

# Administrative Review Report

St. Paul Lutheran School

**Commendations from the Public Health Nutritionist:**

Due to the safer at home policies related to COVID-19, DPI was unable to complete the on-site review at St. Paul Lutheran as originally scheduled for March 2020. All staff at St. Paul Lutheran were accommodating to this new off-site procedure and created time to speak with us over the phone on multiple occasions. Staff was honest in their dialogue about current practices and receptive to suggestions. Based on conversations it is evident that St. Paul Lutheran staff have a good relationship with their students, parents, and vendor. Thank you very much for your willingness to learn more about the Preschool and Infant meal pattern; it was a pleasure working with you.

**Commendations from the Nutrition Program consultant:**

St. Paul Lutheran staff was patient and cooperative throughout the prolonged off-site review due to COVID-19 unexpected school closures. Applications for Free & Reduced price meals were all determined correctly. There were no issues or findings within the financial management of the National School Lunch Program or Afterschool Snack Program. Thank you for using counting and claiming procedures that protect student's civil rights and prevent overt identification.

**Recommendations from the Public Health Nutritionist:**

The School Nutrition Team (SNT) is proud to provide virtual learning this summer in lieu of offering our annual School Nutrition Skills Development Courses (SNSDC) in person. All recorded courses are available July 6 - September 4, 2020 for free. The SNSDC webpage, <https://dpi.wi.gov/school-nutrition/training/snsdc>, also provides you with dates and times to connect with SNT staff during a live call if you wish to have your questions answered in real time. Your SFA would benefit from the Infant and Preschool Meal Pattern course, which is a two hour course.

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## Findings and Corrective Action:

<b>Site Name</b>	
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	1601
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
<b>Site Name</b>	
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	137
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not effectively update student eligibility changes to the benefit issuance (BI) list or the point of service (POS). CA 1: Update the BI list and POS to accurately reflect the eligibility of the students in error and upload the revised BI list and Hot Lunch Roster. CA 2: Provide a process (make a statement) that the SFA will use to ensure student meal eligibility will be updated accurately and timely from the eligibility document to the BI list and POS.</p>
<b>Site Name</b>	
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	215
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not complete the verification process by November 15 and was not approved for an extension (7 CFR 245.6a) CA: Provide a statement detailing the process the SFA will follow to ensure verification is completed within the required time frame. CA 2: Attend the SNSDC Free &amp; Reduced Meal Eligibility and Verification (View all 6 section videos and attend office hours) and upload your certificate of completion into SNACS documents tab.</p>
<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>	<p>Finding: The correct non-discrimination statement was not included on all program materials. If the entire statement does not fit on a document, such as a menu, only use this shortened version: "This institution is an equal opportunity provider." CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>

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<b>Site Name</b>	
<b>Form Name</b>	Local School Wellness (1007)
<b>Question #</b>	1007
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding 1: The SFA's current Local Wellness Policy does not include any of the required content. Finding 2: The SFA does not have documentation indicating when and how the Local Wellness Policy is/will be reviewed and updated. Finding 3: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee. Finding 4: These Local Wellness Policy findings are repeat findings from the SFAs previous Administrative Review. CA: Watch the LWP webinar and upload the certificate of completion. Review the resources online, including the LWP checklist and provide a statement of understanding of the LWP requirements and who will be in charge of creating the Wellness committee, developing the policy, reviewing and updating the policy in future, and sharing the policy and all reviews and updates with the public. Put a policy together by the defined date negotiated with the NPC, which must be provided to our office for approval before December 17, 2020.</p>
<b>Site Name</b>	
<b>Form Name</b>	Professional Standards (1210 - 1219)
<b>Question #</b>	1214
<b>TA Log #</b>	No TA Log# found
<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The School Nutrition Program Director did not complete the 12 hours of annual continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30). CA: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year.</p>
<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>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. CA: 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.</p>
<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

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<b>Corrective Action History</b>	Finding: 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). CA: Provide a training plan for the current school year, for all non-nutrition staff, with school nutrition program responsibilities.	
<b>Site Name</b>		
<b>Form Name</b>	Reporting and Recordkeeping (1500 - 1501)	
<b>Question #</b>	1501	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	Finding: SFA is not maintaining program records and documentation for three years plus the current school year (7 CFR 210.23(c)) specifically copies of notifications and communications to households regarding students Free or Reduced status. CA: Provide a statement of how you will meet the record retention requirement moving forward.	
<b>Site Name</b>	St. Paul Lutheran School	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>	322	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Finding: SFA did 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. The SFA's systemic errors include not counting meals daily by eligibility, nor completing monthly edit checks for each school prior to claim submission. CA: Recalculation. Revise POS, counting and claiming procedures to meet program requirements. From the first day of meal service in the 20/21 SY provide 30 days of clean counts for NSLP from which fiscal action will be assessed.	
<b>Site Name</b>	St. Paul 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>	CAP Accepted	
<b>Corrective Action History</b>		
<b>Site Name</b>	St. Paul Lutheran School	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Accepted	

