St. John Lutheran School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/21/2023	05/01/2024
On-Site Review	05/02/2024	05/02/2024
Site Selection Worksheet	12/21/2023	12/28/2023
Entrance Conference	05/02/2024	05/02/2024
Exit Conference	05/02/2024	05/02/2024

Commendations:

Our sincere thanks to the staff at St. John Lutheran School for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. Thank you for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions while we were on-site.

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the <u>DPI School Nutrition Training Webpage</u>.

It is highly recommended that the authorized representative and food service director use the <u>Calendar of Program</u> <u>Requirements</u> to help keep track of tasks and due dates. The digital version of the calendar has links included, though it could also be printed and written on as tasks are completed. The calendar is designed to be fairly comprehensive and is generally organized in the order that things must be completed each year.

Marketing refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. The goal of marketing is to match your products and services to the customers you aim to serve. The <u>Marketing Your Program webpage</u> provides tools and resources to market your program and show how Wisconsin School Meals Rock!

St. John Lutheran School

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Form Name	Meal Counting and Claiming (300 - 311)			
Question #	305			
Corrective Action History	Finding: The SFA has an Unpaid Meal Charge Policy in place, however, is missing some requirements. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016)Corrective Action: implemented and how households will be notified annually.			
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)			
Question #	700			
Corrective Action History	Finding: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).Corrective Action: DPI website. Using the Annual Financial Report webcast or manual on the DPI website. Using the Annual Financial Report Template notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS or email to Nutrition Program Consultant. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.			
Form Name	Local School Wellness (1000 - 1006)			
Question #	1005			
Corrective Action History	Finding:SFA has not completed the assessment of the Local Wellness Policy within the last three years.Corrective Action:Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.			
Form Name	Verification (207 - 215)			
Question #	208			
Corrective Action History	Finding:SFA did not complete a confirmation review before verifying application(s).Corrective Action:Complete The Verification Process and the VerificationCollection Report (Part 2)online training, submit the certification of completionandsubmit a statement of understanding that a confirmation review must be done bythe confirming official for the selected application(s) before reaching out tohouseholds selected for verification.			
Form Name	Civil Rights (809 - 810)			
Question #	810			
Corrective Action History	Finding: The correct non-discrimination statement (NDS) was not included on all required program materials. The SFA is electing to use the religious exemption to utilize the 2015 NDS on all program materials.			

The following materials were missing the NDS:

Local Wellness Policy

Findings and Corrective Action:

	Unpaid Meal Charge Policy			
	 The following materials contained the incorrect NDS: Free and Reduced Application Instructions/How to Apply Parent/Guardian Information Letter/FAQ Public Release Letter to Households of Approval/Denial of Benefits Direct Certification Approval Letter Sharing of Information Letter Special Dietary Needs Policy Civil Rights Complaint Procedure 			
	materials and upload updated materials into SNACS.			
Form Name	Professional Standards (1210 - 1219)			
Question #	1214			
Corrective Action History	Finding: The Food Service Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30).Corrective Action: Provide a training plan for how the 12 hours of continuing			
	education/training will be met for the current school year.			
Form Name	Professional Standards (1210 - 1219)			
Question #	1219			
Corrective Action History	Finding: 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 the student volunteers who assist with serving lunch meals.Corrective Action: School nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties.			
Site Name	Saint Johns Grade Sch			
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)			
Question #	409			
Corrective Action History	 <u>Finding:</u> The current alternate entree options include: 1. Peanut butter and jelly sandwich (can take 2 sandwiches) - 2 oz eq M/MA, 4 oz eq grain 2. Peanut butter and jelly sandwich and a hard boiled egg or string cheese - 2 oz eq M/MA, 2 oz eq grain 3. Hard-boiled egg (2) - 2 oz eq M/MA 4. String cheese (2) - 2 oz eq M/MA Each entree option must be evaluated for meal pattern compliance individually. The 			

