

Administrative Review Report

Columbus School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/05/2024	02/14/2024
On-Site Review	02/27/2024	02/28/2024
Site Selection Worksheet	01/05/2024	01/12/2024
Entrance Conference	02/27/2024	02/28/2024
Exit Conference	02/28/2024	02/28/2024

Commendations:

Thank you to the School Food Authority (SFA) and Food Service Director (FSD) for their exemplary performance and dedication during the recent Administrative Review (AR). Significant meal pattern improvements have been observed since the last AR, reflecting the SFA and FSD's commitment to excellence in school nutrition. Notably, no meal pattern errors were identified during the week of review, underscoring the SFA and FSD's diligence and attention to detail in menu planning and execution. Additionally, the documentation submitted for review was outstanding, showcasing the FSD's thoroughness and professionalism in maintaining records. It is evident that the FSD and foodservice staff are working diligently to ensure the provision of nutritious and compliant meals to students. Their hard work and commitment to excellence are commendable and greatly appreciated. Thank you for all you do for your students!

Thank you for sending documentation and completing the off-site questions in advance. The school nutrition staff members were very welcoming to the review team and willing to answer questions.

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.

The food service director is operating an excellent lunch program. The director works hard to ensure all program requirements are met and that there are healthy, appealing meals served every day.

The Determining Official does a great job managing student benefits. Thank you for taking the time to thoroughly answer questions and implement suggested changes.

Thank you to the business manager for providing detailed answers to questions and requested documentation. The business manager welcomed suggestions and feedback.

Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	113	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/01/2024 01:51 PM	Finding: The SFA utilizes a Sharing of Information Form to allow families eligible for free and reduced-price meals to elect to share their eligibility status to receive fee waivers. The current form has all the fee waiver options lumped together in one checkbox option. Each specific fee waiver or purpose that information is being shared for must be listed out separately to allow families to elect to share their information for each purpose. The copy of the letter provided in the offsite review also had an outdated non-discrimination statement (NDS) on it. Corrective Action: Modify the form used so each specific fee waiver is listed separately and the most updated NDS is used. Corrected onsite, no further action required.
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:47 PM</p>	<p>Finding: The Annual Financial Report (AFR) for the 2022-23 school year has errors in need of correction.</p> <p>The total revenues, total expenditures, and ending fund balance reported on the AFR do not match the PI-1505 public school financial report for Fund 50. It appears that part of the problem may be failure to report the USDA Foods Entitlement amount as an NSLP revenue and expense on the AFR. Even after accounting for this, it still appears some revenue is missing from the AFR that is included in the PI 1505.</p> <p>Further, most of the allocations on the AFR for each program's revenue and expenditure categories do not appear to be accurate. Please reassess and reallocate revenues and expenses on the report so the values in each section accurately reflect what they are supposed to.</p> <p>Please see corresponding technical assistance section of this report.</p> <p>Corrective Action: Review the AFR manual and/or watch the AFR webcast prior to working through the AFR corrections. When you are ready to record and submit the AFR corrections, use the fillable PDF Annual Financial Report Template to report all of the corrected amounts. Be sure that the total expenditures and total revenues reported on the corrected AFR match the PI 1505 numbers. Upload the final complete PDF form into SNACS. Once approved, the report will need to be updated in the Online Services portal by the DPI accountant.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
Question #	777	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:46 PM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and is not in compliance with the Attestation signed to receive the funds. The SFA is not tracking the funds as required. Please see the corresponding technical assistance section of the final report for additional details and a link to a template tracking tool that can be used.</p> <p>Corrective Action: Provide the process that will be used to track how the funds are spent. Begin tracking SCA funds and upload a copy of the tracker used. As a reminder, the SFA has received a total of \$92,077.21 to date (includes all from rounds 1-4).</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:45 PM</p>	<p>Finding: The DPI version of the non-program revenue tool was completed in the 2023-24 school year. There were two minor corrections needed: paid milk break from the elementary schools was not included and nutrition staff meals were included but did not need to be. School nutrition staff are permitted (if the SFA allows) to have a free meal each day that Fund 50 may absorb the cost for. In this scenario, the school nutrition staff are considered "program adults" (though their meals may never be claimed for reimbursement), so they do not need to be included in the non-program food revenue tool.</p>

