

Administrative Review Report

Faith Lutheran Church

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/17/2023	01/02/2024
On-Site Review	01/09/2024	01/09/2024
Site Selection Worksheet	11/17/2023	11/19/2023
Entrance Conference	01/11/2024	01/11/2024
Exit Conference	01/11/2024	01/11/2024

Commendations:

From the Public Health Nutritionist:

Thank you to all staff at Faith Lutheran Church for the warm welcome and cooperation during this Administrative Review (AR). Your time and patience in working through this review is greatly appreciated. The variety of menu options available is admirable by your students. Thank you for serving your students and community.

From the DPI Review Team:

Our sincere thanks to the administration and school nutrition staff of Faith Lutheran Church. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in-depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.

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 offers School Nutrition Summer Training online and in various locations around the state. Find more information on these training opportunities on the [DPI School Nutrition Training webpage](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>).

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Findings and Corrective Action:

Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	711	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/03/2024 12:21 PM</p>	<p>Finding: Adult meal prices are not set according to FNS Instruction 782-5 Rev. 1.</p> <p>Corrective Action 1: Utilizing the Wisconsin Adult Meal Pricing Guide on the Financial Management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management) on the SNT website, determine the minimum price required for adult meals at your SFA. Notify SFA staff and update prices by the corrective action due date.</p> <p>Corrective Action 2: Upload the calculations used to determine the adult meal price and a copy of the communication sent to staff into SNACS.</p> <p>Corrective Action 3: Update the School Nutrition Contract with the updated adult meal price.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/05/2024 07:53 AM</p>	<p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)).</p> <p>Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 01/05/2024 07:56 AM	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/05/2024 08:09 AM	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>Corrective Action: Provide a statement of understanding that the PI-1441 is to be completed by October 31 of each school year and kept on-site.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/05/2024 08:36 AM	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (needs content statements regarding Updating and Informing the Public and the full USDA Nondiscrimination Statement). (7 CFR 210.31).</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 01/05/2024 10:14 AM	<p>Finding: SFA has not completed the triennial assessment of the Local Wellness Policy within the last three years.</p> <p>Corrective Action: Complete the triennial assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx) that includes WellSAT scores into SNACS or provide a link to this document on the district website.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/11/2024 02:56 PM	<p>Finding: The correct non-discrimination statement was not included on all program materials. Website currently uses the 2015 USDA NDS; SFA is using religious exemption and should use 2019 NDS.</p> <p>Corrective Action: Update program materials to include the 2019 non-discrimination statement and submit a statement that has been updated.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/05/2024 10:35 AM	<p>Finding: DPI tracker does not include a separate worksheet for each school nutrition employee with top portion completed for each employee to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> <p>Corrective Action: Complete a worksheet (or tab) for each school nutrition employee on the DPI training tracker, including employee date of hire, training requirements and all training hours completed this school year for each school nutrition employee and upload into SNACS.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	

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Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 01/17/2024 09:11 AM</p> <p>Finding: The following products were identified in the SFA's offsite storage area as non-domestic and not documented: Ardmore Farms Juice (USA, Poland, China, Chile, Mexico, Turkey and Spain).</p> <p>Corrective Action: Complete and submit a Noncompliant Product List form for the nondomestic product: Ardmore Farms Juices. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>
Site Name	Faith Lutheran School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	401
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 01/17/2024 10:38 AM</p> <p>Finding: It is a requirement that all meal components are offered and served to the students prior to leaving the serving line and going through the point of service where school staff determine if the student has taken a reimbursable meal. During the onsite review, it was observed that the milk cooler was located after the serving line and point of service which didn't allow school staff to determine if a student was served a reimbursable meal.</p> <p>Corrective Action: Submit details regarding how the serving line will be corrected to ensure all meal components are offered and served to students prior to going through the point of service which would ensure staff are able determine if a student had a reimbursable meal.</p>
Site Name	Faith Lutheran School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	403
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 01/17/2024 10:41 AM</p> <p>Finding: The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that states that a variety of milk is offered daily as part of the reimbursable meal.</p>

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		Corrective Action: Submit a copy of an updated menu that includes a variety of milk listed on the menu.
Site Name	Faith 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	Flagged	
Corrective Action History	Flagged 01/17/2024 10:23 AM	<p>Finding: Signage must indicate that students must select at least 1/2 cup fruit and/or vegetable, or a combination with a reimbursable meal. Currently, signage does not list this.</p> <p>Corrective Action: Submit a picture of the correct signage posted by the serving line.</p>
Site Name	Faith Lutheran School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/17/2024 09:30 AM	<p>Finding: The portion size and condiment usage were not consistently filled in daily on the production records during the week of review. 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 full week of completed production records, including the portion sizes of all items and condiment usage, recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
Site Name	Faith Lutheran School	
Form Name	Offer vs Serve (500-502)	
Question #	501	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged	Finding: Although no non-reimbursable meals were observed during the days of onsite review, many students were made to take more than what they needed at lunch. Lunch Offer vs. Serve requirements were not fully understood by all staff working the point of service. Offer vs. Staff resources on WI DPI's Menu Planning webpage may be used as training resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning). The Meal Pattern e-learning resources may also be helpful (https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns:~text+Policy-,Meal%Patterns,-Title%20/%20Description).						
	01/17/2024 10:50 AM	Corrective Action: Have staff responsible for determining reimbursable meals attend a training on Offer vs. Serve either in-person led by the FSD or through online learning. Please submit details regarding when and where the training was held, who attended, and how the training was conducted.						
Site Name	Faith Lutheran School							
Form Name	Food Safety, Storage and Buy American (1404-1411)							
Question #	1406							
TA Log #	No TA Log# found							
Due Date								
Corrective Action Status	Flagged							
Corrective Action History	Flagged	Finding: The most recent food safety inspection report was not posted in a publicly visible location.						
	01/11/2024 03:12 PM	Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.						
Technical Assistance Entries:								
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username
01/11/2024	4039		Administrative Review		Authorized Representative			
Comments					Created By		Created Date	
318 - Point of Service								
It is noted that the POS staff (teachers) use either a laptop or a manual roster to mark off meals taken by students. Each teacher with a manual roster denotes meals taken in different ways/with different marks. If use of manual rosters is to be continued, to ensure an accurate and consistent meal count, it would be recommended to establish a uniform, manual roster or form with preestablished columns and use of consistent marking methods among teachers using these forms.								
								1/11/2024 1:21:35 PM

