

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

School Food Authority: LUMIN, Inc.

Agency Code: 409862

School(s) Reviewed: (2291) Pilgrim Lutheran School

Review Date(s): 12/4/18-12/5/18

Date of Exit Conference: 12/5/18

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:

- 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, or 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 (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>).
- [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 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.

These techniques should be added to the SFA's Local Wellness Policy (LWP) to address the required goal of Nutrition Promotion.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at LUMIN, Inc. for the courtesies extended to us during the review and for being available to answer questions and provide requested documents. Overall, the agency is running an excellent program, which is reflected in high student participation and a fiscally sound food service account. Staff were receptive to recommendations and regularly attend School Nutrition trainings to stay current on program regulations. Thank you for all you do to serve the students in your community!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Community Eligibility Provision (CEP)

Thank you for retaining records used in the development and approval of the Identified Student Percentage (ISP) and claiming percentages. These records are critical source documents that support the agencies participation in CEP SFA-wide. The agency currently in the second round of CEP, cycle year 1.

Carryover

If students leave LUMIN Inc. and attend an outside district that is non-CEP or Provision 2, be aware of the following guidance to assist households in their transition.

Community Eligibility Provision (CEP) students do not carry *individual* meal eligibilities. Students are free based on the student population make-up of a school they attend. If a student attending a Provision school (CEP or Provision 2) transfers to a non-Provision school in an **outside district**, the new school must process a household meal application within 30 operating days. Until July 1, 2019, when this regulation becomes mandatory, we **encourage** the new school to provide free meals and can claim for free meals through the 30th operating day (**or until a new eligibility determination is made, whichever comes first**). In this case, acceptable documentation of eligibility from the former Provision (CEP or P2) LEA can be a copy of the current school year *Wisconsin Schools and Districts Participating in Community Eligibility Provision* list highlighting the former school's name. This list is updated annually and is available on the DPI CEP website. For more information see the [Provision to non-Provision Transfer Student Flow Chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/provision-to-non-provision-transfer-student-flow-chart.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/provision-to-non-provision-transfer-student-flow-chart.pdf>).

Visiting Students

When school-aged students visit LUMIN, Inc., their meal can be included in the total daily count for reimbursement. The agency would not charge the visiting student(s). When LUMIN, Inc. students visit an outside agency that also offers the USDA SBP and NSLP, the host school can claim your students according to the SFAs approved claiming percentages. If this is the case, LUMIN would not claim for meals that day and would not be billed for meals served by the host school. For information refer to the [CEP Visiting Students Flow Chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf), which is found on the CEP website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf>).

Direct Certification

Thank you for running matches in the required time frames to complete the Special Provision Match Report and to obtain April 1 data in order to re-apply for participation in CEP.

Verification

The agency completed the 17-18 SY Verification Collection Report (VCR) by February 1, 2018. Reviewer discussed indicating that you *do not* participate in Provision 2 under Section 2 when completing the 1819 SY VCR.

Meal Counting and Claiming

Commendations/Comments/ Technical Assistance (TA)/ Compliance Reminders

- The review period Severe Need School Breakfast Program (SBP-SN) and National School Lunch Program (NSLP) claims were consolidated correctly. The agency has internal controls in place to check total meals claimed against those eligible and those in attendance.
- All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that *consistently* yields accurate claims. Meals must be claimed at the point of service where it can be determined that the student has all components required for a reimbursable meal. This also includes breakfast in the classroom (BIC) when students must take all planned components (full serve) as part of the CACFP meal pattern.

Findings and Corrective Action

- Finding:** Inaccurate 4K point of sale during BIC at Pilgrim Lutheran School. Breakfasts are not claimed at the point of sale. The fruit component was offered after the POS.

Corrective Action Needed: Correct the point of sale and retrain staff. Submit a statement to the consultant explaining how it was corrected and when staff received training.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all the school nutrition professionals who work hard every day to provide healthy meals to the students at LUMIN Pilgrim Lutheran School. Documents were received in plenty of time to review before the on-site portion of the administrative review.

Comments/Technical Assistance/Compliance Reminders

Training Opportunities

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](https://dpi.wi.gov/school-nutrition/training#up) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Equipment Grants

The United States Department of Agriculture (USDA) distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority's (SFA's) participating in the National School Lunch Program (NSLP). Priority for this grant is given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. Requested equipment must cost more than the SFA's definition of capitalization threshold or \$5,000, whichever is less. For the fiscal year 2018 grant, the SFA's capitalization threshold can be no lower than

\$1,000. More information can be found on the [NSLP Equipment Grant Opportunities](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>).

Signage

While signage was available indicating what a reimbursable meal is, larger signage could be beneficial for the students and the school staff. A link for DPI [signage](#) can be found here with many useful options. Using the larger signage with a dry erase finish and listing the day's menu is important so that students know what the choices for lunch are for building a healthy reimbursable meal.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Offer versus Serve

Offer Versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. It is important for anyone (school staff, teachers, and volunteers) working with the NSLP to fully understand the OVS requirements. The [Offer Versus Serve Guidance Manual](#) and the [Offer Versus Serve Webcast](#) can be used as a training resource (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf> and <https://dpi.wi.gov/school-nutrition/training/webcasts>). Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch/breakfast. Although all students observed at lunch/breakfast took a reimbursable meal, it is important for staff to fully understand the OVS requirements.