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		<p>The tool the FSD completed indicated non-compliance with the non-program food revenue ratio requirements both before and after the corrections listed above.</p> <p>Corrective Action: Submit a statement describing how prices will be modified to ensure the revenue ratio requirements are met. This most often involves increasing the prices of a la carte items.</p> <p>Please note, there is another separate finding related to the unallowability of having Fund 50 absorb the cost of providing lunchroom supervisors a free lunch. On the non-program food revenue tool, the supervisor lunches are listed and show a revenue of \$0.00. Addressing this other finding by altering processes so that Fund 50 obtains proper revenue for the supervisor meals may resolve the overall non-compliance shown in the tool, even without increasing other a la carte prices.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:44 PM</p>	<p>Finding: The adult lunch price listed on the online contract is \$4.65. However, the district is actually charging \$4.75.</p> <p>Corrective Action: Update the 2023-24 online contract so the adult lunch price is accurately reflected—corrected onsite, no further action required.</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	711	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:44 PM</p>	<p>Finding: The SFA is providing free meals to non-school nutrition staff members that sign up for cafeteria supervision duties. These supervisors are considered "non-program adults" and are not eligible to receive free meals and have it absorbed by Fund 50. These supervisors are not paying for their meals and there is currently no fund transfer occurring to pay Fund 50 for these meals.</p> <p>The SFA must either charge all non-program adults the established full price of \$4.75 for lunch and \$2.85 for breakfast or transfer the appropriate amount of money into the food service account to cover the cost.</p> <p>If the non-program adults that have been receiving free lunch will continue to get their lunch for \$0.00, then \$4.75 must be transferred into the food service fund for each of those lunches. For breakfast, the transfer amount would need to be \$2.85 per supervisor breakfast. Any transfers needed could be completed weekly, monthly, or annually. The key is that there is sufficient recordkeeping and that the appropriate transfers are made as required.</p> <p>Corrective Action: Determine how supervisor meals will be paid for and immediately implement the new plan. Submit a written description of the plan, including the date the changes are implemented. Please be specific on how it will be handled for each different school. This must apply for both supervisor breakfasts and lunches.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:54 PM</p>	<p>Finding: Annual civil rights training was not completed by the food service substitutes, the Determining Official, or the Business Manager/Authorized Representative.</p> <p>Corrective Action: Each of these staff members must complete the civil rights training and submit documentation in SNACS indicating completion. If the webcast is used, please complete the steps at the end to obtain the emailed certificate of completion and upload the certificates into SNACS.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:40 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific content regarding the triennial assessment and the full non-discrimination statement are not included.</p> <p>Further, while there is some content in the following areas, this content could be improved with increased clarity and more specific goals: school meals, foods sold outside school meal programs, food and beverage marketing, and nutrition promotion.</p> <p>Please refer to the LWP webpage, specifically the policy checklist and policy builder (which has canned language that can be adopted into an existing policy).</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:40 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. While the committee did their own sort of assessment which involved rating their wellness policy in different areas, this did not fulfill the USDA requirement for the triennial assessment. Be sure to use the LWP Triennial Assessment Report Card found on the DPI Wellness webpage to complete the assessment.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results (such as by posting on the website and/or sending it out to parents). Upload a copy of the Report Card that includes WellSAT scores into SNACS or provide a link to this document on the district website.</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		

