

Administrative Review Report

Lakeside Lutheran High Sch

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	02/12/2024	04/05/2024
On-Site Review	04/16/2024	04/17/2024
Site Selection Worksheet	02/12/2024	02/16/2024
Entrance Conference	04/16/2024	04/16/2024
Exit Conference	04/17/2024	04/17/2024

Commendations:

Thank you to all the staff at Lakeside Lutheran High School for the warm welcome and cooperation during the Administrative Review (AR). Thank you to the Food Service Director (FSD) for being available during the on-site portion of the review and helping us to gather the needed documentation and information prior to our visit. All lunch meal pattern requirements were met during the week of review, and the FSD kept very organized documentation of production records, crediting documentation, and Buy American tracking. Everyone was very receptive to the technical assistance provided on-site. Thank you for serving healthy, nutritious meals to your students!

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The FSD was very receptive to feedback and eager to learn. The lunch servers were very friendly during the review and provide excellent customer service to the students. The kitchen was very clean and it was clear that food safety is valued by the servers.

The FSD is operating an excellent lunch program. The director works hard to ensure all program requirements are met and that there are healthy, appealing meals served every day.

The Determining Official does a great job managing student benefits. Thank you for taking the time to thoroughly answer questions and implement suggested changes.

Thank you to the business manager for providing detailed answers to questions and requested documentation. The business manager welcomed suggestions and feedback.

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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	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 03:50 PM</p>	<p>Finding: 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 in writing to the households, annually. (SP 46-2016)</p> <p>Corrective Action: Provide a timeline of when the policy will be completed and implemented along with a statement of how households will be notified annually in writing.</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 04/23/2024 03:53 PM</p>	<p>Finding: During the administrative review preparation, the SFA discovered they misallocated some labor/benefits expenses to the food service account in the 2022-23 school year. The financial manager is working on adjusting the books to reallocate these expenses appropriately.</p> <p>Further, during the review, the reviewer discovered several expenses charged to food service that were not based on acceptable methodologies for allocations. The financial manager must reassess these expenses. Basing any shared expenses on building square footage or department head count is not acceptable. The specific expenses of concern are for utilities, phone/internet, business insurance, "Check Writers," and "WiseGuy IT."</p> <p>Corrective Action: All costs charged to the nonprofit school food service account must be made into direct costs. Identify if indirect charges can be made into direct costs using time studies, meters, etc. Determine what the direct cost would be. If the indirect amount charged is greater than the direct cost calculated, the difference will need to be refunded to the nonprofit school food service account for SY 2022-23 through the Administrative Review. Any indirect costs that cannot (or will not) be made into direct costs are unallowable and also need to be refunded.</p> <p>Submit a description and any supporting documentation for these corrections. If the financial manager is going to refund all of the unallowable costs to food service and update their books (as opposed to trying to determine the allowable direct portion based on an acceptable allocation methodology), please submit copies of the updated financial spreadsheets.</p> <p>The 2022-23 Annual Financial Report for school nutrition must also be resubmitted with updated numbers after all of the financial adjustments to the books are made. When you are ready to record and submit the AFR corrections, use the fillable PDF Annual Financial Report Template to report all of the corrected amounts. Upload the final complete PDF form into SNACS. Once approved, the report will need to be updated in the Online Services portal by the DPI accountant.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 03:51 PM</p>	<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. Completion of the tool is required annually because the SFA currently sells adult meals, extra milk, and occasional catering. While the amount of non-program foods is minimal, the catering sales are enough to require annual completion of the tool. At this point, it is recommended to use the USDA tool which uses annual numbers.</p> <p>If the SFA expands their non-program food offerings in the future to include extra entrees or other a la carte options, then the DPI version of the tool would be recommended. The DPI tool can assist with setting and adjusting pricing for individual foods/beverages to ensure compliance with the non-program food revenue requirements.</p> <p>Corrective Action 1: Complete the Nonprogram Foods Revenue Tool and upload into SNACS. The tools and resources are available on the Financial Management webpage under "Nonprogram Foods."</p> <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.</p>
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 04/23/2024 02:48 PM</p>	<p>Finding: Adult meal prices are not set according to FNS Instruction 782-5 Rev. 1. The minimum required adult price for the SFA for the 2023-24 school year is \$4.15 but the SFA is currently charging \$4.10.</p> <p>Adult prices are typically calculated in the summer prior to the start of the school year and use the prior year's reimbursement rate in the calculation since the new reimbursement rates are not released until July annually. Given this information the SFA should have calculated the adult lunch by taking the paid student price of \$3.35 and adding on \$0.45 federal paid lunch reimbursement for 2022-23, plus USDA Foods Entitlement value of \$0.30 plus, \$0.048 state aid.</p> <p>The adult meal pricing worksheet and reimbursement rate charts should be used in this calculation annually.</p> <p>Corrective Action: Notify SFA staff and update adult meal prices to at least \$4.15 by the corrective action due date. Update the School Nutrition Contract with the correct adult meal price that will apply for the remainder of the 2023-24 school year.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	800	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:50 PM</p>	<p>Finding: The correct non-discrimination statement (NDS) was not included on all program materials. Some materials were missing the NDS, some contained old versions of the NDS, and some contained the full current NDS. Specifically, the application approval/denial letter contained the outdated NDS with incorrect formatting, the online application contained the outdated NDS, and the Business Office website contained the outdated NDS.</p> <p>The SFA must decide if it will use the full, exact 2022 version of the NDS on all</p>

