

# Administrative Review Report

St. Marks Lutheran School

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/08/2023	01/25/2024
On-Site Review	02/07/2024	02/08/2024
Site Selection Worksheet	12/08/2023	12/22/2023
Entrance Conference	02/07/2024	02/07/2024
Exit Conference	02/08/2024	02/08/2024

## Commendations:

From the Public Health Nutritionist:

Thank you to all staff at St. Mark's Lutheran School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students.

From the Nutrition Program Consultant:

Sincere thanks to the staff at St. Mark's for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. Thank you for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions. Staff were very receptive to feedback and eager to learn. The meal servers were very friendly during the review and provide excellent customer service to the students, especially when topping bagels to order at breakfast time. The kitchen was very clean and it was clear that food safety is valued by the servers. Student lunch participation is fairly high, which shows that they enjoy the healthy, appealing meals and quality customer service.

The school staff members do an outstanding job assisting their Spanish-speaking families and making sure they have the resources they need. Thank you for taking such care to specifically ensure these families can access the Child Nutrition Programs and apply for meal benefits that may assist them.

The cafeteria is festive and inviting to students. The round tables and table centerpieces are a nice touch!

## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	103	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/19/2024 09:16 AM	Finding: The SFA was not correctly using the 30-day carryover for students with an eligibility status from the previous school year. (7 CFR 245.6). The 30 days must be operating days (i.e. school days) and not calendar days. Operating days are the days on which reimbursable meals are provided by the school.  Corrective Action: Provide a corrective action plan on how the 30-day carryover will be correctly provided to students in the future.
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	110	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/19/2024 09:48 AM	Finding: The SFA's direct certification notification letter does not include all required information including: explaining that the child is eligible for free (or reduced-price if Z code) benefits without further application; meal benefits extend to all school-aged children in the household; how to notify the SFA of any

# Administrative Review Report

St. Marks Lutheran School

		<p>additional school-aged children in the household not listed on the notification, and explaining how the household can decline the benefit (7 CFR 245.6). The letter also must contain the full USDA non-discrimination statement (not the shortened statement).</p> <p>The DPI template letter can be found on the Free and Reduced Meal Eligibility webpage under "Notification Letters" <a href="https://dpi.wi.gov/school-nutrition/program-requirements/free-reduced-meal-eligibility">https://dpi.wi.gov/school-nutrition/program-requirements/free-reduced-meal-eligibility</a>. English and Spanish versions are available.</p> <p>Please also refer to page 69 in the USDA Eligibility Manual for information on this requirement: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf</a>.</p> <p>Corrective Action: Provide a statement that the DPI template letter will be used or upload a corrected letter template for direct certification notification to the household into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	119	
<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 02/19/2024 09:14 AM</p>	<p>Finding: The SFA's benefit issuance list (BI) does not contain the required elements. Specifically, the benefit effective date is missing. The benefit effective date must be included.</p> <p>If possible, if it recommended to also include the eligibility source (like application or DC). It is also recommended to keep extra notes on the BI list regarding any changes in benefit status or other relevant details.</p> <p>Please review the <a href="#">Benefit Issuance List in a Nutshell</a>. The SFA should contact the software vendor to see if there is a way to track benefit effective date in the software system.</p> <p>Corrective Action: Update the benefit issuance list to include all required information and upload into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	700	
<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 02/19/2024 11:41 AM</p>	<p>Finding: On the Annual Financial Report (AFR) for 2022-23, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). The SFA serves extra milk and adult meals which are non-program foods.</p> <p>The resource from the <a href="#">DPI Financial Management webpage</a> called "<a href="#">Nonprogram Food Revenue Tool Exceptions</a>" has detailed examples that will help with allocating revenue and expenditures for adult meals and extra milk.</p> <p>Corrective Action: Review the <a href="#">Annual Financial Report webcast</a> or <a href="#">manual</a> on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate 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.</p> <p>There is an <a href="#">Annual Financial Report Template fillable PDF</a> that be used to easily notate the AFR updates for corrective action submission.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	

# Administrative Review Report

St. Marks Lutheran School

<b>Question #</b>	777	
<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 02/19/2024 10:00 AM</p>	<p>Finding: The SFA has received <a href="#">Supply Chain Assistance Funds</a> and is not in compliance with the Attestation signed to receive the funds. The SFA is not tracking the funds as required. Please see the corresponding technical assistance section of the final report for additional details and a link to a template tracking tool that can be used.</p> <p>Corrective Action: Provide the process that will be used to track how the funds are spent. Begin tracking SCA funds and upload a copy of the tracker used. As a reminder, the SFA has received a total of \$35, 241.43 to date (includes all from rounds 1-4)</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	711	
<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 02/19/2024 10:59 AM</p>	<p>Finding: The SFA is not obtaining sufficient revenue into the food service fund for adult meals that it serves.</p> <p>SFAs must charge adults meal prices high enough to cover the full cost of producing the meals. The SFA's online contract lists \$4.25 for an adult lunch price, which is a compliant price to charge. However, during the review it was noted that only visiting adults (like students' grandparents) are charged this \$4.25 price. School staff are able to purchase lunches for only \$2.00 as a job perk. Further, the Authorized Representative, Food Service Director, two kitchen workers, and the IT manager have been allowed to have a free lunch. There is no current process in place for the food service fund to recoup the costs of providing the free adult meals or \$2.00 adult meals.</p> <p>USDA does allow some adults to receive a free meal and have the food service fund absorb that cost. Only "program adults" may receive a free meal (if the school wants to offer this), but these meals may never be claimed for reimbursement. "Program adults" are those working directly in the food service program such as managers, cooks, servers, etc. This benefit does <b>not</b> apply to all staff. In the context of St. Mark's, only the two kitchen staff members and the person listed as the "food service director" at the time of the review would be considered "program staff" eligible to receive a free meal. The Authorized Representative and IT manager do not meet these criteria and should be paying the \$4.25 for their meals.</p> <p>The SFA must either charge all non-program adults (including teachers) the established full price of \$4.25, or transfer the appropriate amount of money into the food service account to cover the difference between the selling price and \$4.25. For example, if teachers will continue to be charged \$2.00, then for every meal sold for \$2.00 a transfer of \$2.25 would need to be made into the food service fund from another source to cover the difference. If the two non-program adults that have been receiving free lunch will continue to get their lunch for \$0.00, then \$4.25 must be transferred into the food service fund for each of those lunches. Any transfers needed could be completed weekly, monthly, or annually. The key is that there is sufficient recordkeeping and that the appropriate transfers are made as required.</p> <p>Corrective Action: Determine how procedures will be modified to ensure the food service fund receives sufficient revenue from adult meals. Implement these changes as soon as possible. In SNACS, describe the plan and the date of implementation.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	804	