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Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:52 PM</p>	<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>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. SFAs are required to inform families where to find free summer meals.</p> <p>It is recommended to share the following in an end of year newsletter or parent email and on the SFA website to further assist families in finding free summer meals. Please note, posting on the website alone is not sufficient outreach and promotion of the SFSP.</p> <ul style="list-style-type: none"> • To find free summer meal locations: <ul style="list-style-type: none"> ○ Call 211 to locate meals in the area ○ Text 'food' (in English or Spanish) to 304-304 ○ Check the Summer Meals Site Finder Map on the Find a Summer Meals Site webpage <p>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.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:52 PM</p>	<p>Finding: During the benefit issuance review, 196 student eligibility statuses were reviewed—1 error was identified. Due to the low error percentage, fiscal action is not required.</p> <p>One student was approved early in the school year for free meal benefits based on the "migrant" box being checked on the application. However, their migrant status was not validated through the appropriate channels and with appropriate documentation prior to approving the free benefit. In the late winter, the Determining Official found out the student was not actually certified as migrant and thus re-processed the application based on income which resulted in a change to reduced-price eligible. However, the application did not have all of the information completed to be processed with income—the Household Members box was blank, but this is a required part of a complete income application.</p> <p>Corrective Action: Contact the household to confirm the number of household members. Ensure the number reported by the family matches the number of names on the application. Fill in the missing household members box with the information obtained, note the conversation with the family, initial, and date. Corrected onsite; no further action required.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	127	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:42 PM</p>	<p>Finding: The full free and reduced-priced meal income eligibility guidelines (IEGs) are included in the parent handbook. However, in the interest of program integrity, the full IEGs should not be distributed to households.</p>

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		Corrective Action: Remove the IEGs from the parent handbook. Upload a copy of or a link to the updated parent handbook.
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	131	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:53 PM</p>	<p>Finding: During review of denied applications, a discrepancy was noted that required further clarification from the household. The application in question was denied due to income exceeding the qualifying amount. The reported income was \$1440 biweekly, but it was unclear if the household size was 2 or 3 as there were 3 names listed but the Household Members box was blank. It was processed based on household size of 2 based on the Determining Official's (DO) understanding of the family structure. With the income reported and 3 household members listed it should not have been denied. However, the application was incomplete due to the blank household members box so it also should not have been approved as-is without clarifying the household size with the household. The DO should have clarified the household size with the family, noted it on the application so it was complete, and then processed the application based on that.</p> <p>Corrective Action: Contact the household to confirm the number of household members. Ensure the number reported by the family matches the number of names on the application. Fill in the missing household members box with the information obtained, note the conversation with the family, initial, and date. Corrected onsite; no further action required. The correction resulted in the child(ren) being eligible for free meals.</p>
Site Name		
Form Name	Verification (207 - 215)	
Question #	208	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:41 PM</p>	<p>Finding: SFA did not complete a confirmation review before verifying application(s).</p> <p>As a reminder, the confirming official cannot be the same person as the determining official. Additionally, the confirming official and verifying official should sign and date the applications in the designated spots when their duty in the verification process is complete.</p> <p>On the application posted on the DPI webpage, you will see there are specific sections on the back of the application for the confirming and verifying official to sign during the verification process.</p> <p>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. Please be sure to include review of pages 103-104 in the Eligibility Manual which discuss what to do if the confirmation review does not validate the initial determination.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:53 PM</p>	<p>Finding: Some printed materials regarding the Child Nutrition Programs have the incorrect version of the USDA non-discrimination statement (NDS) --specifically board policy 8531 and the parent/student handbook:</p> <ul style="list-style-type: none"> Elementary school handbook: NDS is correct on pages 7-8. NDS incorrect on page 24. Middle school handbook: NDS is correct on pages 7-8. NDS incorrect on page 24. High school handbook: NDS correct on page 28. NDS incorrect on page 44. <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name	Columbus Middle School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:43 PM</p>	<p>Finding: Operating days were not reported completely accurately for all schools on the January breakfast claim and January Special Milk Program (SMP) claim. Operating days on the claim must accurately represent the number of days during the month that the applicable program was being served at each site.</p> <p>On January 10, there was a delayed start in the district due to weather so breakfast was only served at the high school that day and not the other schools. In this example, January 10 would be a breakfast operating day for the high school but would not be counted as a breakfast operating day for the elementaries or middle school.</p> <p>For SMP, operating days included all school days. However, the 4K is only in session four days per week. Only the days SMP is served may be recorded as operating days on the claim.</p> <p>Corrective Action: Provide a statement describing how operating days will be reported correctly on all claims going forward.</p>
Site Name	Columbus Middle School	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1404	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 03/01/2024 01:41 PM</p>	<p>Finding: At the middle school, the SFA uses an insulated milk bag to serve milk at breakfast. However, there is no SOP in the site-specific food safety plan regarding this. Further, it does not appear that the milk is normally temped each day after breakfast before it is returned to the milk cooler.</p> <p>Corrective Action: Create a site-specific SOP for using the milk bags and adopt it into the middle school's food safety plan. It is recommended to use the template SOP for Use of Milk Bags: Monitoring of Temperature Option, and start lining the milk bag with ice packs for service daily and follow the temperature monitoring procedures—specifically temping the milk after service before returning it to the milk cooler. Upload the final SOP into SNACS.</p>
Technical Assistance Entries:		

