

Administrative Review Report

Christ-St. Peter Lutheran School, Inc.

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/10/2019	02/21/2020
On-Site Review	03/03/2020	03/04/2020
Site Selection Worksheet	12/10/2019	12/10/2019
Entrance Conference	03/03/2020	03/03/2020
Exit Conference	03/04/2020	03/04/2020

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.

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Appreciation:

Thank you to the staff at of Christ-St. Peter 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 and open 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 willingness of the staff to make changes to meet school nutrition program regulations. The DPI review team is confident that the school will continue to improve their knowledge and operation of child nutrition programs.

We were impressed with the attentiveness of the staff both during meal service and with the distribution of the food during the Fresh Fruit and Vegetable Program. The food distributed that day was jicama and it was presented in a way that all students felt compelled to try it. Nice job.

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Findings and Corrective Action:

Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/04/2020 12:40 PM	Finding: SFA is not tracking nonprogram foods revenue and expenditures. All foods served outside of a reimbursable meal are considered nonprogram foods: extra milks for cold lunch, teacher meals, & guest meals. All of these items must be tallied and have the full cost of each item paid to the nonprofit food service account at the end of the school year. CA: Provide a plan on how nonprogram food revenue and expenditures will be tracked and, going forward, reimbursed to the school food service nonprofit account.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/03/2020 09:44 PM	Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/03/2020 09:49 PM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). CA: 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.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	TA Log# exists	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/03/2020 09:50 PM</p>	<p>Finding: Civil Rights training documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1). CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/03/2020 09:51 PM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/03/2020 09:58 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (missing content: PUBLIC INVOLVEMENT, FOOD AND BEVERAGE MARKETING, OTHER SCHOOL-BASED STRATEGIES FOR WELLNESS, TRIENNIAL ASSESSMENT, UPDATE/INFORM THEPUBLIC) (7 CFR 210.31). CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 03/03/2020 10:57 PM	<p>Finding: The full, correct non-discrimination statement was not included on all required program materials (must be inserted to the handbook where meal information is referenced). Additionally, if meal information is added to the website, the full, correct non-discrimination statement must also be inserted there.</p> <p>CA: Provide a timeline for bringing into compliance, or alternatively, add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/03/2020 11:01 PM	<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/04/2020 04:05 PM	<p>Finding: SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.</p> <p>CA: (Non-systemic) Upload the March monthly edit check and counts sheets for breakfast and lunch into SNACS for review <u>before the claim is submitted</u>. Fiscal action will be applied per regulation.</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	TA Log# exists	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 01:21 PM</p>	<p>Finding: Current signage, while adequate for an Offer Versus Serve (OVS) menu, is not adequate for a menu where all components are served. Signage must be posted visible to students that indicates the components in each served meal. Corrective Action Required: Submit a picture of completed signage posted near the breakfast and lunch service line which shows all five components served as part of a reimbursable lunch and all four items served as part of a reimbursable breakfast.</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 01:26 PM</p>	<p>Finding: The pre-K students were served the K-8 meal pattern, but were not served at the same time and in the same place as the older students. Children who are not yet in kindergarten must be served the pre-K meal pattern if not co-mingled with other grade groups at meals. Corrective Action Required: Submit a statement describing the specific changes made to meal service or meal pattern in order to serve the pre-K students the age-appropriate meal pattern. Additionally, please detail what type(s) of milk will be served to the pre-K students.</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 01:30 PM</p>	<p>Finding: Milk, leftovers, and (occasionally) fruit were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Corrective Action Required: Submit one week of completed breakfast and lunch production records. Ensure that all required fields are completely and accurately filled in and recorded daily. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>

