

# Administrative Review Report

St. John's Lutheran School

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/07/2022	02/27/2023
On-Site Review	02/28/2023	03/02/2023
Site Selection Worksheet	10/01/2022	10/31/2022
Entrance Conference	02/28/2023	02/28/2023
Exit Conference	02/28/2023	02/28/2023

## Commendations:

From Public Health Nutritionist:

Thank you to all staff at St. John's Lutheran for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director at Denmark School District and to the Principal at St. John's Lutheran 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 Food Service Director and Principal were very receptive to reviewer suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

## Recommendations:

No Recommendations found for this review.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	103	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 03/17/2023 01:23 PM	Finding: The SFA was not correctly using the 30 day carryover for students with an eligibility status from the previous school year. SFA used 30 calendar days as opposed to 30 operating days (7 CFR 245.6).  Corrective Action: Provide a statement of understanding that carryover benefits apply for 30 operating days of the school year, as opposed to calendar days, or until a new meal benefit application is received.
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	701	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 03/23/2023 10:12 AM	Finding: Based on the SY 2021-22 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of 3 months average expenditures. The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)).  Corrective Action: Submit a plan and timeline for reducing the net cash resources to below 3 months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	705	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 03/17/2023 12:07 PM	Finding: SFA does not have adequate internal controls to maintain oversight of federal funds. The nonprofit school food service account was charged for unallowable expenses (portion of parish refuse bill without having conducted an annual bag study, portion of school cleaning fee without conducting a time study) (2 CFR 200.303, 2 CFR 200.400).  Corrective Action 1: Complete a bag study to determine the true percentage of the refuse bill that should be charged to the school foodservice account. Additionally, complete a time study to determine the true amount of time being spent cleaning the foodservice area. Upload documentation of both studies into SNACS. The results will be compared to the previously charged percentage and the cost of the unallowable expenses charged to the nonprofit school food service account during SY 2021-22 up to and through the dates of the Administrative Review must be refunded. The consultant will provide guidance on making a transfer using non-Federal sources and uploading a copy of the general ledger into SNACS if necessary.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	806	
<b>TA Log #</b>	TA Log# exists	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 03/02/2023 08:06 AM	Finding: Civil Rights training occurred, but this training was not provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).  CA: Provide the civil rights training to all staff that interact with program applicants (determining official, employees who complete meal counts, any substitute teachers who assist with meal counting at lunch line) found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/22/2023 09:59 AM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (policy statements regarding foods sold outside of the school meal programs, food and beverage marketing, the triennial assessment, and updating/informing the public about the LWP) (7 CFR 210.31).  Corrective Action: Provide proposed updated or missing policy statements and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1001	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/22/2023 09:50 AM	Finding: The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.  Corrective Action: Notify the public of the LWP and upload documentation for how the public was notified.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1004	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/22/2023 09:48 AM	Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.  Corrective Action: Provide a plan on how potential stakeholders will be notified of their ability to participate.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1005	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/22/2023 09:39 AM	Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.  Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card (can be found at <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx</a> ) that includes WellSAT scores into SNACs or provide a link to this document on the district website.
<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>	Flagged 02/28/2023 03:07 PM	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).  Corrective Action: 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. The USDA Summer Meals Site Finder can be found at: <a href="https://usda-fns.maps.arcgis.com/apps/webappviewer/index.html?id=83b4d15211ed491a8ad5104291e601d2">https://usda-fns.maps.arcgis.com/apps/webappviewer/index.html?id=83b4d15211ed491a8ad5104291e601d2</a>
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	208	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2023 02:36 PM	Finding: SFA did not complete a confirmation review before verifying application(s).  Corrective Action: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.
<b>Site Name</b>		
<b>Form Name</b>	Verification (207 - 215)	
<b>Question #</b>	209	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/21/2023 03:27 PM	Finding: The SFA did not use the correct sampling method when selecting applications for verification (SFA is selecting student benefits to verify based on entire BI list instead of only paper applications. Verified students were eligible through DC).  Corrective Action 1: Have the verifying official watch the "Verification Process" webcast on the DPI website and upload a copy of the completed quiz into SNACS. Corrective Action 2: Provide a statement of understanding that the required application selection method is communicated in a School Nutrition Team letter emailed in September, and that students eligible through DC are not to be reviewed during the verification process.
<b>Site Name</b>		

