

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2019	12/09/2019
On-Site Review	12/19/2019	12/20/2019
Site Selection Worksheet	10/30/2019	10/31/2019
Entrance Conference	12/19/2019	12/19/2019
Exit Conference	12/20/2019	12/20/2019

Commendations:

Thank you to the Food Service Director, food service staff, and administration at Trinity Lutheran School for your warm welcome, organized materials, and willingness to learn. Your responsiveness allowed the onsite portion of the Administrative Review to operate smoothly and gave DPI School Nutrition Team staff ample time to offer technical assistance.

Findings and Corrective Action:

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
Corrective Action History		<p>Finding: During the Administrative Review, the documentation used to support the 2018-2019 SY Annual Financial Report could not be found.</p> <p>Corrective Action: Upload the documentation used to support the 2018-2019 SY Annual Financial Report. The consultant will review the documentation and additional information may be requested.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
Corrective Action History		<p>Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14.</p> <p>Corrective Action #1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year.</p>

		Corrective Action #2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.
Form Name	Civil Rights (800 - 807)	
Question #	801	
Corrective Action History		Finding: The Public Release was not distributed to the required locations. Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Form Name	Civil Rights (800 - 807)	
Question #	803	
Corrective Action History		Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Corrective Action: 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.
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
Corrective Action History		Finding: Current Local Wellness Policy (LWP) does not include all of the required content on where it will be posted and how it will be publicly announced(7 CFR 210.31). Corrective Action: 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.
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
Corrective Action History		Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).

		<p>Corrective Action: 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 time frame for distributing SFSP outreach materials.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	130	
Corrective Action History		<p>Finding: One student was receiving free benefits based on foster status. An application was submitted for the student along with other students in the household. The application was denied and the foster student lost their benefits. The "free" foster eligibility status remains effective for that student for the remainder of the school year plus 30 operating days of the next school year.</p> <p>Corrective Action: Notify the household that the foster student is still eligible for free benefits. Update their status within 3 days of notifying the household. Submit a copy of the documentation used to notify the household.</p>
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
Corrective Action History		<p>Finding: At the Point of Sale (POS), students would enter their numbers into the software. The students would then select "lunch", "breakfast" or "milk" on the screen. Each teacher would oversee this process and make sure the students were selecting the right button. Though there were no prices showing on the screen and a teacher was supervising. However, students are not allowed to operate the POS, only the adults.</p> <p>Corrective Action: Clean up the Point of Sale so the students are no longer involved with selecting their meal choice on the screen and an adult is operating the POS. Submit an explanation on how this will be corrected.</p>
Form Name	Civil Rights (809 - 810)	
Question #	810	

Corrective Action History	<p>Finding: The correct non-discrimination statement was not included on menus.</p> <p>Corrective Action: Update menus to include the correct non-discrimination statement, "This institution is an equal opportunity provider." Upload into SNACS a copy of the updated menu.</p>
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action History	<p>Finding #1: Each SFA must review their food safety plan annually.</p> <p>Corrective Action #1: Submit a statement of understanding that the food safety plan needs to be reviewed annually. Explain who will review it and when it will be reviewed by.</p> <p>Finding # 2: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13).An SOP needs to be created for a "sharing or no thankyou table" and for "Time as a Public Health Control".</p> <p>Corrective Action # 2: Modify or create the SOP so that it aligns with actual practices, or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP. A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage.</p> <p>Finding #3: SFA did not have Employee Reporting Agreements on file.</p> <p>Corrective Action # 3: Upload a signed copy of the Food Employee Reporting Agreement for each school nutrition staff working in the kitchen.</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
Corrective Action History	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count due to students picking through the reimbursable grab and</p>

		<p>go bags to select which items they wanted and then leaving items that they did not want. All of this occurred after the point of service during breakfast.</p> <p>Corrective Action: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	401	
Corrective Action History		<p>Finding: Day of on-site lunch service, Three (3) pork sausage links were offered to students. No crediting documentation was provided.</p> <p>Corrective Action: Please provide a CN label or a Product Formulation State (PFS) for this product indicating how it credits in NSLP.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Corrective Action History		<p>Finding: The cafeteria does not have proper breakfast signage indicating what students were being offered at breakfast.</p> <p>Corrective Action: The FSD must display proper breakfast signage, weather the school decides to use OVS or not, indicating to students what the breakfast meal contains. Please take a picture of the breakfast sign posted in the Cafeteria at the beginning of the meal service line and upload it to SNACS.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
Corrective Action History		<p>Question #409 –Missing Documentation All items offered or served to students under NSLP must have crediting documentation, CN label, PFS, or a general standard of identity which means the item can be found in the food buying guide (usually just fruits and vegetables, but sometimes grains and meats as well). Some items currently being offered</p>

may not be creditable, and will need to be discontinued and replaced with items that have crediting documentation. Some grain items can be credited using Exhibit A, found in the Food Buying Guide. Best practice is to offer for whole grain rich items.

Finding: Items currently being offered are not whole grain rich, best practice is to offer as many whole grain rich possible. Over the course of each week 51% of the grains offered must be whole grain rich. The chocolate Entenmann's Donuts (breakfast 11.11.19) being offered at breakfast are not creditable, the first ingredient is sugar and they are not whole grain rich.

Corrective Action: Upload to SNACS either the proper crediting documentation for the Entenmann product or for the creditable product that will replace the Entenmann Product.

