

Administrative Review Report

Zion Evangelical Lutheran Congregation

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/04/2022	11/10/2022
On-Site Review	11/10/2022	11/10/2022
Site Selection Worksheet	10/04/2022	11/07/2022
Entrance Conference	11/10/2022	11/10/2022
Exit Conference	11/10/2022	11/10/2022

Commendations:

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The food service director was very receptive to feedback and eager to learn. The lunch servers were very friendly during the review and provide excellent customer service to the students. The kitchen was very clean and it was clear that food safety is valued by the servers.

From the Public Health Nutritionist:

Thank you to all the staff at Zion Evangelical Lutheran Congregation for the warm welcome and cooperation during this Administrative Review (AR). Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students!

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](#).

It is recommended that school staff seek out opportunities for additional training on the student information system. It seems like staff would greatly benefit from learning more about the features and codes in the system. It may also be a good idea to talk to other schools that use the same software to see if there are any tips to share on using the food service module. This may also help with finding ways to streamline the meal ordering, benefit management, and counting and claiming.

The SFA is encouraged to explore options for minimizing students ordering a meal and a milk on the same day when they only intend to have a full meal with one milk. It seems fairly common for this to happen and it may not always be handled efficiently or correctly.

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Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	103	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/22/2022 11:33 AM</p>	<p>Finding: It did not appear that the SFA was not correctly using the 30-day carryover for students with an eligibility status from the previous school year. (7 CFR 245.6). The determining official believed that 30 calendar days (instead of operating days) were given for the carryover period.</p> <p>Additionally, there were several students on the benefit issuance list noted as receiving benefits during the review period but that did not have eligibility documentation on file for the 22-23 school year. The determining official believes some, if not all, of these students were not correctly changed back to paid after the end of the carryover period.</p> <p>CA: Provide a corrective action plan on how the 30-day carryover will be provided to students in the future.</p>
Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	109	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/22/2022 11:38 AM</p>	<p>Finding: The current determining official (who is also the authorized representative and food service director) does not have their own access to the direct certification (DC) system. The only certified user in DC is the person that was previously in this role and should be deactivated. Each DC user must have their own login and password. Only school staff members currently involved with meal benefit management may have DC access.</p> <p>CA: The determining official must obtain their own DC access. This is a two-step process that involved setting up a username through the Wisconsin DWD system, and then submitting the completed DC access request form.</p> <p>To satisfy this corrective action item, copy the Nutrition Program Consultant on the email sent when submitting the DC access request form.</p>
Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	112	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/30/2022 09:24 AM</p>	<p>Finding: The SFA's benefit issuance list does not contain the required elements including: the names of students eligible to receive meal benefits; the effective date; and the meal eligibility status. The benefit effective date must be included. It is also recommended that the list indicate specifically how the benefits were determined.</p> <p>CA: Update the benefit issuance list to include all required information and upload into SNACS.</p>
Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	

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Question #	305	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/11/2022 02:28 PM</p>	<p>Finding: The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy in place that is communicated and distributed to the households, annually. (SP 46-2016)</p> <p>CA: Provide a timeline of when the policy will be completed and implemented along with a statement of how households will be notified annually.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/22/2022 02:17 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds but is not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.</p> <p>CA: 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>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	701	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/29/2022 08:21 AM</p>	<p>Finding: On the Annual Financial Report (AFR), for 7/1/21--6/30/22, the non-program food allocations were reported to show a negative amount in the category. There were \$46.00 listed as non-program food revenue, but \$139.16 listed as non-program food expenses.</p> <p>CA: Review the Annual Financial Report webcast or manual on the DPI website. Then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. 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>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/22/2022 02:26 PM</p>	<p>Finding: The Public Release was not distributed to the required locations.</p> <p>CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year. At minimum it must be sent to:</p> <ul style="list-style-type: none"> • local news media; • grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.);

