

Administrative Review Report

Saint Lucas Lutheran School

Commendations:

Thank you to all the staff at Saint Lucas Lutheran for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Program Director who has recently stepped into this new role and has built a good foundation for learning and implementing the Child Nutrition Programs; it is no easy feat. The quick responses and proactive approach to obtaining the necessary documentation needed to credit the meal pattern led to an expedited AR. Thank you for working so hard to serve your students healthy, nutritious meals, and showing them compassion day in and day out.

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 in 2023. Find more information on these training opportunities on the DPI School Nutrition Training Webpage.

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Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/10/2023 11:41 AM	Finding: The SFA does have an Unpaid Meal Charge Policy in place but it does not detail at what point the student(s) will be given an alternate meal. Corrective Action: Update the policy and submit a copy in SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/10/2023 01:01 PM	Finding: The Public Release was not distributed to the required locations prior to the start of the school year. Corrective Action: Submit a statement in SNACS of the names of 3 organizations that the public release will be posted and when you plan to have the Public Release posted for the 23-24 SY.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	804	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/10/2023 03:01 PM	Finding: The SFA does not have a system for tracking discrimination complaints received for the school meal program (FNS Instruction 113-1). Corrective Action: Using the Civil Rights Complaints Procedure template (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx) add the school's letterhead and upload it to the school website. Submit a statement when this has been completed.
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	

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Corrective Action History	Flagged 03/08/2023 10:01 AM	<p>Finding: The application selected for verification was already directly certified. Verification was completed incorrectly and not completed by November 15. The Verification Collection Report was completed incorrectly.</p> <p>Corrective Action: Watch the Verification webcast. Submit a statement when this has been completed. https://media.dpi.wi.gov/school-nutrition/verification-process-verification-collection-report/index.html#/</p>
Site Name	Saint Lucas Lutheran School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/10/2023 11:20 AM	<p>Finding: 4K and K students that eat in the classroom are not being checked off as they receive the meal.</p> <p>Corrective Action: Correct the point of service to have a staff member mark off each meal as the student receives a reimbursable meal. Fiscal action will be applied to each lunch claim from August to February. There is a \$600 disregard if the total fiscal action is \$600 or less. Submit lunch check off sheets for 30 operating days starting with March 8.</p>
Site Name	Saint Lucas Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 03/08/2023 08:10 AM	<p>On the production record transport sheet for Saint Lucas Lutheran, portion sizes for vegetables are written for two different portion sizes, either regular (1/2 cup) or large (3/4 cup). However, the school receives meals in Oliver Trays with a few components pre-plated.</p> <p>For the day of onsite review, the pre-plated components were the chicken smackers and the roasted potatoes. It appeared that the roasted potatoes did not seem to be enough to meet the daily minimum requirement of 3/4 cup. The potatoes were taken out and measured using a #8 scoop (1/2 cup) and appeared to be just about 1/2 cup. The potatoes were then measured by weight on an analog scale and appeared to weigh about 3.5-4 oz and using the USDA Food Buying Guide, a 3/4 cup portion should weigh around 4.96 oz. We finally measured them out in a 6 oz spoodle (3/4 cup volume) and the potatoes did not fill the spoodle.</p> <p>DPI then visited the vendor site and confirmed that they had only measured out a 1/2 cup portion of vegetables in the Oliver Tray which is what they do for Offer vs Serve (OVS) site schools. Stating that the extra 1/4 cup vegetable is "available" to students in OVS.</p> <p>However, in this situation when the vegetable is pre-plated, and a second vegetable or additional main vegetable is not sent along with the Oliver Tray, the school is short the additional 1/4 cup vegetable. For the day of onsite, the vendor sent additional carrots to the school so that the minimum requirement could be met for vegetables during onsite review.</p> <p>It is recommended that the portion size is individualized for each school on the transport sheets and written as the portion size that should be offered to the student. If this cannot be done, then it is suggested the portion size language is changed to small and regular since the regular portion size is the minimum requirement of the vegetable component that is allowed to be served daily. For Saint Lucas Lutheran, if the vegetable is sent pre-portioned in the Oliver Tray, this should meet 3/4 cup if no other vegetable is sent/offered on the side. If the vegetable component is offered on the side, then enough should be sent so that up to 3/4 cup is available as needed.</p>