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TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/01/2024	4402		Administrative Review		AR			
Comments								
Annual Financial Report					Created By		Created Date	
<p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. Be sure to review the manual and/or the webcast prior to correcting the AFR, so you know exactly which amounts of money to account for in which section.</p> <p>The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. 'Food' is expenses for edible food items and beverages. 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. <p>Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students receiving the milk break. Revenues and expenses for paid student milk break should be recorded under non-program foods.</p>							3/1/2024 2:01:12 PM	
03/01/2024	4401		Administrative Review		FSD			
Comments								
Special Dietary Needs					Created By		Created Date	
<p>Special Dietary Needs - 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.</p> <p>The board policy for Food Services contains information regarding meal accommodations for special dietary needs. There is a section that states that "The individual making an initial request for such substitutions must inform the Food Service Director or Special Dietary Accommodation Coordinator that the student has a medical condition that restricts the student's diet, in accordance with the criteria set forth in 7 C.F.R. Part 15b. The School District will honor the request for remainder of the school year. Within ten (10) school days after receiving the initial request, a health care provider with prescriptive authority in the State of Wisconsin must submit medical certification that the student's medical condition restricts their diet, in accordance with the criteria set forth in 7 C.F.R. Part 15b. The substitutions may be discontinued until such medical certification is received." The bolded statement does not align with the USDA guidance on this topic. USDA advises that sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child's parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child's need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p> <p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for</p>							3/1/2024 2:00:28 PM	

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guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.

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 the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.

It is recommended that the SFA post their special dietary needs policy on the food service webpage, along with a copy of the medical statement form the district uses when families need to request a meal accommodation. It is suggested the district use the [DPI template medical statement](#) to ensure that the information required by USDA is obtained from households that do request an accommodation for a disability.

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:

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. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.

Brand Names - In some situations, a State licensed healthcare professional may request a particular brand name of a product as a substitute on the medical statement. Generally, SFAs are not required to provide the specific brand requested, unless the brand name item is medically necessary. Instead, the SFA must provide a reasonable modification that accommodates the child's disability and provides equal opportunity for the child to participate in and benefit from the Program. In situations where the requested substitute is very expensive or difficult to procure or obtain, it would be reasonable for the SFAs to follow up with the family to see if a different substitute would be safe and appropriate for the child.

For example, a medical statement for a child with gluten intolerance may request a specific brand of gluten-free bread. If a modification request indicates a brand name item, in most instances, a generic brand is sufficient, unless the brand name item is medically necessary. This can be determined through the interactive process with the child's parent or guardian. In the example above, if the medical statement lists a specific brand of gluten-free bread, the SFA could check with the family to see if it would be safe and appropriate for the SFA to provide a different brand. In this instance, the family could then affirm the brand name change.

Access to Medical Statements - The FSD should have copies of student medical statements that are on file for accommodating students with disabilities in the meal program. While this information is confidential, the FSD does have a legitimate "need to know" for this information since they are responsible for implementing the meal accommodation the student requires. The FSD should reference the actual signed medical statement for the exact meal accommodation information needed for the student to ensure it is fully implemented correctly in accordance with the request. If the medical statement supporting meal accommodations are only available to the school nurse and the summarized information is provided to the FSD, this allows for the possibility of miscommunication as information is passed along without the exact source documentation. The FSD should ensure they keep this information confidential once received.