# Administrative Review Report

St. Marks Lutheran School

<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 02/19/2024 09:50 AM</p>	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). Please refer to the corresponding technical assistance section of the final report for more details and links. There is a DPI template procedure that can be adopted by the SFA to fulfill this requirement.</p> <p>Corrective Action: Utilizing the DPI template policy (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a>), develop procedures for the SFA and upload into SNACS.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<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 02/19/2024 08:55 AM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific content regarding policy leadership, public involvement, school meals, food/beverage marketing, other school-based strategies for wellness, the triennial assessment, updating/informing the public, and the full USDA non-discrimination statement is lacking.</p> <p>Further, content related to the required areas of foods sold outside school meals, foods provided but not sold, nutrition education, nutrition promotion, and physical activity is included but could use updating and improvements.</p> <p>The LWP policy builder and LWP checklist can assist in updating the LWP: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a></p> <p>Corrective Action: 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>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1005	
<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 02/19/2024 08:58 AM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy (LWP) within the last three years, and thus it has not been made publicly available either.</p> <p>See corresponding technical assistance section of this report for more information. Be sure to use the LWP Triennial Assessment Report Card to complete the assessment: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx</a></p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the completed Report Card that includes WellSAT scores into SNACs or provide a link to this document on the school website.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Dietary Specification Assessment Tool (On Site Observation)	
<b>Question #</b>	1	

# Administrative Review Report

St. Marks Lutheran School

<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 02/08/2024 10:01 AM</p>	<p>Finding: All foods served as part of a reimbursable meal must contain zero grams of trans fat per serving (less than 0.5 grams per serving). The hot dog contained 0.5 grams of trans fat. If it is likely that trans fat appearing on a label is naturally occurring, the SFA must request documentation from the manufacturer that reports the source of the trans fat prior to continuing to use the product.</p> <p>Corrective Action: Submit a nutrition facts label for a new hot dog product that will be served that contains 0 grams trans fat or submit documentation from the manufacturer citing the trans fat is naturally occurring.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	126	
<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 02/19/2024 12:08 PM</p>	<p>Finding: There were 95 student eligibility statuses reviewed. Of the 95 students, there were 8 benefit issuance errors noted. These errors are subject to fiscal action. This means the error percentage was 8.42% and thus an independent review of applications will be required next school year—this essentially means you will be required to double check all applications next year and submit a report to DPI. More information will come about this in the late spring.</p> <p>The errors and actions needed were summarized in a spreadsheet that was provided to the SFA during the onsite review. The errors were related to approving applications with ineligible case numbers/assistance programs, missing adult household member SSN information, and missing or inconsistent household members names and household members box.</p> <p>Corrective Action: Take the steps outlined in the spreadsheet provided during the onsite review to correct all 8 errors. Submit documentation in SNACS related to the corrections, including copies of any corrected applications and copies of any adverse action letters sent to the households.</p> <p>Please note that the error related to the verified household was resolved with the Spanish-speaking liaison during the on-site visit as the family submitted an updated application with supporting income information that allowed for their continuation of reduced-price benefits.</p>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	
<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 02/19/2024 09:40 AM</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 in the designated spots when their duty in the verification process is complete.</p> <p>On the <a href="#">application posted on the DPI webpage</a>, you will see there are specific sections on the back of the application for the confirming and verifying official to sign during the verification process.</p> <p>Corrective Action: Review the verification section of the <a href="#">Eligibility Manual</a> 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</p>

# Administrative Review Report

St. Marks Lutheran School

		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.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/19/2024 11:12 AM	<p>Finding: The correct non-discrimination statement (NDS) was not included on all program materials. Some materials were missing the NDS, some contained versions that the SFA modified from the USDA version, and some contained the full NDS.</p> <p>The SFA must decide if it will use the full, exact <a href="#">2022 version</a> of the NDS on all program materials, or if it will use the full, exact <a href="#">2015 version</a> of the NDS on all program materials (which would be allowed if the agency claims a <a href="#">Title IX religious exemption</a>).</p> <p>Corrective Action: Provide as 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. There are two non-discrimination statements: the full, official statement and the shortened statement.</p>
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1212	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/19/2024 09:13 AM	<p>Finding: The Food Service Director (FSD), as listed on the 2023-24 online contract, 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: Either:</p> <ul style="list-style-type: none"> <li>• A: Complete the Professional Standards Exemption form that will be provided upon request and submit to Karrie Isaacson at <a href="mailto:karrie.isaacson@dpi.wi.gov">karrie.isaacson@dpi.wi.gov</a> for the currently designated FSD. With this option, this person will receive a required training plan to complete by a specific due date and will need to obtain the required 8 hours of food safety training. <b>Or,</b></li> <li>• B: Update the FSD designation on the contract to have the kitchen manager be listed as the FSD instead. The kitchen manager would meet the minimum hiring standards because they have a high school diploma, several years of food service experience, and are currently certified as a ServSafe Food Protection Manager. If they will be designated as the FSD, they will need to complete and track at least 12 hours of professional standards training each school year.</li> </ul> <p>Determine if option A or option B will be used and complete the necessary actions for the option chosen.</p>