	 component on certain menu days. Fiscal action is required for a missing component, and the menu must be updated and corrected going forward. Production records were reviewed for the week of review and the review month (April), but do not distinguish how many students took the hot entree option versus the alternate entrees listed above. Fiscal action will be taken for all alternate entrees served on Thursday, April 18, the only day during the review month where the grain could not have been feasibly separated from the hot entree (chicken smackers day), and therefore students who selected an alternate entree may not have had access to the grain component. 6 lunch meals for K-8 students will be reclaimed at St. John Lutheran School due to the missing component.
	<u>Corrective Action:</u> Submit a statement explaining what changes will be made to the available alternate entree options to ensure no missing components.
Site Name	Saint Johns Grade Sch
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action History	 Finding: The daily and weekly minimum requirement for grain was not met for K-8 for lunch during the week of review. The following represents the planned portion size: Tuesday, April 9, 2024: Hard taco shells, 2 per student No crediting document was provided for this product, therefore Exhibit A is used to credit the taco shells. Per the nutrition facts label, 3 shells = 33g. If 3 shells = 33g, Then 2 shells= 22g. This product would fall under Group B within Exhibit A, which tells us 28g = 1 oz eq grain. Therefore, 22g (taco shells) = .78, rounded down to .75 oz eq grain per 2 hard taco shells The daily minimum requirement for K-8 at lunch is 1 oz eq grain. The weekly minimum requirement for K-8 for lunch is 8 oz eq grain. Fiscal action is required for any repeat daily grain shortage violations from the provision of the provision.
	previous Administrative Review. Therefore, fiscal action will be assessed on Tuesday, April 9, for the meals served with the hard taco shells to the K-8 students. Per the production records, 20 shells were prepared (serving size =2), and 6 were leftover. Therefore, 7 meals for K-8 students will be reclaimed at St. John Lutheran School due to the insufficient grain quantity.Corrective Action 1: Describe specifically how the daily minimum requirement for grain will be met for lunch during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).Corrective Action 2: Submit verification that the FSD has completed additional Lunch meal pattern training (e.g. Lunch Meal Pattern webcast on the DPI Online Learning Library https://dpi.wi.gov/school-nutrition/training/online-learning).
Site Name	Saint Johns Grade Sch

Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)			
Question #	411			
Corrective Action History	 Finding: The daily minimum requirement for the M/MA component was not met for Pre-K for lunch during the week of review. The following represents the planned portion size: Thursday, April 11: Spaghetti meat sauce Per the recipe provided and discussion with the FSD on-site, 10# of 80/20 raw ground beef was used for the recipe. Using the information provided, the recipe was entered into the Food Buying Guide's Recipe Analysis Workbook (making a total of 82 1/2cup servings). Each 1/2cup serving would credit as 1.25 oz eq M/MA, which meets the K-8 daily requirement. However, each 1/4cup serving would then only provide .75 oz eq M/MA. The daily minimum requirement for the Pre-K students at lunch is 1.5 oz eq M/MA. Corrective Action: Describe specifically how the Pre-K daily minimum requirement for M/MA will be met for lunch during the day containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). In addition, the updated spaghetti with meat sauce recipe will be submitted with Finding #435. 			
Site Name	Saint Johns Grade Sch			
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)			
Question #	430			
Corrective Action History	 <u>Finding:</u> The lunch production records submitted for the week of review are missing required information or have the following requirements inconsistently filled out. This includes: Planned/actual number of servings prepared Planned/actual quantity prepared in bulk units Planned serving size for condiments Number of reimbursable and non-reimbursable (adult) meals planned and served Contribution to meal pattern (crediting information); While this is considered a "best practice," if this information is not recorded on the production records, then it must be documented somewhere else. Leftover amounts While there is no required production record template, examples are posted on the Production Records webpage (http://dpi.wi.gov/schoolnutrition/national-schoollunch-program/menu-planning/productionrecords). Production records are intended to be useful tools to record information prior to production, during production, and following production. Please refer to the Production Record Requirements list (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). <u>Corrective Action 1:</u> Submit verification that the FSD has completed additional Production Record training (e.g. SNT Production Records webcast on the DPI 			

	Online Learning Library <u>https://dpi.wi.gov/school-nutrition/training/online-</u> learning).			
	<u>Corrective Action 2:</u> Submit one full week of completed lunch production records, including all requirements recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.			
Site Name	Saint Johns Grade Sch			
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)			
Question #	435			
Corrective Action History	 Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. During the week of review, the following recipe inaccuracies were noted: Taco Meat- The measurement of the ground beef (hamburger) listed in the ingredient list is 6 pounds, but the procedures say "3 pounds." In addition, if you are browning the hamburger as part of the recipe, the ingredient list should have the weight of the raw ground beef. The recipe states "40 portions" on the top, but "50 2-oz servings" on the bottom. It is also missing the meal component contribution per serving. Spaghetti with meat sauce- The ingredient list should include the amount of raw ground beef used, since the first step of the procedures is to brown the ground beef. In addition, the recipe is missing a total yield and the meal component contribution per serving (for both Pre-K and K-8). Corrective Action: Please make the necessary updates to all standardized recipes listed above and continue to work towards recipe for the following menu items: Taco Meat Spaghetti with Meat Sauce Be sure to include all requirements of a standardized recipe, including the appropriate ingredients, serving size and yield information. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). 			
Site Name	Saint Johns Grade Sch			
Form Name	Food Safety, Storage and Buy American (1404-1411)			
Question #	1407			
Corrective Action History	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site specific SOP's for labeling and dating products, approved food source (can ONLY serve pasteurized processed egg products). SFA should have 			

