

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: 677995

School Food Authority: Zion Lutheran

School(s) Reviewed: Zion Lutheran

Review Date(s): Nov 21-22, 2016

Date of Exit Conference: Nov 22, 2016

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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you for the courtesies extended to me during the on-site review. I appreciated the work done prior to the review in completing the Off-site Assessment Tool. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The 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 can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". 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 <http://dpi.wi.gov/statesupt/agenda-2017>.

Review Areas

1. Meal Access and Reimbursement

Comments/Technical Assistance/Compliance Reminders:

Public Release

Near the beginning of each school year, the public must be notified that free and reduced price meals and free milk are available. This notice must include the eligibility criteria for free and reduced price meals or free milk. It must be provided to the local news media, the unemployment office, and any major employers who are contemplating large layoffs in the attendance area of the school. **Technical assistance** was given to send out and retain documentation regarding the public release.

Applications

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>), you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually). Technical assistance was given regarding frequency payments and annualizing payments.

Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Income Eligibility Guidelines

The Income Eligibility Guidelines are *for school staff only* and are used in the processing of Free and Reduced-Price Meal Applications. SFAs utilizing a software system for approval of applications should confirm the system uses the current guidelines. Please see link on DPI website for current school year guidelines: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>. **Technical assistance** was provided regarding using the current guidelines.

Direct Certification

As a reminder, you are required to run direct certification minimum of three times a year: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February).

Findings and Corrective Action Needed:

Finding #1: It was found that there was no documentation of the public release being sent out.

Corrective Action Needed: Please submit a statement of who and when you will be sending a public release to in the future.

- Finding #2: It was found that only one direct certification run was completed.**
Corrective Action Needed: Please review the website regarding direct certification and submit a statement regarding the mandatory times to run direct certification.

- Finding #3: It was found that the verification process was not conducted. There was some confusion regarding the verification process.**
Corrective Action Needed: Submit a copy of the application selected for verification with any checks or other supporting documentation from the household selected to show that verification was completed. Please review the DPI website and submit a statement moving forward how verification will be handled in the future. Please complete the verification collection report and be sure to check verification was completed after November 15th. Please note application and documents will be shredded after being received and reviewed by DPI for accuracy.

- Finding #4: It was found there was one application error. It was missing household size and social security numbers.**
Corrective Action Needed: Please contact household and make corrections. Follow-up was completed while on-site. No further action is needed.

2. Meal Pattern and Nutritional Quality

Comments/Technical Assistance/Compliance Reminders: **Commendations and Appreciations**

The menu that was reviewed from the week of October 10-14, 2016 was in compliance with all weekly meal pattern requirements. Great job! Be sure to thank Hamilton School District for their conscientious menu planning.

Technical Assistance

Make sure portion sizes for meat/meat alternate and grain menu items are recorded on production records using weight, not volume. For the macaroni and cheese served on 10/11/16, the production record indicates that a #16 scoop was used, with the intention to provide a 2 ounce portion. Please be aware that a #16 scoop measures 2 fluid ounces by volume; it cannot measure 2 ounces by weight, because a scoop can only measure volume—depending on what you fill it with, that volume of food will have different weights. So, the desired 2 ounce portion size would have to be weighed out, and then you would have to determine the appropriate scoop size that should be used.

Make sure all menu items, including condiments, are recorded on production records each day. Currently, gravy was the only condiment recorded on the production records; there were likely condiments offered for some of the other menu items, but they were not documented.

Corrective Action

- Finding #1: Milk usage was not recorded on the production records.**
Corrective Action: Please submit one week of production records with milk usage recorded each day, by type.

- Finding #2: It was found that the signage board was not filled out and it was not in the best location for children to see.**
Corrective Action: Please move signage board and fill out each day with menu items. Please submit a statement that was completed.

Smart Snacks

All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine

compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Findings and Corrective Action Needed:

Finding #1: It was found that there is a vending machine outside cafeteria.

Corrective Action Needed: Please submit a statement on how this will be correct, such as putting vending machine on a timer or removing product and replacing it with milk, water and juice in the elementary portion sizes.

3. Resource Management

Comments/Technical Assistance/Compliance Reminders:

Edit Checks

U. S. Department of Agriculture (USDA) regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. **Technical assistance** was given to perform an edit check each monthly prior to submitting the monthly claim. The DPI edit check template for schools to use can be found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/contracts-claims-reports>.

