

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

School Food Authority: Trinity Lutheran School

Review Date(s): January 8-9, 2019

Agency Code: 707965

Date of Exit Conference: January 9, 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 at a nominal charge. 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 webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (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). These strategies are effective and research-based.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Trinity 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 DPI review team appreciates the eagerness of the staff at Trinity Lutheran School for their willingness to make changes to meet school meal program regulations. The DPI review team is confident that Trinity Lutheran School will continue to improve its knowledge and operation of school meals programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

All applications were appropriately approved and denied. All students' eligibilities are correctly recorded on the benefit issuance list. Direct Certification (DC) is run in the required timeframes and maintained on file at the SFA. The most current Income Eligibility Guidelines are utilized while assessing applications. The correct DC, Verification, and meal eligibility notification letters are sent home. Thank you!

Technical Assistance:

- As applications are approved and students are found on DC, the Benefit Issuance (BI) list must be updated with the most current information.
- When approving applications and completing the Verification process, there are three officials with important roles: the Determining, Confirming, and Verifying Officials. The Determining Official (DO) approves and denies applications. The Confirming Official (CO) and Verifying Official are for the Verification process. The DO cannot be the CO, but the DO can be the VO. Each official's signature must be on the backs of applications (CO and VO only on applications that go through the Verification process).
 - The Hearing Official (HO) cannot be either the DO, CO, nor the VO.

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ Finding #1: With recent staff turnover, existing staff are unfamiliar with PowerSchool and entering meal eligibility.

Corrective Action Needed: Please submit to the consultant a detailed explanation of who completed PowerSchool trainings and is knowledgeable of its system. Also, please send screen captures or photos of where student eligibility information would be edited.

Verification

Commendations:

Verification was completed by November 15. All income documentation was accurately verified and the Confirming and Verifying Officials reviewed the process. The Verification Collection Report (VCR) was also completed prior to the February 1 deadline. Great work!

Resources:

- [DPI's Verification webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) contains all resources needed to complete the Verification process, including, the Verification tracker form and packet, Verification households notification letters, a Verification webcast, and instructions for completing the VCR (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

Meal Counting and Claiming

Commendations:

Edit checks are completed monthly. Food service staff utilize a few methods of confirming the accuracy of meals counts. All meals served during the day of review were reimbursable. Field trip counts are well taken and properly tracked.

Findings and Corrective Action Needed: Meal Counting and Claiming

Finding #2: Meal counts are recorded at lunch by teachers. Typically this is done electronically, occasionally it is done manually. Teachers are to check off students only after a student has taken a reimbursable meals. This cannot be done while the student is in line.

Corrective Action Needed: Please send an email correspondence to all staff recording meals counts reminding them of the required procedures. Forward this correspondence to the consultant assigned to your review.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the lead and assistant cooks at Trinity Lutheran School for the time spent with the State Agency while onsite. We appreciate your eagerness to learn and comply with USDA regulations. Thank you for having appropriate signage posted in the cafeteria.

Comments/Technical Assistance/Compliance Reminders

Menu Planning

Menus must be planned to meet meal pattern requirements. This blank [K-8 lunch template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) contains the basic information needed to plan compliant menus for the selected age/grade group (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc>).

Training

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>).

Resources

Links to helpful resources we recommend bookmarking and/or printing:

- [Lunch "In a Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>)
- [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>) (paper copy provided on site 1/8/19)
- [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>)
- [USDA Food Buying Guide for Child Nutrition Programs \(FBG\)](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>)
- [Basics at a Glance](https://theicn.org/icn-resources-a-z/basics-at-a-glance/) (<https://theicn.org/icn-resources-a-z/basics-at-a-glance/>)
- [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>)
- [Vegetable Subgroups](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) (paper copy provided on site 1/9/19)
- [Standardized Recipe template for 1 grade group](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>) (paper copy provided on site 1/8/19)
- [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>) (paper copy provided on site 1/8/19)
- [Lunch Production Records for 1 grade group with temperature](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx>) (paper copy provided on site 1/8/19)

Seconds

Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings of the entrée may be sold a la carte. Schools may allow greater amounts than the required minimums by allowing seconds servings of fruits and vegetables. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustaining energy.

Cycle Menu Recommendation

Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.