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		<ul style="list-style-type: none"> local employment office; major employers contemplating or experiencing large layoffs.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 02:19 PM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). 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.
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	Flagged 11/22/2022 02:30 PM	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). CA: All staff and volunteers that interact with program participants must complete the required civil rights training by watching the recorded webcast or reading the entire PowerPoint presentation . Upload the sign in sheet with the names and date(s) the training was provided or upload the electronic certificate of completion obtained after finishing the recorded webcast.
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	Flagged 11/22/2022 02:21 PM	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31. CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 11/22/2022 12:40 PM	<p>Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31). For this reason, other aspects of the LWP requirements are also not being met:</p> <ul style="list-style-type: none"> • The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31. • The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated. • The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee. • SFA has not completed the assessment of the Local Wellness Policy within the last three years and did not share the results of the Local Wellness Policy (LWP) assessment with the public, since there was not policy to assess. <p>CA: Provide a detailed timeline for when the Local Wellness Policy will be implemented. Be sure the plan addresses all of the items above. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 02:14 PM	<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).</p> <p>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>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/22/2022 11:23 AM	<p>Finding: The SFA did not distribute all of the required application materials at the start of the school year. The SFA sent out a link to a printable meal benefit application and makes paper applications available. However, the application instructions and letter to households (i.e. Frequently Asked Questions) were not distributed to all households.</p> <p>CA: Provide a statement explaining how all of the required application packet materials will be distributed to all households at the start of future school years.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/29/2022 03:32 PM	<p>Finding: 39 free and reduced-price meal benefit determinations were reviewed, 10 errors were identified. The SFA did not process all household applications and benefit statuses in compliance with 7 CFR 245.6(a). See the detailed email from November 11, 2022 for specific details on the issues and corrections needed.</p> <p>CA: Submit all requested information in the November 11 email. This includes the specific dates that each item was fixed, a description of how the issue was fixed,</p>

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		<p>and (when applicable) a copy of the adverse action letter that was sent to the household. Upload the letters in SNACS. The dates and other details of the corrections may be typed in the CA box or uploaded as a consolidated document in SNACS.</p> <p>Please complete this corrective action as soon as possible, as it is more time-sensitive than the others.</p> <p>NOTE: Fiscal action will be assessed for these benefit issuance errors, which may result in a reclaim of funds.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	137	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/30/2022 09:19 AM</p>	<p>Finding: There was an application with two students on it that was approved for free benefits but the free meal status was not reflected on the benefit issuance list provided as of 10/31/22. The students should have received free meals from date of the application approval onward.</p> <p>CA: Update the students' meal benefit statuses in the student information system to ensure they are charged \$0.00 for meals. An email from the determining official on 11/11/22 showed a screenshot of one student's correction on 11/2/22. Please provide a screenshot showing the other student's correction.</p> <p>Please also provide a description of processes that will prevent similar errors in the future.</p> <p>It is recommended that the school investigate if the family was charged for meals after the date of their application approval and issue refunds for those improper charges.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	207	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/11/2022 02:00 PM</p>	<p>Finding: SFA did not complete the verification process per 7 CFR 245.2. Verification was not completed on 11/10/22 at the time of the on-site review and verification was not completed in 21-22.</p> <p>CA 1. Complete the verification process and upload all the completed verification documentation into SNACS. Supporting documentation includes the application selected, the notifications sent to household, evidence of any follow up with the household (if needed), documents submitted by the selected household, results of verification, etc.</p> <p>CA 2. Submit a statement of understanding that verification must be completed by November 15 annually.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 11/29/2022 12:24 PM	<p>Finding: The Food Service Director was hired after July 1, 2015. It was not determined in the on-site review if the new director met the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1).</p> <p>CA: Review the Professional Standards hiring requirements for new directors at schools with less than 500 enrollment. Submit a response indicating if the director met the education and experience requirements prior to hire.</p> <p>If they did, please indicate what education and experience they have that fulfills the requirement.</p> <p>If they did not, complete the Professional Standards Exemption form and submit to Karrie Isaacson at karrie.isaacson@dpi.wi.gov for review. The exemption form has been uploaded into SNACS in the Documents tab.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/29/2022 12:29 PM	<p>Finding: The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v).</p> <p>CA: Complete 8 hours of food safety training and provide documentation of completion. It is recommended that the director earn an acceptable food protection manager certification in order to fulfill this training requirement and fulfill the Wisconsin Food Code requirement for schools to have at least one certified person.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1216	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/29/2022 12:32 PM	<p>Finding: The school nutrition program staff did not complete the required training hours for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30).</p> <p>CA: Review the School Nutrition Team Professional Standards webpage for annual training requirements for school food service staff. Provide a training plan for how each staff member that is not in compliance will meet the required training hours for the current school year.</p> <p>This must include the food service director (need 12 hours), the secretary/server (need 4 hours), the three lunch helpers (need 4 hours), and the treasurer (need 4 hours). Please note that the required annual civil rights training may count as part of the annual professional standards training hours.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/29/2022 12:33 PM	<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>