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Site Name	Christ-St. Peter Lutheran School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 01:36 PM</p>	<p>Finding: SFA receives vended meals which are planned and forecasted based on OVS participation; however, SFA usually elects to serve all five components. Corrective Action Required: Submit a statement outlining whether or not the SFA will participate in OVS going forward. Additionally, please provide written communication between the SFA and the vendor outlining the necessary changes made to ensure that appropriate quantities of food are planned, prepared, shipped, and received in order to accommodate the SFA's service model of choice.</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 01:39 PM</p>	<p>Finding: Staff members have not been trained on serving all five components in their minimum mandated quantities. Corrective Action Required: Create a concise and educational meal pattern training module which clearly explains the five meal pattern components in their minimum daily required serving sizes for each age/grade group meal pattern served, pre-K and K-8. Ensure that this training clearly explains that all five components must be served in order for a meal to be reimbursable. This training module may be in the form of a very brief class taught by the Food Service Director (FSD) or it may be in the form of an educational leaflet which staff can review individually. Have all staff responsible for serving reimbursable meals review this training module/attend the class. Please submit a copy of the training module as well as an implementation plan which outlines who must receive the training, how often the SFA will provide refresher training, and how the SFA will track this training (roster, check-list, one-time all-staff training, etc). Please reach out to your Public Health Nutritionist for assistance in creating this meal pattern training module. Many useful resources are available on DPI's Menu Planning webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p>
Site Name	Christ-St. Peter Lutheran School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	

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Question #	1406	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/04/2020 10:41 AM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.</p>

Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged Karen Jardaneh 03/05/2020 12:39 PM</p>	<p>Finding: SFA is not following the current, approved contract. SFA operates 2, separate school buildings but indicated as one school in the online contract. The contract needs to be updated to indicate either: 1) two separate schools on schedule A (with a DPI-provided new school code and should not be done until next school year's contract) or, 2) an alternate serving site listed under the main school site on Schedule A (current school year contract can be altered). CA: Provide a statement of how the schools will be indicated in the contract, update the current school year online contract and submit for approval (only if changing to alternate serving location, not if intend to list sites separately in the contract).</p>

Site Name	Christ-St. Peter Lutheran School	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged Karen Jardaneh 03/05/2020 12:42 PM</p>	<p>Finding: SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8. CA 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA. CA 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.</p>

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TECHNICAL ASSISTANCE:								
03/04/2020	1886	124	Administrative Review	ALL	FSD			Karen Jardaneh
Comments								
<u>Community Eligibility Provision</u>								
It is necessary to maintain all certification documents supporting participation in CEP. • CEP participating schools need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).								
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/05/2020	1875	1408	Administrative Review	Christ-St. Peter Lutheran School	FSD			
Comments								
<u>Temperatures</u>								
All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.								
03/05/2020	1874	1407	Administrative Review	Christ-St. Peter Lutheran School	FSD			
Comments								
<u>Sharing and "No Thank You" Tables</u>								
<p>A Sharing Table is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.</p> <p>A "No Thank You" Table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.</p> <p>Both Sharing tables and "No Thank You" Tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) to address and regulations that must be followed to safely and responsibly implement each type of table. Refer to the Sharing and "No Thank You" Tables Toolkit for a comprehensive guide including standard operating procedures.</p> <p>Food safety decisions surrounding sharing and "No Thank You" Tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.</p> <p>Sharing or "No Thank You" Tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population, at greater risk for foodborne illness.</p> <p>For more information on reducing food waste see the DPI School Nutrition Team Food Safety Page.</p>								
03/04/2020	1871		Administrative Review		FSD			