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		<p>program materials, or if it will use the full, exact 2015 version of the NDS on all program materials (which would be allowed if the agency claims a Title IX religious exemption).</p> <p>Corrective Action: Provide a statement regarding which NDS will be used. Describe how the SFA will ensure the full, exact NDS chosen will be on all program materials going forward.</p> <p>All materials and resources, including websites, that are used to inform families and the public about the USDA Child Nutrition Programs must contain the USDA non-discrimination statement.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/23/2024 02:52 PM</p>	<p>Finding: The public release was not distributed to the required locations. Additionally, the public release that was sent out did not have the school-specific information filled in.</p> <p>SFAs must annually distribute the Public Release to:</p> <ul style="list-style-type: none"> • Local news media • Grassroots organizations - local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.) • Local employment office • Major employers contemplating or experiencing large layoffs <p>SFAs are allowed to, but not required to, pay to have the public release published through a media outlet. Media outlets are allowed to establish a fee for publishing the public release, but the SFA may decline to pay for the service and forgo having the public release published. SFAs must maintain documentation of whom the public release was sent to, the specific materials distributed, and any other communications related to the public release distribution.</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. Be sure to specify the grassroots organizations that the public release will be distributed to. Please also submit a statement describing how the public release will be made school-specific before sending out.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/23/2024 02:48 PM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). See corresponding technical assistance portion of this report for additional guidance on this topic.</p> <p>Corrective Action: Utilizing the DPI template policy as a reference, (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sfa-civil-rights-complaints-procedure-template.pdf), develop procedures that will be adopted by the SFA and upload into SNACS. Describe how and when the procedures will be communicated and implemented in the SFA.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	

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Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:51 PM</p>	<p>Finding: Civil Rights training did not occur for all staff who interact with program participants in the current school year (FNS Instruction 113-1). The Determining Official did not complete this training in the 2023-24 school year.</p> <p>Corrective Action: The Determining Official must complete the civil rights training by the corrective action due date. The training is located here: https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). Submit the certificate of completion received via email after completion of the online training to show the corrective action was taken.</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 04/23/2024 02:49 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The policy does not include sufficient content in any of the required content areas. There is some minimal content regarding foods provided but not sold and physical activity, but these are minimal.</p> <p>Please refer to the LWP webpage, specifically the policy checklist and policy builder (which has canned language that can be adopted into an existing policy).</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. Please also specify how the policy will be made publicly available (such as by posting on the school website or providing in parent handbooks).</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1003	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:50 PM</p>	<p>Finding: The SFA does not actively seek or inform diverse potential stakeholders of their ability to participate in an LWP committee to update and review the wellness policy.</p> <p>Corrective Action: Provide a statement of understanding that an LWP committee must include a diverse group of stakeholders in the review and update of the LWP. Provide a plan on how potential stakeholders will be notified of their ability to participate.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:49 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. Be sure to use the LWP Triennial Assessment Report Card found on the DPI Wellness webpage to complete the assessment.</p> <p>Corrective Action: Complete the assessment of the current Local Wellness Policy and notify the public of the results (such as by posting on the website and/or sending it out to parents). Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the school website.</p> <p>Be sure to use the results of the assessment of the current policy to help drive development of an updated policy that is compliant with program requirements.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 03:52 PM</p>	<p>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). The SFA has posted SFSP information of their website near the end of the school year, however, this is not sufficient program outreach for households. Additional action must be taken to proactively notify families about SFSP, such as sending out information in a spring newsletter or family email blast.</p> <p>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 are required to inform families where to find free summer meals.</p> <p>It is recommended to share the following in an end of year newsletter or parent email and on the SFA website to further assist families in finding free summer meals. Please note, posting on the website alone is not sufficient outreach and promotion of the SFSP.</p> <p>To find free summer meal locations:</p> <ul style="list-style-type: none"> ○ Call 211 to locate meals in the area ○ Text 'food' (in English or Spanish) to 304-304 ○ Check the Summer Meals Site Finder Map on the Find a Summer Meals Site webpage <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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	134	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:50 PM</p>	<p>Finding: The SFA did not perform Direct Certification (DC) in the required timeframes. Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6). In the 2023-24 school year, the SFA skipped the 3-month run which should be between October – December.</p> <p>Corrective Action: Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.</p>