Site Name	Saint Johns Grade Sch		
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Question #	1409		
Corrective Action History	 <u>Finding 1:</u> SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: In dry storage, 2 containers with flour and salad oil were on the floor instead of 6 inches off the floor. In the reach-in cooler, there were several food items that were in bags without labels or dates on them. <u>Corrective Action 1:</u> If possible, correct all observed storage violations during the on-site review. If the violation cannot be corrected during the on-site review, submit documentation (photograph)indicating that food safety violations have been corrected. <u>Finding 2:</u> SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)). It was noted that food was not properly safeguarded and there were a large number of dead flies on the floor of dry storage. <u>Corrective Action 2:</u> Provide a corrective action plan to ensure that all facilities that store food intended for school meals is safeguarded against theft and spoilage. 		

Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
05/13/2024	5014	409	Administrative Review	Saint Johns Grade Sch	FSD
			Comm	ents	
Second Portions:When reviewing the month of review's production records, it was noted that the there was a discrepancy between the number of meals served, number of hot entrees served, and number of alternate entrees served. Per the FSD, students are not able to purchase an extra entrée, nor can they receive one for free. As a reminder, serving seconds (with the exception of fruits and vegetables) free of charge is not allowable. 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 dietary specifications. It also complicates production planning, burdens food cost, and increases the dietary specifications. If students are still hungry, second servings may be sold a la carte. Continue to work on recording accurate information on the lunch production records. The production records are intended to be used for future forecasting, menu planning, and reducing food waste.05/13/20245013409Administrative ReviewSaint Johns Grade SchFSD					
Comments					
compliance in addition to be entrée option	dividually. ing offered of two har	Students wer d a sandwich a d boiled eggs	re being offered peanut l and a hard boiled egg and and 2 string cheese doe	butter and jelly sandwiche d/or string cheese, or just 3 s not include the grain con	l be evaluated for meal pattern es (2) as an alternate entrée, in 2 eggs, or 2 string cheese. The nponent, which led to the nate entrees available to ensure

students have access to all meal components. The Lunch Meal Pattern chart should be referenced when menu planning to ensure daily and weekly requirements for the K-8 age/grade group are being met (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf).					
05/02/2024	4909		Administrative Review		Authorized Representative
			Comme	ents	
 Here are some considerations for starting a program for student helpers. The student helpers should all sign employee health reporting agreements to ensure they will not work with food when they are sick. It is important that the student helpers understand the content of the agreement. Student helpers should complete basic training in general safety and in food safety to ensure they are following proper protocols. They should also receive training on their particular job duties. For example, if they are serving food, they must know the correct serving size and how to make level scoops. Some other specific training they may need is Civil Rights Training. Depending on what you are hoping to have your student helpers do and what equipment they may use, you may need to check the Department of Labor's laws on child labor. There are certain types of equipment that children must 18 or over to use, such as deli slicers. As always, it is highly encourage to consult with the local regulatory authority or sanitarian if there are any other 					
specific food 05/02/2024	5025		Administrative Review		AR/FSD
03/02/2024	5025				
			Comme	ents	
Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals. SFAs are required to annually complete the <u>DPI Non-program Food Revenue Tool</u> or the <u>USDA Non-program Food</u> <u>Revenue Tool</u> . The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in <u>Non-program Foods Revenue Rule SP-20-2016</u> . SFAs that sell only non- program milk and adult meals are <u>exempt</u> from completing the Nonprogram Food Revenue Tool. Food service programs must price adult meals above the overall cost of the student meals. Adult meal pricing must follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5. A <u>Wisconsin Adult Meal Pricing</u> <u>Worksheet</u> has been developed to assist the SFA in pricing adult meals.					
05/02/2024	5018		Administrative Review		Food Service Director
			Comme	ents	
All food service employees (including volunteers and substitutes) must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.05/02/20244948433Administrative ReviewSaint Johns Grade SchFSD					
			Comme		
Crediting Meat	/Mest Al	ternates: Sor			nce-for-ounce because they
contain ingredi is referenced a requirements. I indicated that 2 service and cro 1 oz eq M/MA	ents othen nd used v For exam 1.22 oz by ss multip Then 2.75	er than meat when determi ple, during th weight prov lication was 5 oz = 2.25 oz	(e.g. water, fillers, breadin ining the necessary servir ne day of on-site review, tl vides 1 oz eq M/MA. The s done to calculate how eac	ng). Therefore, it is import ng size for each age/grade he crediting documentati- erving sizes of the ham w ch serving would credit to ze) The planned serving s	ant that the crediting document e group to meet meal pattern on for the diced ham product vere weighed prior to meal wards meal pattern. If 1.22 oz = ize and the meal component

