

# Administrative Review Report

Redeemer Lutheran Grade School

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/17/2023	01/03/2024
On-Site Review	01/10/2024	01/10/2024
Site Selection Worksheet	11/17/2023	11/19/2023
Entrance Conference	01/10/2024	01/10/2024
Exit Conference	01/10/2024	01/10/2024

## Commendations:

### From the Public Health Nutritionist:

Thank you to all staff at Redeemer Lutheran Grade School 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 to students is admirable and appreciated 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 Redeemer Lutheran Grade School. 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	Verification (200 - 204)	
Question #	200	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/31/2024 02:53 PM</p>	<p><b>Finding:</b> The Verification Collection Report (VCR) was not completed accurately. It is missing the results of the verification process in step 5:8.</p> <p><b>Corrective Action:</b> Review the Instructions for Submitting the Verification Collection Report and submit a statement of understanding regarding completing all required sections, including the results of Verification recorded in Section 5:8.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/31/2024 03:03 PM</p>	<p><b>Finding:</b> On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19).</p> <p><b>Corrective Action:</b> Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and note the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system. This has been completed, no further action is needed.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p>	<p><b>Finding:</b> Civil Rights training for food service volunteers (approx.15 people) did not occur or documentation was not</p>

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	01/10/2024 07:00 PM	<p>available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Provide the civil rights training to all staff that interact with program applicants, the <a href="https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html">training</a> is located here: (<a href="https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html">https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html</a>). Upload the sign-in sheet with the names and date(s) the training was provided into SNACS.</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	<p>Flagged</p> <p>01/04/2024 08:51 AM</p>	<p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content (public involvement, food and beverage marketing, nutrition promotion, triennial assessment, updating/informing the public and the full USDA nondiscrimination statement) (7 CFR 210.31).</p> <p><b>Corrective Action:</b> 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	
Corrective Action History	<p>Flagged</p> <p>01/04/2024 04:28 PM</p>	<p><b>Finding:</b> SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p><b>Corrective Action:</b> Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	TA Log# exists	
Due Date		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/10/2024 02:08 PM</p>	<p><b>Finding:</b> SFA is confirming all applications and not just the application(s) chosen for Verification.</p> <p><b>Corrective Action:</b> Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) only before reaching out to households selected for verification.</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	209	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/31/2024 03:33 PM</p>	<p><b>Finding:</b> Applications selected for verification were not verified correctly (7 CFR 245.6a). Incomplete tax documents submitted (missing Schedule 1 and/or Schedule C and/or Schedule F and/or a W-2).</p> <p><b>Corrective Action:</b> Have the verifying official review the SNT Verification webpage (Verification   Wisconsin Department of Public Instruction) for required tax documents for annual income AND follow-up with the family for necessary missing documents (either Schedule 1 or W-2) AND submit the document to SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)	
<b>Question #</b>	314	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/10/2024 12:22 PM</p>	<p><b>Finding:</b> SFA is not following the current approved contract (contract indicates POS at end of line; SFA currently count is happening at front and verification of meal at end.</p> <p><b>Corrective Action:</b> Update the online contract to match process or update the process to match contract and submit statement to SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2024 09:44 AM</p>	<p><b>Finding:</b> The non-discrimination statement was not included on all required program materials (add to handbook section that references meal program and to the USDA CNP complaint policy).</p> <p><b>Corrective Action:</b> Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2024 02:40 PM</p>	<p><b>Finding:</b> The Food Service Director was hired after July 1, 2015, and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1)).</p> <p>Corrective Action 1: Review the Professional Standards hiring requirements on the School Nutrition Team website (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-in-a-nutshell.pdf</a>) and submit a statement of understanding of the hiring requirements for your SFA.</p> <p>Corrective Action 2: Change name in contract of FSD to name of food service coordinator (hired 6-30-2015 who does meet hiring requirements).</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2024 02:41 PM</p>	<p><b>Finding:</b> The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v)).</p> <p><b>Corrective Action:</b> Change name of FSD in contract to name of food service coordinator and upload certification to SNACS.</p>
Site Name		

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Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/04/2024 04:38 PM</p>	<p><b>Finding:</b> Documentation of school food service staff training is being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. However, the tracker indicates incorrect position and training hours for FSD and part time staff.</p> <p><b>Corrective Action:</b> Correct training tracker data for each school food service employee on the DPI professional standards training tracking tool and upload into SNACS.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/30/2024 10:55 AM</p>	<p><b>Finding:</b> The following product was identified during the week of review as non-domestic and not documented: SideKicks (USA, China, Argentina, Chile, Canada, Spain).</p> <p><b>Corrective Action:</b> Complete and submit a Noncompliant Product List form for the non-domestic product: SideKicks. Noncompliant Product List templates can be found on the Buy American webpage.</p>
Site Name	Redeemer 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 11:29 AM</p>	<p><b>Finding:</b> 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 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 near the point of service staff member who was pulling double duty by watching two lines simultaneously: checking students into the lunch line, checking off students purchasing only milk, and checking reimbursable meals of students leaving at the same time.</p>

