

Administrative Review Report

Our Redeemer Lutheran School

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/13/2023	04/14/2023
On-Site Review	04/25/2023	04/25/2023
Site Selection Worksheet	03/13/2023	03/13/2023
Entrance Conference	04/25/2023	04/25/2023
Exit Conference	04/25/2023	04/25/2023

Commendations:

Our sincere thanks to the administration and school nutrition staff of the SFA. We appreciate the time and effort spent preparing for and participating in the administrative review process. The FSD is very organized and had all materials ready and available for review. Thank you also for your availability during the on-site portion of the review. 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) (https://dpi.wi.gov/school-nutrition/training).

From the Public Health Nutritionist: Thank you to all staff at Our Redeemer Lutheran School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the school staff 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 kitchen and lunch records are neat and organized! Thank you for serving healthy, nutritious meals to your students!

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Findings and Corrective Action:

Form Name	Verification (200 - 204)	
Question #	200	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History		
	Flagged 04/05/2023 04:39 PM	<p>Finding: SFA did not select the correct number of applications for verification. Section 4 does not indicate the number of applications and Section 5-8 does not reflect the results of Verification.</p> <p>CA: Review the VCR reporting instructions and upload a copy of the report, with the corrections manually noted, into SNACS.</p>
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 04/06/2023 08:34 AM	<p>Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: 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>
Form Name	Civil Rights (800 - 807)	
Question #	806	

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TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 04/06/2023 09:39 AM</p>	<p>Finding: 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>CA: Provide the civil rights training to all staff - teachers - who interact with program applicants. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Form Name	Local School Wellness (1000 - 1006)	
Question #	1006	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 04/06/2023 09:19 AM</p>	<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>CA: 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.</p>
Form Name	Verification (207 - 215)	
Question #	211	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 04/25/2023 12:25 PM</p>	<p>Finding: The verification notification letter used from SNACS does not contain all required information. The correct NDS was not included with SNACS verification email sent.</p>

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		CA: Submit a statement indicating that the correct NDS will be included as an attachment with the SNACS email/letter or that the DPI template letter will be used moving forward.
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 04/06/2023 09:27 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.</p> <p>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>
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	<p>Flagged 04/25/2023 10:10 AM</p>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <p>-Canned pineapple (Philippines)</p> <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the canned pineapple. Noncompliant Product List templates can be found on the Buy American webpage (https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>
Form Name	Meal Counting and Claiming - Day of Review (317-321)	

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Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/25/2023 12:52 PM</p>	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the student received their reimbursable meal.</p> <p>CA: 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>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/25/2023 11:31 AM</p>	<p>Finding: Bulk quantities of each menu item are sent from Delavan-Darien School District to Our Redeemer Lutheran School daily. Most items come refrigerated or frozen and cooking of the foods occurs onsite at Our Redeemer Lutheran. There is currently no documentation of what is received from Delavan-Darien School District (i.e., a delivery slip). This information should be tracked by Delavan-Darien School District and confirmed by Our Redeemer Lutheran daily. Please add this information to the current production record or develop a separate delivery slip to send with orders.</p> <p>Corrective Action: Send a sample of the delivery slip or updated production record demonstrating this information is tracked.</p>

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Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged	Finding: The most recent food safety inspection report was not posted in a publicly visible location. CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.
	04/25/2023 01:32 PM	

Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1407	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with what is outlined in the site-specific SOP's for (#9 and #10 receiving food; some items in reach-in freezer out of original containers without received dates). CA: Modify the SOP so that it aligns with actual practices or adjust practices to align with the SOP as written. Submit a copy of the updated SOP or a statement describing how practices will be adjusted to be compliant with the established SOP.
	04/25/2023 01:36 PM	

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/25/2023	3498	1107	Administrative Review	Our Redeemer Lutheran School	FSD			

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Comments							
<p>Technical Assistance: Discontinue offering second servings (with the exception of fruits and vegetables) free of charge to students. Offering seconds complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly dietary specifications. If students are still hungry, second servings may be sold a la carte.</p> <p style="text-align: right;">4/25/2023 12:35:10 PM</p>							
04/25/2023	3497	407	Administrative Review	Our Redeemer Lutheran School	FSD		
Comments							
<p>Technical Assistance: Mandarin oranges are sent instead of oranges as indicated on the production records and menus. The mandarin oranges weigh 4.4 oz and credit as ½ cup fruit; however, due to the varying sizes of mandarin oranges the DPI reviewer suggests that the vendor and SFA weigh mandarin oranges prior to serving to ensure that the weight of the mandarin oranges credits as ½ cup fruit. Each mandarin orange must weigh at least 3.2 oz to be equivalent to ½ cup fruit. If one mandarin weighs less than 3.2 oz, two mandarin oranges would have to be served.</p> <p style="text-align: right;">4/25/2023 12:28:35 PM</p>							
04/06/2023	3395	709	Administrative Review	ALL	Authorized Representative		
Comments							
<p>Nonprogram Foods Revenue: All food sold in a school and purchased with funds from the nonprofit school food service account, other than meals and supplements reimbursed by the USDA, must generate revenue at least equal to the full cost of such foods (7 CFR Part 210). All costs of Nonprogram Foods must be covered by revenues received from the sale of those foods including:</p> <ul style="list-style-type: none"> • Food • Labor • Equipment • Purchased Services • Other expenses. <p>Nonprogram Foods may not be supported by funds from reimbursable meals or have losses absorbed by the food service account. If Nonprogram Foods revenue is in the negative, non-federal funds must be transferred into the food service account to cover the deficit. Nonprogram Foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit foodservice account to include, but not limited to:</p> <ul style="list-style-type: none"> • Extra entrees • A la carte items • Adult or visitor meals • Cold lunch milk/extra milks sold/paid milk breaks/ unreimbursed Wisconsin School Day Milk • Food service operated vending machines 							