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		<p>Finding: Prior to service during the onsite review, there was not enough vegetable to meet the daily minimum requirement for the K-8 meal pattern. The menu was planned for 3/4 cup roasted vegetables; however, only 1/2 cup of roasted potatoes was pre-plated and sent to the school for service. No additional vegetables were available or offered on the side. With DPI intervention, additional 1/2 cup portions of carrots were sent to the school and available to students.</p> <p>Corrective Action: Please submit a statement about what will be changed in order to meet the daily minimum requirement for vegetables under Offer Vs Serve at Saint Lucas Lutheran in the situations when vegetables are pre-plated in Oliver Trays or when they are offered on the side.</p>
Site Name	Saint Lucas Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 03/08/2023 08:19 AM</p>	<p>Finding: The school Food Program Director is new of this school year and was told that they are a serve school, not offer vs serve (OVS) and the school's current signage reflects a serve model; however, the school contract and vendor contract state that the school does offer vs serve. The authorized representative also confirmed that the school does OVS. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least 1/2 cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of updated OVS lunch signage posted near the serving line.</p>
Site Name	Saint Lucas Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 03/08/2023 08:22 AM</p>	<p>Finding: The infant and preschool meal pattern replaces the previous meal pattern options for School Food Authorities (SFAs) serving infants and children aged 1-5 and not yet in kindergarten. Meals served under these meal patterns include a greater variety of vegetables and fruits, more whole grains, and less added sugar.</p> <p>Information on these meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool). All components are served to preschool students in the preschool meal pattern; Offer Vs Serve is not an allowable meal serve option.</p> <p>Prior to the onsite visit, it was discussed that the preschool students (K3, K4) are served the K-8 meal pattern at lunch but are served their meals in the classroom and thus are not comingled. The school then made changes to eliminate chocolate milk from the options for the preschool students.</p> <p>During the onsite visit, it was observed that six students were not required to have milk and with DPI intervention, milk was provided to those students.</p> <p>Corrective Action: Submit a statement describing what changes will be made to the preschool meals to meet the preschool meal pattern requirements.</p>

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Site Name	Saint Lucas Lutheran School	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 03/08/2023 08:51 AM</p>	<p>Finding: Offer Versus Serve (OVS) is not being properly implemented at lunch. Students are served all five components rather than being allowed to select three components, including ½ cup fruit and/or vegetable. The Food Program Director is new to the school this year and started after the school year began and thus missed annual training. Although all students observed took a reimbursable meal, it is important for staff to understand the OVS requirements.</p> <p>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>The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns~:text=Policy-,Meal%20Patterns,-Title%20/%20Description).</p> <p>Corrective Action: Have the Food Program Director and any staff responsible for determining reimbursable meals complete training on Offer vs Serve including but not limited to Offer Vs Serve webcast (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html) and Meal or No Meal (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story.html).</p> <p>Please submit details regarding when the training was held, who attended, and how the training was conducted.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/07/2023	3125	805	Administrative Review	ALL	FSD			
Comments								
						Created By	Created Date	
<p>Special Dietary Needs • The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan. • Policy Requirements- At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Food Authorities develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a Special Dietary Needs Policy template which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information. • Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include: 1. an explanation of how the child's physical or mental impairment restricts the child's diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner • A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements. • SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or</p>							3/10/2023 2:52:34 PM	