# Administrative Review Report

St. Marks Lutheran School

<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1217	
<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 02/19/2024 10:07 AM</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>For professional standards purposes, staff that work 20 or more hours in school nutrition each week are "full time" and must complete 6 hours of training annually. Staff that work less than 20 hours each week in school nutrition are "part time" and must complete 4 hours of training annually. Food service directors must complete 12 hours of training annually.</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. A template training tracker can be found on the DPI Professional Standards webpage under Training Trackers: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards">https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards</a>.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	318	
<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 02/19/2024 11:35 AM</p>	<p>Finding: The point of service (POS) at breakfast and lunch require modification. The point of service is defined as "the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid lunch has been served to an eligible child." Please refer the permanent agreement that is attested to at the time of online contract submission, as well as 7 CFR 210.7 and 7 CFR 210.11.</p> <p>At breakfast, the point of service (POS) process yields accurate counts but could be improved. Currently, the breakfast server uses a "beginning of the line" POS model in which they mark off on a paper roster the students that are at the service counter (4-5 students at a time) then serves them their full reimbursable breakfast. The students then leave the line and go eat. In this model, only children that are receiving a breakfast are marked off and the server is able to ensure each student receives a full reimbursable breakfast. The server must ensure they only mark off the few students at the service counter at a time and not any other children in the cafeteria or further back in line. This is a "beginning of the line" POS model but the online contract says that a "roster/checklist - end of the line" is used. Ideally, an end of the line POS would be implemented instead in which students are marked off by name as they leave the line with their full reimbursable breakfast instead of before they receive their meal.</p> <p>At lunch, the 3K and 4K students are served at their seats and the teachers mark them off on a roster after they are seated. The Food Service Director (FSD) sits at the end of the line each day with a computer and marks off each student that receives a reimbursable lunch that day. The FSD does not mark down the student helpers at the time they receive their meals. The FSD also tends to mark off students as they are observed standing in the lunch line and then making any necessary adjustments when they get to the computer station, instead of just waiting until each customer comes to the computer station right before they go sit down. Meals served must be recorded in the software system when the FSD can actually confirm that each child has received a full reimbursable lunch. The FSD must modify procedures to only mark students off when they finally come to the computer station after going the lunch line. This includes for the student helpers taking a hot lunch. For the 3K and 4K, it is recommended to have all of those students come through the lunch line to get their meals and get marked off at the computer station by the FSD before taking their seats.</p>

# Administrative Review Report

St. Marks Lutheran School

		<p>Corrective Action: For breakfast, either implement an "end of the line" POS, or update the online contract to indicate the POS for breakfast is "beginning of the line." Provide a statement describing which action will be taken. If the SFA will continue with the current "beginning of the line" model, provide a statement confirming the kitchen manager will not mark off any students until they get up to the service counter to receive their meal.</p> <p>For lunch, modify the procedures so students are not marked off in the software system until they reach the computer station and the FSD can confirm the child has full reimbursable lunch. Submit a statement describing the modified procedures, including any changes to the 3K and 4K service.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>	325	
<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 02/19/2024 10:44 AM</p>	<p>Finding: It was unclear if the software reports used for filing the claims for reimbursement were correct.</p> <p>For lunch, the claim preparer has used the Lunch Price Plan Count to get the student free, reduced-price, and paid lunch counts for the claim. There is also a daily report called "orders/lunch totals" that shows the total student hot lunches by grade. The total student hot lunches on the daily report does not match the total daily student lunches (all free, reduced-price, and paid student hot lunches) from the Lunch Price Plan Count Report. It appears that the Lunch Price Plan Count would be the correct report to use for the claim (though for January there was a non-systemic error resulting in a claim different than this report), but the SFA should contact the software company to confirm this. They should also inquire with specific examples about why the total daily student hot lunch totals do not match between these reports.</p> <p>For breakfast, the claim preparer obtains data daily by doing the breakfast daily breakdown and recording it on a manual edit check sheet. During the review, this breakfast report for January 2024 was pulled by the office secretary on 2/7 and the totals by category matched the claim preparer's edit check sheet and the submitted claim. However, on 2/8, the claim preparer pulled this same report again from the software system and the counts by category were different though the total number of student breakfasts was the same. The SFA should contact the software vendor to inquire about why the counts would change like this.</p> <p>Corrective Action: Contact the software vendor regarding the two issues above. Provide the answers given by the software vendor to the reviewer via SNACS.</p> <p>Depending on whether or not the reports used for the claims were the correct ones, further corrective action may be required. If claims submitted for reimbursement in the 23-24 school year were not based on the correct software reports, then fiscal action will be calculated if necessary</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	402	
<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 02/08/2024 10:15 AM</p>	<p>Finding: The preschool students were served the K-8 meal pattern for lunch but were not served at the same time as the older students and were given a pre-plated meal. Children who are not yet in kindergarten must be served the preschool meal pattern if not co-mingled with other grade groups at meals.</p> <p>Corrective Action: Submit a statement describing the specific changes made to the lunch meal service in order to serve the preschool students the age-appropriate meal pattern. If the school decides to co-mingle the students, describe specific changes that will be made to accommodate this.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	



# Administrative Review Report

St. Marks Lutheran School

<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	403	
<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 02/08/2024 10:05 AM</p>	<p>Finding: The only allowable milk types in USDA School Meals Programs are low-fat and fat-free flavored or unflavored milk and lactose-free or lactose-reduced fat-free or low-fat milk. Neither 2% (flavored or unflavored) nor whole milk can be served. Please discontinue service of 2% white milk. As a reminder, at least two choices of allowable milk types must be offered daily at each meal.</p> <p>Corrective Action: Submit a statement explaining your understanding of the allowable milk types and your agreement to discontinue service of 2% white milk.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	404	
<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 02/08/2024 09:32 AM</p>	<p>Finding: The printed menu must state "this institution is an equal opportunity provider."</p> <p>Corrective Action: Submit a copy of an updated menu that includes the statement "this institution is an equal opportunity provider."</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	406	
<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 02/08/2024 10:20 AM</p>	<p>Finding: The allowable milk types for children 2-5 years old are unflavored low-fat (1%) and fat-free (skim) milk when following the preschool meal pattern. Please discontinue serving flavored milk.</p> <p>Corrective Action: Submit a statement explaining your understanding of the allowable milk types and that you will discontinue use of flavored milk if following the preschool meal pattern. If the plan is to co-mingle the preschool students with older grades than explain this in the corrective action.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	430	
<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 02/09/2024 06:55 AM</p>	<p>Finding: The production record lists "2-year-old-8th grade/Adults" as the age/grade group meal pattern being served. However, the school is following the K-8 meal pattern. In addition, specific foods and/or accurate serving sizes were not listed on the production record. All items being served should be listed on the production record.</p>