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Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 02:51 PM</p>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>As a reminder, the confirming official cannot be the same person as the determining official. Additionally, the confirming official and verifying official should sign and date the applications when their duty in the verification process is complete.</p> <p>Corrective Action: 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) before reaching out to households selected for verification. Please be sure to include review of pages 103-104 in the Eligibility Manual which discuss what to do if the confirmation review does not validate the initial determination.</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	<p>Flagged 04/23/2024 03:52 PM</p>	<p>Finding: 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. Completed trainings must be tracked and the tracker must include each person's name, their date of hire, their position/role, and their required number of training hours needed per year.</p> <p>Corrective Action: 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 SNACS. Alternatively, the Food Service Director could develop their own tracking tool that meets the requirements above. A template training tracker can be found on the DPI Professional Standards webpage under Training Trackers: https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards.</p>
Site Name	Lakeside Lutheran Hi	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	317	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/23/2024 03:50 PM</p>	<p>Finding: Student meal prices according to eligibility (\$0.00, \$0.40, \$3.35) are briefly visible to the cashier and nearby students when students enter their PIN. Because this could indicate a student's eligibility status and could be viewed by students, it constitutes overt identification and is not allowed. For more information about overt ID, please refer to the corresponding section in the USDA Eligibility Manual.</p>

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		Corrective Action: Provide a statement describing how this will be resolved. This could include working with the software vendor to remove the prices from the screen or using some sort of cover or screen protector to hide the price from view.
Site Name	Lakeside Lutheran Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/16/2024 03:08 PM	<p>Finding: The planned/actual number of servings prepared and quantity prepared in bulk units were not consistently filled in daily on production records during the week of review. Currently, the "Quantity Prepared" column lists either the bulk units prepared or the number of servings prepared, but records do not indicate both numbers. There should be a separate category for "Planned/actual number of servings prepared" and "Planned/actual quantity prepared in bulk units." 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 lunch production records. 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	Lakeside Lutheran Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	433	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/16/2024 10:37 AM	<p>Finding: Acceptable crediting documentation was not available for the bratwurst menu item, served Wednesday, March 6 during the week of review. Processed foods that are not listed in the Food Buying Guide (FBG) must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) label to sufficiently document meal component crediting. A PFS was provided from the manufacturer, however it was unacceptable as it did not accurately reflect the creditable ingredients in the bratwurst from the Food Buying Guide.</p> <p>Corrective Action: Submit updated crediting documentation for the bratwurst that includes an accurate description of the creditable meat ingredients per the Food Buying Guide, along with the Food Buying Guide yield. If acceptable crediting documentation cannot be obtained from the manufacturer, submit a statement of understanding that the product must be discontinued and may not credit towards meal pattern requirements. If a replacement product will be added to the menu, please provide crediting documentation for the new menu item.</p>
Site Name	Lakeside Lutheran Hi	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	435	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/17/2024 08:34 AM	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. In addition, when the number of servings, ingredients, or preparation instructions change, an updated standardized recipe is required to accurately reflect these changes. During the week of review, the following recipe inaccuracies were noted:</p>