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

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03/01/2024	4400		Administrative Review	FSD			
Comments							
Training for FSD				Created By	Created Date		
The new FSD is interested in pursuing the GOALS certificate. This is an excellent idea and any questions on the curriculum or process may be sent to GOALS@dpi.wi.gov . The FSD is also encouraged to attend the School Nutrition Summer Training (SNST) , and may particularly benefit from the Great Beginnings in-person course that is geared towards new FSDs.					3/1/2024 2:00:19 PM		
03/01/2024	4399		Administrative Review	FSD			
Comments							
Extra Entrees				Created By	Created Date		
The SFA has adopted some specific procedures to help ensure students wishing to purchase extra entrees have sufficient funds in their accounts to do so. This was observed at the middle school. Requiring the students to come back up to purchase extras and go to the cashier first is acceptable. However, the older students did not always do this, and it became a bit chaotic at times. The younger students seemed to comply better with the rule. With this being a fairly new practice, perhaps the students are still adapting. Signage and assistance from the cafeteria supervisors may help make this process go smoother. The a la carte block warnings that pop up on the computer for the cashier seem to work well for notifying them when a student can and cannot get a la carte. If the cashier needs to see a student's account balance to help inform a la carte allowability, you could work with the software vendor to make that information available to the cashier on the screen. Please ensure that all procedures related to a la carte sales prevent any overt identification of students eligible to receive free or reduced-price meals.					3/1/2024 1:59:43 PM		
03/01/2024	4398		Administrative Review	AR			
Comments							
Unpaid Meal Charge Policy				Created By	Created Date		
It is recommended that the SFA continue to review and revise their unpaid meal charge policy (i.e. "negative meal account balances policy" and "process for collecting bad debt"). The current policy specifies students will still receive a lunch when their balances are low/negative. However, it is unclear if they will also receive a breakfast when they do not have money in their account. The statement "unpaid meal charges will remain in the student's account from year to year until they graduate" could be confusing to families since the policy talks about when the debt will be written off and sent to collections. Perhaps this section can be clarified that charges under \$100 will remain on the accounts year to year until graduation.					3/1/2024 1:59:26 PM		
03/01/2024	4397		Administrative Review	AR			
Comments							
Procedures for Distribution of Angel Funds				Created By	Created Date		
The SFA has an "angel fund" from donations to help families with unpaid meal debt. Currently, there is a process implemented by the Determining Official for deciding when and who the angel fund is used for. The district should have written internal procedures in place to guide how angel funds are used to resolve school meal debt. This will help ensure that the funds are disbursed equitably and consistently. Please refer to pages 45-46 of the USDA unpaid meal charge resource for more information.					3/1/2024 1:59:03 PM		
03/01/2024	4396		Administrative Review	FSD			
Comments							
Local Wellness Policy				Created By	Created Date		
As the wellness committee continues to meet and the district modifies the policy, please focus on elaborating on the different content areas and strive to include specific goals the district has for the different topics. Resources on the DPI LWP webpage can assist, specifically the LWP Policy Builder .					3/1/2024 1:58:40 PM		
03/01/2024	4395		Administrative Review	FSD			

