

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

**School Food Authority: Lutheran Special
School and Education**

Agency Code: 40-1685

**School(s) Reviewed: Lutheran Special School
(LSS)**

Review Date(s): April 24-25, 2018

Date of Exit Conference: April 25, 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. 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).
- 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>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Lutheran Special School and Education (LSS) for the courtesies extended to us during the on-site review and for being available to answer questions and provide 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. This is the second year that Lutheran Special School and Education has been in the USDA Child Nutrition Programs and is doing great work to follow the regulations.

The DPI review team appreciates the eagerness of the staff at LSS for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, adhering to USDA guidelines and encouraging the students to take the food components for a complete meal. LSS receives meals from Hales Corners Lutheran School this year in a Joint Agreement.

The school nutrition director is actively pursuing the 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. Her participation in these continuing education activities has led to an understanding of the child nutrition programs and Community Eligibility Provision (CEP).

The DPI review team is confident that Lutheran Special School and Education will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- Thank you for running direct certification the required minimum two times per school year.
- The Public Release was distributed to many organizations that help to serve the families served by this school.

Technical Assistance:

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). The purpose is to inform the public that free meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Employment Office (as applicable)
- The Public Release is not to be sent to households as it includes include the specific income amounts for free or reduced benefits.
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Transferring Students

- This [transferring students flowchart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/provision-to-non-provision-transfer-flow-chart.pdf) explains how to transfer the free meal benefit as a students leaves your SFA (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/provision-to-non-provision-transfer-flow-chart.pdf>) and a [template letter](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/provision-to-non-provision-transfer-letter-1617.doc) to communicate with households (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/provision-to-non-provision-transfer-letter-1617.doc>).

Verification

Commendations:

- Thank you for completing the verification collection report (VCR).
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Meal Counting and Claiming

Commendations:

- This SFA correctly completed the edit check to calculate the reimbursable meals before claim submission and used the appropriate Community Eligibility Provision (CEP) percentages.
 - The edit check must ensure the daily meal counts are correct and do not exceed the Attendance Adjusted Enrollment at each site.
 - REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
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2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff at Lutheran Special School and Education for all they do to feed their students. Your time and effort spent preparing for and participating in the onsite review is much appreciated. All school staff were welcoming and professional. The food service director had pleasant interactions with students during observed meal services. Kitchens and service areas were very clean as well. The food service director and school staff were available to answer questions, nice to work with, and receptive to feedback.

Comments/Technical Assistance/Compliance Reminders

Training

- It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program.
- The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements.
- Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up).
- Numerous webcasts are also available, which cover a wide array of topics including:
 - [USDA food recipes](https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg) (https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg)
 - [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)
- These and other webcasts can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (https://dpi.wi.gov/schoolnutrition/training/webcasts)
- The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) techniques to encourage students to make healthy food choices.
- Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors. [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies)

Production Records

- Be specific on production records about the identity, brand, and description of the items served. For example instead of “fruit cup”, list both the applesauce cup and peach cup separately. List the specific type of granola bar or cereal bar offered, and list both when two types are offered, rather than just listing “cereal bar” or “pop tart” as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories.
- Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records.
- A list of [Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) requirements (“Must Haves and Nice to Haves”) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>)

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Crediting Documentation

- The USDA [Food Buying Guide](https://foodbuyingguide.fns.usda.gov/) for School Meals Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the *Food Buying Guide* and require further documentation (a Child Nutrition [CN] label or a product formulation statement [PFS]) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs. (<https://foodbuyingguide.fns.usda.gov/>)

❑ Finding #1: Product Formulation Statements (PFS) were missing from the following~

At lunch:

- Bun offered on 03.08.18
- Sliced bread offered on 03.09.18
- Hot dog bun offered day of onsite review 04.24.18

At breakfast:

- Muffins offered 03.06.18, 03.08.18, and 04.24.18
- Apple oatmeal bar offered on 03.05.18
- Honey grahams offered 03.07.18
- Pop-tarts offered on 03.09.18
- **Corrective action needed:** Please provide Product Formulation Statements (PFS) for above listed items.

Standardized Recipes

- Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (e.g., grilled cheese) should have a standardized recipe.
- This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Continue to use the resources on our website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe,

tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained.

- These are found on the [Meal Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#menuplanningtools). It is encouraged to [view the webcast, What's the Yield with Standardized Recipes?](#) which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr).

❑ **Finding #2:** Standardized recipes are not currently being used.

- **Corrective Action Needed:** Provide a standardized recipe for each of the follow menu items:
 - Turkey sandwich offered 03.08.18
 - Grilled cheese sandwich offered on 03.09.18
 - Tomato soup recipe offered on 03.09.18

Meat/Meat Alternate

- Some meat/meat alternates do not credit ounce-for-ounce because they contain ingredients other than meat (e.g. water, fillers, breading).
- For example, the USDA slice turkey (#110554) credits as 1 ounce equivalents (oz. eq.) for every 1.43 ounce by weight. Without knowing how much each slice weighs it is impossible to know how a slice will credit.
- In order to serve 2 oz eq of turkey, you need to serve 2.86 oz. by weight. You will need to weigh the slices of turkey using a scale in order to determine this.
- Make sure to use current product information to determine the weight of each serving in order to meet the daily and weekly requirements.