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	<ul style="list-style-type: none"> The recipe submitted for the "Plain Rice" on the menu was a quantity recipe for "Brown Rice Pilaf" that did not accurately reflect how this menu item was made. The recipe for the "Sloppy Joe on a Bun" lists raw ground beef (no more than 20% fat) as an ingredient, but the USDA product information sheet shows this is the 85/15 beef product. This recipe is also missing a portion size and total yield. The recipe for the "Crispy Chicken Salad" is missing a portion size, number of portions, and total yield. The recipe for the tossed salad lists romaine lettuce or spring mix as an ingredient, and optional to add shredded carrots or cherry tomatoes. The recipe for the seasoned black beans is missing a total yield. <p>Standardized recipes should be written to reflect exactly how a recipe is being made in the kitchen. Using the same products and the same quantities each time ensures that one portion size credits the same towards meal pattern and contributes the same towards the dietary specifications.</p> <p>Corrective Action: Please make the necessary updates to all standardized recipes listed above and continue to work towards recipe standardization as menu items are served. Submit an updated standardized recipe for the following menu items that will be served again this school year: Plain rice, Crispy chicken salad. Be sure to include all requirements of a standardized recipe, including serving size and yield information. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>
Site Name	Lakeside Lutheran Hi
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 04/16/2024 09:28 AM</p> <p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> California Blend vegetables- Product of Mexico Valencia Oranges- Product of Mexico <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products listed above. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/23/2024	4807		Administrative Review		FSD			
Comments								
Non-Profit Food Service Account and Annual Financial Report					Created By		Created Date	
<p>Please review the Maintenance of the Non-Profit Food Service Account In a Nutshell resource, as it contains much important information the financial managers must know.</p> <p>When reporting information for USDA Foods (i.e. commodities) on the Annual Financial Report, record USDA Foods processing and handling charges as an expenditure in Purchased Services under National School Lunch (NSL). Record USDA Foods entitlement value of under both NSL Food Revenue and NSL Food Expenditure (they will cancel out). The entitlement value received is found in the USDA Foods Ordering System under the Commodities Allocation and Receipt Report (i.e. CARS Report).</p> <p>When recording revenues from NSLP claims, be sure to record the "Total Meal Reimbursement" amount as the revenue—NOT the "Total Net Payment" amount. On months when there are commodity charges (such as for shipping/handling of USDA Foods), these fees are automatically deducted from NSLP claims. These "Commodity Charges Recovered" are an NSLP expense. Using the AIDS Register reports can aid in keeping track of these (in addition to looking at the claims) as the Total Meal Reimbursement and Commodity Charges Recovered are listed out separately in the AIDS Register.</p>							4/23/2024 3:59:08 PM	

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Payment Information	Amount
Total Meal Reimbursement <small>(Include *PBR Payment shown below.)</small>	\$5,707.50
Commodity Charges Credited:	\$0.00
Commodity Charges Recovered:	\$1,466.65
Total Net Payment:	\$4,240.85

Accessing the [AIDS Register](#) can help the SFA track its payments received from the state as they are paid. It will include lunch reimbursements, USDA Foods commodity handling charges, state lunch aid, and any other miscellaneous school nutrition program payments made from the state.

Indirect Costs-

DPI does not allow the annual assigned indirect cost rate to be applied to the nonprofit food service account.

For both public and private schools in Wisconsin, any indirect type costs assessed to food service must be supported with documentation. Examples of supporting documentation for costs assessed to the nonprofit food service account could include:

- o **Rent** – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
- o **Utility charges** - separately metered or current usage study by the local utility company.
- o **Labor expenditures** – a time study based on actual amount of time worked specifically for the purpose of school food service.
- o **Printing/publishing** – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
- o **Waste disposal services, extermination services, and laundry services** - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.

Any costs billed to the food service account must be directly allocable to food service. Basing any portions of expenses on building square footage is not allowed. Using a head count proportion based on department size is also not an acceptable method for allocating shared costs.