The Bosco Sticks (offered lunch 11.13.19) are not creditable, no documentation provided. The company does make a creditable Bosco Stick, please work with your distributor to obtain a creditable product.


Corrective Action: upload to SNACS the crediting documentation for the Bosco Stick or the crediting documentation for the replacement Bosco stick. All Bread products missing crediting documentation and not whole grain rich.

Corrective Action: all new bread products (Alpha Baking Co) crediting documentation (PFS) needs to be uploaded into SNACS.

Finding: Recipes must be standardized to the kitchen the meal is prepped in and any dish with more than one ingredient must have a standardized recipe.

- Spanish rice needs documentation and/or a standardized recipe to ensure crediting.

Corrective action: Please upload into SNACS the necessary documents to ensure proper crediting and/or a standardized recipe.

		<ul style="list-style-type: none"> Chocolate Chip Cookie recipe is a quantity recipe and is not standardized to the kitchen at Trinity Lutheran School. <p>Corrective Action: Please upload into SNACS a chocolate chip cookie recipe that has been standardized to the kitchen at Trinity Lutheran Grade School.</p> <p>Finding A: Missing vegetable sub group. During the week of review the beans, peas, and legumes vegetable subgroup was not offered. This is a repeat violation, so fiscal will be accessed.</p> <p>Finding B: The pre-k students must follow the CACFP meal pattern since they are not co-mingled with the other students. Production records must reflect the two different groupings. I have included a sample production record, please notice both grade groupings are listed with OVS or no OVS.</p> <p>Corrective Action A&B: Using the week of review, November 11-15, 2019 please make all the changes and updates to bring the review week in to compliance. Submit a compliant breakfast and lunch production record for the week of review. With proper crediting and listing all creditable products. All crediting documentation must also be submitted.</p> <div style="text-align: center;">  Sample - production-record-lur </div>
Form Name	Offer vs Serve (500-502)	
Question #	500	
Corrective Action History		<p>Finding: OVS is also not properly implemented. Bags are prepackaged by the FSD and a rotation of teachers supervise breakfast service. Teachers must be educated as to how breakfast service must be conducted. If it is truly OVS, then they will need training. If it is not and students must take the entire bag, then this must be communicated to teachers and students. Currently Students are digging through the bags and taking just the items they want.</p>

		Corrective Action: Please describe in detail how the FSD will impart the proper breakfast service procedures to other adults/volunteers helping serve breakfast. DPI website has many useful tools to assist the FSD
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
Corrective Action History		<p>Finding: Temperatures food must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete.</p> <p>Corrective Action: Upload one week of completed temperature logs into SNACS and provide a statement indicating how temperatures will be monitored and how logs will be retained going forward.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
12/20/2019	1230	212	Administrative Review	ALL	FSD			
Comments								
					Created By	Created Date		
Household selected for Verification Process was found on Direct Certification after the household was notified for Verification. If a household is found on Direct Certification after the Verification Process has started, SFAs need to select another application to verify.								

Further Technical Assistance

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced-Price Meal application materials in English, Spanish, and Hmong.

- The USDA Food and Nutrition Service (FNS) website offers many other foreign language translations of the Application for Free and Reduced-Price School Meals (<https://www.fns.usda.gov/school-meals/translated-applications>).

The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Special Dietary Needs

- A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. This [flow chart](#) gives guidance on special dietary needs. The [USDA Q&A on Accommodating Special Dietary Needs resource](#) and the [USDA Special Dietary Needs Handbook](#) contains even more detailed information.
- It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.
- SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations **must meet the USDA meal pattern requirements** in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a [fluid milk substitute](#) the SFA wishes to provide for students must be approved by the SNT office. Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable.

Food Safety Plans

- SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- All schools must have a comprehensive, site-specific food safety plan on-site, which includes HACCP process 1, 2, and 3 items; applicable SOPs; a list of equipment; and a list of food service staff at that site. The food safety plan must be reviewed annually. A prototype [food safety plan template](#) as well as template SOPs may be found on the [SNT Food Safety](#) webpage.
- All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.
- [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices. The [Office of Food Safety](#) website includes additional food safety resources.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file.
- While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Time as Public Health Control

- Time/temperature control for safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called “Time as a Public Health Control.” Please refer to the [Wisconsin Food Code Fact Sheet: Time as a Public Health Control](#)” for detailed procedures regarding this practice. TCS foods include:
 - Milk and dairy products
 - Shell eggs
 - Meat (beef, pork, and lamb)
 - Poultry
 - Fish
 - Shellfish and crustaceans
 - Baked potatoes
 - Heat-treated plant food, such as cooked rice, beans, and vegetables
 - Tofu and other soy protein
 - Sprouts and seed sprouts
 - Sliced melons
 - Cut tomatoes
 - Cut leafy greens
 - Untreated garlic-and-oil mixtures
 - Synthetic ingredients, such as textured soy protein in meat alternatives

Administrative Review Report

Trinity Lutheran School

- To utilize “Time as a Public Health Control,” the school must have a corresponding SOPs in the site-specific food safety plan. Template SOPs are available on the [SNT Food Safety](#) webpage.
- If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Sharing and No Thank You Tables

- Definitions:
 - 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.
 - 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.
- 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 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.
- 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.
- 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.

Summer Food Service Program (SFSP) Outreach

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. 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