❑ **Finding #3:** Missing standardized recipe for the Turkey sandwich above, and the production record that was provided did not indicate how much turkey was offered to credit as 2 oz eq m/ma.

- **Corrective Action Needed:** Weigh slices and determine how many turkey slices you will need to use per sandwich to equal 2 oz eq m/ma. Record on the standardized recipe in finding #2.

Daily Minimum Requirements

- The USDA has set the [Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) to ensure students are offered daily servings of vegetable, including all subgroups. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf)
- The USDA K-8 meal pattern requires students to be offered $\frac{3}{4}$ of vegetable daily, with differing amounts of the subgroups over the course of the week. The weekly total of vegetables is $3\frac{3}{4}$ cups.
- Menus must be planned to meet meal pattern requirements. To assist with this process, use a menu planning worksheet found on the [Menu Planning](#) webpage, under the Menu Planning Worksheets heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

❑ **Finding #4:** During the week of review:

- (Monday 03.05.18) the planned menu offered 1 cup of lettuce mix. Lettuce credits half of the serving size, 1 cup = $\frac{1}{2}$ cup. This was the only vegetable offered during meal service. The daily $\frac{3}{4}$ cup was not offered creating daily shortage.
- A minimum of $\frac{1}{2}$ cup dark green vegetables must be offered during the week. This subgroup was missing.

- **Corrective Action Needed:** Submit a completed K-8 [menu planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc) for the week of review indicating how all the subgroups and quantities will be met. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc>)
Other tools to help complete the worksheet can be found [here](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf). (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/menu-planning-worksheet-instructions.pdf>).

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. Thank you.

3. RESOURCE MANAGEMENT

Technical Assistance:

- 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](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues. The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Annual Financial Report (AFR)

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- If the ending balance on June 30 is a negative amount, a transfer must be made from the non-federal funds to bring the ending balance to \$0.00 or a positive balance.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "Ala Carte", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money

deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
 - [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)
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4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- When using the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, and other documents used to convey program information, it is necessary to use the current statement (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, **“This institution is an equal opportunity provider.”** Either of these statements must be in the same size font as the other text in the document.
- The “And Justice for All” poster was posted in public view where the program is offered.
- Civil rights training was conducted for all staff who administer any portion of a school nutrition program; this is to be completed annually.
- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form was completed by October 31 (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).
- This SFA has a plan to follow the correct procedures when handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Technical Assistance:

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements are supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement 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>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
 - Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
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Local Wellness Policy

Technical Assistance:

- 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 (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance 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 the SFA complies with the 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.
 - Plan for measuring policy implementation.
 - Designation of one or more officials as being 'in charge' of the policy.
 - An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress 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.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed – Local Wellness Policy

❑ **Finding # 5:** This SFA is operating with an old Local Wellness Policy (LWP) from 2006, but has been reviewing points to revise and update the LWP. This SFA is in transition between buildings and food service providers, so is working to identify its LWP vision.

Corrective Action Needed: Please submit a statement indicating the proposed timeline to update the Local Wellness Policy.

Smart Snacks in Schools

No Smart Snacks of any kind offered.

Professional Standards

Commendations:

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- The director is working toward the GOALS certificate and completes many training hours in a variety of subjects.
- The SFA tracks all of the continuing education training hours on an Excel document. The file includes the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged.

Water

Commendations:

- Water is placed in a nice decanter on a table in the cafeteria with cups.

Food Safety, Storage and Buy American

Commendations:

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

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site’s Food Safety Plan.
- The most recent food safety inspection report was posted in public view.
- All cooling equipment temperatures are recorded daily on the production record.
- The food service employees have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf).

Food Safety Plans

- The Food Safety Plan was available for review; it was specific to Lutheran Special School and Education.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (https://dpi.wi.gov/school-nutrition/food-safety).
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.

Buy American

There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Noncompliant Product list (word doc) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Finding #6: Canned diced peaches from Greece and Aztec tortilla with no country of origin.

Corrective Action Needed: Submit a statement listing the four pieces of information from above or use the DPI template from the link also listed above indicating the reason.

Reporting and Recordkeeping

Commendations:

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any

updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

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

Commendations:

School Breakfast Outreach

- At the beginning of the school year and again in January, this SFA notifies families of the availability of breakfast.
- In reviewing the numbers from lunch participation in School Year (SY) 2016-17, this SFA will qualify for Severe Need Breakfast reimbursement in SY 2018-19.
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

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 Lutheran Special School and Education, USDA requires 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 ‘Summer Meals’ to 877-877 to find Summer sites
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

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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5. COMMUNITY ELIGIBILITY PROVISION (CEP)

Commendations:

- This SFA operates within the USDA guidelines for the CEP program, including claiming the appropriate percentage of meals at free or paid levels, informing the households of the CEP operation and completing documents and keeping records.
 - The ISP is 41.666% at this time, but with this school adding a grade next school year and an increase in direct certification matches, they may revise their contract for CEP.
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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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!