

# Administrative Review Report

St. Philip's Lutheran School

## Review Schedule:

Schedule Type	Start Date	End Date
Offsite-only Review	12/10/2019	03/06/2020
<del>On-Site Review</del>	<del>03/19/2020</del>	<del>03/20/2020</del>
Site Selection Worksheet	12/10/2019	12/10/2019
Entrance Conference by phone	05/05/2020	05/05/2020
Exit Conference by phone	05/21/2020	05/21/2020

## Commendations:

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

Thank you, also, for uploading organized and thorough meal pattern documentation. There is a good foundation for standardized recipes- excellent! We appreciate your flexibility and patience during this unusual review process. Thank you.

## Recommendations:

Students under the age of 5 and not yet in kindergarten must be served 1 of 3 possible ways:

- Comingled, with students in kindergarten or older (this is St. Philip's current practice)
- Served the 5 full components at each meal, following the CACFP Pre-K and Infant Meal Pattern
- Offered the 5 components Family Style at each meal, following the CACFP Pre-K and Infant Meal Pattern

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. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. Menu planning worksheets can be found in the Documents tab. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>) and these following resources:

- Meal pattern ([https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf))
- Milk ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_milk\\_component.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_milk_component.pdf))
- Meat/meat alternate ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_mma\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_mma_component_handout.pdf))
- Yogurt ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/yogurt\\_in\\_cacfp.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/yogurt_in_cacfp.pdf))
- Fruit and vegetables ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_fv\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_fv_component_handout.pdf))
- Grains ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_grain\\_component\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_grain_component_handout.pdf))
- Grain based desserts ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/grain\\_based\\_dessert\\_handout.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/grain_based_dessert_handout.pdf))
- Cereal ([https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp\\_cereals\\_meet\\_sugar\\_calc.pdf](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/pdf/cacfp_cereals_meet_sugar_calc.pdf))

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## Findings and Corrective Action:

Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	800	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>05/06/2020 09:22 AM</p>	<p><b>Finding:</b> The incorrect nondiscrimination statement (NDS) was provided as an answer on the offsite. Additionally, the correct NDS is absent on the school's website, where participation in the NSLP and SBP is referenced. Also the correct, full NDS is not present on the letter sent home to families describing the School Breakfast Program.</p> <p><b>CA: Provide a timeline</b> for updating program materials (all materials made available to families which reference CNPs), including the website, to include the correct NDS.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	
Due Date		
Corrective Action History	<p>Flagged</p> <p>03/11/2020 08:56 AM</p>	<p><b>Finding:</b> The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).</p> <p><b>CA: Provide a statement</b> describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>03/11/2020 08:51 AM</p>	<p><b>Finding:</b> Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p><b>CA:</b> Include all training hours completed this school year for each school food service employee onto the USDA or <b>DPI professional standards training tracking tool and upload into SNACS.</b></p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	

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TA Log #	TA Log# exists	
Due Date		
Corrective Action History	<p>Flagged</p> <p>05/18/2020 04:33 PM</p>	<p><b>Finding:</b> Each school within the SFA must have a written site specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13) The plan is missing HACCP Process 1-2-3 documentation for each menu item.</p> <p><b>CA: Provide a statement</b> indicating how this required information will be available for the new school year.</p>
Site Name	St Philips Lutheran Sch	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>05/12/2020 11:45 AM</p>	<p><b>Finding:</b> The following were not recorded on daily production records during the week of review.</p> <ul style="list-style-type: none"> <li>· Planned/actual quantity prepared in purchase units</li> <li>· Amount leftover</li> <li>· Number of reimbursable and non-reimbursable (adult) meals planned and served (please transfer this number from the daily tally sheet)</li> <li>· Type of fruit</li> </ul> <p><b>Corrective Action:</b> Update the breakfast and the lunch templates so all required information is recorded. Alternately, use the updated DPI template (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/transport-sheet.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/transport-sheet.xlsx</a>). Submit one week of completed breakfast and lunch production records, including all required information recorded daily. Chose a future week once school has resumed.</p>
Site Name	St Philips Lutheran Sch	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	
Due Date		