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Comments									
Edit Checks					Created By			Created Date	
<p>When reviewing the monthly edit check reports prior to submitting the claims, please pay attention to any edit check errors that the software may flag that would be noted on the bottom of the report. While the FSD is doing a good job manually reviewing the edit check reports, using the software's warning messages is also a good idea. If there are software system warning messages that show up on the bottom of the edit check, the FSD should investigate the issue to see if the data is indeed accurate or if an error occurred that requires correction prior to claim submission.</p> <p>Additionally, as described in the corrective action item regarding operating days on claims, please ensure the operating days for each program for each site on the claims accurately represents the number of days in the month that the specific program was offered at each site. The number of operating days for each program and site is not automatically the number of school days in the month.</p>								3/1/2024 1:58:17 PM	
03/01/2024	4394		Administrative Review		AR				
Comments									
Supply Chain Assistance Funds					Created By			Created Date	
<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.</p> <p>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.</p> <p>SCA funds do not need to be spent by a specific date, but it is USDA's intent that the funds will be used as quickly as practicable to alleviate supply chain challenges.</p>								3/1/2024 1:58:02 PM	
03/01/2024	4393		Administrative Review		FSD				
Comments									
Cost Per Half Pint Milk on Claims					Created By			Created Date	
<p>When completing the claims for the WI School Day Milk Program (WSDMP) and the Special Milk Program (SMP), please be sure to refer to the claiming instructions for cost per half pint to use on the claim. The reported costs should be reflective of the milk being served within the program. If chocolate milk is not served in the program, then the price on the claim should not reflect the cost of the chocolate milk (which is often higher than unflavored milk).</p>								3/1/2024 1:57:41 PM	
03/01/2024	4392		Administrative Review		FSD				
Comments									
Training					Created By			Created Date	
<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> <p>The non-school nutrition staff members that have school nutrition-related duties (i.e. the Determining Official and Business Manager/Authorized Representative) do not need to complete a certain minimum number of training hours annually. However, it is recommended that they continue to receive sufficient job-specific training that supports their school nutrition duties. They should also receive the annually required USDA civil rights training. For these staff members, the SFA should maintain a record of the individual's name, title of training, training source, and dates of the civil rights and job-specific training received which may include attendance records, sign in sheets, email confirmations, etc.</p> <p>SFA's may use their discretion when determining which (if any) food service staff will be considered "managers." Staff that are considered "managers" must complete 10 hours of professional standards training annually. While all SFAs must have someone designated as</p>								3/1/2024 1:57:23 PM	

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"director," there is no requirement that SFAs designate managers in the Child Nutrition Programs. Please refer to the USDA Professional Standards guide for more details on what may classify someone as "manager."									
03/01/2024	4391		Administrative Review		FSD				
Comments									
Civil Rights Complaint Procedure					Created By			Created Date	
The SFA has adopted the DPI template for civil rights complaints procedures and has posted this file on the district webpage . While this is allowable, it is not required to post this procedure or distribute it to households. The procedures are intended for internal reference in the district to guide actions to be taken if a child or household wishes to file a civil rights complaint in the school meals programs.								3/1/2024 1:57:00 PM	
03/01/2024	4390		Administrative Review		FSD				
Comments									
Water Access					Created By			Created Date	
Water is required to be available at no charge and without restriction to students during the lunch meal service and breakfast meal service in the cafeteria. Water can be provided in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. The SFA minimally meets this requirement because there is a water fountain outside the cafeteria and around the corner. However, it is not immediately adjacent to the meal service area. The SFA may consider improving water access by providing a cooler with water and cups in the meal service area during meal time. For more information and resources on the water requirement visit the Water Availability webpage.								3/1/2024 1:56:50 PM	
03/01/2024	4389		Administrative Review		FSD				
Comments									
On-Site Monitoring					Created By			Created Date	
When completing the annually required on-site monitoring forms, be sure to sign and date on the last page to adequately document completion.								3/1/2024 1:56:33 PM	
03/01/2024	4388		Administrative Review		VO				
Comments									
Verification Collection Report					Created By			Created Date	
On the Verification Collection Report, the number of schools reported was not accurate in accordance with the report instructions. The SFA should have reported 4 schools instead of 5. The instructions say to report the number of schools or institutions operating the NSLP and/or SBP and the number of enrolled students with access to the NSLP and/or SBP as of the last operating day in October—for this reason JEDI should not be counted since it does not participate in NSLP or SBP.								3/1/2024 1:55:55 PM	
03/01/2024	4387		Administrative Review		DO				
Comments									
Effective Date for Meal Benefits					Created By			Created Date	
A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. The effective date for students eligible for benefits via Direct Certification (DC) is the date of the DC Run. The effective date for free/reduced-price meal applications is the date the application is approved by the Determining Official—not the date the application is received, or the date signed by the parent/guardian.								3/1/2024 1:55:37 PM	
When the Determining Official completes the "office use only" section on the back of the applications, it is only necessary to sign in the Determining Official spot. The space for Confirming Official is only needed during the verification process.									
03/01/2024	4386		Administrative Review		DO				