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		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.
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 11/22/2022 01:57 PM	Finding: There were not signed employee health reporting agreements on file for the lunch servers. CA: Please read and sign the form. Upload the signed forms into SNACS.
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1403	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 11/14/2022 09:13 AM	Finding: The following products were identified in the SFA's storage area as non-domestic and not documented on the Buy American tracking form : Frozen Broccoli (Mexico) and Cucumbers (Mexico). Be sure to look where the product was grown or produced and distributed. CA: All non-compliant products were added to the tracking form while on-site. No further corrective action required.
	CAP Submitted 11/14/2022 09:15 AM	Corrective action completed on-site.
	CAP Accepted 11/14/2022 09:16 AM	CAP Accepted
Site Name	Zion Lutheran School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	406	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 11/14/2022 10:27 AM	Finding: The Preschool Meal Pattern is intended for school food authorities (SFAs) serving children 1-5 years of age and not yet in traditional kindergarten. During the week of review, the 4k students were eating lunch in their classroom due to it being the beginning of the school year and were receiving the K-8 meal pattern. Children who are not yet in kindergarten must be served the preschool meal pattern, if not co-mingled with other age/grade groups at meals. CA: As of October 24th, 2022, 4k students transitioned to eating lunch in the cafeteria, with kindergarteners, to improve meal efficiency. This was observed during the onsite visit. The co-mingling flexibility now applies, and students may receive the K-8 meal pattern. No further corrective action required. If 4k students return to eating in their classroom, the Preschool Meal Pattern must be provided to this age/grade group.
	CAP Submitted 11/14/2022 10:28 AM	Corrective action completed on-site.

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	CAP Accepted 11/14/2022 10:29 AM	CAP Accepted
Site Name	Zion Lutheran School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	409	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/14/2022 09:57 AM	<p>Finding: The daily minimum requirement for the vegetable component was not met for lunch on 10/11/22, during the week of review. The following represents the planned portion size: Tuesday 10/11: Dragon Punch Vegetable Juice, ½ cup vegetable. The daily minimum requirement for K-8 is ¾ cup vegetable.</p> <p>As a reminder, if a vegetable shortage would be found missing on your next Administrative Review, fiscal action would be required.</p> <p>CA: Describe specifically how the daily minimum requirement for the vegetable component will be met for lunch during the day containing the shortage (e.g. increase serving size, additional menu item, product replacement, etc.).</p>
Site Name	Zion Lutheran School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/14/2022 09:55 AM	<p>Finding: The 2 oz eq grain-based dessert limit was exceeded during the week of review—a 2 oz eq of grain-based dessert was offered. The cookie served on Monday (10/10/22) credited as 0.75 oz eq of grain. The French toast bites served on Tuesday (10/11/22) were classified as a donut, and credit as 2.0 oz eq of grain-based dessert. Therefore, the total grain-based dessert offered over the course of the week was 2.75 oz eq.</p> <p>CA: Submit a statement that explains your plan to reduce the amount of grain-based desserts offered at lunch during the week of review.</p>
Site Name	Zion Lutheran School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/14/2022 09:48 AM	<p>Finding: Production records are the SFA's way of proving that reimbursable meals were served. All items offered as part of the reimbursable meal must be recorded.</p> <p>The following items were missing from Zion's completed production records:</p> <ul style="list-style-type: none"> • Daily milk usage, including amount of each milk type • Menu type- breakfast or lunch • Menu item- with a product number or specific description • Planned/actual quantity prepared in purchase units • Leftover amounts, with unit of measurement (including condiments) <p>CA: Submit one full week of completed production records that includes the items listed above.</p>
Site Name	Zion Lutheran School	