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01/11/2024	4038	318	Administrative Review	Faith Lutheran School	Authorized Representative			
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Comments

Created By

Created Date

Point of Service

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim.

To do this, any school food service meal counting and claiming system must contain ALL of the basic elements listed below:

- Eligibility documentation
- Collection procedures
- Point of service meal counts
- Reports
- Claim for reimbursement
- Internal controls.

The same payment options must be available to all students regardless of eligibility category. For instance, if students eligible for paid meals have the option to pay on a weekly or daily basis, students eligible for reduced-price meals must also have this option. All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students. Meals must be counted at the point of service (POS) where it can be accurately determined that a reimbursable meal has been served. Only one meal per student per meal service may be claimed for reimbursement.

1/11/2024 1:13:40 PM

01/11/2024	4054	22	Administrative Review	Faith Lutheran School	FSD			
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Comments

Created By

Created Date

Pre-K Portion Sizes for Condiments

K3-Kindergarten students were served condiments by the staff using large bottles rather than individual portion-controlled condiments. Continue to monitor the serving size of condiments given to students to ensure the correct amount is given so an excessive amount does not add additional calories, sodium and saturated fat.

1/17/2024 11:06:47 AM

01/11/2024	4053	410	Administrative Review	Faith Lutheran School	FSD			
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Comments

Created By

Created Date

Meal Pattern

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly meal pattern requirements. Continue to

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make sure all daily and weekly meal component requirements are being offered to students despite any inaccuracies from the planned menu by the school delivering meals/food.

1/17/2024 11:04:11 AM

01/11/2024	4052	433	Administrative Review	Faith Lutheran School	FSD			
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Comments

Created By

Created Date

Meal Component Crediting Information

Nutrition Facts labels, Child Nutrition (CN) labels and/or product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.

1/17/2024 11:00:02 AM

01/05/2024	3986	1006	Administrative Review	ALL	FSD			
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Comments

Created By

Created Date

Triennial Assessment

LWPs must include language regarding the completion of a triennial assessment, which must occur at least once every 3 years. The assessment must be made available to the public and measure:

- compliance with the wellness policy
- how the local wellness policy compares to a model policy
- process made attaining the goals of the wellness policy

1/5/2024 10:20:19 AM

01/05/2024	3985	806	Administrative Review	ALL	FSD			
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Comments

Created By

Created Date

Civil Rights Training

USDA requires civil rights training on an annual basis for all who interact with the Child Nutrition Programs participants. The training outlines specific civil rights regulations that govern these programs. The training informs administrators of these programs receiving Federal financial assistance of their rights and responsibilities.

Each SFA must maintain documentation of the training and an attendance record of participants that attended. Training on civil rights requirements is mandatory for all front-line staff of the USDA Child Nutrition Programs so that they understand these requirements. For convenience, DPI has created a [sign-in sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/civil-rights-attendance-record.docx) to record the annual mandatory civil rights training for front-line staff. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/civil-rights-attendance-record.docx>).

1/5/2024 8:00:53 AM

01/05/2024	3984	801	Administrative Review	ALL	FSD			
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Comments

Created By

Created Date

Public Release

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All School Food Authorities (SFAs) are required to distribute a Public Release before the start of the school year. The purpose is to inform the community of SFAs offering free and reduced priced meals to eligible students. SFAs should attempt to send the public release to the following: local media grassroots organizations major employers contemplating or experiencing large layoffs local unemployment office SFAs are not required to pay to have the public release published. SFAs need to maintain documentation that shows who received the current public release as well as a copy of the distributed public release. Please note, the Public Release cannot be posted to the SFA's website, nor to the district handbook.

1/5/2024 7:52:13 AM

01/05/2024	3983	203	Administrative Review	ALL	FSD			
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Comments

Created By

Created Date

Confirming Official

The confirming official (CO) only has one role = confirmation review. The confirmation review is part of the verification process, which is to confirm student eligibility. This is the person that looks at each application selected for verification to "confirm" that the application was approved correctly (checks for math errors and completeness) at the time it was originally approved. The confirming official does not confirm every application submitted – this is often found as an error on Administrative Reviews. This confirmation review is completed before the letter is sent to the household(s) selected for verification.

1/5/2024 7:30:28 AM