When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes (potentially planned quantity). Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

Menu

The printed menu should list all components included with the reimbursable meal. Grains are not being listed daily (ex, chicken and gravy, Salisbury steak, salad bar with grilled chicken)

Desserts

Dessert items are frequently offered on the menu. These foods must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal and overall labor. Keep in mind that grain based desserts, found in Exhibit A, are limited to 2 oz eq per week.

Weight vs Volume

	Measures	Measured In	Conversions	Tools Used
WEIGHT	Meat/meat alternates Grains	Ounces (oz) Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
VOLUME	Fruits Vegetables Milk	Fluid ounces (fl oz) Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	Spoodles , measuring cups, measuring spoons, scoops, dishers, ladles

***WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

CACFP Meal Pattern (Infants and Pre-K students)

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. The meal pattern requirements were updated to better align with the Dietary

Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Food Safety

One recipe suggests dropping frozen beef crumbles on the floor to loosen them. Please keep food safety in mind and utilize a more sanitary way to loosen frozen foods.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

****☐ Finding #3: Production Records**

There were no lunch production records on file from September 27, 2018- January 7, 2019, which includes the week of review (November 12-16, 2018). Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components.

Production records are intended to be useful tools to record information prior to production, during production, and following production. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

Production records must be completed for each meal served and retained for 3 years plus the current school year.

FSD and SA completed the production record for January 8 and 9, 2019, onsite. TA provided during completion. SA provided paper copies of appropriate production record (one grade group, lunch, temperature log included) to SFA on January 9, 2019. SFA is encouraged to send completed production records to SA for guidance in the following weeks.

Previous FSD, who resigned a week before the on-site review, supposedly kept production records through the final day of service in December 2018. As of the final day of the on-site of review (1/9/19) these records could not be found. Per email sent on 1/25/2019 the production records still had not been found.

USDA guidance states that *if production records are missing, or missing for a certain time period, meals served during that time must be disallowed/reclaimed unless the SFA is able to demonstrate to the satisfaction of the SA that reimbursable meals were offered and served.* SFA was able to provide invoices, menus, and daily records of number of students served so no fiscal action will be taken at this time.

Corrective Action Needed for Finding #3: A future week must be selected for review and all materials documenting meal pattern compliance for that week must be sent to the Public Health Nutritionist assigned to the review. After the week has been served submit:

- Completed [K-8 lunch menu planning template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc)
- [Daily production records for lunch](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx) that specify the planned portion size for each menu item (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx)
 - Be specific on production records about the identity, brand, and description of the items served. “Fresh fruit” does not indicate exactly what was offered.
 - The production record should reflect substitutions, if any are made.
- [Standardized recipes](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) for all items prepared in-house with two or more ingredients (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc)
- Current Child Nutrition (CN) Labels or manufacturer’s product formulation statements (PFS) to show how purchased products credit as meal components for all menu items not found in the Food Buying Guide.
 - *(Please note that product specification sheets or marketing brochures, commonly found on distributor websites, **cannot** be used for crediting meal components).*
- Complete labels with nutrition facts (name of the food item, brand name, nutrition facts and ingredients) for menu items and/or ingredients in recipes
- USDA Foods fact sheets for USDA Foods products (brown box and Wisconsin-processed)
- Product labels for grain products (bread, buns, rolls, etc.) that include the ready to eat weight of a serving in grams or ounces, the ingredient list, and nutrition facts
- a signed statement that food service staff have viewed the [production records webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#pr) (https://dpi.wi.gov/school-nutrition/training/webcasts#pr)
- a signed statement of understanding agreeing to complete production records daily and maintain all production records for three years plus the current school year

****☐ Finding #4: Alternate meals**

Each entrée must be considered as a separate service line, and be evaluated for meal pattern compliance individually.

Missing grain component: Yogurt and string cheese are offered daily during the week of review as an alternate entree option, and provide 0 oz eq grain. There is no grain offered with the yogurt and string cheese entrée. When students select the yogurt and string cheese option, they lose access to all other entrees. Students who select the yogurt and string cheese entrée have access to 0 oz eq grain daily and weekly. The K-8 meal pattern requires a minimum of 1 oz eq grain be offered daily and 8 oz eq grain to be offered weekly.

