

WISCONSIN DEPARTMENT OF  
PUBLIC INSTRUCTION

SFA Name: Immanuel Lutheran School and Child Care  
 Administrative Review Conducted on: 2/7/2017  
 Sites Selected for Review: Immanuel Lutheran School and Child Care

**Commendations & Suggestions**

Outstanding job meeting all of the requirements for lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Thank you for being so well prepared!

The kitchen staff was kind and courteous and interacted well with the students.

**Other areas of Technical Assistance (NOT requiring Corrective Action)**

120. On the off-site assessment tool the SFA had indicated that all changes to the benefit issuance document should be made within 30 days. During the on-site the SFA indicated that all changes were made within a few days which would fall within the appropriate time frames. The correct time frames for when changes should be made to the point of service benefit issuance document were discussed with the SFA. For new students, changes must be made within 10 days of receiving a completed application. For transfer students, changes should be made within 10 days of receiving a completed application.

1003. During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

1004. SFA must demonstrate outreach to notify potential stakeholders (community members) about the opportunity to be involved in the wellness policy activities. TA given on-site

1005. During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

1219. SFA is keeping individual training records for each employee. During the on-site review, it was discussed with the SFA how to use the USDA Professional Standards Training Tracking Tool or something similar. The DPI developed and USDA developed tracker can be found at <https://dpi.wi.gov/school-nutrition/professional-standards>

**Resource Management – Adult Meals:**  
 It is suggested that the SFA separates adult meal revenues from program revenues in their food service ledger by adding a revenue code for adult meal sales. This will make it easier to track non-program food revenues from program revenues.

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

**Due Date for Corrective Action Plan:** 3/31/2017

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

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

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

<b>Finding #1</b>
404. Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch.
<b>Technical Assistance Provided</b>
During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.
<b>Regulation / Citation and Summary</b>
210.10(a)(2) Unit pricing. Schools must price each meal as a unit. Schools need to consider participation trends in an effort to provide one reimbursable lunch and, if applicable, one reimbursable afterschool snack for each child every school day. If there are leftover meals, schools may offer them to the students but cannot get Federal reimbursement for them. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s). The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions.
<b>SFA Suggested Guidance for Compliance</b>

To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.

**SFA Response**

**Finding #2**

803. The SFA has a procedure in place for handling civil rights complaints, but the procedure does not identify the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights)

**Technical Assistance Provided**

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

**Regulation / Citation and Summary**

FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

**SFA Suggested Guidance for Compliance**

To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure to the State Agency.

**SFA Response**

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<b>Finding #3</b>
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1001. The Local School Wellness Policy has not been made available to the public.
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<b>Technical Assistance Provided</b>
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During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter.
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<b>Regulation / Citation and Summary</b>
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210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must: (1) Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy; (2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis; (3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.
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<b>SFA Suggested Guidance for Compliance</b>
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To be in compliance the SFA must provide a statement that the wellness policy has been made public. In addition please submit documentation to support the statement, if the policy was posted to the website please provide the link, if it was sent out in a newsletter please provide a copy of the newsletter.
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<b>SFA Response</b>
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<b>Finding #4</b>
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1601. The SFA has not performed SFSP outreach.
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<b>Technical Assistance Provided</b>
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It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: [www.fns.usda.gov/summerfoodrocks](http://www.fns.usda.gov/summerfoodrocks) (note, this replaces the [whyhunger.org](http://whyhunger.org) website)
- Use the site locator for smartphones - [Rangeapp.org](http://Rangeapp.org)

#### **Regulation / Citation and Summary**

210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

#### **SFA Suggested Guidance for Compliance**

To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

#### **SFA Response**