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<b>Corrective Action History</b>		Finding : During the week of review, a fruit shortage was noted. Fruited jello was served on Tuesday, Feb 25 and this did not provide the daily minimum of 1/2 cup. Corrective Action : Please submit a statement or recipe indicating how this menu item will be planned in order to meet daily requirements in the future.
		CAP Accepted
<b>Site Name</b>	St. Paul 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>	CAP Accepted	
<b>Corrective Action History</b>		Finding : Per phone call with food service staff no formal training on the topic of Offer versus Serve has been completed. Although meal observation was not possible related to COVID-19, it is important for staff to understand the OVS requirements. OVS resources on WI DPI's Menu Planning webpage may be used as training resources ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a> ). The lunch meal pattern webcast may also be helpful ( <a href="http://dpi.wi.gov/school-nutrition/training/webcasts#lunch">http://dpi.wi.gov/school-nutrition/training/webcasts#lunch</a> ). Corrective Action : Have staff person responsible for determining reimbursable meals participant in training on OVS. Please submit proof of webinar completion.
		CAP Accepted
<b>Site Name</b>	St. Paul Lutheran School	
<b>Form Name</b>	Afterschool Snack Program	
<b>Question #</b>	3	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		Finding: Daily and monthly point of service afterschool snack counts are not being maintained to support the claims for reimbursement. CA: Provide a statement that describes how Afterschool Snack counts will be recorded at the Point of Service and maintained for three years plus the current school year. Submit 30 consecutive operating days of Afterschool Snack POS counts. Fiscal action will apply.
<b>Site Name</b>	St. Paul Lutheran School	
<b>Form Name</b>	Afterschool Snack Program	
<b>Question #</b>	4	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>		Finding: Afterschool Snack counts were incorrectly counted and claimed. Claim for review month can not be validated. ADA on claim is not based on Afterschool activity attendance. (7 CFR 210.10).  CA: Recalculation required. Correct the issue and provide 30 consecutive operating days of ASP point of sale snack counts. Fiscal Action may apply.
<b>Site Name</b>	St. Paul Lutheran School	
<b>Form Name</b>	Afterschool Snack Program	
<b>Question #</b>	7	

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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>	<p>Finding: The Afterschool Snack onsite monitoring was not completed within the required timeframes. (7 CFR 210.9)            CA: 1. Provide a statement of understanding that the Afterschool Snack Program must be monitored twice each year at each site it is operated at. Once during the first four weeks of the program plus one additional time during the program year.</p>		

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
07/24/2020	2186		Administrative Review					
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Take care to see that the Annual Financial Report beginning balance matches the ending balance of previous year. Ensure that no funds are transferred out of the school food service fund and account for any transfers into the food service fund from the school's general fund on the annual financial report.								7/24/2020 2:43:12 PM
07/24/2020	2185		Administrative Review					
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
St Paul currently is approved as Area-Eligible Afterschool Snack Program. Accurate snack counting can be simplified by using a counting or tally system that is separate from any daycare or afterschool care attendance records. However, to figure the Average Daily Attendance figure required on the monthly ASP claim, those separate attendance records will be necessary. Using a combined production and snack count form such as the one on the SNT webpage <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/asp-area-eligible-menu-prod-record-count-record.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/asp-area-eligible-menu-prod-record-count-record.docx</a> will assist in accurate counting. Note that only an adult in charge can check or mark students off at the time that they receive snack. To be eligible for reimbursement under the ASP, the program must: Be operated by an SFA or RCCI that participates in the NSLP. The SFA must retain financial, administrative, and managerial responsibility of the ASP. Provide organized, supervised, and educational enrichment activities designed with the purpose of caring for students in an afterschool setting. Have at least one afterschool enrichment activity must be open to all students at the site operating the ASP. Operate only after the school day has ended. Snacks cannot be reimbursed in programs operated before or during the school day. Operate the program only on days school is in session. Snacks are not reimbursable on weekends, holidays, or during school vacations. The afterschool snack meal patterns are different from NSLP and are different depending on age group. While all ages of students may be served together, production records must indicate the number of servings of each meal pattern that were served for each component. All prepared foods served for ASP must meet the nutritional and crediting requirements. Please refer to the ASP meal pattern. Keep all labels of prepared foods served in ASP.								7/24/2020 1:49:29 PM
07/24/2020	2184		Administrative Review					
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Monthly edit checks compare daily and monthly meal count data to other information (e.g., number of eligible students and attendance figures, etc.) to identify possible problems in the meal count system prior to submitting a claim for reimbursement. Any meal counts that do not seem reasonable should be explained or investigated to ensure accuracy. A test of reasonableness cannot be defined for all circumstances but examples of what could be considered "unreasonable" unless explained include: • Meal counts that exceed the number of eligible students in attendance on any given day • Constant counts – meal counts are the same every day. • Meal counts where extremely high percentages of eligible students eat every day. • Pattern counts – counts that seem to repeat in patterns. • Served count equal to delivery count for vended meals An edit check form developed by the SNT may be used: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/monthly-edit-check.doc">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/monthly-edit-check.doc</a> . The edit check becomes a part of the monthly claiming records retained by the SFA.								7/24/2020 1:19:03 PM
07/21/2020	2179		Administrative Review					