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Corrective Action History	<p>Flagged</p> <p>05/05/2020 03:36 PM</p>	<p><b>Finding:</b> The daily minimum vegetable requirement was not met at lunch on 2/26/20. The daily minimum requirement for K-8 is ¼ cup. The following represent the planned portion sizes:</p> <ul style="list-style-type: none"> <li>- ½ cup corn</li> <li>- ¼ cup lettuce credits as 1/8 cup</li> </ul> <p><u>This is a repeat violation from 2015, and therefore, all meals claimed on 2/26/2020 are subject to fiscal action.</u></p> <p><b>Corrective Action:</b> Describe specifically how the daily minimum requirement for vegetables will be met for the nacho meal during the review period (e.g. portion sizes increased, additional menu items, product replacements, etc.).</p>
Site Name	St Philips Lutheran Sch	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action History	<p>Flagged</p> <p>05/12/2020 11:36 AM</p>	<p><b>Findings:</b></p> <p>a. The turkey and gravy needs to be revised to reflect how it is actually prepared. Recipe yields 40 servings of 2 slices each (which should equal a total of 80 slices), but also states there are 50 servings to a pan. In other places, the recipe calls for 300 slices. Using the information that 5# equals 74.66 servings (1.43 oz, or 1 oz eq each), we can determine that 6.5# equals 97 servings.</p> <p>b. The nachos with ground beef and cheese sauce recipe needs to be revise to reflect how it is actually prepared. 10 pounds of beef crumbles is 160 oz, which yields 160x 1 oz servings. There is only enough for 1 oz per serving, not 2 oz. 5 pounds of cheese is 80 oz, which yields 160x ½ oz servings. Total, this recipe credits as 1.5 oz eq M/MA.</p> <p>c. The turkey ham and cheese on a bun recipe needs to be revised to reflect how it is actually prepared. The procedure calls for 6 slices of turkey ham times 50 servings = 300 slices. However, the ingredients calls for 576. The procedure calls for 1 slice of cheese times 50 servings = 50 slices. However, the ingredients calls for 100. Original recipes with mark-up are in the Documents tab.</p> <p><b>Corrective Action:</b> Please update these recipes to reflect actual practice. Re-submit so crediting can be determined.</p>
Site Name	St Philips Lutheran Sch	

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<b>Form Name</b>	Wisconsin School Day Milk Program	
<b>Question #</b>	7	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action History</b>	Flagged 05/18/2020 10:02 AM	<b>Finding:</b> SFA did not accurately determine the cost per half pint of milk for the Wisconsin School Day Milk Program (WSDMP). The cost must be based on a weighted average of all milks purchased and used for year. <b>CA:</b> Provide a statement on how the cost of milk for the WSDMP will be determined moving forward.

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
05/18/2020	2042	1403	Administrative Review	ALL				

### Comments

Food products used for the school meals program must have documentation if they are non-domestic. Further information can be found in Buy American in a Nutshell (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf>). Please complete non-domestic documentation for any products at the school and the off-site kitchen (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

05/18/2020	2041	10	WSDMP	St Philips Lutheran Sch	FSD			
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### Comments

The **Wisconsin School Day Milk Program (WSDMP)** was created by the Wisconsin Legislature to reimburse schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced price meals. Only one half-pint of milk may be claimed per eligible student per school day. By State law, no charge can be made to those students who qualify for free and reduced price meals and are receiving free milk under the WSDMP. Milk served to paid students at the milk break in Grades Pre-K through 5, and students in Grades 6-12, is not eligible for reimbursement. If milk served to students is claimed under the federal Special Milk Program (SMP), it may not be claimed under the WSDMP. The WSDMP is a program to support WI dairy farmers. It is suggested to inquire about a statement from the milk processor that indicates at least 50% of the milk being processed and delivered is from WI farms. See the [Wisconsin Dairy Plant Directory](https://datcp.wi.gov/Documents/DairyPlantDirectory.pdf) (<https://datcp.wi.gov/Documents/DairyPlantDirectory.pdf>) for further information.

05/17/2020	2043	1400	Food Safety	ALL	FSD			
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### Comments

#### Food Safety Plans

SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. ? All schools must have a comprehensive, site-specific food safety plan on-site, which includes HACCP process 1, 2, and 3 items; applicable SOPs; a list of equipment; and a list 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 webpage](https://dpi.wi.gov/school-nutrition/program-requirements/food-safety). (<https://dpi.wi.gov/school-nutrition/program-requirements/food-safety>)

All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.

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A Flash of Food Safety is a video series designed to help school nutrition professionals understand and apply safe food practices. The Office of Food Safety website includes additional food safety resources.