# Administrative Review Report

St. Marks Lutheran School

		Corrective Action: Submit a full week of completed breakfast and lunch production records with these changes corrected on each. The completed production records should be after the onsite review but before the corrective action due date. Production record templates can be found on the WI DPI webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a> ).
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	433	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/08/2024 09:38 AM	<p>Finding: Acceptable crediting documentation was not available for the Hot Dog, Salisbury Steaks, Tortilla Chips and Cheese Sauce. Processed foods that are not listed in the <a href="#">Food Buying Guide (FGBG)</a> must be accompanied by a Product Formulation Statement (PFS) or Child Nutrition (CN) Label to sufficiently document meal component crediting.</p> <p>Corrective Action: Submit acceptable crediting documentation for the Hot Dog, Salisbury Steaks, Tortilla Chips and Cheese Sauce or pick replacement options for these items that have acceptable crediting documentation.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	434	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/09/2024 06:48 AM	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There were no standardized recipes for the Chicken Patty on a Bun, Hamburger on a Bun, Hot Dog on a Bun, Mashed Potatoes, Gravy, Beef/Pork Taco Meat, Chicken Taco Meat, and Bagel with toppings.</p> <p>Corrective Action: Submit a standardized recipe for the Chicken Patty on Bun, Hamburger on a Bun, Hot Dog on a Bun, Mashed Potatoes, Gravy, Beef/Pork Taco Meat, Chicken Taco Meat, and Bagel with toppings. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a>).</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	500	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/08/2024 11:12 AM	<p>Finding: Four non-reimbursable meals were observed during breakfast service on the day of review. Either the meals did not contain three full components or the required 1/2 cup fruit, vegetable, or combination under Offer vs. Serve.</p> <p>Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is 1/2 cup fruit, vegetable or combination, under Offer vs. Serve. Additionally, in this statement explain how this error will be corrected and avoided in the future.</p>
<b>Site Name</b>	Saint Marks Ev Lutheran School	

# Administrative Review Report

St. Marks Lutheran School

<b>Form Name</b>	Offer vs Serve (500-502)		
<b>Question #</b>	501		
<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 02/08/2024 11:17 AM</p>	<p>Finding: Although no non-reimbursable meals were observed at lunch during the day of onsite review, both Offer vs Serve and meal pattern training must be completed by staff that are at the point of service determining reimbursable meals. Offer vs. Serve and Meal Pattern training resources can be found on WI DPI's Menu Planning webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a> ).</p> <p>Corrective Action: Have staff responsible for determining reimbursable meals attend a training on Offer vs. Serve and Breakfast and Lunch Meal Pattern. Please submit details regarding when and where the training was held, who attended and how the training was conducted. If WI DPI's online training resources are utilized, please submit the Certificate of Completion for each training.</p>	
<b>Site Name</b>	Saint Marks Ev Lutheran School		
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)		
<b>Question #</b>	1409		
<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 02/19/2024 09:02 AM</p>	<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. The following food storage violations were observed: food items not stored 6 inches off the ground in dry storage and crates full of milk cartons stored directly on floor in walk-in cooler.</p> <p>Corrective Action: Corrected on-site by rearranging storage areas to have all food stored at least 6 inches off the floor. No further action required.</p>	
<b>Site Name</b>	Saint Marks Ev Lutheran School		
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)		
<b>Question #</b>	1411		
<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 02/08/2024 10:09 AM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: Ardmore Farms Juice (USA, China, Chile, Mexico, Turkey, Spain and Poland), Pineapple (Indonesia) and Mandarin Oranges (China).</p> <p>Corrective Action: Complete and submit a Noncompliant Product List form for the non-domestic products: Ardmore Farms Juice, Pineapple and Mandarin Oranges. <a href="#">Non-compliant Product List templates</a> can be found on the <a href="#">Buy American webpage</a>.</p>	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/19/2024	4312		Administrative Review		FSD			

# Administrative Review Report

St. Marks Lutheran School

Comments									
Professional Standards Training					Created By			Created Date	
<p>Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this <a href="#">"In A Nutshell- Training"</a> document. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.). SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. <a href="#">The DPI Professional Standards Tracking Tool</a> or the <a href="#">USDA Professional Standards Tracking Tool</a> are encouraged but not required.</p> <p>Any non-school nutrition staff members and volunteers that assist with aspects of the Child Nutrition Programs do not need to complete a certain minimum number of training hours annually. However, they should receive sufficient job-specific training that supports their school nutrition duties. They should also receive the annually required USDA civil rights training. For these people, the SFA should maintain a record of the individual's name, title of training, training source, and dates of the civil rights and job-specific training received which may include attendance records, sign in sheets, email confirmations, etc.</p> <p>The <a href="#">Institute of Child Nutrition has many training resources available in Spanish</a>, which could be helpful for Spanish-speaking school nutrition employees and volunteers.</p>								2/19/2024 12:18:38 PM	
02/19/2024	4311		Administrative Review		AR				
Comments									
Back-Up Plan for Cook Absence					Created By			Created Date	
<p>Currently, the school does not have a defined back-up plan in place in the event the kitchen manager is unable to work. As a reminder, all SFAs that participate in NSLP agree to provide reimbursable meals to children each school day. If the kitchen manager is sick, the SFA could not simply shutdown the school lunch and breakfast programs that day. The SFA should develop a contingency plan to ensure the students could be served reimbursable school meals even if the kitchen manager is out.</p>								2/19/2024 12:18:01 PM	
02/19/2024	4310		Administrative Review		FSD				
Comments									
Food Safety Plan					Created By			Created Date	
<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.</p> <p>Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.</p> <p>Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. The food safety plan must be reviewed annually. A prototype <a href="#">food safety plan template</a> as well as template SOPs may be found on the <a href="#">SNT Food Safety</a> webpage.</p> <p>All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.</p> <p>Please ensure the food safety plan is reviewed/updated annually, and that it is site-specific so it only contains information relevant to the specific operation.</p>								2/19/2024 12:17:40 PM	
02/19/2024	4309		Administrative Review		AR				
Comments									
Advertised Prices					Created By			Created Date	
<p>It was noted that the price for an extra milk and the full pay adult meal price were listed differently in the computer system and the school handbook. Please double check advertised prices and actual prices being charged so it is consistently and accurately communicated to customers</p>								2/19/2024 12:17:27 PM	
02/19/2024	4308		Administrative Review		FSD				

