

# Administrative Review Report

St. John's Lutheran School

## Review Schedule:

| Schedule Type            | Start Date | End Date   |
|--------------------------|------------|------------|
| Off-Site Review          | 12/08/2022 | 01/04/2023 |
| On-Site Review           | 01/12/2023 | 01/12/2023 |
| Site Selection Worksheet |            |            |
| Entrance Conference      | 01/12/2023 | 01/12/2023 |
| Exit Conference          | 01/12/2023 | 01/12/2023 |

## Commendations:

Our sincere thanks to the administration and school nutrition staff of Glendale River Hills School District. We appreciate your time and effort spent preparing for and participating in the administrative review process. The DPI team really appreciates how the food service worker presented the grilled cheese sandwiches on the day of review. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

For information on the USDA Child Nutrition Programs, visit the DPI School Nutrition webpage. For in-depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<https://dpi.wi.gov/school-nutrition/training>).

## Findings and Corrective Action:

|                           |                          |  |
|---------------------------|--------------------------|--|
| Site Name                 |                          |  |
| Form Name                 | Civil Rights (800 - 807) |  |
| Question #                | 801                      |  |
| TA Log #                  | No TA Log# found         |  |
| Due Date                  |                          |  |
| Corrective Action Status  | Flagged                  |  |
| Corrective Action History | Flagged                  | <b>Finding:</b> The Public Release was not distributed to the required locations (news media outlet).  |
|                           | 01/12/2023 03:42 PM      | <b>CA:</b> Upload into SNACS the name of the news media outlet that the public release will be sent in the following school year.  |
| Site Name                 |                          |  |
| Form Name                 | Civil Rights (800 - 807) |  |
| Question #                | 803                      |  |
| TA Log #                  | No TA Log# found         |  |
| Due Date                  |                          |  |
| Corrective Action Status  | Flagged                  |  |
| Corrective Action History | Flagged                  | <b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).  |
|                           | 01/12/2023 03:21 PM      | <b>CA:</b> 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. |
| Site Name                 |                          |  |
| Form Name                 | Civil Rights (800 - 807) |  |
| Question #                | 805                      |  |

# Administrative Review Report

St. John's Lutheran School

|                           |  |  |
|---------------------------|--|--|
| TA Log #                  | No TA Log# found                       |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged                                |  |
| Corrective Action History | <p>Flagged<br/>01/12/2023 03:21 PM</p> | <p><b>Finding:</b> All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).</p> <p><b>CA:</b> Provide a detailed statement or policy indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. See the SNT Special Dietary Needs example policy for assistance (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx</a>).</p> |
| Site Name                 |  |  |
| Form Name                 | Civil Rights (800 - 807)               |  |
| Question #                | 806                                    |  |
| TA Log #                  | No TA Log# found                       |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged                                |  |
| Corrective Action History | <p>Flagged<br/>01/12/2023 03:22 PM</p> | <p><b>Finding:</b> Civil Rights training did not occur or documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).</p> <p><b>CA:</b> Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>   |
| Site Name                 |  |  |
| Form Name                 | Civil Rights (800 - 807)               |  |
| Question #                | 807                                    |  |
| TA Log #                  | No TA Log# found                       |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged                                |  |
| Corrective Action History | <p>Flagged<br/>01/12/2023 03:22 PM</p> | <p><b>Finding:</b> The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p><b>CA:</b> Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>   |
| Site Name                 |  |  |
| Form Name                 | Local School Wellness (1000 - 1006)    |  |
| Question #                | 1000                                   |  |
| TA Log #                  | No TA Log# found                       |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged                                |  |
| Corrective Action History | <p>Flagged<br/>01/12/2023 03:35 PM</p> | <p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content: Nutrition promotion, triennial assessment, policy leadership, public involvement, foods sold outside of the school meal programs, and food and beverage marketing (7 CFR 210.31).</p> <p><b>CA:</b> Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>   |
| Site Name                 |  |  |
| Form Name                 | Local School Wellness (1000 - 1006)    |  |
| Question #                | 1001                                   |  |