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Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date	12/23/2022	
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/14/2022 09:52 AM</p>	<p>Finding: The K-8 meal pattern requires the menu planner to offer students a certain amount of vegetable subgroups over the course of the week, including ½ cup of starchy vegetables. It was determined that there were no starchy vegetables offered during the week of review, 10/10/22-10/14/22.</p> <p>As a reminder, if a vegetable subgroup would be found missing on your next Administrative Review, fiscal action would be required.</p> <p>CA: Submit a statement explaining how the weekly vegetable subgroup shortage will be fixed during the week of review. Include product information and serving size of the added vegetable with the statement.</p>
Site Name	Zion Lutheran School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1408	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 11/22/2022 02:07 PM</p>	<p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete. While servers consistently temp hot food and take appropriate corrective action when required, temperatures are not achieved.</p> <p>There were not any other temperature logs available for the review period. The SFA became aware of the need to take and record daily temperatures of equipment while preparing for the review.</p> <p>In November, they started keeping equipment temperature logs before the on-site visit occurred. At the time of the visit, the milk cooler was not being temped daily though the servers had been taking the temperatures of the milk cartons themselves.</p> <p>CA: Corrected by the time of the on-site visit. Servers should continue with the newly adopted temperature recording procedures. No further action needed at this time.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/30/2022	2494		Administrative Review		FSD			
Comments								
						Created By		Created Date
<p>With the school's current processes for meal benefit management and counting/claiming, it is crucial that the claim preparer is aware of the most up-to-date benefit issuance list including the dates of approval.</p> <p>When students are approved for benefits or have a change in their benefit, the determining official promptly updates their status in the SIS. This update then automatically results in the correct meal charge for the student. However, the claim preparer manually reviews the daily meal count sheets and highlights student names according to their benefit status to allow for totaling of the free, reduced-price, and paid meals served.</p> <p>To ensure accuracy, the claim preparer must know the student's most updated statuses and the effective dates of the statuses to support correct color-coding (and thus claiming) on any given day. Please ensure this detailed information is readily available to the claim preparer.</p>								11/30/2022 9:35:49 AM

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Further, the school is encouraged to continue exploring ways to streamline the meal counting and claiming procedures. There is currently a significant amount of manual work involved by three different staff members.								
11/30/2022	2493	112	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
A benefit issuance list must identify names of students eligible to receive meal benefits, the effective date and the meal eligibility. The benefit issuance list should also include how the benefits were determined, for example, through direct certification or by application.						11/30/2022 9:26:52 AM		
11/30/2022	2492	308	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
If the SFA will continue serving the 4K students in their classrooms for the first month or two of the school year, this should be reflected on the online contract. It can be noted in the "describe, if other" section on the policy statement.						11/30/2022 8:01:34 AM		
11/30/2022	2491		Administrative Review		FSD			
Comments					Created By	Created Date		
The effective eligibility date for a directly certified student is the date of the original output file. The effective eligibility date for a student eligible by application is the date the application is approved--not the date the application is received.						11/30/2022 7:48:16 AM		
11/29/2022	2489	111	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
Eligibility for free/reduced-price meals is extended to all children in a household if any member has been identified through the direct certification process as eligible for benefits under the Assistance Programs. These children are also considered directly certified. SFAs are encouraged to take appropriate steps to identify children who are part of an Assistance Program household but were not identified through direct certification through available means, such as through the use of school district enrollment records. SFAs should keep records of how and when the benefit extension was established, including documentation showing which child(ren) they share a household with. Please begin keeping clearer documentation on file that supports benefit extensions among household members. Refer to the Eligibility Manual for additional details.						11/29/2022 2:18:38 PM		
11/29/2022	2488	107	Administrative Review	ALL	FSD			
Comments					Created By	Created Date		
Households must be notified, either in writing or verbally, of their child's eligibility status within 10 operating days of receipt of the application [7 CFR 245.6(c)(6)]. Local Educational Agencies (LEAs) are permitted to communicate the written notification via e-mail to the adult household member who signed the application. Households with children who are denied benefits must receive prompt, written notification of their denial. The notification may be provided by mail or e-mail to the adult household member who signed the application. Posting the denial on the "notification" page of an online system does not meet this requirement. Likewise, informing the household of denial via telephone does not meet this requirement. LEAs that use automated telephone information systems must also give written notification of denial. The notification must advise the household of: <ul style="list-style-type: none"> Reason for denial of benefits; Right to appeal; Instructions on how to appeal; and Ability to reapply for free and reduced-price benefits at any time during the school year. Refer to the Eligibility Manual for additional details.						11/29/2022 1:56:47 PM		
11/29/2022	2481		Administrative Review		FSD			