# Administrative Review Report

St. Marks Lutheran School

Comments							
Public Release				Created By		Created Date	
<p>As a reminder, a School Food Authorities (SFAs) are required to distribute a Public Release <b>before the start of the school year</b>. The purpose is to inform the community of SFAs offering free and reduced priced meals to eligible student. SFAs should attempt to send the public release to the following:</p> <ul style="list-style-type: none"> <li>• local media</li> <li>• grassroots organizations</li> <li>• major employers contemplating or experiencing large layoffs</li> <li>• local unemployment office</li> </ul> <p>SFAs are <u>not</u> 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.</p>						2/19/2024 12:17:11 PM	
02/19/2024	4307		Administrative Review		AR		
Comments							
Unpaid Meal Charge Policy				Created By		Created Date	
<p>The SFA has an unpaid meal charge policy. However, it is recommended to modify the policy to improve clarity for families. It must address 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 intended to use the money to purchase that day's meal. The policy should also more clearly spell out the low/negative balance notification process and clearly explain if/when a student would be denied a meal for having a negative account. The current policy suggests students will be denied a meal if their account is negative, however in practice, it does not sound like the SFA ever denies a child a meal. Please refer to the unpaid meal charge resources on the <a href="#">Financial Management webpage</a> for more information.</p>						2/19/2024 12:16:55 PM	
02/19/2024	4306		Administrative Review		FSD		
Comments							
Special Dietary Needs				Created By		Created Date	
<p><b>Special Dietary Needs</b> - 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><b>Policy Requirements</b> - 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 School Districts 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 <a href="#">Special Dietary Needs Policy template</a> which can be modified to fit the needs of the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.</p> <p><b>Medical Statement</b> - It is recommended, but not required, for SFAs to use the <a href="#">prototype Medical Statement for Special Dietary Needs</a> posted on the <a href="#">DPI SNT website</a>. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:</p> <ol style="list-style-type: none"> <li>1. an explanation of how the child's physical or mental impairment restricts the child's diet</li> <li>2. the food(s) to be avoided</li> <li>3. the food or choice of foods that must be substituted</li> <li>4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner</li> </ol> <p>A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.</p> <p>SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within Offer vs. Serve for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.</p>						2/19/2024 12:16:36 PM	

# Administrative Review Report

St. Marks Lutheran School

<p><b>Brand Names</b> - In some situations, a State licensed healthcare professional may request a particular brand name of a product as a substitute on the medical statement. Generally, SFAs are not required to provide the specific brand requested, unless the brand name item is medically necessary. Instead, the SFA must provide a reasonable modification that accommodates the child’s disability and provides equal opportunity for the child to participate in and benefit from the Program. In situations where the requested substitute is very expensive or difficult to procure or obtain, it would be reasonable for the SFAs to follow up with the family to see if a different substitute would be safe and appropriate for the child.</p> <p>For example, a medical statement for a child with gluten intolerance may request a specific brand of gluten-free bread. If a modification request indicates a brand name item, in most instances, a generic brand is sufficient, unless the brand name item is medically necessary. This can be determined through the interactive process with the child’s parent or guardian. In the example above, if the medical statement lists a specific brand of gluten-free bread, the SFA could check with the family to see if it would be safe and appropriate for the SFA to provide a different brand. In this instance, the family could then affirm the brand name change.</p> <p><b>Timing of Medical Statements</b> - Sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child’s parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child’s need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p> <p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child’s parent or guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.</p> <p><b>Access to Medical Statements</b> - The FSD should have copies of student medical statements that are on file for accommodating students with disabilities in the meal program. While this information is confidential, the FSD does have a legitimate “need to know” for this information since they are responsible for implementing the meal accommodation the student requires. The FSD should reference the actual signed medical statement for the exact meal accommodation information needed for the student to ensure it is fully implemented correctly in accordance with the request. If the medical statement supporting meal accommodations are only available to the school nurse and the summarized information is provided to the FSD, this allows for the possibility of miscommunication as information is passed along without the exact source documentation. The FSD should ensure they keep this information confidential once received.</p> <p><b>Resources</b> - The <a href="#">Special Dietary Needs Flowchart</a> outlines the process of accommodation determination. The <a href="#">USDA Q&amp;A on Accommodating Special Dietary Needs</a> resource, the <a href="#">USDA Special Dietary Needs Handbook</a>, and <a href="#">Q&amp;As: Milk Substitution for Children with Medical or Special Dietary Needs</a> (Non-Disability) contain additional detailed information</p>	
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02/19/2024	4305		Administrative Review		FSD		
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<b>Comments</b>
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Verification	Created By	Created Date
<p>When the verification process is completed in the fall, the SFA must adhere to the household notification requirements. Please use the DPI template <a href="#">“We HAVE Checked Your Application” letter</a> to communicate the outcome of verification to the family. While it may be helpful to also verbally communicate this to the household in their preferred language, the letter should also be used.</p> <p>When an application(s) is chosen for <a href="#">verification</a>, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.</p>		2/19/2024 12:16:07 PM

# Administrative Review Report

St. Marks Lutheran School

When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.								
Acceptable documentation of income or receipt of assistance may be provided for any point in time between the months prior to application and the time the household is required to provide the documentation.								
Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.								
During the verification process, households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)].								
02/19/2024	4304		Administrative Review		FSD			
<b>Comments</b>								
<b>Declining a Meal Benefit</b>				<b>Created By</b>		<b>Created Date</b>		
If a child is eligible for a meal benefit and the parent/guardian wants to decline the benefit and pay the full paid student price for meals, the SFA must honor this request. When this happens, the SFA must change the child's benefit in the software system and must clearly note that the household requested a lower benefit status. Benefits may be reinstated anytime during the remainder of the school year and/or up to 30 operating days carryover if the household parent requests it. It is best to receive and document this request from the household in writing. If this comes up in a joint custody situation where one adult wants the child to have the benefit and the other does not, please call a DPI consultant to discuss as this can be challenging to navigate.						2/19/2024 12:15:34 PM		
02/19/2024	4303		Administrative Review		FSD			
<b>Comments</b>								
<b>Independent Review of Applications</b>				<b>Created By</b>		<b>Created Date</b>		
LEAs that have a 5% or more error rate during the certification review of the Administrative Review will be required to conduct a second independent review of applications in the following school year.  More information on the Independent Review of Applications is found in the <a href="#">Eligibility Manual</a> . An SNT memo will be mailed from DPI during the summer following the year the review occurred with more information for those SFAs that are required to conduct an independent review of applications						2/19/2024 12:15:19 PM		
02/19/2024	4302		Administrative Review		FSD			
<b>Comments</b>								
<b>Application Approval – General</b>				<b>Created By</b>		<b>Created Date</b>		
The total household members box on a meal benefit application includes all children and adults in the household and must match the number of names on the application for that application to be considered complete. Applications missing adult signatures must be returned to the household adult member to obtain. Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. If an application has an income reported with a frequency that seems questionable (such as reporting an income of \$33,000 twice per month instead of annually), the income amount and frequency should be clarified with the household before processing the applications.  The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial the application updates. Reasonable effort should be made to obtain the missing information prior to denying the application.						2/19/2024 12:15:00 PM		