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Comments						
Processing Applications			Created By	Created Date		
<p>The total household members box on a meal benefit application includes all children and adults in the household and must match the number of names on the application for that application to be considered complete. Applications missing adult signatures must be returned to the household adult to obtain. 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. If an application has an income reported with a frequency that seems questionable (such as reporting an income of \$27 biweekly, when \$27 may actually be their hourly wage which is not an income frequency option on the application), the income amount and frequency should be clarified with the household before processing the applications.</p> <p>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). The determining official should document the details of the conversation plus date and initial the application updates. Reasonable effort should be made to obtain the missing information prior to denying the application.</p> <p>If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start program, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household. The effective date is the date the determining official is made aware of the eligibility.</p> <p>Applications that indicate a child is a foster child are considered Other Source Categorical eligible and this child is eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.</p>					3/1/2024 1:55:14 PM	
03/01/2024	4385		Administrative Review	DO		
Comments						
Household Notification Letter Updates			Created By	Created Date		
<p>Most of the meal eligibility letters generated from the software program contain an unnecessary paragraph before the non-discrimination statement is listed. This information is from the USDA prototype meal application used prior to 2023-24 (so it is outdated) and it does not need to be included on the benefit approval/denial letters. It is recommended to remove this paragraph from the template letters.</p> <p>It is recommended to update the Direct Certification (DC) approval letter to increase clarity for the households. The SFA should add the clarification that if a household is eligible for reduced-price benefits through DC due to a Z code match, that they may be able to qualify for free meals if they complete an application. You may choose to adopt some language from the DPI DC template letter.</p>					3/1/2024 1:54:53 PM	
03/01/2024	4384		Administrative Review	DO		
Comments						
Sharing of Information and Disclosure			Created By	Created Date		
<p>The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal or milk benefits.</p> <p>Each school year, the SFA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as fee waivers. Detailed consent must be obtained each school year. Find the Sharing of Information with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage (also available in Spanish and Hmong). On the forms, each specific non-school nutrition purpose that the eligibility information will be used (if consent is given) must be listed out separately so parents/guardians can consent for each item.</p> <p>It is recommended to distribute the Sharing of Information form to all families that are approved for free and reduced-price meal benefits through an application or Direct Certification (DC).</p> <p>For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the <i>Disclosure Agreement</i> form should be signed and kept on file at the district. There are two template forms available on the Free and Reduced Meal Applications and Eligibility webpage. One for SFA staff one for outside agencies. Both Disclosure Agreement templates are available in English and Spanish.</p>					3/1/2024 1:54:31 PM	