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Comments									
					Created By		Created Date		
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.							11/29/2022 9:17:18 AM		
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.									
11/29/2022	2480		Administrative Review		AR				
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Students have the option of purchasing an extra milk or milk for their cold lunch. Families can sign up in the software system for an extra milk and can also order milk in the morning. Sometimes families order and lunch and a milk when they really intend just for the child to have the lunch that includes the milk and not for them to have an extra milk.							11/29/2022 8:52:33 AM		
The food service director (FSD) who is responsible for checking students off at the point of service manually verifies in the lunch line what the children actually got, including if they took an extra milk with their lunch. It is rare for a student to select two milks with their lunch, so there are sometimes manual corrections needed "behind the scenes" to ensure students are not charged for a milk they did not take.									
For the cold lunch milk, the FSD checks off which kids ordered and took their milk after they are seated and the lunch line is done moving. The milk cooler is set apart from the lunch line, so kids taking cold lunch milk only do not come up to the FSD with their milk.									
It is highly recommended that the school adjust these procedures for ordering and verifying extra milks. The process may be able to be simplified and errors minimized with some changes. The school may consider having all children taking cold lunch milk to come up to the POS when they take their milk to be checked off by the FSD. There may also be some reminders to parents needed that a lunch includes a milk and they should not order a lunch and milk if they only want their child to get the one milk included with their lunch.									
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Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals.							11/29/2022 8:14:38 AM		
On the Annual Financial Report, there is \$46.00 listed as non-program food revenue, but there are \$139.16 listed as non-program food expenses with the total in the food expenses. Sale of non-program foods (i.e. cold lunch milk and adult meals) must be self-sustaining and cannot run in the negative. The revenue must be greater than or equal to expenditures. Here is a resource to assist with allocating the cold lunch milk and adult meals as non-program foods on the report.									
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When a student deposits funds in their lunch account, which will be used for meal purchases, the amount received is not treated as revenue until the meal has been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the food service fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your AFR. Please ensure family meal account deposits are recorded correctly as described above.							11/29/2022 8:07:10 AM		
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<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>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 SFA 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 "In a Nutshell- Hiring Requirements".</p> <p>Per SP 38-2016, SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet the hiring standards. Additional resources may be found on the Professional Standards webpage.</p> <p>For Zion, the standards below would apply for the new food service director.</p> <ul style="list-style-type: none"> • Bachelor's degree, or equivalent educational experience, with academic major or concentration in food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field; OR • Bachelor's degree, or equivalent educational experience, with any academic major or area of concentration, and a State-recognized certificate for school nutrition directors. In Wisconsin this is the DPI School Nutrition GOALS Certificate; OR • Associate's degree, or equivalent educational experience, with academic major or concentration in food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field; and at least one year of relevant food service experience; OR • High school diploma (or GED) and three (3) years of relevant food service experience. SFAs with an enrollment of 500 or less, the Wisconsin DPI allows a minimum of one year of relevant food service experience with this option. <p>Additionally, at least eight hours of food safety training is required for all new Food Service Directors, either not more than five years prior to their starting date or completed within 30 days of their start date.</p>						11/22/2022 2:51:54 PM
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<p>The SFA is not currently making any accommodations for special dietary needs requests outside of the meal pattern. However, if families inquire about such accommodations in the future, it is recommended that the food service director review the Special Dietary Needs webpage and contact the DPI School Nutrition Team for additional guidance, as needed (https://dpi.wi.gov/school-nutrition/program-requirements/special-dietary-needs).</p> <p>A signed medical statement from a licensed medical practitioner (in Wisconsin anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. It is recommended, but not required, for SFAs to use the prototype Medical Statement for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.</p> <p>SFAs may at their discretion, choose to accommodate special dietary requests without a signed medical statement from a licensed medical practitioner. These accommodations must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is highly recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.</p>						11/22/2022 2:40:01 PM
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<p>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.</p>						11/22/2022 2:35:16 PM
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<p>All SFAs are required to distribute a Public Release 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"> Local news media Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)) Local employment office Major employers contemplating or experiencing large layoffs <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. Spanish and Hmong versions are also available.</p>							11/22/2022 2:26:43 PM
11/22/2022	2452	803	Administrative Review	ALL	FSD		
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<p>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.</p> <p>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.</p> <p>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.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> Document the complaint using the USDA Program Discrimination Complaint Form (Espanol). Submit complaints within five days of receiving the complaint to Wisconsin Department of Public Instruction (DPI). <ol style="list-style-type: none"> Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: jessica.sharkus@dpi.wi.gov 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. 							11/22/2022 2:20:39 PM
11/22/2022	2451		Administrative Review		FSD		
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<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. The USDA Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers includes detailed information on allowable ways to utilize these funds.</p> <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 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 in the entire amount as NSL revenue on the AFR during the year it is received and are expensed to NSL "food" as it is used. The NSL food expense may carry over into future AFR reporting year.</p>							11/22/2022 2:17:06 PM
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<p>A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months.</p>								11/22/2022 2:15:55 PM			
<p>SFAs can inform families of summer meals by promoting the following methods:</p> <ul style="list-style-type: none"> Promotion of the Summer Meals Locator on the DPI Summer Meals webpage Promotion of calling 211 to locate meals in the area o Promotion of the ability to text 'food' (in English or Spanish) to 304-304 Promotion of visiting the Summer Food Service Program webpage 											
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<p>All food service employees must have a signed Employee Reporting Agreement on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses. There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.</p>									11/22/2022 1:58:14 PM		
11/22/2022	2446		Administrative Review		FSD						
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<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.</p> <p>Food safety programs should contain Standard Operating Procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list.</p> <p>A prototype food safety plan template as well as template SOPs may be found on the SNT Food Safety webpage. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.</p> <p>The food safety plan should be reviewed and updated annually. Please ensure that this is completed.</p>									11/22/2022 1:55:49 PM		
11/22/2022	2444	1501	Administrative Review	ALL	FSD						
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<p>All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents.</p> <p>Other examples of program records that must be kept for three years plus the current year are:</p> <ul style="list-style-type: none"> Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters) Meal count participation data by school Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established Agreements and free and reduced price policy statements Approved and denied free and reduced price meal applications Procedures and documentation for direct certification for free meals, if applicable Procedures for alternate point-of-service meal counts, if applicable Menu and food production records and, if applicable, nutrient analysis records 									11/22/2022 1:52:06 PM		