# Administrative Review Report

St. Marks Lutheran School

<p>When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the <a href="#">Income Eligibility Guidelines</a> (IEG) one would look at the amount of their income under the column indicating that stated frequency.</p> <p>When assessing household income on an application, be sure that all reported income is included—including any child income reported in part 3B.</p> <p>When the Determining Official completes the "office use only" section on the back of the applications, it is only necessary to sign in the Determining Official spot. The space for Confirming Official is only needed during the verification process.</p>	
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02/19/2024	4301		Administrative Review		FSD		
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Comments							
Application Approval – Case Numbers for Categorial Eligibility				Created By	Created Date		
<p>The staff responsible for processing meal applications should re-train themselves on how to handle applications with assistance program case numbers. When a family submits an application with a case number (i.e. they complete Step 2), then must list the assistance program name and their case number for the program. The only programs that may be listed are FoodShare (SNAP), W-2 Cash Benefits (TANF), or FDPIR. Badgercare, Medicaid, and Pandemic-EBT are not eligible programs on an application.</p> <p>Case numbers for FoodShare and W-2 Cash Benefits should be 10 digits in length. If a household lists a 16-digit case number, they may have erroneously listed their EBT card number and the Determining Official (DO) should contact the family to clarify and obtain the correct case number. If the family lists an ineligible program name, then the application cannot be approved as "free" based on the case number. If the family lists several program names that include eligible and ineligible programs, the DO should contact the family to clarify which assistance programs they use and ensure the case number reported is for an eligible program.</p> <p>Aside from obtaining additional clarification from the family if the program name and case number are potentially ineligible or erroneous, the DO does not need to obtain paperwork from the family proving their assistance program or case number. If the program name is an eligible program and the case number length is appropriate, the DO should accept the information at face-value. If the DO would like assistance with any future case number applications, please contact a DPI consultant for one-on-one assistance. Some helpful resources:</p> <ul style="list-style-type: none"> <li>"Categorial Application" section of the <a href="#">Overview of F/R Eligibility Process Part 1</a> training</li> <li>Step 2 section of <a href="#">Filling Out the Household Application</a> training</li> </ul>				FSD	2/19/2024 12:14:14 PM		

02/19/2024	4300		Administrative Review		FSD		
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Comments							
Effective Date of Benefits				Created By	Created Date		
<p>A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. The effective date for students eligible for benefits via Direct Certification (DC) is the date of the DC Run. The effective date for free/reduced-price meal applications is the date the application is approved by the Determining Official—not the date the application is received, or the date signed by the parent/guardian. Aside from the approval date, Determining Officials must record the level of benefits for which a student(s) is approved and sign or initial and date the application.</p> <p>As a reminder, applications must be reviewed in a timely manner. Within 10 operating (school) days of receipt, eligibility must be determined, families must be notified of eligibility status, and the status must be implemented.</p> <p>The SFA should retain copies of the DC approval letters, application approval letters, and application denial letters that are sent to households. This will help ensure the SFA has documentation on file to support that the household notification requirements for meal benefits are being met.</p>				FSD	2/19/2024 12:13:59 PM		

02/19/2024	4299		Administrative Review		FSD		
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Comments							
Carryover of Meal Benefits				Created By	Created Date		
<p>An individual child's free and reduced-price eligibility status from the previous year will continue, within the same LEA, for up to 30 operating (school) days into the new school year or until a new eligibility determination is made, whichever is first. During the carryover period, when a new determination is made (by application or Direct Certification [DC]), if the new meal benefit increases for a better meal benefit, the change must be made immediately, and the household is notified. During the carryover period, when a new</p>				FSD	2/19/2024 12:13:19 PM		