# Administrative Review Report

St. John's Lutheran School

|                           |  |  |
|---------------------------|--|--|
| TA Log #                  | No TA Log# found                                     |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | Flagged<br>01/12/2023 03:36 PM                       | <b>Finding:</b> The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.<br><b>CA:</b> Notify the public of the LWP and upload documentation for how the public was notified.   |
| Site Name                 |  |  |
| Form Name                 | Local School Wellness (1000 - 1006)                  |  |
| Question #                | 1004   |  |
| TA Log #                  | No TA Log# found                                     |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | Flagged<br>01/12/2023 03:37 PM                       | <b>Finding:</b> The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.<br><b>CA:</b> Provide a plan on how potential stakeholders will be notified of their ability to participate.   |
| Site Name                 |  |  |
| Form Name                 | Local School Wellness (1000 - 1006)                  |  |
| Question #                | 1005   |  |
| TA Log #                  | No TA Log# found                                     |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | Flagged<br>01/12/2023 03:38 PM                       | <b>Finding:</b> SFA has not completed the assessment of the Local Wellness Policy within the last three years.<br><b>CA:</b> Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.   |
| Site Name                 |  |  |
| Form Name                 | Food Safety & Buy American (1400 - 1403)             |  |
| Question #                | 1400   |  |
| TA Log #                  | No TA Log# found                                     |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | Flagged<br>01/12/2023 03:31 PM                       | <b>Finding:</b> The SFA did not have a copy of the food safety plan at each school and/or was not site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).<br><b>CA:</b> Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACs. |
| Site Name                 | Saint John Lutheran Grade Sch                        |  |
| Form Name                 | Meal Counting and Claiming - Day of Review (317-321) |  |
| Question #                | 318  |  |
| TA Log #                  | No TA Log# found                                     |  |
| Due Date                  |  |  |

# Administrative Review Report

St. John's Lutheran School

|                           |  |  |
|---------------------------|--|--|
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | <p>Flagged<br/>02/03/2023 09:45 AM</p>                   | <p><b>Finding:</b> The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts for the K-3 students were not taken as the student received their reimbursable meal; meals checked off by teacher and then meals were taken to students.</p> <p><b>CA:</b> Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>   |
| Site Name                 | Saint John Lutheran Grade Sch                            |  |
| Form Name                 | Meal Counting and Claiming - Day of Review (317-321)     |  |
| Question #                | 320  |  |
| TA Log #                  | No TA Log# found   |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | <p>Flagged<br/>02/03/2023 10:07 AM</p>                   | <p><b>Finding:</b> The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Students are checked off by teachers before students receive a reimbursable meal.</p> <p><b>CA #1:</b> Correct the meal counting process to ensure meal counts are correctly counted. <b>Corrected on-site; no further action needed.</b></p> <p><b>CA #2:</b> Submit a statement describing the corrected system along with a timeline for implementation.</p>   |
| Site Name                 | Saint John Lutheran Grade Sch                            |  |
| Form Name                 | Meal Counting and Claiming - Review Period (322-325)     |  |
| Question #                | 325  |  |
| TA Log #                  | No TA Log# found   |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | <p>Flagged<br/>02/03/2023 10:45 AM</p>                   | <p><b>Finding:</b> SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.</p> <p><b>CA:</b> Upload the January monthly edit check into SNACS for review before the claim is submitted.</p>  |
| Site Name                 | Saint John Lutheran Grade Sch                            |  |
| Form Name                 | Meal Components and Quantities - Day of Review (400-408) |  |
| Question #                | 404  |  |
| TA Log #                  | No TA Log# found   |  |
| Due Date                  |  |  |
| Corrective Action Status  | Flagged  |  |
| Corrective Action History | <p>Flagged<br/>01/12/2023 01:33 PM</p>                   | <p><b>Finding:</b> Signage was not posted at lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, 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><b>Corrective Action:</b> Submit a picture of completed signage posted near the lunch service line.</p> |
| Site Name                 | Saint John Lutheran Grade Sch                            |  |
| Form Name                 | Meal Components and Quantities - Day of Review (400-408) |  |
| Question #                | 406  |  |