Weekly M/MA shortage: Per FSD, the daily PBJ sandwich is made with 2 TBSP peanut butter, which provides 1 oz eq M/MA. Students who select the PBJ option lose access to all other entrees. Students who select the PBJ are being offered 1 oz eq M/MA daily and 5 oz eq M/MA weekly. The K-8 meal pattern requires a minimum of 1 oz eq M/MA be offered daily and 9 oz eq M/MA to be offered weekly.

Weekly M/MA shortage: Per FSD, the daily ham sandwich is made with 2 slices of ham, which weigh 1 oz total. This provides $\frac{3}{4}$ oz eq M/MA. Students who select the ham sandwich option lose access to all other entrees. Students who select the ham sandwich are being offered $\frac{3}{4}$ oz eq M/MA daily and 3.75 oz eq M/MA weekly. The K-8 meal pattern requires a minimum of 1 oz eq M/MA be offered daily and 9 oz eq M/MA to be offered weekly. It is recommended to increase the amount of ham put on the sandwich so that 1 oz eq M/MA is provided daily.

The following structure was discussed with the FSD on-site as a possibility to remedy alternate entrées leading to shortages:

You may select either option A or B

- a. Main entree*
- b. Sandwich (PBJ or ham) + protein (cheese stick or yogurt)*

All meal options include fruit, vegetables, and choice of milk

Corrective Action Needed for Finding #4: Include alternate meals in the menu planning worksheet (CA for finding #1) and ensure that daily and weekly minimums are met. Submit recipes for alternate sandwiches. If any product/ingredient is added or substituted, please include crediting documentation. Submit pictures of completed signage to reflect changes made.

****☐ Finding #5: Vegetables**

Fruits and vegetables are credited by volume (cups). Slotted spoons are not a standardized form of measurement. Please utilize spoodles, which are available with slots. Discontinue serving with slotted spoons. Please update recipes or reference sheets that mention serving with slotted spoons.

The type of “fresh vegetable” listed on the menu and served during the week of review was not available for review. The specific type(s) of vegetable offered, along with planned portion size(s), must be recorded on the production records to document this component was planned and served. It is acceptable to list “fresh vegetable” on the menu, but not on the production records.

Daily vegetable shortage: Per the K-8 meal pattern, students must have access to $\frac{3}{4}$ cups vegetables daily. The following is a summary of the vegetables served during the week of review:

- Monday: $\frac{1}{4}$ cup hash brown = **SHORTAGE**
- Tuesday: $\frac{1}{2}$ cup mashed potato + $\frac{1}{2}$ cup broccoli = 1 cup
- Wednesday: $\frac{1}{2}$ cup fresh veggies = **SHORTAGE**
- Thursday: $\frac{1}{2}$ cup baked beans + $\frac{1}{2}$ cup fresh veggies = 1 cup
- Friday: $\frac{1}{2}$ cup carrots + $\frac{1}{2}$ cup fresh veggies = 1 cup

Missing ‘Other’ vegetable subgroup: There is no record of the ‘Other’ vegetables being served during the week of review. K-8 students must have access to $\frac{1}{2}$ cup Other vegetables weekly. Missing vegetable subgroup results without knowing the specific vegetables offered and their planned serving size.

Red/orange vegetable subgroup shortage: Only $\frac{1}{2}$ cup carrots is recorded as red/orange vegetables served during the week of review. K-8 students must have access to $\frac{3}{4}$ cup red/orange vegetables weekly.

Corrective Action Needed for Finding #5: Verified upon submission of menu planning worksheet (CA #3).

****☐ Finding #6: Fruit**

Daily shortage: One clementine was offered to each student on Wednesday, November 14. Per the [Food Buying Guide](https://foodbuyingguide.fns.usda.gov/), a clementine credits as $\frac{3}{8}$ cup fruit (<https://foodbuyingguide.fns.usda.gov/>). Per the K-8 meal pattern students must have access to $\frac{1}{2}$ cup fruit daily.

Weekly shortage: K-8 students must have access to 2- ½ cup fruit weekly. The daily shortage leads to a weekly shortage:

- Monday: ½ cup peaches
- Tuesday: ½ cup pears
- Wednesday: 3/8 cup clementine = **SHORTAGE**
- Thursday: ½ cup applesauce
- Friday: ½ cup peaches

Corrective Action Needed for Finding #6: Verified upon submission of menu planning worksheet (CA #3). Please also submit a written statement explaining how minimum ½ cup of fruit will be offered when clementines are served in the future.