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Comments								
Fruit compliance reminders								
No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is divided by this total fruit offering to determine the weekly juice offering. Meeting the weekly fruit limit solely with dried fruit and fruit juice can be compliant. However, whole fruits - fresh or canned - are strongly encouraged in child nutrition programs in order to expose students to a wider array of nutrients, flavors, and textures. The USDA recommends that at least half of the recommended amount of fruits should come from whole fruits. Students learn from all experiences at school, including the cafeteria and meal service line. When dried fruit and fruit juice are used to meet most or all of the weekly fruit requirement, students may not be learning to appreciate whole food options which are inherently lower in sugar and often higher in fiber.								
03/04/2020	1870		Administrative Review		FSD			
Comments								
Hunger and Food Waste in Child Nutrition Programs								
With time-limited lunch periods and increased amount of fruits and vegetables offered as part of the meals under the Healthy Hunger Free Kids Act, some students may save some items for consumption at a later time. This practice is allowable, and USDA encourages it as a way to reduce potential food waste and encourage consumption of healthy school meals. For food safety concerns, this practice should be limited to only food items that do not require cooling or heating, such whole fruit, cereal, or packaged crackers. Additionally, in order to reduce food waste and further instill age-appropriate portioning, the SFA might consider serving the Pre-K and K-5 meal patterns at the East Campus (where only 4K through 2nd grades are served).								
03/04/2020	1869	501	Administrative Review	Christ-St. Peter Lutheran Sch	FSD			
Comments								
It is critical that all food service staff, even volunteers, understand the meal pattern in order to ensure that all students are served a reimbursable meal. Without OVS in place, students in grades K-8 must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal, in addition to the other components (milk, grain, meat/meat alternate) in their daily minimum quantities. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup of fruit and/or vegetable, to create a reimbursable meal.								
03/04/2020	1867	500	Administrative Review	Christ-St. Peter Lutheran Sch	FSD			
Comments								
At the time of onsite review, the SFA was receiving meals planned and prepared according to OVS forecasting; however, the SFA primarily operates the served model onsite, mostly electing to serve each student all five components. This has lead to difficulties with food shortages throughout the year. To improve forecasting and ensure that all students have access to a reimbursable meal, it is pivotal to work with the contracted vendor, specifically addressing whether the SFA will serve fully reimbursable meals to student (where each meal contains all five components in their mandated daily and weekly quantities) or if the SFA will utilize OVS (where students must be offered all five components in their mandated daily and weekly quantities, but may select as few as three components, one of which must be at least $\frac{1}{2}$ a cup of fruit, vegetable, or combination).								
03/04/2020	1866	409	Administrative Review	Christ-St. Peter Lutheran Sch	FSD			

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Comments

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff to record leftovers, milk, and the specific types of fruit served. Thorough, accurate production records will aid the SFA in communicating the district's needs and preferences to the vendor, which will aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Additionally, The production record should reflect substitutions, if any are made. Continue to work with staff to ensure that production records are thoroughly and accurately completed daily.

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Comments

Pre-K students are allowed to be served the K-8 **meal pattern** when they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in pre-K or older. It may also be used when it would be difficult to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. However, in situations where pre-K students are served at a different time or in a different place than K-8 students, two separate age-appropriate meal patterns must be followed: the pre-K meal pattern for those not yet in kindergarten and the K-8 menu for the K-8 students. Details regarding the Preschool Meal Pattern can be found on our Infants and Preschool in NSLP and SPB webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool>). As discussed onsite, the Preschool Meal Pattern chart may be found on the USDA's and DPI's websites, respectively, and are very useful tools (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf ; (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/preschool-lunch-menu-planning-worksheet.docx>)). Please see below for a summary of the Technical Assistance discussed onsite, focused on several notable differences in the pre-K meal pattern and the meal patterns for other age/grade groups: Milk: Only unflavored milk is allowable under the pre-K meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>) Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the pre-K meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. Sugar in cereal: The infant and pre-K meal patterns require cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. For more information, including the sugar limit charts, the calculation formula, and cereals that meet the sugar requirements, please refer to the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Yogurt: The infant and pre-K meal patterns require yogurt to contain no more than 23 grams of total sugars per 6 ounces. This requirement will help reduce children's consumption of added sugars. For more information, including the sugar limit charts and calculation examples, please refer to the Infants and Preschool in NSLP and SBP webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Grain-based desserts: Grain-based desserts are not creditable toward the grains component under the pre-K meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. For a complete list of foods considered to be grain-based desserts, please refer to Exhibit A for Child Nutrition Programs (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>). Whole grain-rich: At least one grain serving per day, per child, must be a whole grain-rich (WGR) item. Foods that meet the WGR criteria must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. If a food is determined to be WGR under the school meals programs, it will also be WGR under the pre-K meal pattern. Serving a vegetable in place of a fruit at lunch: A second vegetable may be served in place of the fruit component at lunch. The second vegetable must be at least the same serving size as the fruit component it is replacing. If two vegetables are served, they must be two different vegetables. Juice: Pasteurized full-strength juice may only be served once per day,

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per child, to children ages 1-5 and not yet in kindergarten under the pre-K meal pattern. If offering half-day preschool, you may choose to handle the half-day sessions as two completely separate programs. In which case, juice may be served once per session, but still only once per day, per student.