# Administrative Review Report

St. Marks Lutheran School

determination is made (by application or DC), if the change is a decrease in meal benefits, the LEA must notify the household in writing. LEAs may have 1-5 calendar days to notify households and change the benefit. Adverse action is not applicable if a child's eligibility expires at the end of the carryover period. On DC runs during the carryover period, an "N" code is not a new determination.								
02/19/2024	4298		Administrative Review		AR			
Comments								
Summer Meals Planning				Created By		Created Date		
<p>If St. Mark's wishes to serve meals during the summer of 2024, the planning process should begin as soon as possible. The school operated the Seamless Summer Option (SSO) in the summer of 2023. Please note that if you offer SSO this summer, an additional abbreviated review of the SSO program will need to be conducted.</p> <p>St. Mark's is encouraged to look into the Summer Food Service Program (SFSP). The SFSP would allow service of meals to community children aged 18 and under, the reimbursement rate is higher, there is an additional shipment of USDA Foods, and the meal pattern is simpler. The SFSP does have its own separate contract, claiming process, training, and review process. However, after the initial launch of the program, the SFA may be able to more easily implement the program in summers to come to serve the community families.</p> <p>To operate the SFSP in summer 2024, Complete the <a href="#">New Agency Information Form - SFAs</a>. This short 'interest' form MUST be completed in order for DPI to set-up the SFSP application for your agency and provide information on next steps. For further details please send an email to <a href="mailto:sfsp@dpi.wi.gov">sfsp@dpi.wi.gov</a> and a member of the SFSP Team will contact you.</p>						2/19/2024 12:13:01 PM		
02/19/2024	4297		Administrative Review		AR			
Comments								
Breakfast Participation				Created By		Created Date		
<p>Breakfast participation in the district is low compared to the number of students attending and compared to lunch. Increased participation in the School Breakfast Program (SBP) will enable the SFA to help students start their school day with good nutrition and for the school to earn reimbursement for breakfasts served.</p> <p>Currently, breakfast is served before school only in the cafeteria. Students must arrive to school early if they would like to have breakfast. The SFA is encouraged to explore options for altering the SBP service models to increase participation.</p> <p>In addition to the traditional, cafeteria-based breakfast model, schools may also consider an alternative breakfast model. For example, "Breakfast in the Classroom" involves serving the breakfast meal to children during a morning class, often while the teacher is taking attendance or giving classroom announcements. Schools operating "Grab &amp; Go Breakfast" serve children a breakfast "to go," often in a paper or plastic bag, before school or during a morning break. Consider offering a second-chance breakfast during late morning for students who are not hungry first thing in the morning.</p> <p>When exploring different breakfast service models, be sure to consider who will retain responsibility for the point of service (POS). It may be a simpler option to have food service staff operate the POS at one central location and then allow students to take their meals to their classrooms to eat, as opposed to having teachers responsible for POS in their classrooms.</p> <p>To learn more about these and other breakfast service options, please see the <a href="#">USDA School Breakfast Program webpage</a>. Additional breakfast resources and contact information for School Breakfast Program specialists is available on the <a href="#">DPI School Breakfast webpage</a>.</p>						2/19/2024 12:12:36 PM		
02/19/2024	4295		Administrative Review		FSD			
Comments								
Local Wellness Policy				Created By		Created Date		
<p>SFAs are required to retain basic records demonstrating compliance with local wellness policy (LWP) requirements. For assistance in the creation and updates of a LWP, Wisconsin Team Nutrition has several wellness policy resources available: A <a href="#">toolkit</a>, a <a href="#">wellness policy builder</a>, and <a href="#">wellness policy report card</a> found on the <a href="#">LWP webpage</a>.</p> <p>Each year, stakeholders must be provided with the opportunity to participate in the development, implementation, periodic review, and update of the local school wellness policy as stated in 7 CFR 210.31(d)(1). It is at the discretion of the SFA on how stakeholders are invited to participate. Suggestions for including a variety of stakeholders include:</p>						2/19/2024 12:12:02 PM		

# Administrative Review Report

St. Marks Lutheran School

<ul style="list-style-type: none"> <li>sending a letter to parents/families;</li> <li>providing status updates in teacher/staff trainings;</li> <li>posting a call for volunteers on the LEA website;</li> <li>including a blurb on the school, or local community newspaper, newsletter, and/or blog;</li> <li>partnering with community organizations to spread the information; and</li> <li>posting information about the process on social media.</li> </ul> <p>SFAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). Posting the policy on the school's website may be an easy and effective way to accomplish this.</p> <p>SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)). The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy. SFAs must use the <a href="#">Wisconsin Local Wellness Policy Triennial Assessment Report Card</a> in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two.</p>	
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02/19/2024	4294		Administrative Review		AR		
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**Comments**

Title IX Religious Exemption	Created By	Created Date
<p>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 exemption religious grounds if there is a conflict between Title IX and a school's governing religious tenets.</p> <p>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 NDS and the 2019 version of the AJFA poster.</p> <ul style="list-style-type: none"> <li>The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: <a href="https://www.usda.gov/sites/default/files/documents/JFAGreen508.pdf">https://www.usda.gov/sites/default/files/documents/JFAGreen508.pdf</a>. 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.</li> <li>The <a href="#">2015 version of the Non-discrimination Statement</a> 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 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.</li> </ul> <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 <a href="#">NDS section of the Civil Rights webpage</a> for more resources and references on this subject.</p>		2/19/2024 12:11:44 PM

02/19/2024	4293		Administrative Review		FSD		
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**Comments**

Complaints of Discrimination	Created By	Created Date
<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 <a href="#">procedures for receiving and processing complaints alleging civil rights discrimination</a> within the USDA Child Nutrition Programs. It is recommended SFAs use the <a href="#">Template Civil Rights Complaint Procedures</a> to create written procedures.</p>		2/19/2024 12:11:25 PM

# Administrative Review Report

St. Marks Lutheran School

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.

If a complaint of discrimination is received at your district, the following procedures should be followed:

1. Document the complaint using the [USDA Program Discrimination Complaint Form](#).
2. Submit complaints within five days of receiving the complaint to:
  - Wisconsin Department of Public Instruction (DPI)
    - Mail: Director, School Nutrition Team  
125 S. Webster Street Madison, WI 53707-7841
    - Fax: (608) 267-0363
    - Email: [jessica.sharkus@dpi.wi.gov](mailto: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.

02/19/2024	4292		Administrative Review		FSD		
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### Comments

#### Non-Profit Food Service Account

**Created By**

**Created Date**

Please review the [Maintenance of the Non-Profit Food Service Account In a Nutshell](#) resource, as it contains much important information the FSD must know.

As a reminder, all SFAs must maintain a separate revenue and expense ledger that reports all accrued food service revenues and incurred food service expenditures from July 1 through June 30. Revenues must be recorded on an **ACCRUAL** basis and recognize income when it is **earned** (not a cash basis which recognizes when money is **received**). State reimbursements are the exception and are recorded when they are received. Expenses are recorded as they are **INCURRED or billed**--not as they are **paid**.

If a tool is needed to aid in the food service ledger management, there are [monthly](#) and [yearly](#) Excel-based tools available on the [Financial Management webpage](#) under "Budgeting and Cost Control" to assist.

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).

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.

2/19/2024 12:10:35 PM

	<b>Is of</b>	<b>Payment Information</b>	<b>Amount</b>
		<b>Total Meal Reimbursement</b> <small>(Include *PBR Payment shown below.)</small>	<b>\$1,091.99</b>
		Commodity Charges Credited:	\$0.00
0		Commodity Charges Recovered:	\$150.71
		<b>Total Net Payment:</b>	<b>\$941.28</b>

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.

Student deposits, used for meal purchases, are not recorded as revenue until the meal has actually been served/sold to the student. Funds in student accounts are treated as a deposit or liability account in the food service fund until the meal is served, at which point the sale is recorded as revenue. Until the meal is served/sold to the student, the food service fund has not actually earned the revenue from the paying households—they are merely holding onto the household deposits for future purchases.

