

# Administrative Review Report

Journeys Lutheran School

## Commendations:

Thank you to all staff and student helpers at Journeys Lutheran School for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Program Director who goes above and beyond with compassion and warmth for every student, every day. The meals served were full of color and texture, and it was nice to see a spice station to help students add flavors to foods in place of using table salt. Thank you for serving healthy, nutritious meals to your students and for going above and beyond to care for your students.

## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<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>	Flagged 02/02/2023 10:16 AM	<p>Finding: The SFA has received <a href="#">Supply Chain Assistance (SCA) Funds</a> and not in compliance with the Attestation signed when receiving these funds. The funds are not being tracked separately.</p> <p>Corrective Action: Upload a copy of the <a href="#">tracker</a> that will be used to track how the funds are spent. The SCA funds may only be used on domestic minimally processed or unprocessed foods used in NSLP or SBP. The DPI School Nutrition Team recommends using the SCA funds on milk for ease of tracking.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	701	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/09/2023 01:52 PM	<p>Finding: The 21-22 Annual Financial Report requires correction. The allocation for Grants is incorrect. The only revenue for grants in the 21-22 school year was the \$2000 received as the first part of the Breakfast Expansion Grant. The same amount should be allocated as an expense for Grants so that the amounts cancel out. The Supply Chain Assistance Funds are not recorded as a grant, but instead are a revenue for NSLP.</p> <p>Corrective Action: Update the 2021-22 <a href="#">Annual Financial Report</a> by hand with the necessary corrections. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will need to make any adjustments after December 31.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/02/2023 09:05 AM	<p>Finding: Milks are occasionally given away for free to students that are not selecting a reimbursable meal. The school does not want to charge the students for the milks because it is a CEP school. Because the milk is being served outside of a reimbursable meal, it is considered a <a href="#">non-program food</a>. SFAs must generate adequate revenue from other non-program foods so that the total revenue meets the requirements in 7 CFR 210.14 (f).</p> <p>However, because there are no other non-program foods generating revenue, the cost of these items must be covered by a non-federal funding source.</p>

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		<p>Reimbursement money from USDA cannot be used to cover the costs of providing these non-reimbursable items to students free of charge because they are considered non-program foods. Therefore, these milks must be tracked and recorded throughout the year to ensure that another funding source covers the cost of providing the milk for free.</p> <p>Corrective Action: Develop a process to track any milks students take outside of the reimbursable meal. Submit a statement describing how non-program foods given free to students will be tracked and accounted for.</p> <ul style="list-style-type: none"> <li>When food service is running in the negative and the school's fund is already absorbing these losses, there is no additional "transfer" that needs to be made since the school fund is already covering program losses that exceed the cost of the non-program foods served. On the Annual Financial Report, a portion of the amount listed under Revenues as an "Operating Transfer from Non-Food Service Account" should be broken out and classified as a Non-Program Food Revenue Transfer from the Non-Food Service Account. Please note that a "transfer" or journal entry would not actually be made since this amount would already be covered by the school fund, but it would need to be allocated on the report.</li> <li>When the food service account is running in the positive (if this ever occurs in the future), a "transfer" or journal entry would need to be made because food service dollars (reimbursements) would be covering the total cost of serving these non-program foods free of charge. In this case, the total reimbursements in the year would be greater than the total program expenses and thus the reimbursement money would be covering the cost of these non-program foods. This means that money from the school fund would need to be entered as a revenue through a journal entry to food service to cover the costs of serving these non-program foods for free to students.</li> </ul>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/20/2023 02:23 PM</p>	<p>Findings: The SFA does not have <a href="#">procedures for handling discrimination complaints</a> specific for the school meal program (FNS Instruction 113-1).</p> <p>Corrective Action: Provide a timeline for when a school meal program civil rights complaint policy will be put in place or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.</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 01/27/2023 11:26 AM</p>	<p>Finding: The current <a href="#">Local Wellness Policy (LWP)</a> does not include all of the required content. The topics of public involvement, food sold outside of the school meal programs, food provided but not sold, food and beverage marketing, triennial assessment, and updating/informing the public are lacking (7 CFR 210.31).</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1004	