04/23/2024	4806		Administrative Review		FSD		
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Comments

Refunds of Student Account Balances

Created By

Created Date

When a child leaves the district or graduates, SFAs MUST attempt to return remaining student account funds. However, SFAs may allow families that are not approved for free or reduced-price meals to donate their remaining funds to cover unpaid meal charges that were uncollectable from other households. Households approved for free or reduced-price meal benefits MUST receive a refund. There is a federal requirement that children eligible for reduced-price meals pay a maximum of 40 cents per lunch meal and 30 cents per breakfast meal. Retaining the unused funds would result in the per meal price exceeding the federal maximums. For more information on student account refunds, please refer to the [DPI Financial Questions and Answers](#).

4/23/2024 3:58:44 PM

04/23/2024	4805		Administrative Review		FSD		
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Comments

Unpaid Meal Charge Policy

Created By

Created Date

Per USDA policy memo [SP 46-2016](#), no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review.

The policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child’s money to repay unpaid charges if the child intends to use the money to purchase that day’s meal.

4/23/2024 3:58:30 PM

The policy should be implemented and enforced SFA-wide, but there is local discretion to vary policy based on student grade level.

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The policy must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement.							
The policy must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.							
Policies regarding the collection of unpaid meal charges should be included in the written unpaid meal policy.							
SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).							
FNS recommends keeping low or negative account balances confidential to minimize student distress and embarrassment. Direct communications to the adult in the household privately (and ahead of time) via mail, phone, or email. If low balance reminders and/or F/R applications are sent home with the student, communicate this in a discrete manner (e.g. white paper and envelope).							
For a snapshot of what the policy should include, see the Unpaid Meal Charges In a "Nutshell." For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the Financial Management Webpage or the USDA Unpaid Meal Charges Webpage .							
04/23/2024	4804		Administrative Review		FSD		
Comments							
Special Dietary Needs				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.</p> <p>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 schools 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 the SFA. If the school already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.</p> <p>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</p>						4/23/2024 3:58:12 PM	
04/23/2024	4803		Administrative Review		AR		
Comments							
Students Withdrawing				Created By		Created Date	
When students leave the school, it is important that they are removed from the food service software program as soon after their withdrawal as possible. During the review, one student that withdrew in January still appeared on the March benefit issuance list.						4/23/2024 3:57:59 PM	
04/23/2024	4802		Administrative Review		FSD		
Comments							
School Nutrition Webpage				Created By		Created Date	
The school may consider developing a specific school nutrition section of the school website. This can help families access menus, related policies, free/reduced-price meal application information, and any other important program information.						4/23/2024 3:57:46 PM	
04/23/2024	4801		Administrative Review		FSD		

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Comments									
Kitchen Use by Other Groups					Created By	Created Date			
<p>When school/community groups will be using the kitchen space that is primarily used for the school nutrition programs, there are some important considerations.</p> <p>It is ultimately the school administration's responsibility and decision if kitchen use by other groups will be allowed when facilities are not being used for Child Nutrition Program purposes (e.g. preparing and/or serving breakfast, lunch, or snacks, as applicable). If this is allowed, clear guidelines must be in place regarding use of the school kitchen and storage facilities. Additionally, you must have a site-specific standard operating procedure (SOP) in your food safety plan describing how outside groups will be handled. Please reference the template SOP titled "Non-Food Service Staff & Other Visitors in Food Service" in the template food safety plan on the SNT Food Safety Webpage. When non-food service staff and visitors are present, they must adhere to food safety practices and safety precautions to protect food and prevent injury.</p> <p>The school food authority (SFA) has a responsibility to protect the food used in the school meals programs. Steps must be taken to ensure food for school meals is not contaminated, adulterated, accidentally used for non-program purposes, etc. The Code of Federal Regulations for the National School Lunch Program specifically requires that storage of purchased and donated foods meet the requirements shown below (d). If outside groups will use the school kitchen and storage facilities, then precautions must be taken to safeguard the program foods (such as locking or limiting access to storage areas, limiting use of certain pieces of equipment, etc.).</p> <p>(d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.</p>						4/23/2024 3:57:23 PM			
04/23/2024	4800		Administrative Review		FSD				
Comments									
A la Carte Offerings					Created By	Created Date			
<p>If the school wants to offer a la carte items in the future (such as extra entrees or snack items), you must consider the nutrition content of each item as it must meet the Smart Snacks requirements. You also must ensure the items are priced high enough that the full cost of producing and serving the items is covered. Using the DPI nonprogram food revenue tool can help with establishing selling prices. It is recommend to only allow students to purchase a la carte items if they have money in their account to do so—schools typically do not allow charging of a la carte items. Schools can also set their own rules on when students will be able to make a la carte purchases. Sometimes to deal with a busy service line and space constraints, schools require students to just take their full reimbursable meal on their first trip through the line and then they must come back up a second time later in the lunch period to make a la carte purchases. Please contact a DPI SNT member with any questions regarding a la carte items.</p>						4/23/2024 3:56:44 PM			
04/23/2024	4799		Administrative Review		FSD				
Comments									
Starting a School Breakfast Program					Created By	Created Date			
<p>The school does not currently offer the School Breakfast Program (SBP). The SFA is encouraged to research options, engage stakeholders, and explore the addition of breakfast in future school years. Offering the SBP can help ensure students are fed in the morning and ready to learn. Serving breakfast may also help generate additional revenue. There are many different service models available including "grab and go" and "breakfast after the bell." There is a separate meal pattern for breakfast, and separate POS records and production records are still required for breakfast. Please review the SBP webpage and SBP Resources for more information.</p>						4/23/2024 3:56:20 PM			
04/23/2024	4798		Administrative Review		AR				
Comments									
Sharing of Information and Disclosure					Created By	Created Date			
<p>Currently, individual student meal eligibility statuses are not shared with anyone for any reason except with the guidance department for AP test fee waivers and ACT fees. Parental consent is not needed to share this information for these two specific purposes as they are</p>						4/23/2024 3:55:53 PM			

