

Administrative Review Summary Report Technical Assistance and Corrective Action Plan

Agency Code: 364867

School Food Authority: St. John's Lutheran School

Review Date(s): 12-14-16

Date of Exit Conference: 12-14-16

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. John's Lutheran School for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review and we greatly appreciated the work done prior to the review in completing the Off-site Assessment Tool. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The 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 can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>. Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". 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.

Review Areas

1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Appreciation/Commendations/Noteworthy Initiatives:

- Of those students eligible for free/reduced price meals in November, all were determined correctly, direct certification had been run in the appropriate timeframes, and Verification was performed correctly. Kudos for a job well done!

Comments/Technical Assistance/Compliance Reminders:

Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.

Findings and Corrective Action Needed:

2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Commendations

St. John's Lutheran School is receiving a variety of healthy, fresh, appealing meals from Denmark School District. Thank you to the menu planner at Denmark not only for planning healthy meals but for sending thorough and organized documentation prior to the on-site review. Thank you to all the staff and volunteers at St. John's for working hard to serve wonderful meals to students each day.

Comments/Technical Assistance/Compliance Reminders

- **Production Records:** Make sure that staff are consistently completing the top left portion of the production records with the total daily meals planned and served at the school.
- **Crediting Documentation:** Make sure to always keep current, accurate crediting documentation on file, either in the form of paper copies or electronically. CN labels should be photographed, photocopied, or cut directly off the package and kept on file. Product Formulation Statements (PFS) must be kept for any processed product that does not have a CN label. Products are reformulated often, so be sure to check at least twice a year that the documentation on file is accurate for the specific products you are receiving. More information on CN labels and PFS can be found on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>
- **O vs S Signage:** The National School Lunch Program regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meal. The lunch signage should list the five components, and that 3 of these components including at least ½ cup fruit, vegetable, or a combination of fruit and vegetable must be taken. <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>.

Findings and Corrective Action Needed:

- **Finding #1:** There was a weekly shortage of the meat/meat alternate component for the review week of November 14-18, 2016. There are two entrée options offered daily, and if a student chooses the option every day that offers the lesser amount of meat/meat alternate, they still must be offered the weekly minimum of 9 ounce equivalents of meat/meat alternate. Technical assistance was given on this prior to the onsite review in a discussion with the menu planner.
Corrective Action Needed: Please submit a written statement explaining what you will add to the menu so that the week of review meets the weekly minimum of 9 ounce equivalents meat/meat alternate.

- ❑ **Finding #2:** No vegetables from the bean/pea/legume subgroup were offered during the review week. This was likely due to the fact that the school providing meals had a four-day week, so the fifth day of the week at St. John's was a bagged lunch option. This week was out of the norm and this missing vegetable subgroup is not a systemic problem.
Corrective Action Needed: Please submit one week of completed production records to show that ½ cup of beans/peas/legumes were served. **(This was completed prior to the on-site review; thank you!)** Please also submit a written statement explaining what you will add to the week of review (November 14-18) to meet this subgroup requirement.
- ❑ **Finding #3:** While the signage posted, states that the reimbursable meal starts with a fruit or vegetable, it does not state that ½ cup of fruit, vegetable, or combination of the two must be taken.
Corrective Action Needed: Please submit a picture of the signage that states ½ cup of fruit, vegetable, or combination must be taken.
- ❑ **Finding #4:** There was confusion about what constitutes a reimbursable meal under Offer versus Serve (OVS). To have a reimbursable meal, a student must leave the line with 3 components including ½ cup fruit and/or vegetable. There is a helpful OVS webcast posted on our website that you may want to use to retrain staff and volunteers: <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>.
Corrective Action Needed: Please submit a written statement explaining what you will do to make sure all staff and volunteers understand OVS requirements. Submit employee sign-in sheet when training is complete.

3. Resource Management and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs

Comments/Technical Assistance/Compliance Reminders:

Annual Food Service Financial Report:

- 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 are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance."

Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>

- All nonprogram food costs including food, labor, equipment, purchased services, and other 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.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

Allowable Expenditures

- The nonprofit school food service account is to be used only for the operation of the school meal program including food, supplies, equipment and personnel.
- For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation.
- **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.

Unpaid Meal Charges Policy

- All School Food Authorities (SFA) operating federal school meal programs must have a written and clearly communicated policy to address unpaid meal charges in place by July 1, 2017.
- SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- The policy must explain how the SFA will handle situations where children eligible to receive reduced price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service.
- The policy should be implemented and enforced SFA-wide.
- The SFA has discretion to vary policy based on student grade level.

Findings and Corrective Action Needed:

- **Finding #1:** Because the school utilizes mostly volunteer labor for its food service program, it has an ending fund balance of \$4,072.62 which is an excess cash balance because 3 month's operating expenses equals \$2,857.44.

Corrective Action Needed: Please provide a spend-down plan for the 16-17 school year.

4. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Comments/Technical Assistance/Compliance Reminders:

Local Wellness Policy and School Meal Environment

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 and full compliance with requirements of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.
- Content of the Wellness Policy - At a minimum the wellness policy must include:
 - Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
 - Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
 - Standards for all foods and beverages provided, but not sold, to students during the school day.
 - Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
 - Description of public involvement, public updates, policy leadership, and evaluation plan.
- SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In

addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

- A summary of the requirements can be found at: https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Annual 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.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers (20 hrs or more/week)	Other Staff (less than 20 hrs/week)	Part Time Staff
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Food Safety and Storage

- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees 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 Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs

Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- 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.

SBP and SFSP Outreach

- It is necessary to inform the community about access to Summer Food Service feeding sites in your area even if your school does not provide summer meals. This information is located at <http://dpi.wi.gov/community-nutrition/sfsp/outreach> and may be posted as a flyer or a phone number list in your spring newsletter.

Findings and Corrective Action Needed:

- Finding #1:** Employee reporting agreements not on file.
Corrective Action Needed: Please have all food service staff and volunteers fill out an employee reporting agreement and submit signed copies http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfs_empl_rpt_agrmt.doc.