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<ul style="list-style-type: none"> All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements) Documentation associated with the local school wellness policy Number of food safety inspections obtained per school year by each school Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year Records from the most recent food safety inspection Documents demonstrating compliance with Civil Rights requirements Audit reports and written responses and any related corrective action. 								
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<p>SFAs are required to retain basic records demonstrating compliance with local wellness policy (LWP) requirements. For assistance in the creation and updates of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A toolkit, a wellness policy builder, and wellness policy report card found on the LWP webpage.</p> <p>Each year, stakeholders must be provided with the opportunity to participate in the development, implementation, periodic review, and update of the local school wellness policy as stated in 7 CFR 210.31(d)(1). It is at the discretion of the LEA on how stakeholders are invited to participate. Suggestions for including a variety of stakeholders include:</p> <ul style="list-style-type: none"> sending a letter to parents/families; providing status updates in teacher/staff trainings; posting a call for volunteers on the LEA website; including a blurb on the school, LEA, or local community newspaper, newsletter, and/or blog; partnering with community organizations to spread the information; and posting information about the process on social media. <p>SFAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). While the SFA did include the policy in the parent/student handbook, it is recommended to look at other ways to make the policy more widely available to the public, beyond just the parents. Posting the policy on the school's website may be an easy and effective way to accomplish this.</p> <p>SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2)). The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy. SFAs must use the Wisconsin Local Wellness Policy Triennial Assessment Report Card in order to fulfill the triennial assessment requirement. The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two.</p> <p>Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued. The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team. The Triennial Assessment Report Card should be kept on file for your next DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.</p>						11/22/2022 12:43:32 PM		
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<p>Most districts and private schools participating in the National School Lunch Program are required to run direct certification (DC) with full enrollment student input files, at minimum:</p> <ul style="list-style-type: none"> 1st: beginning of the year (between July 1 - first day of school) 2nd: three months after first run (between October - December) 3rd: six months after first run (between January - March) 4th: between March 15 and April 1 (for CEP proxy report) <p>DPI recommends running DC more often than four times a year. A DC match should be completed when you receive a new student. The effective eligibility date for a DC eligible student is the date of the original output file. DC runs are only for school nutrition, and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition programs. A DC run should not be completed specifically for students in private schools to identify eligibility for other funding sources (i.e., Title 1).</p>						11/22/2022 11:40:21 AM		