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considered "state education programs." However, there are many other circumstances when parental consent is required before sharing free/reduced meal benefit information. It is strongly recommended that staff members that receive this confidential information read and sign a disclosure agreement acknowledging their responsibilities for handling this information. Please contact DPI with any questions regarding sharing information, and refer to the Confidentiality and Disclosure section of the USDA Eligibility Manual and the Sharing Information and Disclosure Agreements section of the DPI eligibility webpage .									
04/23/2024	4797		Administrative Review		AR				
Comments									
Verification					Created By			Created Date	
When completing the verification process in the fall each year, it is recommended to use the DPI Verification Tracker Form to keep track of the steps and the dates of completion. When completing the Verification Collection Report (VCR) after the process is complete, please ensure that each field is entered accurately in accordance with the instructions . On the 2023-24 VCR, it was indicated that the SFA used "Standard Sample" in section 5-3, when really they used "Alternate One."								4/23/2024 3:55:38 PM	
04/23/2024	4796		Administrative Review		AR				
Comments									
Software Vendors					Created By			Created Date	
The SFA stated that their current software for free/reduced meal applications and POS will no longer be available after the 2023-24 school year. DPI cannot make specific recommendations or endorsements on software to use. However, software programs that have online meal application modules are required to have their applications reviewed approved by DPI to ensure compliance before schools may use them. There is a list of currently approved online application software vendors that may help guide the school's search for another software program. Additionally, the software the school currently uses for other student information management does have some food service modules available, including POS. However, it does not appear that this vendor has an online meal application at this time.								4/23/2024 3:55:21 PM	
04/23/2024	4795		Administrative Review		FSD				
Comments									
Food Safety Plan					Created By			Created Date	
The SFA has a site-specific food safety plan, but it is typically kept in the FSD's office. The plan should be kept in the kitchen where the food service staff can reference it as needed. The plan is supposed to be a reference for employees to guide their food safety practices, so it should always be accessible to employees during the hours of operation.								4/23/2024 3:55:01 PM	
04/23/2024	4794		Administrative Review		FSD				
Comments									
Title IX Religious Exemption					Created By			Created Date	
Title IX of the Education Amendments of 1972 ("Title IX") is a federal law that prohibits sex discrimination by educational institutions receiving financial assistance from the federal government, including USDA. Although this prohibition applies to a wide array of public and private schools at the K-12 and the college/university level, the law includes some exceptions, including one permitting an institution to be exempt on religious grounds if there is a conflict between Title IX and a school's governing religious tenets. Educational institutions that claim a Title IX religious exemption or seek USDA assurance of religious exemption from Title IX provisions may continue using the 2015 version of the USDA non-discrimination statement (NDS) and the 2019 version of the "And Justice for All" (AJFA) poster.								4/23/2024 3:54:46 PM	
<ul style="list-style-type: none"> The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf. All "And Justice for All" posters must be printed at 11" width x 17" height. The minimum text size to be used on the posters is 14-point. The 2015 version of the Non-discrimination Statement must be included on all program materials. If the SFA claims the religious exemption and thus elects to use the 2015 statement, they must ensure it is used consistently across all program materials. This may require the SFA to take on the responsibility of 									