03/04/2020	1864	317	Administrative Review	Christ-St. Peter Lutheran School	FSD				
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Comments

Schools participating in CEP must provide access to both breakfast and lunch for all students during each school day. During meal service, **schools are required to keep accurate meal counts and maintain a POS system that ensures Federal reimbursements are claimed only once for each student served a reimbursable.** Schools may not claim reimbursement for additional meals served to students, or for meals that do not meet the meal pattern requirements.

To meet this requirement, schools must:

- Count total meals served daily;
- Not collect school meal applications from households; and
- **Cover with non-Federal funds any operating costs (i.e., costs for providing meals to all students at no cost) that exceed Federal reimbursements. An accurate meal count may be achieved through a variety of methods and FNS does not require the use of any specific POS system.** However, in recent years, many school districts have chosen to implement POS systems which incorporate technologies such as personal identification numbers (PIN), biometrics, and other individual student identifiers. When implementing CEP, FNS encourages school systems to maintain an accurate POS system that has a proven track record of reliability and security; including, accounting for adult meals and a la carte sales, while taking advantage of CEP's elimination of meal categories to streamline operations at the POS. **DPI offers a counting and claiming form on its website to easily and accurately track total meals. (<https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision>.)**

03/04/2020	1863	404	Administrative Review	Christ-St. Peter Lutheran School	FSD				
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Comments

Adequate signage helps ensure that students accurately select reimbursable meals under Offer Versus Serve (OVS). OVS signage was available in the cafeteria; however the SFA is mostly serving meals with all 5 components. Signage must be specific to the meal served, indicating what is served as part of a reimbursable meal and listing the five components. If the SFA opts to continue with Offer versus Serve meals rather than switching to the served model as discussed onsite, current signage will suffice. If the SFA switches to the fully served model, the signage must list all five components that are served as part of a reimbursable meal. Signage examples were left onsite; these and other examples are on our Signage webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>). Additionally, it would be beneficial to lower the physical placement of the breakfast and lunch meal signage so that it is more accessible to these young students who are not yet tall enough to easily read the signage as it is currently placed.

03/04/2020	1862	403	Administrative Review	Christ-St. Peter Lutheran School	FSD				
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Comments

For students not yet in kindergarten, only unflavored milk is allowable under the pre-K meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>). Pre-K students were

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offered flavored milk as part of the co-mingling flexibility misuse, which is addressed in question 406. The corrective action for the co-mingling flexibility misuse will encapsulate the corrective action necessary for this milk type violation. As such, no corrective action is required for question 403 at this time.

03/04/2020	1861	812	Administrative Review	Christ-St. Peter Lutheran School	FSD			
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Comments

Leftovers: The USDA Child Nutrition Programs allow for and reimburse for one meal per student per day. Second helpings of entrees are currently being offered to some of the last students in the meal service. This creates the possibility of disparate treatment of students, which is not allowed under USDA Civil Rights regulations of these programs.

Per question #88 in the resource, [Meal Requirements - USDA Q & A](#), **leftovers** served to students on the same day as they are initially offered are considered **seconds**. Occasional, small quantities of leftover entrée food (seconds), offered on the same day, might be allowable, but with awareness of the potential for disparate treatment because of how those students allowed access to seconds might be selected. Chronic quantities of entrée leftovers might necessitate communication with the meal provider/vendor to better calibrate the number of meals delivered. Question #89 in the resource mentioned above discusses guidance around offering extra helpings of components offered for a reimbursable meal. Occasional, small quantities of leftover food offered on another day are not counted toward the meal components, including the vegetable subgroups. The State agency has discretion to determine whether such leftovers are of a reasonable amount and are not occurring on a regular basis.

03/04/2020	1860	400	Administrative Review	Christ-St. Peter Lutheran School	FSD			
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Comments

Vending School Responsibility for Crediting Documentation and Meal Pattern Reminder: Ensuring that foods purchased under a vended contract and sold to students in the NSLP meet daily and weekly meal pattern requirements. Although the SFA is purchasing meals through a vended agreement, it is ultimately the SFA's responsibility to ensure all meal pattern requirements are met. Information on lunch meal pattern requirements can be found on the NSLP Menu Planning webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.

