

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

School Food Authority: Hope Christian Schools, Inc.: Fidelis

Agency Code: 401729

School(s) Reviewed: Hope Christian Schools, Inc.: Fidelis

Review Date(s): November 28, 2017

Date of Exit Conference: 11/28/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations:

Thank you to the Food Service Director and staff for the courtesies extended to the Public Health Nutritionist and I during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. 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. We appreciate all that you do to serve the children healthy meals every school day!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations

This school participates in the Community Eligibility Provision. They collect alternate applications for other programs only.

Verification

Technical Assistance/ Compliance Reminders

The Verification Collection Report was completed on-site. This is an annual report due by February 1 each year. For CEP schools, this is a modified report. A copy of a blank report with markings of what sections CEP only SFAs need to fill in was left on-site.

Meal Counting and Claiming

Commendations

Edit checks have been completed for lunch and breakfast each month along with the printouts from the student software. Edit checks used were the forms created by DPI. The edit checks were very well done, organized, and included all required data. The breakfast and lunch claims were done correctly.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Director of Operations & Office Manager and teachers at HOPE Christian School: Fidelis and to Registered Dietitian and culinary professionals of the Milwaukee Center for Independence (MCFI). We appreciate your time and efforts spent preparing for and participating in the onsite review. Documentation was thorough and well-organized. The Director of Operations & Office Manager, working on the meal service line during lunch, encouraged students to select all five components and enjoy their meals.

Technical Assistance and Program Requirement Reminders

Child and Adult Care Food Program

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary

Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Cocoa Puffs 25% Less Sugar cereal was above the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements.

Offer versus Serve (OVS) is not an appropriate service style for preschool or pre-K students, such as 4K students at HOPE Christian School: Fidelis. OVS may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, breakfast bars, granola bars, and toaster pastries. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving fat-free chocolate milk as part of breakfast and lunch to 4K students. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Product Formulation Statements

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current CN label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include weights of raw and cooked ingredients, based on entries in the *Food Buying Guide*. Neither the BATTER TYPE COATING listed on the Fully Cooked Whole Grain Breaded Chicken Patties PFS nor the whole grain blend (oats and oat flour) listed on the French Toast Crunch Bar are based on entries in the *Food Buying Guide*.

3. RESOURCE MANAGEMENT

Commendations

The SFA does not sell any nonprogram foods (adult meals, extra entrees, or milk). None of the sections flagged for a comprehensive review on the Resource Management Risk Assessment Tool. No comprehensive reviews were required for the Resource Management section of the review.

Technical Assistance/Compliance Reminders

Allowable Costs

- On very rare occasions, students take a non-reimbursable meal. The school does not want to charge the students for the items because it is a CEP school. Therefore, when students take a non-reimbursable meal, each item the student takes must be tracked and recorded throughout the year. I suggest keeping an excel spreadsheet of these items and noting the cost of each individual item. At the end of the school year, a transfer must be made from the school account to the food service account to cover the cost of these items. Since Hope Christian Fidelis has one account altogether, you will not need to make a transfer. Instead, you will note the 'transfer' on the Annual Financial Report under non-program foods.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed at the beginning of the school year for all staff involved with the School Nutrition Programs. The PI 1441 form was completed correctly and done prior to the October 31 deadline. "And Justice for All" poster is prominently posted in the cafeteria next to the serving line.

Technical Assistance/Compliance Reminders

Special Dietary Needs

- There are no students with Special Dietary Needs at this time. However, below are some pointers regarding Special Dietary Needs to refer back to for future reference.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.

Local Wellness Policy

Commendations

The Food Service Director (FSD) attended the Local Wellness Policy class as part of the School Nutrition Team's annual SNSDC classes. The FSD created the Local Wellness Policy that includes all of the required criteria. Well done!

Technical Assistance/Compliance Reminders

While the Wellness Policy includes goals, be sure to outline those specific measurable goals in the policy for Nutrition Education, Nutrition Promotion, Physical Activity, and Other School-Based Strategies for Wellness. An example for a measurable goal for Other School-Based Strategies for Wellness would be to say you plan to hold a Health Fair every year and offer wellness screenings. By holding one Health Fair a year, you would be meeting your goal.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

The school does not sell any food to students on campus. There are no vending machines or fundraisers either.

Professional Standards

Commendations

The Food Service Director is doing a fantastic job tracking the required annual training hours for her and her staff. The Food Service Director attends SNSDC classes and already has enough hours for the entire school year. The food service staff and teaching staff is also up to date on their trainings. Food service staff has a back to school training with the school's vendor which includes many topics relating to School Nutrition. The teaching staff is trained on Civil Rights and Offer Vs. Serve. The Food Service Director is doing a great job making sure staff are getting trainings that pertain to their job duties.

Food Safety, Storage and Buy American

Commendations

The Food Safety manual was completed and site specific. It had all of the required components including the list of Process 1, 2, and 3 foods, and the list of kitchen equipment, and the employee reporting agreement. The temperature logs for the coolers were also well documented and well organized in a binder. The most recent food safety inspection is posted in a prominent location in the cafeteria next to the serving line, well done!

Technical Assistance/Compliance Reminders

Many products in the dry storage and refrigerator were not labeled with a country of origin, substituting this information for "packaged by" or "distributed by". This made identifying compliance and noncompliance with the Buy American Provision challenging. The MCFI kitchen manager does not maintain documentation of non-domestic products. To ensure compliance with this provision in the future, check products for domestic or non-domestic origins as part of the receiving process. The [Buy](#)

[American Noncompliant Product List template](#) and further information is available on the USDA Foods [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Nine products were identified during the onsite review as non-domestic products without noncompliant product documentation, including garlic powder from China; parsley flakes from Israel; tropical fruit from the Philippines; frozen broccoli from Mexico; limes from Mexico; ginger from Brazil; yellow bell peppers from Canada; bananas from Costa Rica; and cantaloupe from Mexico.

Findings and Corrective Action:

- **Finding #1:** Standard operating procedure (SOP) for Breakfast in the Classroom was not included in the Food Safety manual.

Corrective Action Needed: Print a copy of the [BIC SOP](#), discuss with staff, and add it to the Food Safety manual. Submit a copy of the SOP to show this has been completed.

- **Finding #2:** Standard operating procedures (SOPs) for donating leftover food items was not included in the Food Safety manual.

Corrective Action Needed: Draft a standard operating procedure (SOP) detailing how leftover foods which will be donated are handled safely. List the types of foods that are collected and describe how they are labeled and stored. If foods requiring time/temperature control for safety (TCS) are collected, include how temperatures are monitored for safety. Add this new SOP to the Food Safety Manual and submit a copy via email.

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All items pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.
- For CEP documents, keep on file for 3 years after the final claim is submitted, including 3 years after you have discontinued CEP.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- Breakfast participating is very high. The school is doing a wonderful job promoting the breakfast program.
- Summer meals are well advertised by the school towards the end of the year, using posters with a phone number to call for serving locations.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the

knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!