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		<b>Corrective Action:</b> 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 to determine if a student had a reimbursable meal.
Site Name	Redeemer Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	402	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/17/2024 11:20 AM</p>	<p><b>Finding:</b> During the onsite review, it was observed that 4oz portion cups were being used to serve the canned pears however, there was a lid on top which would prevent a full 1/2 cup portion of fruit inside the cup.</p> <p><b>Corrective Action:</b> Submit a statement indicating a plan of action for removal of the 4 oz. portion cups and alternate plan for serving fruit at lunch. This could be attained by purchasing larger portion cups to ensure that 1/2 cup fruit fits inside or that all canned fruit could be served with a spoodle.</p>
Site Name	Redeemer 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	<p>Flagged</p> <p>01/17/2024 11:31 AM</p>	<p><b>Finding:</b> 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 a variety of milk is offered daily as part of the reimbursable meal.</p> <p><b>Corrective Action:</b> Submit a copy of an updated menu that includes a variety of milk listed on the menu.</p>
Site Name	Redeemer Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	407	
TA Log #	No TA Log# found	
Due Date		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/30/2024 10:41 AM</p>	<p><b>Finding:</b> The Fritos used during the day of review are neither enriched nor nixtamalized according to the ingredient list and, therefore, do not meet the criteria for grains served under the National School Lunch program meal pattern.</p> <p><b>Corrective Action:</b> Submit the product label for the alternate grain and/or corn product intended for future use, ensuring it meets the necessary enrichment or nixtamalization standards.</p>
<b>Site Name</b>	Redeemer Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/17/2024 11:46 AM</p>	<p><b>Finding:</b> The weekly minimum requirement for meat/meat alternate was not met for K-8 grade students for lunch during the review period. The following represent the planned portion sizes: Daily- Mini Turkey and Cheddar Cheese Sliders crediting as 1 oz. equivalent meat/meat alternate equating to 5 oz. equivalent of meat/meat alternate per week. The weekly minimum requirement for K-8 grade students is 9 oz. equivalent of meat/meat alternate per week.</p> <p><b>Corrective Action:</b> Describe specifically how the weekly minimum requirement for meat/meat alternate will be met for lunch during the review period (e.g. portion sizes increased, additional menu items, product replacements, etc.).</p>
<b>Site Name</b>	Redeemer Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	431	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/17/2024 11:36 AM</p>	<p><b>Finding:</b> The milk usage, condiment usage, offer vs. serve indication and amount prepared 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 (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>).</p>



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		<p><b>Corrective Action:</b> Submit one full week of completed production records, including milk usage, condiment usage, offer vs. serve indication and daily amount prepared, 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>
<b>Site Name</b>	Redeemer Lutheran School	
<b>Form Name</b>	Civil Rights (811-812)	
<b>Question #</b>	811	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/10/2024 02:48 PM</p>	<p><b>Finding:</b> The most current (2022) nondiscrimination "And Justice for All" poster is not located in the meal service area and/or not visible to students (FNS Instruction 113).</p> <p><b>Corrective Action:</b> Hang the current (2022) USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met. If corrected while onsite, no further action required.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	Username
01/10/2024	4013	208	Administrative Review	ALL	Authorized Representative			

### Comments

**Created By**

**Created Date**

## Confirming Official

The confirming official conducts a second check of the information presented on the original application. The confirming official should have working knowledge how applications are processed and how to reference the Eligibility Manual. The confirming official should only review, sign and date the application(s) selected for verification, and not ALL of the applications on file. It is an error if all applications are confirmed or signed. If the confirming official finds an error in the original application determination, consult the Eligibility Manual, page 104, for follow up actions.

1/10/2024 2:04:01 PM

01/10/2024	4057	25	Administrative Review	Redeemer Lutheran School	FSD			
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### Comments

**Created By**

**Created Date**

## Seconds

Discontinue offering second servings (with the exception of fruits and vegetables) free of charge to students. Offering seconds complicates production planning, burdens food cost and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat and sodium of these portions must be

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included in the weekly dietary specifications. If students are still hungry, second servings may be sold a la carte.  
1/17/2024 11:53:25 AM

01/10/2024	4055	433	Administrative Review	Redeemer Lutheran School	FSD			
Comments					Created By	Created Date		

## Labels

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 substituted.

1/17/2024 11:48:43 AM

01/10/2024	4171		Administrative Review		FSD			
Comments					Created By	Created Date		

## Whole Grain Requirement

80 percent of the weekly grains offered and credited in school meal programs must be whole grain rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. During the onsite review, it was observed that a non-whole grain rich tortilla was used to make the Turkey and Cheese Pinwheels. Since this menu item was offered daily during the week of onsite review and the non-whole grain rich tortilla was used it is unlikely that the school was in compliance with at least 80 percent of the weekly grains being offered as whole grain rich. It is recommended that the school sending the food and the school receiving the food be in continuous communication to ensure the food items offered follow the daily and weekly meal pattern requirements.

1/30/2024 10:47:20 AM

01/04/2024	3982		Administrative Review		FSD			
Comments					Created By	Created Date		

## #1004 Local Wellness Policy

SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31). The SFA must inform the public about the content, implementation of, and updates to the LWP on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, newspaper articles and/or posting to school/district's website. The SFA must retain documentation regarding the notification (7 CFR 210.31).

1/4/2024 4:27:14 PM

01/04/2024	3981		Administrative Review		FSD			
Comments					Created By	Created Date		

## #103 Determining Applications

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Applications must be reviewed in a timely manner. Whenever possible, applications should be processed immediately, and must be processed within 10 operating days. This is particularly important for children who are not eligible to receive carryover benefits because they were not certified as eligible for free or reduced-price meals during the previous school year. According to 7 CFR 245.6(c)(6)(i), within 10 operating days of receipt of the application:

- An eligibility determination must be made,
- The family must be notified of its status, and
- The status must be implemented.

1/4/2024 3:40:00 PM