❑ **Finding #1:** At Pilgrim Lutheran School students were served the entree and grain then offered the fruit and vegetable option.

Corrective Action: Please provide the PHN with -

- A plan of action (training plan) in the form of a detailed written statement
- A signed roster and webcast quiz completion form for all food service staff
- A plan indicating how errors will be corrected and avoided in the future

Child and Adult Care Food Program (CACFP)

Pre-kindergarten students are allowed to be served the K-5 (-8 or 12 at breakfast) menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in preschool or K-5. During on-site observation, preschool students were served the K-8 menu, but were not being served at the same time as the older students. Children who are not yet in kindergarten must be served the updated [CACFP](#) meal pattern if not co-mingled with other age/grade groups at meals (<https://dpi.wi.gov/community-nutrition/cacfp/new-cacfp-meal-pattern>).

Training and additional resources can be found on the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Offer Versus Serve (OVS) is not an appropriate service style for pre-kindergarten (K4) students. It 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 developing food preferences. Instead, pre-kindergarten (K4) students should be served all the required components in at least the minimum amounts at each meal.

❑ **Finding #2:** Teachers for each class enter point of sale for their own students at lunch, therefore the point of sale and the food service workers know which students are pre-kindergarten (K4) students. Food service staff were not serving pre-kindergarten (K4) students the CACFP meal pattern.

Corrective Action Needed: Provide the PHN with:

- Updated lunch production records for the CACFP meal pattern for the pre-kindergarten (K4) students.
- Documentation of CACFP meal pattern training.
- Statement indicating how the CACFP meal pattern/service will be monitored to ensure proper service to pre-kindergarten (K4) students at breakfast and lunch.

Vegetable

Production records supplied by the vendor indicated which serving tool was to be used by the server and the server did not use the suggested tool. Raw baby carrots were being served on 12/4 with a gloved hand, which is not an appropriate serving utensil as it is not a standardized form of measurement. Fruits and vegetables are credited by volume (cups). Please use spoodles, which are appropriate serving utensils, available with slots. When asked, the server did not know how many baby carrots credited as at least half a cup red/orange vegetable.

❑ Finding #3: Some students may not have been given the correct portion size for baby carrots because the production sheets did not list how many baby carrots fit into a ½ cup spoodle.

Corrective Action Needed: Work with the vendor and find a solution to ensure that students who choose baby carrots receive the proper portion size.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

The agency is in compliance.

SFA-wide CEP schools are not required to develop an unpaid meal charge policy.

Paid Lunch Equity (PLE)

PLE does not apply to SFA-wide CEP schools.

Revenue from Nonprogram Foods

The agency does not sell adult meals, extra milk, or any other nonprogram foods.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Civil Rights Compliance Self-Evaluation Form

This form should be completed SFA-wide rather than by site. Reviewer discussed consolidating all site forms into one document.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the agency must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 5 days.

- All SFAs should have written procedures in place for 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).

Annual Training

When completing annual Civil Rights training, make sure to cover all required areas by utilizing the SNTs Civil Rights PowerPoint. Other Child Nutrition Program trainings that are designed by outside companies or organizations may not be in compliance. Thank you to the admin staff for completing the DPI SNT Civil Rights Training while the reviewer was onsite.

On-site Monitoring

The agency is in compliance.

Local Wellness Policy

Technical Assistance (TA)/Compliance Reminders

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 required School Food Authorities (SFAs) to have a revised local school wellness by June 30, 2017.

The agency recently updated the LWP and has made strides to develop goals and objectives that fit the needs of LUMIN, Inc. and USDA. The agency has established a diverse committee and has made efforts to make Wellness a top priority. When reviewing the policy, the following minimum requirements are missing and should be included:

- Goal on Nutrition Promotion
- Language permitting the public to participate in the development, implementation, and review of the LWP.

The food service director worked to update the LWP while reviewer was onsite. The updates will be discussed with the LWP committee for final approval.

Triennial Assessment

The first triennial assessment should be completed in the 2020-21 SY. There are two parts to the assessment. Part one is to assess the extent to which each school is in compliance with the policy goals and objectives. The Report Card (<http://goo.gl/forms/9Wy5IJbrL0>) can be used to complete this piece. The second part is to assess how the SFAs LWP compares to a model policy. A tool called the WellSAT (<http://www.wellsat.org/default.aspx>) can be used to fulfill this requirement.

Smart Snacks in Schools

The agency does not sell food items to students, on the school campus, during the school day.

Professional Standards

Technical Assistance (TA)/Compliance Reminders

Training Requirements

SFAs should clearly document *all* required training information and maintain that file including 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

The agency is in compliance.

Food Safety and Storage

Findings and Corrective Action: Food Safety

- ✓ **Finding:** Pilgrim Lutheran School does not have a Standard Operating Procedure (SOP) for Breakfast in the Classroom (BIC).

Corrective Action Needed: Submit a template of the SOP that the school will use. Implement this SOP agency wide if other sites are missing the same SOP in their food safety plan. Begin training staff on the details of the SOP. Also address how food safety and sanitation will be handled for the grades that eat lunch in the classroom.

Corrected onsite. No further action necessary.

Buy American

Technical Assistance and Program Requirement Reminders

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Corrective Action:

No corrective action for the Buy American section of the review. All non-compliant products had documentation.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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

The agency is in compliance.

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 webpage (dpi.wi.gov/statesupt/agenda-2017).



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