03/04/2020	1859	710	Administrative Review	ALL	FSD			
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Comments

Nonprogram Food Revenue Rule: All costs associated with identified 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. Nonprogram foods include adult meals, a la carte, extra entrees (sold or intentionally produced to accommodate provision of extra entrées), extra milks, vended meals, catering, and food service operated vending machines. Question #92 in the [Meal Requirements - USDA Q & A](#), defines milk served to students who bring cold lunch as a nonprogram food.

SFAs are required to annually complete the DPI Nonprogram Food Revenue Tool or the USDA Nonprogram Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Nonprogram Foods Revenue Rule SP-20-2016. A nonprogram foods deficit must receive a transfer of non-federal funds into the nonprofit food service account. **SFAs that sell only nonprogram milk and adult meals are exempt from completing the Nonprogram Food Revenue Tool.** Food service programs must

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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 Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals.

03/04/2020	1858	807	Administrative Review	ALL	FSD				
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Comments

Civil Rights Self-Compliance Form • The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

03/04/2020	1857	806	Administrative Review	ALL	FSD				
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Comments

Civil Rights Training • Civil rights training, such as the Civil Rights PowerPoint Presentation, must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood service staff.

03/04/2020	1856	803	Administrative Review	ALL	FSD				
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Comments

Processes for complaints • All SFAs must have procedures (written procedures preferred) or policies in place for handling civil rights complaints in regard to discrimination in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). A SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that s/he wishes 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. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints. • Civil rights complaints that are filed with the district, must be forwarded to the Civil Rights Division of USDA FNS or DPI School Nutrition Team within five days. • DPI has developed a new [Civil Rights Complaint Policy template form](#) which SFAs may use to develop such a policy.

03/04/2020	1855	1406	Administrative Review	Christ-St. Peter Lutheran School	FSD				
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Comments

Food Safety Inspections • Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's Food Safety Plan. • The most recent food safety inspection report must be posted in public view.

03/04/2020	1854	1217	Administrative Review	ALL	FSD				
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Comments

Training Requirements • 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 ["In A Nutshell-Training"](#) document. • Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.). • SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The [DPI Professional Standards Tracking Tool](#) or the USDA Professional Standards Tracking Tool are encouraged but not required.

03/04/2020	1853	810	Administrative Review	ALL	FSD				
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Comments

Nondiscrimination Statement (NDS) • When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015. • When space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the main text in the document and the format cannot be altered.

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Comments

LOCAL WELLNESS POLICY (LWP) LWP Requirements • The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires SFAs to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017. • SFAs are required to retain basic records demonstrating compliance with LWP requirements. • If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available, including a toolkit, a wellness policy builder, and wellness policy report card. **LWP Content** • SFAs are required to have language in their LWP that relates to all the content areas listed in the [LWP Checklist](#) found on the Local Wellness Policy section of the DPI SNT website. This checklist includes sample policy statements (italicized) under each content area. • **Sample Language: Policy Leadership:** The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy. **Public Involvement:** The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy. **School Meals:** All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010. **Foods sold outside of school meals program:** All food and beverages sold outside of the school meal programs shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. **Foods provided but not sold (e.g., class parties, class snacks, rewards):** The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations will be promoted and a list of ideas is available to staff and family members. **Food and Beverage Marketing:** Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. **Nutrition Education:** Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects. **Nutrition Promotion:** School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school. **Physical Activity:** The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education. **Other School-Based Strategies for Wellness:** The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year. **Triennial Assessment:** The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture. **Update/Inform the Public:** The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.