❑ **Finding #7: Offer vs. Serve**

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch. Although all students observed at lunch took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The [Offer Versus Serve Guidance manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf) and the [Offer Versus Serve Webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>). We also recommend the “[Meal or No Meal](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)” activity (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html).

In summary, the school must OFFER the required portions of fruit, vegetable, grain, meat/meat alternate, and milk at each meal. Students must SELECT at least three full, different, food components, one of which is ½ cup fruit and/or vegetable.

Corrective Action Needed for Finding #7: Please submit a signed statement that all food service staff have viewed the OVS webcast and the lunch portions of the “Meal or No Meal” activity. Please see the links above. Please note that Trinity Lutheran School is currently only expected to train on OVS at **lunch for grades K-8.**

❑ **Finding #8: Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). The following recipes were not standardized:

- Chocolate chip pancakes
- Italian bread
- Ham sandwich
- Peanut butter and jelly sandwich

Corrective Action Needed for Finding #8: Submit standardized recipe for the items listed above.

❑ Finding #9: Incorrect grade grouping

Trinity Lutheran School is utilizing the K-8 lunch meal pattern. When potato products are served (ex, hash browns, tri-tators, potato smiles, etc.) student are offered different amounts based upon their grade level. All K-8 students need access to the same amount of foods. All meals offered to K-8 students must meet the meal pattern.

Corrective Action Needed for Finding #9: Please review the [lunch meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) and submit a signed statement explaining how portion sizes will be the same regardless of grade (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>).

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be evaluated to determine if the meal pattern for the National School Lunch Program is being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Trinity Lutheran School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

BUY AMERICAN

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance 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>).

Findings and Corrective Action Needed: Buy American

❑ Finding #10: Non-compliant items

The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Pineapple- Indonesia
- Mandarin oranges- China

Corrective Action Needed for Finding #10: Submit completed documentation for the above items as well as seasonal items. We recommend checking for new/substitution products and their country of origin multiple times per semester (ex, once every month). A suggested [Buy American - Non Compliant Product List template](#) can be found on the Buy American webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - *Ex. Blueberries are not available domestically during the months of December – June.*
 - c) **Availability** – Product(s) is not available to purchase domestically.
 - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
 - e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 - f) **Other**- Please provide a written explanation.
 - *Ex. The SFA received a donation of non-domestic oranges*
 - *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on

Buy American exceptions, visit the [Buy American Provision Memos](https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

The food service account maintains a non-profit status with its ending fund balance not exceeding three months operating costs. The SFA also successfully maintains a separate account for food service, making the tracking of revenues and expenditures simpler for staff.

Technical Assistance:

- Rent is charged to food service for the use of its kitchen space. To ensure this is not an indirect cost (which are unallowable for the meal programs in Wisconsin), supporting documentation is required for rent costs assessed to the food service fund. This could include the consultation with knowledgeable resource personnel on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
- Adult meals and extra milks are considered Non-Program Foods and must be recorded as such on the Annual Financial Report (AFR).
- The entitlement value of USDA Foods (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
 - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](https://dpi.wi.gov/nutrition/online-services) (dpi.wi.gov/nutrition/online-services).

Compliance Reminders:

- The Unpaid Meal Charge Policy must be made available to all households in writing at the beginning of the school year.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- Finding #11:** An Unpaid Meal Charge Policy was not available for review.

Corrective Action Needed: Please submit this policy to the consultant assigned to your review.

- Finding #12:** Food service utilizes Scrips at nearby stores for food purchases. Scrips are beneficial for the school as they refund an amount of credit for shopping at a particular store. Going forward, these refunds *must* be put back into food service.

Corrective Action Needed: Please submit a statement explaining how Scrips will be handled in the future. Explain how it will be ensured that food service will receive all

refund credits through Scrips purchased through the food service account and then submit this to the consultant assigned to your review.

❑ Finding #13: With staff turnover, it is unclear as to who involved with food service will be aiding the business manager with the AFR and other aspects of the nonprofit food service account going forward.

Corrective Action Needed: Please develop written procedures detailing how food service and the business manager will work together regarding program operations. Submit these procedures to the consultant assigned to your review.

❑ Finding #14: There have been instances where students have been charged \$0.45 instead of \$0.50 for a la cart milk at lunch. The staff at Trinity Lutheran are unsure as to how teachers would be able to change the price of milk at the POS.

