

Administrative Review Report

Kingdom Prep Lutheran HS #40-1774

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.

Appreciation/Commendations:

Thank you to the staff at Kingdom Prep Lutheran High School (KPLHS) for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance.

The DPI review team appreciates the eagerness of the staff at Kingdom Prep Lutheran High School for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, student feedback and student servers. We were impressed during meal service that the male student population of this new high school were kind, courteous and interested in participating in the provided meals.

The DPI review team is confident that KPLHS will continue to improve their knowledge and operation of child nutrition programs. KPLHS participates in the Community Eligibility Program (CEP) to offer all students the breakfast and lunch meals at no cost.

We appreciate your positive attitudes and willingness to learn. Thank you for using the DPI resources applicable to your meal programs.

The Due Date for Corrective Action items is Monday, April 6, 2020.

Refer to the Technical Assistance and Compliance Reminders resource sent in an email and uploaded to the Documents tab in SNACS.

Recommendations:

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Noted errors may require additional corrective action and may also be subject to fiscal action.

Training Opportunities:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the

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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 webpage (dpi.wi.gov/school-nutrition/training).

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

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Findings and Corrective Action items:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question	700
Corrective Action	<p>Finding: The SFA does not track and account for all revenues and expenditures for the nonprofit school food service account separately (7 CFR 210.19).</p> <p>Corrective Action: Review the Annual Financial Report webcast or manual on the DPI website. Submit into SNACS a statement on how the revenues and expenditures will be tracked separately for the nonprofit school food service account, perhaps using the DPI Purchase Record/Revenue Templates or other available resources.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question	705
Corrective Action	<p>Finding: SFA does not have adequate internal controls to maintain oversight of federal funds for purchasing food, beverages and supplies.</p> <p>Corrective Action: View the Procurement webcast (http://media.dpi.wi.gov/school-nutrition/procurement-small-purchasing-method/story.html) on Small Purchases which discusses the process to bid out for food, beverages and supplies. Upload to SNACS the names who watched the training webcast (FSD and Authorized Representative).</p>
Form Name	Local School Wellness (1000 - 1006)
Question	1001
Corrective Action	<p>Finding: The SFA did not notify the public about the Local Wellness Policy (LWP) in accordance with 7 CFR 210.31.</p> <p>Corrective Action: Upload into SNACS a statement on how the public will be notified of the LWP, include the title(s) of the SFA representative(s) that will ensure compliance.</p>
Form Name	Local School Wellness (1000 - 1006)
Question	1002
Corrective Action	<p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) will be reviewed and updated.</p> <p>Corrective Action: Provide a plan on when and how the LWP will be reviewed and updated.</p>
Form Name	Civil Rights (809 - 810)
Question	810

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Corrective Action	<p>Finding: The correct non-discrimination statement was not included on all program materials.</p> <p>Corrective Action: Update program materials and website to include the correct non-discrimination statement found on the school nutrition civil rights webpage. Upload into SNACS a copy of materials updated or provide link to website.</p>
Form Name	Professional Standards (1210 - 1219)
Question	1217
Corrective Action	<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>Corrective Action: 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>
Form Name	Food Safety & Buy American (1400 - 1403)
Question	1400
Corrective Action	<p>Finding: The SFA has a complete site specific Food Safety Plan, but has not documented that it has been reviewed annually. The FSD should provide necessary training to kitchen helpers. Corrective Action: Submit a statement of how and when the Food Service Director (FSD) will annually review, update and document the review.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question	1401
Corrective Action	<p>Finding: The FSD completed an Employee Health Reporting Agreement, but must also include any kitchen helpers - adult or student.</p> <p>Corrective Action: Submit a statement of completion to have the student workers sign the Employee Health Reporting Agreement (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question	403
Corrective Action	<p>Finding: At least two choices of allowable milk types must be offered daily at each meal. On 3/3/2020, there were 24 students who did not have access to two or more milk types.</p> <p>Corrective Action: Submit a written plan of action that will be taken to ensure that all students have access to two or more milk types at each meal.</p>

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Form Name	Meal Components and Quantities - Review Period (409-412)
Question	409
Corrective Action	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There were no standardized recipes for the chicken fajitas, spaghetti with meat sauce, and taco meat.</p> <p>Corrective Action: Submit standardized recipes for the items above. Be sure to include all requirements of a standardized recipe, including serving size and yield. 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). The recipe template and an example were provided and discussed on site.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question	410
Corrective Action	<p>Finding: Leftovers were not filled in daily on production records during the week of review. Additionally, information regarding hamburger buns were not recorded on 2/3/2020. There was not fruit recorded on 2/5/2020. 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).</p> <p>Corrective Action: Submit one week of completed production records, including leftovers recorded daily. Choose a week that occurs after the completion of this Administrative Review (AR), but before the corrective action due date (April 6).</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question	411
Corrective Action	<p>Finding: Crediting documentation was not available for all foods served during the week of review. Processed products not listed in the USDA Food Buying Guide (FBG) require a Child Nutrition (CN) label or a product formulation statement (PFS) to credit toward the meal pattern. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. Documentation should be printed on company letterhead and signed. If a processed product does not have a Child Nutrition (CN) label or product formulation statement (PFS) and is not in the USDA Food Buying Guide (FBG), it may not credit toward the meal pattern. Additionally, collect new product labels annually and update records when new products are purchased and when products change.</p> <p>Corrective Action: Submit crediting documentation for the following items: ham (2/6), Scooby Grahams (2/7), Crunch Mania (2/3), and Goldfish (2/3). Please also submit the ready-to-eat weight of a serving in grams or ounces, the ingredient list, and nutrition for hamburger buns (2/3), spaghetti (2/5), bread (2/6), and hot dog</p>