03/04/2020

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Comments

REPORTING AND RECORDKEEPING: Reporting • SFAs participating in USDA School Nutrition Programs agree to submit claims for reimbursements, submit program applications and submit reports each year within the required timeframes. The In a Nutshell-Reports provides more information on reporting and timeframes. **Recordkeeping** • All program records related to the school nutrition programs must be kept for a period of three years after submission of

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the final claim for reimbursement for the fiscal year. This would include free, reduced-price and denied applications, DC documents, and verification documents. **CEP** • There are additional record retention rules for CEP. **LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect.** In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP. Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

03/04/2020	1836	1104	Administrative Review	Christ-St. Peter Lutheran School	FSD			
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Comments

No **competitive foods** or beverages are sold at Christ St. Peter Lutheran School at time of review. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. Someone at each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser tracking tools on our Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

03/04/2020	1834	1300	Administrative Review	Christ-St. Peter Lutheran School	FSD			
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Comments

WATER • Water is required to be available at no charge and without restriction to students during the lunch and breakfast meal services. • Water can be provided in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. Pitchers of water and cups are made available at the East campus and a working drinking fountain is available in the cafeteria at the West campus. This drinking fountain, however, not ideal as the water does not spring from the spout very far from the unit and is slightly challenging to get one's mouth close to the water. To encourage students to drink water, it might be encouraged to put out a pitcher and some cups. • For more information and resources on the water requirement, see our [Water Availability webpage](#).

03/03/2020	1833	900	Administrative Review	ALL	FSD			
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Comments

ON-SITE MONITORING • Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP. This is due by February 1. • The [onsite monitoring forms](#) for the NSLP and the SBP are on the Administrative Review section of the DPI SNT website. • A CEP-specific, NSLP and SBP on-site monitoring form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on the Community Eligibility Provision (CEP) section of the DPI SNT website.

03/03/2020	1832	801	Administrative Review	ALL	FSD			
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Comments

Public Release • All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to: • Local news media • Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)) • Local employment office • Major employers contemplating or experiencing large layoffs. • SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials

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distributed. The [Community Eligibility Provision \(CEP\) webpage](#) contains public release templates for SFAs operating both District-wide and Mixed District CEP.

03/03/2020	1831	305	Administrative Review	ALL	FSD				
Comments									
<p>Meal Counting and Claiming, 305h: To implement the field trip bag meal option, the following must be done: 1. Develop an ordering procedure to allow food service staff time to purchase, prepare and pack bag meals 2. Keep food items, including milk, at the appropriate temperatures until meal service 3. Use an acceptable point of service counting procedure to record the number of reimbursable meals served by category (free, reduced, and paid) and/or account for any a la carte sales. Schools may use a class roster to check off each student's name as he/she is handed a reimbursable meal. Another option for schools with electronic meal counting systems is to mark the computer-generated bar codes of the students when they receive the meals.</p>									
03/03/2020	1830	305	Administrative Review	ALL	FSD				
Comments									
<p>Meal Counting and Claiming, 305d: SFAs may claim visiting students in the paid category or the individual's category with documentation (unless they are from a CEP school). Visiting students to a CEP school may be added to the total meal count.</p>									
03/03/2020	1825	20	Administrative Review	Christ-St. Peter Lutheran School	FSD				
Comments									
<p>Co-mingling flexibility misuse. TA and CA given under question 406.</p>									
12/17/2019	1199	1901	Administrative Review	Christ-St. Peter Lutheran School	Person responsible for FFVP claim				
Comments									
<p>FFVP • The October claim had two incorrect service dates which appear to be data entry errors not claim errors. Please ensure the correct information is entered into the claim.</p>									
12/17/2019	1198	1901	Administrative Review	Christ-St. Peter Lutheran School	Person responsible for FFVP claim				
Comments									
<p>FFVP • MCFI is invoicing the SFA for all portions of fresh fruits/veggies (FFV) sent; however the school is only claiming those served. This is ok but for FFVP it is also ok to claim the full amount invoiced and incorporate the leftovers in the lunch program as long as steps are being taken to minimize the amount of leftovers.</p>									
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name	
03/05/2020	1887	133	Administrative Review	ALL	FSD				

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Comments

Direct Certification

SFAs that operate CEP at each site(s) are required to run DC **one time per year for the Special Provision Match in October, and as needed to obtain April 1 data supporting an increase in ISP or a recalculation due to a significant change in participating schools.** Maintain all original DC match lists at the SFA as paper copies or electronically. Additional Direct Certification information can be found online (<https://dpi.wi.gov/school-nutrition/programrequirements/direct-certification>).