



SFA Name: Risen Savior Lutheran School 401351
 Administrative Review Conducted on: 3/7/2017
 Sites Selected for Review: Risen Savior Lutheran School

Date Corrective Action Plan was provided to SFA: 3/29/2017

Due Date for Corrective Action Plan: 4/28/2017

The following pages address the findings that were identified during your Administrative Review.
 For each finding you will be presented with the following:

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| The finding, and details specific to the SFA regarding the finding | A summary of the regulation / requirement |
| The Code of Federal Regulations citation number or alternate resource citation | Suggested guidance for the SFA in order to achieve compliance |
| | SFA area for reply to state how, when and by whom corrections will be made |

Commendations & Suggestions
Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for breakfast.
Fresh and Safe staff was friendly and accommodating. They were open to discussion and suggestions.
The staff was well prepared with the requested documentation.
The students were well behaved and had great manners.

Other areas of Technical Assistance (NOT requiring Corrective Action)
Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
Menu Review- not all recipes are standardized and in written standardized format. Items that need standardized recipes include: Chili Con Carne Without Beans and Nachos with Ground beef. It is acceptable to use USDA recipes, but any changes by the school need to be noted on the recipe so recipe results and portions are standardized. Items not used in a recipe need to be noted as such and recipe ingredients and yields need to be adjusted.

Day of Review Menu - The food vendor was informed to revise this week's menu to ensure that all vegetable subgroups are met. The day of review's menu had a substitution from broccoli to green beans. When substituting vegetables, it is recommended to use a vegetable from the same subgroup to ensure that the weekly quantities are still met.

Day of Review Menu - Recommend serving low fat or reduced fat salad dressings in place of full fat varieties.

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

Please provide a detailed response to each finding in the spaces provided.

Finding #1
410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation and Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: minimum of 8 oz. equivalent of grains per week.
SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #2

410. For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 3/4 cup red/orange vegetable subgroup.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.

<http://healthymeals.nal.usda.gov/>

Regulation / Citation and Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-8: 3/4 C red/orange.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for vegetable subgroups are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #3

318. The point of service did not provide an accurate meal count by eligibility status. This is a systemic error. For breakfast, teachers did not mark their sheets as the students were taking their meals, they were waiting until the end of meal service to take a head count. For lunch, tally marks are not available for everyday day during the month of review, some days just had a round number. Unable to verify the claim for the month of review. A 30 day recalculation is required for breakfast and lunch.

Technical Assistance Provided

During the review, an accurate point of service was discussed with the SFA. The point of service does not provide an accurate meal count by eligibility status. This is a systemic error. To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation and Summary

210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum:(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA will advise the State Agency that the systemic error has been corrected, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward.

Beginning March 13, 2017, please submit 30 operating days' worth of meal counts using the revised Point of Service Sheet.

SFA Response

Finding #4

316. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The meal counts were not correctly used in the claim for reimbursement. The school transcribed the total meal counts incorrectly for breakfast and lunch from the meal tally sheets to the excel book that is used for the claim for reimbursement.

Technical Assistance Provided

During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation and Summary

210.7(c) Reimbursement limitations. To be entitled to reimbursement under this part, each school food authority shall ensure that Claims for Reimbursement are limited to the number of free, reduced price and paid lunches and meal supplements that are served to children eligible for free, reduced price and paid lunches and meal supplements, respectively, for each day of operation.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA has corrected inaccurate counting and/or claiming procedures, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward.

SFA Response

Finding #5

403. On the day of review, fluid milk was not available in at least two varieties on all serving lines for breakfast. There was milk available throughout the meal, however there was only one option.

Technical Assistance Provided

During the on-site review, the fluid milk requirements were discussed with the SFA. The SFA must ensure that fluid milk is offered that is 1% unflavored or nonfat unflavored or flavored. Milk that is above 1% fat content is not allowable for a reimbursable meal. The SFA must provide at least 2 different varieties of milk throughout the meal service.

Regulation / Citation and Summary

220.8(d) Fluid milk requirement. A serving of fluid milk as a beverage or on cereal or used in part for each purpose must be offered for breakfasts. Schools must offer students a variety (at least two different options) of fluid milk. Effective July 1, 2012 (SY 2012-2013), all milk must be fat-free or low-fat. Milk with higher fat content is not allowed. Fat-free fluid milk may be flavored or unflavored, and low-fat fluid milk must be unflavored. Low fat or fat-free lactose-free and reduced-lactose fluid milk may also be offered.