4. General Program Compliance

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. Please see link for guidance and templates for power point and training templates: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually. This form can be access on the DPI website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

All SFAs should have procedures (written procedures preferred) 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. The form to assist in filing these complaints can be found at: https://https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

Food Safety

All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. **Technical assistance** was given regarding having a food safety plan available on-site for the food service operations. An updated food safety plan template can be found on the DPI website: <http://dpi.wi.gov/school-nutrition/food-safety>.

All food service employees must have a signed Employee Reporting Agreement on file. Technical assistance was given to regarding this employee agreement. This agreement can be found on the DPI website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf>. All pieces of cooling equipment such as a milk cooler must have the internal temperature taken and recorded daily on a temperature log. **Technical assistance** was given to regarding temperatures being recorded daily for the milk cooler.

Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan.

Food safety inspection reports need to be posted in public view. **Technical assistance** was given regarding the posting of the most recent inspection report for the public to view.

Wellness Policy

Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.

- LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
- SFA must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
- SFA must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
- SFAs must permit parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation that all have been notified of participation availability.
- The SFA must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* (http://fns.dpi.wi.gov/fns_wellnessplcy2).
- SFA is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification.

Professional Standards

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.

Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.

Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.

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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Procurement

When purchasing milk, procurement regulations apply. It is good business practice to reach out to a few organizations for pricing. DPI has templates available for milk bids. Please retain documentation for all procurement practices. This DPI link offers a template for milk bids: <http://dpi.wi.gov/school-nutrition/procurement/purchasing-templates>. If you need additional assistance with procurement questions, please contact Randy Jones at Randall.jones@dpi.wi.gov or 608-267-2277.

Schools should develop and utilize a written procurement policy and procedure handbook. Information can be found on the DPI website at: <http://dpi.wi.gov/school-nutrition/procurement/developing-procurement-handbook>,

Record Retention

All NSLP program documents which include free and reduced price applications, including applications from households denied benefits 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.

Findings and Corrective Action Needed:

- Finding #1: It was found that no civil rights training has been completed.**

Corrective Action Needed: Please have all individuals involved in foodservice review the civil rights power point and sign the training roster. Please submit the training roster.

- Finding #2: It was found that the self-evaluation compliance form was not completed.**

Corrective Action Needed: Please submit a copy of a completed self-evaluation form.

- Finding #3: It was found no inspection report was posted.**

Corrective Action Needed: Please post inspection report in a visible area. Submit a statement of where it will be posted.

- Finding #4: It was found that that there is no food safety plan available on-site.**

Corrective Action Needed: Please submit a copy of a food safety plan

- Finding #5: It was found that a employee reporting agreement had not been filled out for the food service person.**

Corrective Action Needed: Please have food service complete the employee reporting agreement. It was completed on-site, no further action is needed.

- Finding #6: It was found there was no wellness policy for the school.**

Corrective Action Needed: Please submit a plan with a timeline of when and how you the school will create a wellness policy. Please include who will be involved in the committee, when the committee will plan to meet and when a policy will be created and made available to the public.

- Finding #7: It was found that there was no tracking of professional standards.**

Corrective Action Needed: Please submit create and submit a copy of a tracking tool for required trainings for all individuals that may have duties related to food service. Please include in the tool:

- Name of staff person/ Date hired
- Title/position
- A brief list of core duties/responsibilities
- Employee status (Full-time, Part-time, Acting, Substitute), including average hours/week for each Part-time employee
- Professional standards employee category/position (Nutrition Program Director, manager, Staff)

Additionally, please submit a statement of proposed trainings.

5. Other Federal Programs Reviews

Comments/Technical Assistance/Compliance Reminders:

Summer Feeding

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

USDA Foods

The USDA's Food and Nutrition Service is charged with administering the [Food Distribution Program](#). Through the Food Distribution Program, USDA purchases foods through direct appropriations from Congress, and under surplus-removal and price-support activities. The foods are distributed to State agencies for use by School Food Authorities (SFA) participating in the National School Lunch Program (NSLP). On the average, USDA foods make up 15 to 20 percent of the product served at participating agencies in the form of beef, pork, fish, poultry, dairy, fruits, vegetables, oil and grain. For more information, please contact: [Laura Sime](#), (608) 267-9119, or [Lynne Slack](#), (608) 266-2596 or [Dino Ante](#), (608) 266-3615. Additional information can be found at: <http://dpi.wi.gov/school-nutrition/usda/new-program>. **Technical assistance** was provided regarding USDA Foods.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. 7 CFR 210.18 requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

	Nov. 20, 2016	January 12, 2016
Signature of Authorized Representative	Date of Exit	Negotiated Corrective Action Date
Signature of Food Service Director		
Signature of Nutrition Program Consultant	Signature of Public Health Nutritionist	

