

USDA Child Nutrition Programs
Commendations, Corrective Actions & Technical Assistance

School Food Authority: St Paul Lutheran School

Agency Code: 687821

School(s) Reviewed: 7210-St Paul Lutheran School

Review Date(s): January 25, 2019

Review Team: TCB Reviewer

Date of Exit Conference: 1/25/2019

Corrective Actions Due Date: 4/17/2019

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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, 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, 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St Paul Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, 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.

The TCB review team appreciates the eagerness of the staff at St Paul Lutheran School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that St Paul Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

Commendations

Commendation #1: *The structure of breakfast service is logistically difficult but was done very well and students seemed very appreciative of the availability of breakfast. Thank you for ensuring students receive easy access to meal items at breakfast even though the process is physically challenging.*

Required Corrective Actions

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

Finding #1: *The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The household's meal benefits were incorrectly calculated. Household name has been provided to SFA. Potential Fiscal Action will be calculated at closure of review.*

Required Corrective Action #1: *Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into the shared Google folder.*

Finding #2: *The SFA did not correctly complete the confirmation review process when verifying applications. The confirming official was the same as the determining official.*

Required Corrective Action #2: *Program requirements stipulate the confirming official must be different than the determining official. The SFA will submit a plan to ensure the appropriate personnel fulfill each role of the verification process. Submit the plan to the shared Google folder.*

Finding #3: *The SFA does not have procedures for handling discrimination complaints specific for the school meal program.*

Required Corrective Action #3: *Provide a timeline for when a school meal program complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.*

Finding #4: *Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30), specifically Civil Rights Training.*

Required Corrective Action #4: *Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.*

Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not correspond directly to numbered findings above.

Technical Assistance #1: *43 free and reduced-price meal application determinations were reviewed; 1 error was identified.*

Technical Assistance #2: *The DPI website provides a number of resources helpful in the process of [Application Verification](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).*

Technical Assistance #3: *All SFAs must have procedures in place for handling civil rights complaints in regard to discrimination in the National School Lunch Program and School Breakfast Program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 3 days.*

Technical Assistance #4: *Each year, non-school nutrition staff with responsibilities for school nutrition programs must complete annual training that is applicable to their job (7 CFR 210.30).*

Technical Assistance #5: *Within the Food Safety program, almost all menu items are listed by their appropriate process category; please add the few items that were missing.*

The 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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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