SFA Suggested Guidance for Compliance

To come into compliance with the fluid milk requirements, the SFA must provide the State Agency with a written assurance that staff administering the Program understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, along with an indication that corrections have been made at this site, as well as system-wide, in order to bring the menus into compliance. Submit a copy of documentation (milk receipts, labels, menus, or production records) to demonstrate compliance.

SFA Response

Finding #6
404. Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch.
Technical Assistance Provided
During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.
Regulation / Citation and Summary
210.10(a)(2) Unit pricing. Schools must price each meal as a unit. Schools need to consider participation trends in an effort to provide one reimbursable lunch and, if applicable, one reimbursable afterschool snack for each child every school day. If there are leftover meals, schools may offer them to the students but cannot get Federal reimbursement for them. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s). The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions.
SFA Suggested Guidance for Compliance
To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.
SFA Response

Finding #7
1005. An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.
Regulation / Citation and Summary
210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local

educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted to the state agency for review.

SFA Response

Finding #8

1000. The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not address foods that are provided but not sold, for example class parties, class snacks, rewards. The SFA is responsible for defining guidelines to include in the wellness policy.

Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies.
<http://www.fns.usda.gov/tn/local-school-wellness-policy>

Regulation / Citation and Summary

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school based

contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that: (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this to the State Agency. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted to the state agency for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

SFA Response

Finding #9

1100. The SFA does not have a policy for all food sold outside of the reimbursable meals sold.

Technical Assistance Provided

During the review Smart Snack requirements were reviewed with the SFA. They must have a policy in place for all food sold on campus during the normal school day. The SFA should contact the state agency to determine if there are any state specific requirements. The SFA was provided with the USDA website for Smart Snacks. <http://healthymeals.nal.usda.gov/smartsnacks>

Regulation / Citation and Summary

The Smart Snacks interim final rule amends the National School Lunch Program and School

Breakfast Program regulations to establish nutrition standards for all foods sold in schools, other than food sold under the lunch and breakfast programs. It is recommended that the SFA update its policies for all foods sold on campus outside of the reimbursable meals sold, to include all requirements of the Smart Snacks regulations.

SFA Suggested Guidance for Compliance

To bring this finding into compliance the SFA must create a policy for all food and beverage items that are sold within the SFA during the normal school day. The policy must state that all items will be reviewed to ensure that the Smart Snack requirements are met. The policy should also include, but not limited to; a statement that a copy of all product labels will be maintained by the SFA, the process that will be implemented to verify that each food/beverage item meets Smart Snack requirements, the name and title of the SFA representative that will ensure compliance moving forward, and the training/information that will be provided to all LEA departments that sell food/beverages during the school day. A copy of this policy must be submitted to the SA.

SFA Response

Finding #10

1221. The SFA has additional employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program who have not received applicable training. There are 10 teachers who need training for offer vs serve, taking an accurate point of service, and civil rights.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

SP 39-2015: Question 29: Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only? No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that the appropriate training is completed.

SFA Response

Finding #11

1401. Storage violations were observed on-site. The SFA had food that was not stored 6 inches off the floor. There were boxes and milk crates on the floors of the walk in refrigerators, freezer, and dry storage room.

Technical Assistance Provided

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is stored at least 6 inches off the floor.

Regulation / Citation and Summary

210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.

210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.

SFA Suggested Guidance for Compliance

To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food will be stored at least 6 inches off of the floor.

SFA Response

Finding #12

702. The SFA did not record a general fund transfer to zero out the loss in the food service program.

Technical Assistance Provided

On the SFA's Child Nutrition Program Report submitted to DPI for SY 15-16, the SFA's ending balance was negative \$29,337.64. The SFA's food service program operated at a deficit and should have reported a general fund transfer to show they have zeroed out the loss in the food service account. During the review, the 2015-2016 Child Nutrition Program Report was revised to correctly report a general fund transfer in the "Transfers from General Fund" line.

Regulation / Citation and Summary

7 CFR 210.14 Resource management. (a) Nonprofit school food service. School food authorities shall maintain a nonprofit school food service. Revenues received by the nonprofit school food service are to be used only for the operation or improvement of such food service, except that, such revenues shall not be used to purchase land or buildings, unless otherwise approved by FNS, or to construct buildings. Expenditures of nonprofit school food service revenues shall be in accordance with the financial management system established by the State agency under § 210.19(a) of this part. School food authorities may use facilities, equipment, and personnel supported with nonprofit school food revenues to support a nonprofit nutrition program for the elderly, including a program funded under the Older Americans Act of 1965 (42 U.S.C. 3001 et seq.).

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the internal control procedures that have been put into place to ensure financial information will be correctly reported on the Child Nutrition Program Reports, to include a general fund transfer if required to zero out the balance.

SFA Response