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<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 01/27/2023 11:12 AM	Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the Local Wellness Policy (LWP) committee.  Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1006	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 01/27/2023 11:11 AM	Finding: The SFA did not share the results of the Local Wellness Policy (LWP) <a href="#">triennial assessment</a> with the public per 7 CFR 210.31.  Corrective Action: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment.
<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (314 - 316)	
<b>Question #</b>	314	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/02/2023 08:47 AM	Finding: SFA is not following the current approved contract. The joint agreement was updated in October 2022 but the updated version was not uploaded into the contract.  Corrective Action: During the on-site review, the contract was resubmitted with the updated joint agreement document. No further action required.
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1219	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/02/2023 09:06 AM	Finding: One non-school nutrition staff member who responsibilities for the school nutrition program(s) is not tracking training hours and is required to complete 4 hours of <a href="#">professional standards training</a> hours annually. (7 CFR 210.30).  Corrective Action: Provide a training plan and upload a copy of their professional standards tracker tool for the current school year.
<b>Site Name</b>	Journeys Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	402	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		

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<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 02/01/2023 04:50 PM</p>	<p>Finding: Vegetables are credited by volume (cups). On day of review, food service staff portioned out celery by guesstimate (four sticks for ½ cup) versus using a standardized measurement tool.</p> <p>For items that are difficult to portion by volume, such as celery sticks, use the USDA Food Buying Guide (FBG) to determine the weight of ½ cup of celery. For example, according to the FBG, about six ½-inch by 4-inch celery sticks credits ½ cup of vegetable or 2.28 oz by weight.</p> <p>Corrective Action: Submit a written statement outlining how vegetables will be portioned and served in a standardized form of measurement. Work with vendor to determine the appropriate number of vegetable pieces to equal a ¼ cup or ½ cup for hard to measure vegetables such as baby carrots, pepper slices, and celery sticks.</p>
<b>Site Name</b>	Journeys 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>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged 02/02/2023 07:31 AM</p>	<p>Finding: There was signage geared toward school nutrition professionals educating on what needs to be offered and taken by students for a reimbursable meal, and an additional sign for lunch describing to students what constitutes a reimbursable meal.</p> <p>However, signage for breakfast geared towards students was missing. The breakfast signage should list the four items and inform students that under Offer versus Serve (OVS), they must select at least three items, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a>).</p> <p>Corrective Action: Submit a picture of breakfast signage near the service line.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/10/2023	2858		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
As described in the corresponding corrective action item, milk given for free to students that do not select a reimbursable (or take an extra milk with their meal) must be tracked. There is a space on the <a href="#">CEP meal check off sheet templates</a> to mark down "a la carte milk" which could be utilized to track these milks. The school could also develop some other sort of process to track these milks that suits their operation.								2/10/2023 10:11:07 AM
02/10/2023	2857		Administrative Review		FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
<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> <ul style="list-style-type: none"> <li>The <a href="#">USDA 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.</li> </ul> <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>								2/10/2023 9:55:22 AM