05/02/2024	4947	410	Administrative Review	Saint Johns Grade Sch	FSD
			Comme	ents	
at both breakf	ast and lu	nch. These ca	-	Venu Planning webpage, i	al pattern requirements are met under the Menu Planning Tools
05/02/2024	4946	430	Administrative Review	Saint Johns Grade Sch	FSD
			Comme	ents	
<u>Production Records:</u> Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. The current production record template is outdated and uses language that is no longer applicable (e.g. Enhanced Food Based Menu Planning). Production records submitted for the week of review did not meet the requirements, as detailed in Finding #430. Please update the production record templates and continue to work with staff to ensure all necessary information is documented. Production record templates can be found on our Production Records webpage (<u>https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</u>).					
05/02/2024	5016		Administrative Review		Authorized Representative
			Comme	ents	
When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.					
05/02/2024	4944	405	Administrative Review	Saint Johns Grade Sch	FSD
			Comme	ents	
<u>Family Style Meal Service:</u> During the family style meal service for the preschool students, supervising adults were serving the fruit, vegetable, and milk components to the students. If children are served foods or beverages, then they must be provided in at least the minimum required serving size. During the day of on-site observations, carrot sticks, and broccoli were provided on plates, but the planned serving sizes (how much would have equaled 1/4cup vegetable) was not communicated to the teachers. It is recommended that under the Family Style Meal Service, children are given the option to serve themselves whenever possible. Supervising adults should actively encourage children to try components and accept full portions during meals. Meals are considered reimbursable if students are seated at the table and serve themselves at least ¼ cup fruit, vegetable, or a combination. Training resources on family style meals may be found on SNT's Infant and Preschool in NSLP webpage, under the Meal Environment tab. (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).					
05/02/2024	4916		Administrative Review		Authorized Representative & Determining Official
Comments					
Official. Aside	from the a	approval date			etermined by the Determining enefits for which a student(s) is
05/02/2024	4914		Administrative Review		Authorized Representative
			Comme	ents	
If electing to use the religious exemption to use the 2015 nondiscrimination statement, all program materials must be consistent with this statement.					all program materials must be
05/02/2024	4977		Administrative Review		FSD

		Comme	nts			
Records from the food safety program are required to be kept for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year.						
05/02/2024	4976	Administrative Review	AR/FSD			
		Comme	nts			
Annual Professional Standards 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. A summary of the training requirement is provided in this <u>"In A Nutshell- Training"</u> document. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.).						
03/02/2024	4775					
05/02/2024 4975 Administrative Review AR Comments Per USDA policy memo SP 46-2016, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review. The policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's morey to repay unpaid charges if the child intends to use the money to purchase that day's meal. Should be implemented and enforced SFA-wide. Local discretion to vary policy based on student grade level. Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts. Policies regarding the collection of unpaid meal charges should be included in the written unpaid meal policy. SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually). For a snapshot of what the policy should include, see the <u>Unpaid Meal Charges Suction of the Financial Management Webpage</u> or the <u>USDA Unpaid Meal Charges Webpage</u> .						
05/02/2024	4974	Administrative Review	AR			
Comments						
The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.05/02/20244973Administrative ReviewAR						
		Comme	nts			
	-	assessment of their local wel	Iness policy (LWP) at least once every three years per 7 completed by June 30, 2020 (for SFAs that were			

St. John Lutheran School

participating in 2016-2017 school year). The assessment must measure LWP compliance, goal and outcome progress,						
and how the policy compares to the model policy. FNS recommends the WellSAT Tool as a resource to conduct the						
LWP triennial assessment. Assessment results and findings must be released to the public as a written report. There is						
no required template for this report.						
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05/02/2024 4972

C

Administrative Review

FSD

Comments

Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually. A prototype <u>Site-Specific Food Safety Plan</u> <u>Template for Wisconsin School Food Authorities</u> may be found on the <u>SNT Food Safety</u> webpage.