# Administrative Review Report

St. John's Lutheran School

|                           |   |  |
|---------------------------|---|--|
| TA Log #                  | No TA Log# found  |  |
| Due Date                  |   |  |
| Corrective Action Status  | Flagged   |  |
| Corrective Action History | Flagged<br>01/12/2023 01:44 PM                                    | <p><b>Finding:</b> The meals offered to K3 and K4 did not meet the Preschool meal pattern requirements. Specifically, these students cannot be served chocolate milk.</p> <p><b>Corrective Action:</b> Submit a statement explaining what specific changes will be made to bring the meals served to K3 and K4 into compliance with the preschool meal pattern.</p>  |
| Site Name                 | Saint John Lutheran Grade Sch                                     |  |
| Form Name                 | Meal Components and Quantities - Review Period (409-412, 430-437) |  |
| Question #                | 410   |  |
| TA Log #                  | No TA Log# found  |  |
| Due Date                  |   |  |
| Corrective Action Status  | Flagged   |  |
| Corrective Action History | Flagged<br>02/03/2023 11:37 AM                                    | <p><b>Finding:</b> There was a weekly dark green and red/orange vegetable shortage at lunch during the week of review. Only 1/2 cup of red/orange vegetables were offered and there were zero cups of dark green vegetables offered over the course of the week. The minimum for red/orange vegetables is 3/4 cup/week and the minimum for dark green vegetables is 1/2 cup/week.</p> <p><b>Corrective Action:</b> Submit a statement explaining how these weekly shortages will be fixed during the week of review.</p> |
| Site Name                 | Saint John Lutheran Grade Sch                                     |  |
| Form Name                 | Meal Components and Quantities - Review Period (409-412, 430-437) |  |
| Question #                | 437   |  |
| TA Log #                  | No TA Log# found  |  |
| Due Date                  |   |  |
| Corrective Action Status  | Flagged   |  |
| Corrective Action History | Flagged<br>02/03/2023 11:34 AM                                    | <p><b>Finding:</b> There was a weekly grain shortage at lunch during the week of review. Only 7 oz. eq. grains was offered over the course of the week, which does not meet the minimum 8 oz. eq. grains requirement for the K-8 meal pattern.</p> <p><b>Corrective Action:</b> Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.</p>                |
| Site Name                 | Saint John Lutheran Grade Sch                                     |  |
| Form Name                 | Civil Rights (811-812)  |  |
| Question #                | 811   |  |
| TA Log #                  | No TA Log# found  |  |
| Due Date                  |   |  |
| Corrective Action Status  | Flagged   |  |
| Corrective Action History | Flagged<br>01/12/2023 03:25 PM                                    | <p><b>Finding:</b> The nondiscrimination "And Justice for All" poster is not in the correct size (11" x 17").</p> <p><b>CA:</b> Corrected onsite; no further action needed.</p>  |
| Site Name                 | Saint John Lutheran Grade Sch                                     |  |
| Form Name                 | Food Safety, Storage and Buy American (1404-1411)                 |  |
| Question #                | 1406  |  |
| TA Log #                  | No TA Log# found  |  |
| Due Date                  |   |  |

# Administrative Review Report

St. John's Lutheran School

|                                  |                                |  |
|----------------------------------|--------------------------------|--|
| <b>Corrective Action Status</b>  | Flagged                        |  |
| <b>Corrective Action History</b> | Flagged<br>01/12/2023 03:26 PM | <b>Finding:</b> The most recent food safety inspection report was not posted in a publicly visible location.<br><b>CA:</b> Corrected onsite; no further action needed. |

## Technical Assistance Entries:

| TA Date   | TA Log # | Question # | TA Area               | Site | SFA Contact | Email             | Phone                | User Name |
|---|----------|------------|-----------------------|------|-------------|-------------------|----------------------|-----------|
| 01/12/2023  | 2685     |            | Administrative Review |      | FSD/AR      |                   |                      |           |
| <b>Comments</b>   |          |            |                       |      |             |                   |                      |           |
|   |          |            |                       |      |             | <b>Created By</b> | <b>Created Date</b>  |           |
| Food service staff, teachers and Authorized Representative did not have a clear understanding of the Offer Versus Serve (OVS) requirements for lunch. Although all students observed took a reimbursable meal, it is important for staff to understand OVS requirements. Visit our Online Learning Library for opportunities ( <a href="https://dpi.wi.gov/school-nutrition/training/online-learning">https://dpi.wi.gov/school-nutrition/training/online-learning</a> ). |          |            |                       |      |             |                   | 1/12/2023 1:47:42 PM |           |