02/19/2024	4291		Administrative Review		FSD		
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# Administrative Review Report

St. Marks Lutheran School

Comments						
Nonprogram Foods				Created By	Created Date	
<p><a href="#">Nonprogram foods</a> include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals.</p>					2/19/2024 12:10:05 PM	
02/19/2024	4290		Administrative Review	FSD		
Comments						
Supply Chain Assistance Funds				Created By	Created Date	
<p><a href="#">Supply Chain Assistance (SCA) Funds</a> are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs.</p> <p>The USDA <a href="#">Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers</a> includes detailed information on allowable ways to utilize these funds.</p> <p>SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. DPI has developed a <a href="#">Supply Chain Assistance (SCA) Funds Expense Tracker</a> that SFAs may use to track these funds, however, SFAs may use any form of tracking.</p> <p>SCA funds do not need to be spent by a specific date, but it is USDA's intent that the funds will be used as quickly as practicable to alleviate supply chain challenges.</p>					2/19/2024 12:09:42 PM	
02/08/2024	4284		Administrative Review	FSD		
Comments						
Production Records				Created By	Created Date	
<p>Although information was kept on separate papers and later compiled onto the daily production record this could lead to mistakes or inaccuracies. It is recommended to solely utilize the production records before meal service, during meal service and after meal service.</p>					2/15/2024 1:16:39 PM	
02/08/2024	4244		Administrative Review	FSD		
Comments						
Breakfast for Late Students				Created By	Created Date	
<p>It was not observed but rather discussed that tardy students were allowed to take only non-perishable breakfast items to the classroom but not the milk component. Since milk is a required component to be offered at breakfast time, the students must have the opportunity to take it along with their other breakfast items back to the classroom otherwise a non-reimbursable would be offered and would not be able to be claimed.</p>					2/9/2024 7:28:03 AM	
02/08/2024	4236	25	Administrative Review	Saint Marks Ev Lutheran School	FSD	
Comments						
Extra Milk for Cereal				Created By	Created Date	
<p>Additional milk for cereal is given free of charge to students above and beyond their reimbursable breakfast meals. Offering additional milk could add to food cost and increase dietary specifications. When students are not charged an a la carte price for additional milk the calories, saturated fat, and sodium of these portions must be included in the weekly dietary specifications.</p>					2/9/2024 7:03:02 AM	
02/07/2024	4243		Administrative Review	FSD		
Comments						
Breakfast Grain Items				Created By	Created Date	
<p>Several foods offered at breakfast credit less than 1oz eq. grain including the Honey Graham Crackers, Chewy Granola Peanut Butter Bars and Chewy Granola Chocolate Chip Bars. In order for a grain to be considered a food item at breakfast, it must credit as 1oz. eq. These grain options should be bundled together so that if a student selects a grain, they have at least 1oz eq. Physically bundling them together in a bag or boat works well.</p>					2/9/2024 7:24:48 AM	

# Administrative Review Report

St. Marks Lutheran School

02/07/2024	4242		Administrative Review		FSD			
<b>Comments</b>								
<b>Vendor Orders</b>					<b>Created By</b>		<b>Created Date</b>	
It is recommended that the FSD have the ability to order directly from the vendor rather than sending a list of items to the vendor and then the vendor placing the order. This would help eliminate the risk of the wrong item being ordered or an item not being ordered all together.							2/9/2024 7:20:57 AM	
02/07/2024	4241		Administrative Review		FSD			
<b>Comments</b>								
<b>Chips on Production Records</b>					<b>Created By</b>		<b>Created Date</b>	
On the production record Lay's Potato Chips were being credited as an "other" vegetable however this is considered an "extra item" and not a creditable vegetable according to the meal pattern.							2/9/2024 7:18:47 AM	
02/07/2024	4240		Administrative Review		FSD			
<b>Comments</b>								
<b>Production Records – Modifying</b>					<b>Created By</b>		<b>Created Date</b>	
It is recommended to use the <a href="#">Wisconsin DPI Production Records</a> in which the FSD can alter the portion sizes, menu items being served, make substitutions etc. and not follow what the previous FSD was using and having to cross out what was not accurate.							2/9/2024 7:17:01 AM	
02/07/2024	4239		Administrative Review		FSD			
<b>Comments</b>								
<b>Production Records – Serving Sizes</b>					<b>Created By</b>		<b>Created Date</b>	
The production record serving sizes should be consistent with what is happening in the kitchen. If the items are being weighed rather than measured, this should be reflected on the production record. It is also recommended that the items are a minimum of 1/2 cup portion size rather than what is currently listed on the production record of 1/4 cup for most fruits and vegetables since most items were weighed to equal 1/2 cup.							2/9/2024 7:15:43 AM	
02/07/2024	4238		Administrative Review		FSD			
<b>Comments</b>								
<b>Daily Menu Posting</b>					<b>Created By</b>		<b>Created Date</b>	
The daily menu must be posted every day and should be near the beginning of the serving line rather than at the end of the serving line or by the point of service.							2/9/2024 7:11:32 AM	
02/07/2024	4237		Administrative Review		FSD			
<b>Comments</b>								
<b>Field Trip Meals</b>					<b>Created By</b>		<b>Created Date</b>	
It was not observed but rather discussed that it is required that the daily minimum amount of each component is given in a field trip bagged meal. For the K-8 meal pattern, the minimum amount of each component is 1oz. eq. meat/meat alternate, 1oz. eq. grain, 3/4 cup vegetable, 1/2 cup fruit and 8oz. milk.							2/9/2024 7:10:51 AM	
02/07/2024	4235	437	Administrative Review	Saint Marks Ev Lutheran School	FSD			
<b>Comments</b>								
<b>Crediting Dark Leafy Greens</b>					<b>Created By</b>		<b>Created Date</b>	
Raw, uncooked leafy greens are credited as half the volume when served, when offered in their fresh forms. For example, 1/2 cup of fresh baby spinach credits as 1/4 cup dark green vegetable. The same crediting principles applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. The smallest creditable amount of vegetables is 1/8 cup. The production records currently list 1/8 cup of romaine lettuce crediting as 1/16 cup which is not creditable.							2/9/2024 6:59:37 AM	