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<p>modifying template materials provided by DPI so they have the 2015 statement the SFA is electing to use. DPI may have some template materials already available with the 2015 NDS that can be sent to the SFA upon request.</p> <p>Additionally, USDA and State agencies will continue monitoring proper use of the NDS and the appropriate AJFA poster in program management evaluations, civil rights reviews, and administrative reviews. Please note that if program complaints of discrimination or any other compliance-related issues arise against these educational institutions they will have to demonstrate how using the 2022 version of the NDS and AJFA poster is against their religious tenet(s).</p> <p>If the SFA claims the Title IX religious exemption, they should then use the exact poster and statement listed above. The SFA should not simply modify the 2022 non-discrimination statement to align with the school's religious tenet.</p> <p>Refer to the NDS section of the Civil Rights webpage for more resources and references on this subject.</p>							
04/23/2024	4793		Administrative Review		FSD		
Comments							
Civil Rights Compliance Self-Evaluation form				Created By	Created Date		
<p>Be sure that the PI-1441 Civil Rights Compliance Self-Evaluation form is required to be completed by SFAs annually by October 31. The school did not complete this in the 2023-24 school year until April. Please ensure this is completed by the deadline going forward. Upon completion, it does not need to be submitted to DPI but must be kept on file at the SFA.</p>					4/23/2024 3:54:26 PM		
04/23/2024	4792		Administrative Review		FSD		
Comments							
Process for Handling Civil Rights Complaints				Created By	Created Date		
<p>While the SFA may have policies related to discrimination, no policy was provided that fulfills the USDA requirements for processes for receiving and handling civil right complaints within the school meal programs. The existing policies do not contain the specific information needed related to the meal programs.</p> <p>The policy/procedures are intended for district internal use only. There is not a need to post the civil rights complaint processing procedures on your website, as parents and students do not need to be given this information. The procedures are just to guide what would happen within the district if such a specific complaint was received.</p> <p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> 1. Document the complaint using the USDA Program Discrimination Complaint Form. 2. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> • Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> o Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 o Fax: (608) 267-0363 o Email: jessica.sharkus@dpi.wi.gov 3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need-to-know 					4/23/2024 3:54:12 PM		
04/17/2024	4766	1106	Administrative Review	Lakeside Lutheran Hi	FSD		

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Comments							
Smart Snacks – Fundraiser Compliance				Created By	Created Date		
<p>The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. It is the responsibility of the SFA to track exempt fundraisers, ensuring compliance. This simply means keeping a list of each student organization that has a food/beverage fundraiser, noting the length of time and location of the fundraiser, ensuring that no organization has more than two fundraisers, and ensuring that each fundraiser is not more than two consecutive weeks. Tracking templates are available on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks). Someone within the district must be responsible for tracking Smart Snacks compliance at the SFA level, school level, and for foodservice.</p>					4/17/2024 9:12:28 AM		
04/17/2024	4764	430	Administrative Review	Lakeside Lutheran Hi	FSD		
Comments							
Production Records				Created By	Created Date		
<p>Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Current production record templates used for lunch do not meet the requirements, as detailed in Finding #430. Please update the production record template and continue to work with staff to ensure all necessary information is documented. Production record templates can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).</p>					4/17/2024 8:45:08 AM		
04/16/2024	4763	435	Administrative Review	Lakeside Lutheran Hi	FSD		
Comments							
Standardized Recipes				Created By	Created Date		
<p>Technical assistance was provided for the recipe standardization process. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization and use all resources available to you. Visit our Standardized Recipes webpage for additional tools and resources or contact a Public Health Nutritionist for assistance (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes; https://dpi.wi.gov/school-nutrition/directory).</p>					4/17/2024 8:42:06 AM		