

Administrative Review Report

Trinity Lutheran School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/17/2023	02/05/2024
On-Site Review	02/07/2024	02/07/2024
Site Selection Worksheet	11/17/2023	11/21/2023
Entrance Conference	02/07/2024	02/07/2024
Exit Conference	02/07/2024	02/07/2024

Commendations:

From Public Health Nutritionist:

Thank you to all staff at Trinity 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:

My sincere thanks to the staff at Trinity Lutheran School for your warm welcome. I appreciate the time and efforts spent preparing for and participating in the administrative review. I 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. The food service director is operating an excellent lunch program. I was impressed with the food service staff. They maintain a very clean and pleasant environment. The décor in the dining room was very fun and inviting for all students. The director works hard to ensure all program requirements are met and that there are healthy, appealing meals served every day. Thank you again!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the [DPI School Nutrition Training Webpage](#).

Marketing refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. The goal of marketing is to match your products and services to the customers you aim to serve. The Marketing Your Program webpage provides tools and resources to market your program and show how Wisconsin School Meals Rock!

Administrative Review Report

Trinity Lutheran School

Findings and Corrective Action:

Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
Corrective Action History		<p><u>Finding:</u> The SFA's Unpaid Meal Charge Policy in place does not follow regulation SP 46-2016. SFAs cannot charge late fees to free or reduced price students, SFAs cannot remove students from the program if they have cash in hand to pay for the meal.</p> <p><u>Corrective Action:</u> Update the policy and upload into SNACS and provide a timeline of when the policy will be implemented and how households will be notified annually.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
Corrective Action History		<p><u>Finding:</u> On the Annual Financial Report (AFR), all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). SFA included parental choice program revenues and expenses on AFR, which does not pertain to the Child Nutrition Programs.</p> <p><u>Corrective Action 1:</u> Review the Annual Food Service Financial Report webcast on the DPI website and upload the certificate of completion into SNACS.</p> <p><u>Corrective Action 2:</u> Using the copy of the 2022-23 Annual Financial Report provided while onsite, notate the updates required to show the revenues and expenses broken out by program and category on the Annual Financial Report Template. 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>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	777	
Corrective Action History		<p><u>Finding:</u> The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not aware of what the funds can be spent on, and the funds are not being tracked separately.</p> <p><u>Corrective Action:</u> Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent.</p>
Form Name	Civil Rights (800 - 807)	
Question #	803	
Corrective Action History		<p><u>Findings:</u> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p><u>Corrective Action:</u> Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS, provide timeline of when this policy/procedure will be put into place.</p>
Form Name	Civil Rights (800 - 807)	
Question #	805	
Corrective Action History		<p><u>Finding:</u> The SFA does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs.</p> <p><u>Corrective Action:</u> Provide a timeline for when a Special Dietary Needs procedure will be put in place. Provide the name and title of the SFA representative that will ensure compliance. It is recommended that SFAs utilize the Special Dietary Needs policy template. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).</p>
Form Name	Civil Rights (800 - 807)	
Question #	807	
Corrective Action History		<p><u>Finding:</u> The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p>

Administrative Review Report

Trinity Lutheran School

		<p><u>Corrective Action:</u> Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. The form is located here: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action History		<p><u>Finding:</u> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p><u>Corrective Action:</u> Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	135	
Corrective Action History		<p><u>Finding:</u> The SFA did not retain direct certification (DC) match runs on file at the SFA, either electronically or hard copy (7 CFR 245.6).</p> <p><u>Corrective Action:</u> Provide a statement describing how the SFA will retain DC files for the required timeframe.</p>
Form Name	Verification (207 - 215)	
Question #	208	
Corrective Action History		<p><u>Finding:</u> SFA did not complete a confirmation review before verifying application(s).</p> <p><u>Corrective Action:</u> Watch The Verification Process and the Verification Collection Report (Part 2) webcast, provide proof of completion 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.</p>
Form Name	Verification (207 - 215)	
Question #	211	
Corrective Action History		<p><u>Finding:</u> The verification "We Have Checked" notification letter was not sent to the household selected for verification.</p> <p><u>Corrective Action:</u> Send the "We HAVE CHECKED your application" notification letter to the household selected for verification, upload a copy of the letter sent into SNACS and provide a statement of understanding that this letter needs to be sent out every year before November 15.</p>
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action History		<p><u>Finding:</u> The correct non-discrimination statement (NDS) was not included on all program materials. The NDS was missing on the local wellness policy. The correct NDS elected by School Food Authority (SFA) was not included on DC notification letter, verification "We Must Check" and "We Have Checked" documents, free and reduced meal application and public release.</p> <p><u>Corrective Action:</u> Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
Corrective Action History		<p><u>Finding:</u> Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). Specifically, the administrative assistant, who is the determining and verifying official and enters the monthly claims and the financial administrator who is the confirming official and completes the annual financial report.</p> <p><u>Corrective Action:</u> Provide a training plan for the current school year, for all non-</p>

