

Administrative Review Report

Shining Star Christian Schools, Inc.

Commendations:

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

Recommendations:

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 no charge (this year all courses will be online). Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI 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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
TA Log #	TA Log# Exists
Corrective Action Status	Flagged
Corrective Action History	<p>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).</p> <p>CA: Review the Annual Financial Report webcast and manual on the DPI website then submit the 2019-20 Annual Financial Report with revenues and expenses broken out by program and category. Upload the 19-20 report into SNACS.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1000
TA Log #	TA Log# Exists
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31).</p> <p>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>
Form Name	Local School Wellness (1000 - 1006)
Question #	1001
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The SFA did not notify the public about the Local Wellness Policy (LWP) in accordance with 7 CFR 210.31.</p>

Administrative Review Report

Shining Star Christian Schools, Inc.

	CA: Upload into SNACS a statement on how the public will be notified of the LWP, include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Form Name	Local School Wellness (1000 - 1006)
Question #	1002
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated. CA: Provide a plan on when and how the LWP will be reviewed and updated.
Form Name	Local School Wellness (1000 - 1006)
Question #	1004
Corrective Action Status	Flagged
Corrective Action History	Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee. CA: Provide a plan on how potential stakeholders will be notified and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Form Name	Local School Wellness (1000 - 1006)
Question #	1005
Corrective Action Status	Flagged
Corrective Action History	Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. CA: 1) Provide a timeline for when the assessment of the LWP will be completed and the public notified. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. 2) Provide a statement of understanding of the LWP assessment requirements.
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	Flagged
Corrective Action History	Finding: The correct non-discrimination statement was not included on all required program materials on the website. CA: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	409
TA Log #	TA Log# exists
Corrective Action Status	CAP Submitted
Corrective Action History	Finding: Production records missing key pieces of information: milk types and usage CA: Once school is back in session, submit one week of completed production records for both breakfast and lunch that include all of the required information. Review the Production Record Requirements list, as needed (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)

Administrative Review Report

Shining Star Christian Schools, Inc.

Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
TA Log #	TA Log# exists
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: Incorrect crediting for chicken and gravy recipe. There is only 1.5 oz eq meat/meat alternate per serving not 2 oz eq meat/meat alternate as the recipe states.</p> <p>CA: Update recipe crediting and submit.</p>
Form Name	Food Safety
Question #	1406
Corrective Action Status	Accepted
Corrective Action History	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. This is completed, so no further action is required.</p>
Form Name	SFA On-Site Monitoring (901 - 904)
Question #	901
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: SFA did not complete on-site monitoring for NSLP or SBP per 7 CFR 210.8.</p> <p>CA: Submit a plan on how onsite monitoring will be completed by February 1 each year for each school and program moving forward and the position responsible.</p>

Technical Assistance Entries:

Comments

Water is required to be available at no charge and without restriction to students during the lunch and breakfast meal services in the cafeteria or adjacent to the cafeteria. Water can be provided in a variety of ways, such as water pitchers and cups on lunch tables, a water cooler, a water fountain, or a faucet that is accessible to students during meal service.

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. A CEP specific on-site monitoring NSLP and SBP 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.

Buy American Provision

The vendor maintains a running list of all the food products that are non-domestic. As a reminder, please ensure the name of the school is listed at the top of the document. Refer to the Buy American in a Nutshell summary page for more information. This can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Comments

Smart Snacks/ Fundraisers

No competitive foods or beverages are sold at this time. However, a discussion with the food service director revealed some interest in starting in the near future.

Administrative Review Report

Shining Star Christian Schools, Inc.

Any food or beverage sales must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. If you choose to sell foods or beverages that **are Smart Snack compliant**:

- These foods or beverages may be sold at any time and in any location.
- You must designate a person at your school to keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator. We recommend using the Alliance for a Healthier Generation Smart Snacks Product Calculator to assess compliance of products sold outside the reimbursable meals. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records (<https://foodplanner.healthiergeneration.org/calculator/>).

If you choose to sell foods or beverages that **are not Smart Snacks compliant**:

- These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser must not exceed two consecutive weeks in length.
- Exempt fundraisers cannot occur in the meal service area during meal times.
- Someone in the school must keep track of the exempt fundraisers.

Fundraiser tracking tools are available on our Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

Remember, constant unhealthy food and/or beverage fundraisers undermine progress made by the school nutrition department to provide healthy, balanced meals to students. Whenever possible, the district is strongly encouraged to help student organizations find ways to fundraise that promote a healthy lifestyle. More information on healthy fundraisers can be found on WI DPI's Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks>).

Production Records

Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. In addition, it is how the SFA documents what they offered as part of the reimbursable meals. Production records were missing milk types and usage for most days. Please refer to the Production Record Requirements for a list of all mandatory items that must be listed and filled in on production records. Visit the Production Records webpage for more information. <https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>

Standardized Recipes

The Chicken and Gravy Crediting says 2 oz eq meat/meat alternate but reviewer calculated 1.5 oz eq meat/meat alternate per serving. This did not create a daily or weekly meat/meat alternate shortage. Be sure to update the recipe with the correct crediting.

10lbs chicken in the recipe = 160 oz total in recipe. Per crediting for chicken: 2.75 oz = 2 oz eq m/ma

Cross multiply:

$$\begin{array}{rcl} \frac{2.75 \text{ oz}}{160 \text{ oz chix in}} & = & \frac{2 \text{ oz eq m/ma}}{116.3636 \text{ oz eq}} \\ \text{recipe} & & \text{m/ma total} \end{array}$$

116.3636 oz eq m/ma in the recipe ÷ 75 servings = 1.5 oz eq m/ma per serving.

Annual Financial Report (AFR)

- 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.

Administrative Review Report

Shining Star Christian Schools, Inc.

- When a student deposits funds in their lunch account, which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your AFR.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year, and it can never be a negative balance. A transfer must be made from non-federal funds to bring the ending balance to \$0.00.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy) (<http://dpi.wi.gov/school-nutrition/wellness-policy>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the LWP goals.)

USDA Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) 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 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, 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 other text in the document. The long form must be used on websites in its exact form without altering.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal

Administrative Review Report

Shining Star Christian Schools, Inc.

Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.