Corrective Action Needed: Please submit a statement explaining how this will not happen in the future to the consultant assigned to your review.

❑ Finding #15: The AFR information and the SFAs ledger from SY 17-18 do not match.

Corrective Action Needed: Please submit the updated numbers to the consultant assigned to your review.

Additional Corrective Action (if needed): Please resubmit the AFR information to Jacqueline Jordee (jacqueline.jordee@dpi.wi.gov).

Resources:

- DPI SNT's [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- For more information on allowable expenditures to Fund 50, please see the [AFR Expenditure Categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc).
- For more information on revenues and expenditures for the AFR, please see the [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx).

Paid Lunch Equity (PLE)

Trinity Lutheran School was not required to raise its lunch prices for the 18-19 school year due to a positive food service fund balance on January 31, 2018. Therefore, a comprehensive review in this area was completed. No action is required.

Revenue from Non-program Foods

Commendations:

Adult meals and milks only are the only non-program foods served at Trinity Lutheran. Adult meals are priced appropriately and non-program foods are reported on the AFR.

Compliance Reminders:

- If ever the SFA decides to sell non-program foods beyond adult meals and milks only, the Non-Program Foods Revenue Tool would need to be completed. This tool ensures all costs of non-program foods are covered by their revenue.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

Civil rights trainings were completed for teachers involved in the programs and properly recorded on the attendance log.

Technical Assistance:

- On a select internal documents, there is the possibility for future overt identification. Please ensure only necessary staff involved with the meal programs have access to student eligibility information.

Compliance Reminders:

- Civil Rights Training is to be completed for all staff working with the programs. Please ensure that all staff involved in the meal programs complete the Civil Rights training **annually** as well as sign-off on the participation form.
- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.
- School food service staff may make food substitutions, at their discretion, to accommodate children **without** a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Findings and Corrective Action Needed: Civil Rights

❑ **Finding #16:** The Hearing Official and on food service employee did not complete the annual Civil Rights training.

Corrective Action Needed: Please have the HO and food service employee complete the Civil Rights training and submit the sign-off attendance sheet to the consultant assigned to your review.

❑ **Finding #17:** The non-discrimination statement is not on the back-to-school letter nor is it on the SFSP outreach.

Corrective Action Needed: Please update these documents to contain this statement and submit them to the consultant assigned to your review.

Resources:

- Please find the Civil Rights training PowerPoint and Attendance sheet on the [Civil Rights webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).
- [Special Dietary Needs Medical Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)
- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

Local Wellness Policy

Commendations:

Trinity Lutheran School's Local Wellness Policy (LWP) includes all required areas and is very comprehensive. With staff turnover, new roles are being delegated for the committee.

Technical Assistance:

- A LWP is in place to set the standard for student, school, and community wellness. Develop your policy to include specific goals for your school and assess these goals annually to ensure your school is promoting local wellness to the best of its ability.
- A LWP committee must be established to annually revise and assess the school's LWP.
- A school's LWP must contain all items listed in the [LWP Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf). Consider utilizing the [LWP Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyNOCRd8SteFNmyA/viewform?c=0&w=1) to ensure all items on the checklist are included in your LWP (https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyNOCRd8SteFNmyA/viewform?c=0&w=1).

Professional Standards

Commendations:

Student workers are trained appropriately and all staff have completed required trainings. Great work!

Technical Assistance:

- Professional Standards training completion and tracking is required for all food service employees. It is recommended that teachers administering WSDMP, paid and volunteer cafeteria aides, and student workers complete job-specific training and annual civil rights training. For more information, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf).
- A program "director" is the person designated to perform or oversee the majority of the program duties (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).
- Annual training hour requirements are as follows:
 - Food Service Director: 12 hours
 - Food Service Manager: 10 hours
 - Full-time Food Service Staff: 6 hours
 - Part-time Food Service Staff: 4 hours
- As Trinity Lutheran School is in the process of hiring a new food service director, the hiring requirements must be met. These requirements are specific to food service directors and include requirements such as education, school nutrition experience, and food safety training requirements. Reference the [Hiring Requirements for Food Service Directors](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) for more details (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf).

Findings and Corrective Action Needed: Professional Standards

- Finding #18:** Professional Standard trainings are not tracked.