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The simplest way for Journeys to begin tracking SCA funds would be to use the DPI tracking tool with the total amount of SCA funds received to date from round 1, reallocation of round 1, and round 2 and 3. Then, enter in the milk invoice amounts from the start of the 22-23 school year to now, or beginning now and going forward. Please contact the DPI nutrition program consultant if there are any other questions, and also refer to the SCA Funds In a Nutshell resource.										
02/09/2023	2846		Administrative Review		FSD					
Comments					Created By	Created Date				
<p>All SFAs are required to distribute a <a href="#">Public Release</a> before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available.</p> <p>SFAs must annually distribute the Public Release to:</p> <ul style="list-style-type: none"> <li>Local news media o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)</li> <li>Local employment office</li> <li>Major employers contemplating or experiencing large layoffs</li> </ul> <p>SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.</p> <p>If the SFA calls the local media each year to inquire about publishing the public release but declines to pay to publish it, a record of this phone call should be kept to show an attempt was made send out the release to the media but that a fee was required.</p>						2/9/2023 2:17:05 PM				
02/09/2023	2845		Administrative Review		FSD					
Comments					Created By	Created Date				
<p>Each SFA must designate one staff member as the "Food Service Director" (FSD). The Food Service Director performs and/or oversees areas such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and day-to-day program management.</p> <p>When the time comes for the school to designate/hire a new food service director, please be sure the <a href="#">minimum hiring standards for new directors</a> are followed.</p> <p>The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the NSLP and SBP, with further flexibilities for directors hired after April 29, 2019, in SFAs with under 2500 enrollment.</p> <p>The hiring standards for new directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food safety training. These requirements are listed in a summary document called "<a href="#">In a Nutshell- Hiring Requirements</a>".</p>						2/9/2023 2:12:23 PM				
02/09/2023	2844		Administrative Review		FSD					
Comments					Created By	Created Date				
<p>Both of the school employees whose daily duties involve serving school meals must meet the <a href="#">annual professional standards training requirements</a> and these hours must be tracked. This includes the one staff member that only serves lunch each day. Since serving meals is part of their everyday duties, they would be considered part-time school nutrition staff and need to have 4 hours of training completed and tracked annually.</p>						2/9/2023 2:10:23 PM				
02/09/2023	2843		Administrative Review		FSD					
Comments					Created By	Created Date				
<p>If the school wishes to enlist the help of parent/community volunteers for meal service, they should receive some training. This training should, at minimum, include school nutrition <a href="#">civil rights training</a>, job-specific training, basic food safety training, and review of the <a href="#">employee health reporting agreement</a> (which covers reportable illnesses/symptoms that would exclude a person from working with food). It is also recommended that they receive training on Offer vs Serve so they are clear on exactly what makes up a complete reimbursable meal. Training should be documented. These volunteers would not be held to</p>						2/9/2023 2:07:30 PM				

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the annual professional standards training hour requirements (such as to receive 4 hours of training each year).							
02/09/2023	2842		Administrative Review		FSD		
Comments						Created By	Created Date
The school enlists the help of several student interns during meal time as a way to teach practical job skills. This is great! The student interns do an excellent job. The food service director provides regular verbal training for the interns on food safety, avoiding work if sick, pared down civil rights training, and job-specific training. The adult servers also help supervise and train the interns each day during service. Thank you for taking the time to provide the training the interns need in a manner that is effective for them.							2/9/2023 1:58:46 PM
02/09/2023	2841		Administrative Review		FSD		
Comments						Created By	Created Date
In the cooler and freezer, there are some program foods intermingled with foods from outside of school food service. While there is minimal food for the programs kept on-site, it is recommended to more clearly separate and label program foods in the freezer and cooler. This will help prevent accidental use or contamination of program foods.							2/9/2023 1:55:22 PM
02/01/2023	2804	402	Administrative Review	Journeys Lutheran School	Food Program Director		
Comments						Created By	Created Date
<p><a href="#">Production records</a> are required to document that food meeting the meal pattern was served in the appropriate serving sizes. It was observed during lunch meal service that planned portions on the transport sheet were not being followed for portions of fruits and vegetables and increased portions were served. Reasons included receiving difficult-to-portion out vegetables (i.e. celery sticks) and ease of using a single serving utensil (4 oz spoodle) for fruits and vegetables between lunch periods (3-8th grade and 9-12th grade).</p> <p>This did not result in any component shortages; however, thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. If increased or consistent portions for fruits and vegetables are desired, communicate the needs of your program with your vendor.</p>							2/1/2023 4:54:51 PM