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- Foods sold outside school hours by food service
- Foods used for catering
- Foods sold to classes or fundraisers
- Vended meals sold to other agencies (Joint)
- Any other foods for which the SFA does not receive reimbursement from USDA

4/6/2023 10:48:47 AM

04/06/2023	3393	806	Administrative Review	ALL	Authorized Representative		
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Comments

Civil Rights Training

- Civil rights training, such as the [Civil Rights webcast](#), must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood-service staff.

4/6/2023 9:41:03 AM

04/06/2023	3390	1217	Administrative Review	ALL	Authorized Representative		
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Comments

Training Requirements

- 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 "[In A Nutshell- Training](#)" 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. The DPI [Professional Standards Tracking Tool](#) or the USDA Professional Standards Tracking Tool are encouraged but not required.

4/6/2023 9:28:21 AM

04/06/2023	3384	807	Administrative Review	ALL	Authorized Representative		
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Comments

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form must be completed and signed by October 31 annually. This is kept on file at the SFA until requested by DPI.

4/6/2023 8:51:46 AM

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04/06/2023	3383	806	Administrative Review	ALL	Authorized Representative			
Comments								
<p>USDA requires civil rights training on an annual basis for all who interact with the Child Nutrition Programs participants. The training outlines specific civil rights regulations that govern these programs. The training informs administrators of these programs receiving Federal financial assistance of their rights and responsibilities. Each SFA must maintain documentation of the training and an attendance record of participants that attended.</p> <p style="text-align: right;">4/6/2023 8:46:31 AM</p>								
04/06/2023	3382	805	Administrative Review	ALL	Authorized Representative			
Comments								
<p>Special Dietary Needs</p> <ul style="list-style-type: none"> • 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. • Policy Requirements- 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 Special Dietary Needs Policy template which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information. • Medical Statement - It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include: <ol style="list-style-type: none"> 1. an explanation of how the child's physical or mental impairment restricts the child's diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 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 • 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. • 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. 								

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- SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. SFAs must get pre-approval from the DPI School Nutrition Team by completing the Fluid Milk Substitute Approval Form. A List of Allowable Fluid Milk Substitutes is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements.
- Resources - [The Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The USDA Q&A on Accommodating Special Dietary Needs resource, the USDA Special Dietary Needs Handbook, and Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) contain additional detailed information.

4/6/2023 8:41:20 AM

04/06/2023	3381	803	Administrative Review	ALL	Authorized Representative		
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Comments

Processes for Complaints

- 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.
- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. **It is recommended SFAs use the [Template Civil Rights Complaint Procedures](#) to create written procedures.**
- 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 (Espanol).
 2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) o Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 or Fax: (608) 267-0363 or Email: 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.

4/6/2023 8:40:27 AM

04/06/2023	3380	802	Administrative Review	ALL	Authorized Representative		
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Comments

Limited English Proficiency

Organizations participating in the USDA Child Nutrition Programs have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by those with Limited English Proficiency (LEP). Persons with LEP are individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. See [USDA Memo SP 37-2026](#), Meaningful Access for Persons with Limited English

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[Proficiency \(LEP\) in School Meal Programs](https://fns.usda.gov/cn/meaningful-access-persons-lep-school-meal-guidance-and-qas) (fns.usda.gov/cn/meaningful-access-persons-lep-school-meal-guidance-and-qas)

4/6/2023 8:39:34 AM

03/29/2023	3323	431	Administrative Review	Our Redeemer Lutheran School	FSD			
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Comments

Technical Assistance: Production records are intended to be useful tools to record production information. The following are not consistently recorded on lunch production records: planned number of meals, quantity prepared in purchase units (i.e., 2- #10 cans, 10 lb. case, 2-96 count case), leftovers of each menu item, and condiment usage. Please consistently document for all menu items daily.

3/29/2023 8:48:43 AM