Corrective Action Needed: Please completed training trackers for all food service employees and submit these to the consultant assigned to your review (tracking tool is below under *Resources*).

Resources:

- [Professional Standards "In a Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf)
- [Professional Standards tracking tool](https://dpi.wi.gov/school-nutrition/professional-standards) (https://dpi.wi.gov/school-nutrition/professional-standards)

Food Safety and Storage

Commendations:

The food safety plan was site-specific and contained all required components. No storage violations were observed on site and the food service director completed weekly food safety hygiene checklists. Two food safety inspections were completed in the previous school year. The most recent food safety inspection report was posted publically. Really fantastic work!

Technical Assistance:

- While on site, the review team observed a teacher suggesting a student bring her milk to the classroom to consume later. This practice is not allowable as it poses a food safety and health concern. If this issue arises in the future, please advise the milk not be removed from the cafeteria, as it is a Time and Temperature Control for Safety (TCS) food.

Compliance Reminders:

- Food Safety Plans are to be reviewed annually and should only contain information specific to the SFA's operations. Some required components of a food safety plan include: Process 1, 2, and 3 menu items, Employee Reporting Agreements, applicable SOPs, and a site-specific equipment list.

Findings and Corrective Action Needed: Food Safety and Storage

Finding #19: A Standard Operating Procedure (SOP) is not in place for field trip meals.

Corrective Action Needed: Please create a SOP for field trips (utilizing DPI's template) and have it approved by your local sanitarian. Submit this to the consultant assigned to your review.

Resources:

- DPI's [Field Trip SOP](https://dpi.wi.gov/school-nutrition/food-safety) (https://dpi.wi.gov/school-nutrition/food-safety)
-

Reporting and Recordkeeping

Commendations:

The Paid Lunch Price (PLP) report, VCR, FNS-10 report, and AFR were all completed. Thank you!

Technical Assistance:

- All records must be kept for three years plus the current school year and temperature logs must be kept for a minimum of six-month.

Resources:

- The general [Calendar of Requirements](https://dpi.wi.gov/school-nutrition/calendar-of-requirements) may be referenced for all daily, monthly, and annual program requirements (https://dpi.wi.gov/school-nutrition/calendar-of-requirements).
-

Summer Food Service Program (SFSP) Outreach

Commendations:

SFSP Outreach was completed prior to the end of the academic school year, as required. Thank you!

Compliance Reminders:

A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **USDA requires all SFAs 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:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- 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 USDA [Summer Food webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations:

Milk counts were appropriately taken in the classrooms. The milk served is Wisconsin-produced and the price of milk is appropriate. Only one half-pint of milk is claimed per student per day. Thank you!

Technical Assistance:

- For the WSDMP, the **SFA can only claim free and reduced students in kindergarten through fifth grade** for reimbursement.
- **Sixth through eighth graders may receive milk in conjunction with other grades, however, the free and reduced students in these grades cannot be claimed for reimbursement.**
- **The cost of all milks served to the students below cannot be covered by the food service fund (the funds to cover these costs must come out of the school's general fund):**
 - students who do not qualify for meal benefits ("paid students") in kindergarten through fifth grade; and
 - all students (free, reduced, and paid) in sixth through eighth grade.

Compliance Reminders:

- The **WSDMP Application Agreement (PI-1464)** with DPI must be updated on a regular basis. If the agreement is older, consider revising and resubmitting an updated copy to the DPI for approval. If ever there are major staff changes or alterations to your procedures, resubmit an updated version of this agreement.

Findings and Corrective Action Needed: WSDMP

Finding #20: While the review team is familiar with the past food service director's procedures for WSDMP, with a recently large amount of staff turnover, the previous WSDMP system for organizing counts and transferring them to the annual claim will be altered.

Corrective Action Needed: Please develop new counting and claiming procedures that detail how the SFA will aid the SFA in ensuring accurate milk counts are recorded. Submit these procedures and a completed monthly count sheet for January 2019 (containing only free and reduced students for kindergarten through fifth grade) to the consultant assigned to your review.

Resources:

- [WSDMP webpage](https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk) (https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk)
- [WSDMP Application Agreement \(PI-1464\)](https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf) (https://dpi.wi.gov/sites/default/files/imce/forms/pdf/f1464.pdf)

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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 the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (https://dpi.wi.gov/statesupt/every-child-graduate).”



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