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	buns (2/7).
Form Name	Meal Components and Quantities - Review Period (409-412)
Question	412
Corrective Action	<p>Finding: The only allowable milk types in USDA School Meals Programs are non-fat and fat-free flavored or unflavored milk. 2 percent milk was found in storage, but not seen during meal service. Please discontinue stocking 2 percent milk.</p> <p>Corrective Action: Submit a statement explaining your understanding of the allowable milk types and that you will discontinue use of 2 percent milk.</p>
Form Name	Offer vs Serve (500-502)
Question	500
Corrective Action	<p>Finding: The lunch Offer versus Serve (OVS) requirements are not fully understood by all staff and 3 students were seen taking non-reimbursable breakfasts on 3/4/2020. The school must offer the required portions of fruit, grain, and milk at breakfast. From these offerings, students must select at least three items, one of which is ½ cup fruit and/or vegetable. Use the OVS In a Nutshell for guidance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-in-a-nutshell.pdf). OVS resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals attend a training on OVS. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question	1405
Corrective Action	<p>Finding: Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year (7 CFR 210.13). The SFA did not receive two food safety inspections in the current or prior school year, and does not have documentation on file indicating that two inspections were requested from the local regulatory authority.</p> <p>Corrective Action: Contact the local regulatory authority to request two food safety inspections. Submit and retain documentation of this communication.</p>
Form Name	Afterschool Snack Program (1700)
Question	1700
Corrective Action	<p>Finding: The SFA has the Afterschool Snack Program (ASP) listed on their annual contract, but have not been operating this school year.</p>

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Corrective Action: Please provide a timeline of when to begin the ASP and submit documentation that applicable parties (FSD, Authorized Rep, office and program administrators) have watched the webcast of the Afterschool Snack Program (https://media.dpi.wi.gov/school-nutrition/afterschool-snack/story_html5.html). Your SFA would be Area Eligible, providing free reimbursement for all snacks served.

Technical Assistance

Meal Pattern and Menu Planning:

- 1) The “case count” of fruit is the number of pieces in one 40 pound case. Currently, KPLHS is purchasing 88 ct apples and 88 ct oranges. Consider purchasing 125-138 ct apples (credits as 1 cup) and 113-138 ct oranges (credits as ½ cup). These higher case counts will be significantly less costly and still credit sufficiently.
- 2) KPLHS has a salad bar that they are not using. This would be a great way to offer a variety of fruits and vegetables to students. Fruits and vegetables on a garden bar can credit toward the meal pattern. Even with garden bars, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. See examples on our Signage webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>). Production records must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the Production Records webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records>). A Vegetable Subgroup handout that identifies common vegetables with their respective subgroups is also available (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>).
- 3) No more than half (50 percent) of the total fruit offerings may be in the form of juice.
- 4) As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, which makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).
- 5) Signage is posted, but not filled in daily. Consider writing in the daily menu.
- 6) The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. The following information must be recorded on a Buy American Non-Compliant Product List for non-domestic food items:
 - Date
 - Name of product
 - Country of origin
 - Reason:
 - Cost analysis
 - Seasonality
 - Availability
 - Substitution
 - Distribution
 - Other

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A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). See the Buy American in a Nutshell for more information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf>)

- 7) It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. OVS resources on WI DPI's Menu Planning webpage may be used as training resources (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ovs>).

Nutrition Programs and Regulations:

- 1) It was discussed that more people be added to the District Wellness Committee to include students, parents and a health professional.
- 2) Based on the SY 2018-19 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3 months average expenditures. This is due to the SFA not expending any costs to the food service program, but there were reimbursements paid for meals. (7 CFR 210.9(a).
- 3) A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months through the Summer Food Service Program (SFSP). SFAs can inform families of summer meals via the following methods:
 - Promotion of the summer meals locator on the DPI Summer Meals webpage
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the Summer Food Service Program webpage
- 4) We discussed the possibility of operating the Area Eligible Afterschool Snack program again since students are at school long hours and engaged in study hall, sports and activities. Forms were shared to document the food production record and point of service (POS). KPLHS may use Power School software for POS. Meal pattern was discussed, also.
- 5) All school nutrition documents must be kept on file for 3 years plus the current school year.
- 6) Use the Calendar of Requirements for CEP schools to keep abreast of report actions and due dates. The Calendar provides links to each subject for your review and usage.