g. 2018). All expenses and revenues in the timeframe are to be reported by category within each program on the Annual Financial Report (AFR) for that school year (e.g. 2017-18 SY).
- Adult meals and extra milks are considered Non-Program Foods and must be recorded as such on the AFR.

- The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School Purchased Services Expenditure.
 - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

Compliance Reminders:

- The Unpaid Meal Charge Policy must be made available to all households in writing at the beginning of the school year.
- If a child has money to purchase a reduced price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay previously unpaid charges if the child intended to use the money to purchase that day's meal.

Paid Lunch Equity (PLE)

St. John Lutheran School was not required to raise its lunch prices for the 18-19 school year due to a positive or zero fund balance on January 31, 2018. Therefore, a comprehensive review in this area was completed.

Revenue from Non-program Foods

Commendations:

Adult meals and extra milks are the only non-program foods served and adult meals are priced appropriately.

Compliance Reminder:

- If non-program foods beyond adult meals and extra milks are sold at the SFA, be sure to complete the [Non-Program Foods Revenue Tool](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) to ensure the costs of these foods are covered by their revenues (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

The "And Justice For All" poster is hung in a publicly visible location. The Civil Right Self-Evaluation (PI-1441) was completed prior to the October 31 deadline. Overt identification was not observed on site. The Public Release was sent out, as required. Special Dietary Needs medical statements are maintained on file for students and statements contain all required components. Water is made available to students during meal service.

Technical Assistance:

- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***
- The Public Release is required to be sent to the following places:
 - News outlet
 - Grassroots organization
 - Major employer expecting layoffs

Findings and Corrective Action Needed: Civil Rights

Finding #4: The Hearing Official (HO) does not have civil rights training.

Corrective Action Needed: Please have the HO complete the civil rights training and submit the attendance record to the consultant assigned to your review.

Finding #5: Unpaid Meal Charge Policy does not contain the Non-Discrimination Statement.

Corrective Action Needed: Please include the statement on the policy and re-submit it to the consultant assigned to your review.

Resources:

- The full-length [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

Local Wellness Policy (LWP)

Commendations:

St. John Lutheran School's LWP has all required components listed on the LWP checklist. Thank you!

Technical Assistance:

- The SFA has reached out to its community in order to start a wellness committee. As a reminder, the LWP needs to be reviewed and revised, as necessary, each year by the committee. This committee may include any staff, students, or members of the community.
- Every three years, a formal assessment (Triennial Assessment) is to be completed and the results of this assessment are to be publicly posted.

Professional Standards

Commendations:

Professional Standards annual trainings are completed and tracked for all school nutrition staff. Student workers also assist staff in cleaning after meal service. These students receive job-specific trainings that are documented and tracked. Great work!

Technical Assistance:

- A program "director" is the person designated to perform or oversee the majority of the program duties (sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management).
- Annual training hour requirements are as follows:
 - Food Service Director: 12 hours
 - Food Service Manager: 10 hours
 - Full-time Food Service Staff: 6 hours
 - Part-time Food Service Staff: 4 hours

Food Safety and Storage

Commendations:

The food safety plan was site-specific and contained all required components. No storage violations were observed on site. The kitchen is very well kept and maintained by food service employees. Two food safety inspections were completed in the previous school year. Really fantastic work!

Technical Assistance:

- As a reminder, the most recent food safety inspection report must be posted in the service area.
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Reporting and Recordkeeping**Commendations:**

The Paid Lunch Price (PLP) report, VCR, FNS-10 report, and AFR were all completed. Thank you! All records are kept for the required three years plus the current school year and temperature logs are kept for the minimum six-month requirement.

Summer Food Service Program (SFSP) Outreach**Compliance Reminders:**

- Before the end of the academic school year, SFAs are required to send information to households regarding Summer Food Service Programs in their area. Be sure to include the non-discrimination statement.
- 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)

Findings and Corrective Action Needed: SFSP

Finding #6: SFSP outreach was not completed by the SFA.

Corrective Action Needed: Please submit a draft outreach letter to the consultant assigned to your review.

Resources:

- 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).
 - For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov
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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 webpage](https://dpi.wi.gov/statesupt/every-child-graduate) (<https://dpi.wi.gov/statesupt/every-child-graduate>).



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