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Comments				Created By	Created Date
All cooling equipment such as milk coolers must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines. Temperature logs should be maintained for 6 months. All food service employees must have a signed Food Employee Reporting Agreement on file ( <a href="https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf">https://datcp.wi.gov/Documents/foodemployee-reporting-agreements-supplement.pdf</a> ). The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site. Remove or adapt SOPs to reflect site-specific procedures such as receiving hot prepared foods, and temping each batch of prepared foods at the time of service.					7/21/2020 1:22:39 PM
07/21/2020	2178		Administrative Review		
Comments				Created By	Created Date
Keep a signed, dated roster of all Civil Rights training participants.					7/24/2020 2:44:58 PM
Civil Rights Training • Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.					7/21/2020 1:09:55 PM
07/21/2020	2177		Administrative Review		
Comments				Created By	Created Date
Processes for complaints • Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. • All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance. • All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A 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. Please refer to the USDA Program Discrimination Complaint Form for assistance in filing these complaints ( <a href="https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf">https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf</a> ).					7/21/2020 1:07:39 PM
07/21/2020	2176		Administrative Review		
Comments				Created By	Created Date
Verification is required to be completed between October 1 and November 15 of each school year. Use the verification tracking for found on the SNT webpage: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/verification">https://dpi.wi.gov/school-nutrition/program-requirements/verification</a> . The Verification Collection Report is due by February 1 each year. The Free, Reduced and Verification course offered for SNSDC 2020 is six recorded videos available for viewing now until September.					7/21/2020 12:10:23 PM
07/21/2020	2175		Administrative Review		
Comments				Created By	Created Date
The SFA needs to retain all records which identify a student's Free or Reduced status including the original application, notes from a conversation with the household completing or clarifying an application, copies of letters or emails notifying a household of a determination, copies of DC runs that qualify each student, and any other communications with a household regarding a student's eligibility or with another school official regarding a Other Source Categorically eligible student.					7/21/2020 11:31:06 AM
07/21/2020	2174		Administrative Review		
Comments				Created By	Created Date
When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually). The Determining Official must fill out the back of the application with the income information that determined the application. When applications are chosen for					7/21/2020 11:19:18 AM

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verification, 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. The CO only reviews and signs applications chosen for verification. • 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. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.							
07/07/2020	2151		Administrative Review				
Comments							
				Created By	Created Date		
SFAs must establish a local school wellness policy (LWP) for each school participating in the NSLP or SBP. Regulations require minimum content to be included regarding nutrition, physical activity, foods sold on campus, health promotion, etc. See the Local Wellness Policy Checklist on the SNT website for details. (7 CFR 210.31) The SFA must inform the public about the content, implementation of, and updates to the LWP on an annual basis. SFAs may use a variety of methods to notify the public about the LWP. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification (7 CFR 210.31). The SFA must review and update the local school wellness policy (LWP) on a periodic basis. The frequency of updates is a local decision and is based on the content and structure of the plan (7 CFR 210.31). The SFA must permit parents, students, physical education teachers, school health professionals, school administrators, school board members, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP (7 CFR 210.31). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31). An assessment of the Local Wellness Policy (LWP) must be conducted once every three years, with the first assessment completed no later than June 30, 2020. The SFA must develop a report that describes the extent to which schools comply with the LWP; the progress made toward attaining the goals of the LWP; and the extent to which the LWP compares to a model policy. To meet this requirement, the School Nutrition Team encourages SFAs to use: 1)The LWP Report Card to assess the extent to which schools comply with the LWP and progress made in attaining the goals of the LWP. 2) The WellSAT tool can be used to assess how the policy compares to a model policy. These tools are located on the Local Wellness Policy webpage ( <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> ). Retain a copy of the assessment report and documentation regarding the public notification (7 CFR 210.31). The SFA must inform and update the public about the assessment of the implementation of Local Wellness Policy (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public including: mailing flyers, newsletters, emails, website postings, and newspaper articles. The assessment includes the extent to which the SFA is in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy (7 CFR 210.31).					7/7/2020 9:35:59 AM		
06/08/2020	2104	406	Administrative Review	St. Paul Lutheran School	FSD		
Comments							
				Created By	Created Date		
St. Paul Lutheran currently serves a small number of students in 3K and 4K. They eat in the lunchroom before the elementary students arrive; staff are able to distinguish these PreK kids from the rest of the students. There is an infant and preschool meal pattern that is different from the K-8 meal pattern for the National School Lunch Program. When the two age groups are not co-mingled, SFAs are expected to use the Preschool Meal Pattern. Information on these meal patterns is available on the Infants and Preschool in NSLP and SBP webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool</a> ).					6/9/2020 6:05:21 PM		
06/08/2020	2103	1403	Administrative Review	ALL	FSD		
Comments							
				Created By	Created Date		
Food products used for the school meals program must have documentation if they are non-domestic. Further information can be found in Buy American in a Nutshell ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-a-nutshell.pdf</a> ). Please complete non-domestic documentation for any products at the school and the off-site kitchen ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a> ).					6/9/2020 5:44:52 PM		



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