05/05/2020	2033	410	Administrative Review	St Philips Lutheran Sch				
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### Comments

The menu planning worksheet used is not correct for the K-8 meal pattern. K-8 students need access to 1 oz eq daily and 9 oz eq M/MA weekly. They also need access to 1 oz eq daily and 8 oz eq grain weekly.

05/01/2020	2032	305	Visiting Students	ALL	FSD			
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### Comments

305d: Visiting students to a CEP school may be added to the total student meal count and served the meal for free.

04/29/2020	2031	709	Adult Lunch Price	ALL	FSD			
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### Comments

For non-pricing sites, the minimum adult lunch price should be at least the rate received for a free student's meal, which includes the federal reimbursement rate for a free meal including the \$.07 (PBR) plus the federal cash-in-lieu of commodities rate, plus the state lunch aid. If a SFA receives the \$.02 lunch differential, include this amount in the federal reimbursement. For non-pricing sites, the minimum adult breakfast price should be at least the rate received for a free student's meal, which includes the federal reimbursement rate for a free meal, plus the state breakfast aid. If a SFA receives the severe need breakfast differential, include this amount in the federal reimbursement. USDA Food Value is not included in the breakfast meal price.

04/29/2020	2030	706	PLE	ALL	FSD			
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### Comments

Action required by all School Food Authorities (SFAs): SFAs are required to complete this Paid Lunch Equity Survey before June 8, 2020. This survey will take less than 5 minutes to complete and will serve as documentation on how pricing SFAs intend to comply with the guidance described below. Note: Residential Child Care Institutions (RCCIs), SFAs participating in Provision 2, participating in Community Eligibility Provision (CEP) SFA-wide, or are non-pricing (do not charge for meals) should complete the Paid Lunch Equity Survey, but do not complete the Paid Lunch Equity Tool.

03/11/2020	1946	810	NDS	ALL	FSD			
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### Comments

Nondiscrimination Statement (NDS) • When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015. • 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 main text in the document and the format cannot be altered.

03/11/2020	1943	1601	SFSP Outreach	ALL	FSD			
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### Comments

Summer Food Service Program (SFSP) Outreach A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, 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:

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Promotion of the summer meals locator on the <a href="https://dpi.wi.gov/community-nutrition/sfsp">DPI Summer Meals webpage</a> ( <a href="https://dpi.wi.gov/community-nutrition/sfsp">https://dpi.wi.gov/community-nutrition/sfsp</a> )								
Promotion of calling 211 to locate meals in the area								
Promotion of the ability to text 'food' to 877-877 to locate meals in the area								
Promotion of the Summer Food Service Program webpage Resources:								
For more information on the SFSP contact: Amy J. Kolano, RD, CD, SFSP Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov								
03/10/2020	1938	1600	SBP Outreach	ALL	FSD			
<b>Comments</b>								
School Breakfast Program (SBP) Outreach SFAs must inform families of the availability of reimbursable breakfasts served under the School Breakfast Program (SBP) at the beginning and throughout the school year. The goal of providing school breakfast outreach is to increase participation in the SBP.								
03/10/2020	1937	805	Special Dietary Needs	ALL	FSD			
<b>Comments</b>								
Special Dietary Needs • A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. This flow chart gives guidance on special dietary needs. The <a href="https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf">USDA Q&amp;A on Accommodating Special Dietary Needs</a> ( <a href="https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf">https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf</a> ) resource and the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf">USDA Special Dietary Needs Handbook</a> ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf</a> ) contains even more detailed information. • It is recommended, but not required, for SFAs to use the prototype <a href="https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs">Medical Statement for Special Dietary Needs</a> posted on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs">DPI SNT website</a> ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs">https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs</a> ), which is also available in Spanish and Hmong. • SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly 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. Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable.								
03/10/2020	1936	802	LEP	ALL	FSD			
<b>Comments</b>								
Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency. SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.								
03/10/2020	1935	305	Visiting Students	ALL	FSD			
<b>Comments</b>								
• SFAs may claim visiting students in the paid category or the individual's category with documentation (unless they are from a CEP school). SFAs may claim visiting students in the paid category or the individual's category with documentation.								
03/10/2020	1934	303	Meal Benefits	ALL	FSD			

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## Comments

• 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. Meals are counted at the point in the food service operation where it can be accurately determined that a reimbursable free, reduced-price or paid meal has been served to an eligible student. Adults at the POS must be trained in Meal Pattern and OVS and be able to recognize a reimbursable meal. • Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.