

**USDA Child Nutrition Programs**  
*Commendations, Corrective Actions & Technical Assistance*

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**School Food Authority:** Hales Corners Lutheran School      **Agency Code:** 407076  
**School(s) Reviewed:** 840 – Hales Corners Lutheran School      **Review Date(s):** January 21, 2019  
**Review Team:** TCB Reviewer      **Date of Exit Conference:** 1/21/2019  
**Corrective Actions Due Date:** 4/15/2019

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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.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Hales Corners 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 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 TCB review team appreciates the eagerness of the staff at Hales Corners Lutheran 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, menu, service, local wellness, and overall responsiveness to recommendations made while on site. We were impressed at the overall cleanliness of the kitchen and the courteousness of staff toward students.

The TCB review team is confident that Hales Corners Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

## Required Corrective Actions

Please review and reply to this Corrective Action Plan to identify procedures and/or documents needed to correct these issues.

**Finding #1:** *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.*

**Required Corrective Action #1:** *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 shared Google folder.*

**Finding #2:** *Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).*

**Required Corrective Action #2:** *Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.*

**Finding #3:** *The SFA did not have a copy of the food safety plan at each school and/or was not site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).*

**Required Corrective Action #3:** *Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into the shared Google folder. Specifically, ensure the plan lists all menu items according to their process category, and details for monitoring daily temperature logs for the freezer and cooler.*

**Finding #4:** *The SFA is not meeting meal pattern requirements for the Special Milk Program. Only ½ cup (4 fl. oz.) is served rather than 1 cup (8 fl. oz.).*

**Required Corrective Action #4:** *The SFA must increase the serving size to meet the meal pattern requirement of 1 cup (8 fl. oz.).*

**Finding #5:** *The SFA is not taking a milk count at the point-of-service during the Special Milk Program.*

**Required Corrective Action #5:** *The SFA is serving all students then marking the roster. The roster must be marked as students are served, not after. Submit a plan and training documentation showing all adults responsible for SMP have been retrained in proper point of service.*

**Finding #6:** *The SFA did not process all household applications in compliance with 7 CFR 245.6(a). Two applications were not determined correctly due to missing/incorrect household information, including child or household name, case number, social security number, adult signature, miscategorized applications, benefit issuance errors.*

**Required Corrective Action #6:** *Contact household(s) with incomplete application(s) and request the missing information. Upload a copy of the completed application into shared Google folder. [Corrected by day of review; no further correction required.]*

**Finding #7:** *The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually.*

**Required Corrective Action #7:** *Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.*

**Finding #8:** *The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).*

**Required Corrective Action #8:** *Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and timeframe for distributing SFSP outreach materials.*

## Recommended Technical Assistance

Please review the following Technical Assistance; a response is not required. Internally, identify procedures and/or documents needed to work toward continuous improvement of the program. Please note, numbers below may not directly correspond to the preceding section.

**Technical Assistance #1:** *Documentation of trainings/continuing education must be maintained for all school food service staff to demonstrate the minimum training requirements are being met (7 CFR 210.30).*

**Technical Assistance #2:** *Each year, non-school nutrition staff with school nutrition program responsibility must complete annual training that is applicable to their job (7 CFR 210.30).*

**Technical Assistance #3:** *Additional information is available from DPI's website regarding [Wisconsin School Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) requirements (<https://dpi.wi.gov/school-nutrition/food-safety>).*

**Technical Assistance #4 and #5:** *Additional information is available from DPI's website regarding the [Special Milk Program \(SMP\)](https://dpi.wi.gov/school-nutrition/milk-programs/special-milk) (<https://dpi.wi.gov/school-nutrition/milk-programs/special-milk>).*

**Technical Assistance #6:** *Additional information is available from DPI's website, in a section dedicated to "[Unpaid Meal Charges](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)" (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).*

**Technical Assistance #7:** *Please update the wellness policy to specifically address "foods provide but not sold to students".*

**Technical Assistance #8:** *USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. 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 USDA Summer Food website (<http://www.fns.usda.gov/summerfoodrocks>)*

The State Superintendent of Wisconsin Department of Public Instruction shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage ([dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017)).



*With School Nutrition Programs!*