Administrative Review Report

Trinity Lutheran School

		school nutrition staff, with school nutrition program responsibilities. This must include a minimum of civil rights training and training related to job duties.
Site Name	Trinity Lutheran Grade Sch	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
Corrective Action History		<p><u>Finding:</u> The menu type (lunch), planned/actual number of servings prepared, planned/actual quantity in bulk units, and actual meals served were not consistently filled in daily on production records during the week of review. Production records are intended to be useful tools to record information prior to production, during production, and following production.</p> <p>Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p><u>Corrective Action:</u> Submit one full week (5-days) 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	Trinity Lutheran Grade Sch	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	435	
Corrective Action History		<p><u>Finding:</u> Standardized recipes are required for all menu items made in-house with more than one ingredient. There were no standardized recipes for pizza chicken or cheeseburgers.</p> <p><u>Corrective Action:</u> Submit a standardized recipe for cheeseburgers and pizza chicken. 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 (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).</p>
Site Name	Trinity Lutheran Grade Sch	
Form Name	Civil Rights (811-812)	
Question #	811	
Corrective Action History		<p><u>Finding:</u> The nondiscrimination "And Justice for All" poster is located in the meal service area and visible to students, however, was not printed in the required 11x17 size and 14-point. (FNS Instruction 113).</p> <p><u>Corrective Action:</u> Replace the current USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area with the correct 11x17 size color printed poster. Provide an image of how this requirement will be met. If corrected while onsite, no further action required.</p>
Site Name	Trinity Lutheran Grade Sch	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
Corrective Action History		<p><u>Finding:</u> The most recent food safety inspection report was not posted in a publicly visible location and was located behind the counter in the kitchen.</p> <p><u>Corrective Action:</u> Provide a photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>

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Administrative Review Report

Trinity Lutheran School

Technical Assistance Entries:					
TA Date	TA Log #	Question #	TA Area	Site	SFA Contact
02/07/2024	4247	700	Administrative Review	ALL	FSD/AR
Comments					
<p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> • 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. • 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. • 'Food' is expenses for edible food items and beverages. • 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. • 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. • 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. • When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools. 					
02/07/2024	4246	777	Administrative Review	ALL	FSD/AR
Comments					
<p>Supply Chain Assistance (SCA) Funds 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. 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 Supply Chain Assistance (SCA) Funds Expense Tracker that SFAs may use to track these funds, however, SFAs may use any form of tracking. SCA funds are recorded under WUFAR code 717 Revenue Source - federal reimbursement and 547 Program/Project Code - National School Lunch (NSL). Record the entire amount into NSL revenue on the AFR during the year it is received and expense it to NSL "food" as it is used. The NSL food expense may carry over into future AFR reporting year.</p>					
02/07/2024	4232	500	Administrative Review	Trinity Lutheran Grade Sch	FSD
Comments					
<p>Technical assistance was provided on Offer versus Serve (OVS). It was observed on the day of review that teachers/aides were sending students back to take the fruit component when they already had ½ cup of vegetables (tater tots) and another two full components on their tray. PHN explained that these students were not required to select the fruit component.</p>					
02/07/2024	4231	800	Administrative Review	ALL	FSD/AR
Comments					
<p>If electing to use the religious exemption to use the 2015 nondiscrimination statement, all program materials must be consistent with this statement.</p>					
02/07/2024	4230	126	Administrative Review	ALL	FSD/AR
Comments					
<p>The total household member size box 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.</p>					
02/07/2024	4255	1219	Administrative Review	ALL	FSD/AR
Comments					
<p>It is recommended that the financial specialist that is responsible for the annual financial report take the "Annual Food Service Financial Report" webcast on the DPI Online Learning Library.</p>					
02/07/2024	4254	1219	Administrative Review	ALL	FSD/AR
Comments					
<p>It is recommended that the office assistant who is responsible for entering claims and is the determining and confirming officials take the "Submitting Site-Based Reimbursement Claims," as well as the 4-part Free and Reduced Eligibility webcasts.</p>					
02/07/2024	4229	433	Administrative Review	Trinity Lutheran Grade Sch	FSD

Administrative Review Report

Trinity Lutheran School

Comments

There is a difference between product specification sheets and product formulation statements (PFS). A product specification sheet identifies specifics of the product such as product code, case weight, shelf life, and packing information. Product specification sheets are not acceptable forms of crediting documentation. A PFS is considered acceptable crediting documentation, and it shows exactly how a product contributes to the meal pattern with entries from the USDA Food Buying Guide (FBG). A PFS is required for processed products not listed in the FBG that do not have a Child Nutrition (CN) label or USDA Product Information Sheet. A PFS must be from the manufacturer and include product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern; and an original signature from the manufacturer certifying the information is correct. The crediting decision-making tree (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/crediting-decision-making-tree.pdf>) helps staff determine what types of documentation are needed.