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At the time of the review, the school had only completed one DC run for the current school. The second run should be completed as soon as possible to fulfill the requirement to complete a run three months after the first run.										
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Students' meal benefit eligibility as determined in the previous school year must remain in effect for up to 30 operating days in the subsequent school year, or until a new determination is made (7 CFR 245.6) Any student without documentation to support a meal eligibility after the 30 days must be charged and claimed at the paid rate. Please refer to the sections of the Eligibility Manual regarding carryover.										11/22/2022 11:29:02 AM
11/22/2022	2438	126	Administrative Review	ALL	FSD					
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Please note that the space on the back of free/reduced applications for the confirming and verifying official signatures must only be completed if the application is selected for verification. When applications are approved, only the signature of the determining official and approval date must be recorded in this section. A double-check and second signature is not required on all applications unless an Independent Review of Applications is required (as notified by DPI).										11/22/2022 11:26:48 AM
11/22/2022	2437		Administrative Review		FSD					
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An application packet includes the Free and Reduced Price Meal Eligibility application, the Instructions/How to Apply, and the Letter to Parents/Frequently Asked Questions. Note, these documents are also available in Spanish and Hmong on the free and reduced meal applications webpage .										11/22/2022 11:18:44 AM
11/22/2022	2436		Administrative Review		FSD					
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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 (letter or e-mail).										11/22/2022 11:18:03 AM
The determining official should document the details of the conversation plus date and initial on the application. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.										
11/22/2022	2435		Administrative Review		FSD					
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To be considered complete, an application must include all required information. Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and should not be processed. The LEA should make reasonable efforts to contact the household in order to clarify or obtain the required information. If clarification is obtained, the determining official can make notes on the application, sign/initial, and date then proceed with processing the application.										11/22/2022 11:16:14 AM
11/11/2022	2373	305	Administrative Review	ALL	FSD					
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USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot of what the policy should include, see the Unpaid Meal Charges In a "Nutshell" . For a comprehensive overview including best practices and helpful materials,										11/11/2022 2:31:14 PM

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see the Unpaid Meal Charges section of the Financial Management Webpage or the USDA Unpaid Meal Charges Webpage .								
While the school secretary verbally communicated how unpaid meals are typically handled, a formal written policy must be established and distributed. It is great that school is currently taking steps to ensure children are able to get a school meal regardless of their account balance, and that balance communications are handled directly with the parents/guardians.								
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There are materials to assist with verification on the DPI SNT webpage for Verification . It is highly recommended to use the Verification Tracker Form and the template letters . It is also recommended the Verifying Official watch the verification webcast prior to beginning verification to ensure proper procedures are followed.								11/11/2022 2:10:11 PM
11/11/2022	2371	214	Administrative Review	ALL	FSD			
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When a benefit eligibility status increases as a result of verification, the change must take place within three days. When benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.								
DPI has created a We HAVE CHECKED your application letter template for LEAs to use after verification is completed. According to 7 CFR 245.7(b)(1), when a household appeals a reduction or termination of benefits within the 10-calendar day advance notice period, the LEA must continue to provide the benefits for which the child was originally approved, until a final determination is made. The LEA may continue to claim reimbursement at the original level during this period. When a household does not request an appeal during the 10-calendar day advance notice period, benefits must be reduced or terminated no later than 10 operating days after the notice period. If the hearing official rules the child's benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official's decision.								11/11/2022 2:08:04 PM
Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.								
11/11/2022	2370	207	Administrative Review	ALL	FSD			
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When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA.								
DPI has created a We MUST CHECK your application sample letter for verification purposes with required documentation included. When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program.								
According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.								
The LEA must make at least one attempt to contact the household when the household does not respond to the request for verification [7 CFR 245.6a(f)(6)]. "Non-response" includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children's eligibility for free and reduced-price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.								11/11/2022 2:06:02 PM
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When an application(s) is chosen for 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 Confirming Official does not need to double check every application submitted throughout the year. The role of Confirming Official is only required during the annual verification process.		11/11/2022 2:03:18 PM