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fall within offer vs. serve. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. • SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. SFAs must get pre-approval from the DPI School Nutrition Team by completing the Fluid Milk Substitute Approval Form. A List of Allowable Fluid Milk Substitutes is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements. • Resources - The Special Dietary Needs Flowchart outlines the process of accommodation determination. The USDA Q&A on Accommodating Special Dietary Needs resource, the USDA Special Dietary Needs Handbook, and Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) contain additional detailed information.									
03/07/2023	3120	801	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
The PI 1441 Form (Civil Rights Self Evaluation Form) is due by October 31, annually.									3/10/2023 1:10:00 PM
03/07/2023	3237	1211	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
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. The Food Service Director is required to have 12 hours of training, annually.									3/23/2023 12:06:33 PM
03/07/2023	3103	114	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
Provide the F/R meal application within back to school packet or a folder so it is discreet for households to pick up a F/R meal application.									3/8/2023 10:42:57 AM
03/07/2023	3098	134	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
Direct Certification: Run partial enrollment through DC immediately when you have new students transfer in. Run full enrollment through DC prior to start of school, send out DC approval letters letting households know of eligibility. This will decrease the amount of F/R meal applications that must be processed.									3/8/2023 10:09:48 AM
03/07/2023	3097	207	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
When completing Verification, total up the approved applications from July 1- Oct 1. Disregard any students that were Directly certified prior to October 1; they should not be included in the pool as they were already verified by the Direct Certification system.									3/8/2023 9:50:51 AM
03/07/2023	3096	208	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
The Confirming Official must review, sign and date the application chosen for Verification prior to mailing the "We Must Check" letter to the household.									3/8/2023 9:47:27 AM
03/07/2023	3095	431	Administrative Review	Saint Lucas Lutheran School	FSD				
Comments									
					Created By			Created Date	
Instead of throwing away leftover fruits and vegetables at the end of the lunch service, consider pre-portioning them into 1/2 cup servings and adding to the service line the following day for students in addition to the planned menu noting the addition to your									3/8/2023 9:27:58 AM

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production records. This will help reduce food waste and increase option variety for students at lunch.								
03/07/2023	3094	500	Administrative Review	Saint Lucas Lutheran School	FSD			
Comments								
						Created By	Created Date	
Though Offer vs Serve (OVS) is option for elementary and middle schools, it is highly recommended. For the kindergarten class to participate in OVS, consider allowing them to come down to the service line to choose the components they would like at their meal, one of which being a 1/2 cup fruit, vegetable, or combination of both. If the trays are too difficult for them to carry back upstairs, find a space for them to eat in the cafeteria before returning upstairs. If this is not feasible, implement offer vs serve as best as possible in the classroom by bringing up a milk choice and allowing the declining of milk, and offering other components that are not pre-plated or easy to turn down (i.e. basket of rolls, basket of fruit, pre-portioned vegetable not on the Oliver Tray, etc).							3/8/2023 9:42:03 AM	
Offer Vs Serve: As the vendor pre-plates some components each day for lunch, giving students choices for the fruit, any additional vegetable or grains, and the milk can satisfy OVS requirements. What is important to remember is that students need the ability to decline some components. Finding additional volunteers or staff or finding self-serve items that students can take for components will help in the transition from serve service model to OVS service model as trays will need to be checked at the point of service to make sure they include at least three full components, one of which is 1/2 cup fruit, vegetable or combination of both.							3/8/2023 9:22:06 AM	
03/07/2023	3093	1	Administrative Review	Saint Lucas Lutheran School	FSD			
Comments								
						Created By	Created Date	
Consider participating in the School Breakfast Program (SBP). Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the School Breakfast Program webpage (https://dpi.wi.gov/school-nutrition/school-breakfast-program). There will also be a class at our School Nutrition Summer Training (SNST) on Breakfast Models. Consider attending SNST to learn more (https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training).							3/8/2023 9:14:24 AM	
03/07/2023	3086	435	Administrative Review	Saint Lucas Lutheran School	FSD and vendor			
Comments								
						Created By	Created Date	
Creating and reviewing standardized recipes are an on-going process. Even the USDA quantity recipes need to be revised and updated as requirements and ingredients change. One recipe used during the review week (chicken taco meat) appeared to be off in crediting. During discussion with the vendor, it appeared that the recipe had not been updated to reflect the current USDA product (100101) being received for diced chicken which was crediting as 1 oz for 1 oz eq and not 3 oz for 2 oz eq. This crediting error did not result in any meal pattern shortages but should be updated to reflect accurate crediting for meal planning.							3/8/2023 8:29:29 AM	