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<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>	Flagged 02/28/2023 02:56 PM	Finding: The correct non-discrimination statement was not included on all program materials (SFA-created NDS is in parent handbook with mention of NSLP, 2022 USDA NDS on all other documents). The SFA is choosing to claim a religious exemption from the 2022 NDS to instead use the 2015 NDS.  Corrective Action: Update program materials to include the 2015 non-discrimination statement in accordance with the claim of religious exemption. All public materials referencing the school lunch program must include the 2015 version of the NDS if exempt from the 2022 version. Provide a statement of understanding that this will be completed.
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1213	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2023 01:05 PM	Finding: The 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)).  Corrective Action: Complete 8 hours of food safety training and provide documentation of completion.
<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>	Flagged 02/28/2023 01:18 PM	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).  Corrective Action: Provide a training plan for how the 12 hours of continuing education/training will be met for the current school year.
<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>	Flagged 03/16/2023 04:14 PM	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.  Corrective Action: Include all training hours completed this school year for the Food Service Director onto the USDA or DPI professional standards training

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		tracking tool ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx</a> ) and upload into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1219	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 03/16/2023 04:21 PM	Finding: Non-school nutrition staff who have responsibilities for the school nutrition program (teachers who check that a student received a reimbursable meal through Offer vs Serve) did not receive job specific training in the current school year (7 CFR 210.30).  Corrective Action: Have all teachers (including substitutes) who check that students receive a reimbursable meal watch the Offer vs Serve webcast on the DPI SNT website. Upload the completed training tracker to SNACS.
<b>Site Name</b>	St. John's Lutheran School	
<b>Form Name</b>	Offer vs Serve (500-502)	
<b>Question #</b>	502	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2023 12:35 PM	Finding: While lunch signage exists, the signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. The current signage indicates that students must select all five components. Signage examples can be found on our Signage webpage ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a> ).  Corrective Action: Submit a picture of the updated lunch signage.
<b>Site Name</b>	St. John's Lutheran School	
<b>Form Name</b>	Civil Rights (811-812)	
<b>Question #</b>	811	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2023 02:20 PM	Finding: The incorrect nondiscrimination "And Justice for All" poster is located in the meal service area (FNS Instruction 113) (2022 And Justice for All Poster is currently displayed as opposed to 2019 poster and SFA is claiming religious exemption from 2022 NDS). The 2019 And Justice for All poster can be found at: <a href="https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf">https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf</a> . It must be printed in 11"x17" format with a minimum of 14-point font.  Corrective Action: Provide a statement that the 2022 version will be taken down and replaced with the 2019 poster.

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/28/2023	3014	402	Administrative Review	St. John's Lutheran School	FSD			

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Comments									
					Created By			Created Date	
Spaghetti noodles were served on the day of review with a spaghetti spoon. This utensil is helpful in meal preparation, but it is not a standardized form of measurement. A more accurate utensil would have been a spoodle to ensure the appropriate portion size is offered.								2/28/2023 12:47:09 PM	
02/28/2023	3013	1403	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
The following information must be recorded on a Buy American Non-Compliant Product List: 1. Date 2. Name of product 3. Country of origin 4. Reason (cost analysis, seasonality, availability, substitution, distribution, other) A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage ( <a href="https://dpi.wi.gov/school-nutrition/procurement/buy-american">https://dpi.wi.gov/school-nutrition/procurement/buy-american</a> ). This has been discussed with the FSD at Denmark School District.								2/28/2023 11:14:26 AM	
02/28/2023	3236		Administrative Review		FSD				
Comments									
					Created By			Created Date	
Foodservice Directors are required to receive 12 hours of job-specific training that relates to the child nutrition programs per year. The Wisconsin DPI SNT allows a two-year flexibility to help SFAs meet this training requirement. As long as some training is completed in each of the two years, any training completed in excess of the 12-hour requirement can be applied to the immediately previous or following year. Trainings can be provided in a variety of formats (online, in person, webinars, etc.) and through various providers.								3/23/2023 10:49:05 AM	
02/28/2023	3037	806	Administrative Review	ALL	FSD				
Comments									
					Created By			Created Date	
Civil Rights training was completed in the middle of this school year. Although this still meets the yearly civil rights training requirements, best practice would be to complete Civil Rights training at the beginning of the school year so all staff who have duties related to the programs are trained by the time they start interacting with students.								3/2/2023 8:10:23 AM	
<b>Indirect Costs</b> DPI does not allow the annual assigned indirect cost rate to be applied to the nonprofit food service account. For both public and private schools in Wisconsin, any indirect type costs assessed to food service must be supported with documentation. Examples of supporting documentation for costs assessed to the nonprofit food service account could include: <ul style="list-style-type: none"><li><b>Labor expenditures</b> – a time study based on actual amount of time worked specifically for the purpose of school food service.</li><li><b>Waste disposal services, extermination services, and laundry services</b> - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.</li></ul>									