Administrative Review Report

Columbus School District

02/28/2024	4360	1	Administrative Review	Columbus Middle School	FSD			
Comments								
Increasing Breakfast Participation				Created By		Created Date		
<p>It is strongly encouraged that the SFA explore the option of Breakfast After The Bell (BATB), also known as "Second Chance Breakfast," both to reach more students and to increase revenue from a boost to the number of reimbursable meals served. BATB can be structured in a variety of ways and tailored to best meet the needs of your students and staff. Most importantly, BATB ensures access to breakfast for all students, including those who may not arrive to school early enough to participate in the traditional breakfast in the cafeteria. Many schools utilize a Grab n' Go style of service at the Middle and/or High School level for BATB. Students can quickly select a portable reimbursable meal during passing times. Some schools opt to extend the passing time between first and second periods to allow for a "Nutrition Break," which is another option to consider. With support from food service staff, administration, custodial services, and teachers, BATB can be executed with minimal-to-no impact to the regular school day. Visit our School Breakfast Resources webpage for more information on school breakfast models, online learning, marketing and promotion strategies and more (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) or reach out to our School Breakfast Specialists (DPISBP@dpi.wi.gov).</p>						2/28/2024 10:22:15 AM		
02/28/2024	4359	1411	Administrative Review	Columbus Middle School	FSD			
Comments								
Buy American				Created By		Created Date		
<p>The SFA diligently tracks Buy American non-compliant products, ensuring compliance with regulatory requirements. To enhance record-keeping efficiency, it is recommended that the SFA consider utilizing an alternate form structured as a running list for comprehensive documentation. This approach streamlines the tracking process, facilitating easier management and accessibility of information. During the onsite review, a sample form was reviewed and provided for reference. A copy of this multiple item form, along with additional resources, is accessible on our Buy American Provision webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/noncompliant-product-list_multiple.docx; https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american).</p>						2/28/2024 10:04:37 AM		
02/28/2024	4356	1104	Administrative Review	Columbus Middle School	FSD			
Comments								
Competitive Foods				Created By		Created Date		
<p>No competitive foods or beverages are sold at Columbus Middle School. If any competitive food and/or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks guidelines or must qualify as an exempt fundraiser. Someone at each school must be responsible for documenting compliance of exempt fundraisers and any other food/beverage sales. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</p>						2/28/2024 10:00:46 AM		
02/27/2024	4344	433	Administrative Review	Columbus Middle School	FSD			
Comments								
Crediting Documentation				Created By		Created Date		
<p>During the documentation review, it was identified that certain menu items within the School Food Authority's (SFA) crediting documentation contain inaccuracies. Specifically, discrepancies were noted regarding the crediting of the Breaded Chicken Patty on a Bun recipe and the Jones Dairy Farm Breakfast Sausages Patties (served Monday, 1/22/24, and Wednesday, 1/24/24, respectively). An inversion error was observed in the crediting of Breaded Chicken Patty on a Bun recipe, where the ounces equivalents (oz eq) for Meat/Meat Alternate (MMA) and grains were swapped; the recipe credits as 2 oz eq MMA and 3 oz eq grains. Additionally, the crediting for two sausages was incorrectly listed as 2 oz eq MMA on production records instead of the accurate 1 oz eq MMA, as indicated by the Child Nutrition (CN) label. While these discrepancies did not result in daily or weekly meal pattern errors, they underscore the importance of accuracy in crediting documentation. Similar errors may lead to inadvertent non-compliance in future menus and subsequent Administrative Reviews. It is recommended that the SFA conduct a thorough review of crediting documentation to ensure future menus accurately align with the meal pattern.</p>						2/27/2024 11:34:16 AM		

Administrative Review Report

Columbus School District

This proactive measure will not only uphold compliance with federal regulations but also safeguard against potential future errors in crediting, thereby maintaining the integrity of the Child Nutrition Program.							
02/27/2024	4343	411	Administrative Review	Columbus Middle School	FSD		
Comments							
Monthly Menus				Created By		Created Date	
<p>Upon review of the monthly menu provided, two areas were identified that warrant attention. Firstly, it was noted that the planned breakfast menu was not consistently served as listed. While it is understood that substitutions and menu changes may be necessary due to unforeseen circumstances such as unavailable food items or vendor substitutions, a pattern of deviation from the posted menu was observed. To ensure transparency and consistency in meal service, it is recommended that the posted menu accurately reflects the items that will be served to students, to the best of the SFA's ability. This practice helps manage expectations and ensures students are informed about the meals they can expect each day. Secondly, the monthly menu lists milk as an "assortment of milk" without specifying the types of milk available. It is generally recommended to provide clarity by listing each type of milk offered, if space permits. This helps students and staff make informed choices and accommodates dietary preferences or restrictions.</p>						2/27/2024 11:29:45 AM	
03/05/2024			Administrative Review				
Comments							
Breakfast on the Playground				Created By		Created Date	
<p>During the review the FSD inquired about the allowability of serving breakfast on the playground. While there are no program regulations prohibiting this, careful consideration and planning must be enacted if this will be pursued.</p> <p>Consider:</p> <ul style="list-style-type: none"> • Where would the meals be served? Fully outside? At a kiosk right inside the door so kids could come get a breakfast then go right back outside with their meal? • How will the meals be packaged with all meal pattern requirements met? • How would the POS work? An accurate count by student name would still be needed daily to ensure proper billing and claiming. • How would the food be safely transported outside and served? Protected from contamination? Time-temperature control for safety foods kept cold? • Would kids have the opportunity to wash their hands before eating? • How would trash be handled and litter minimized? • Where would the kids be able to eat? Would they have to sit on the ground? • Is there potential liability in this service model as there may be increased choking risk if kids are attempting to eat during outdoor playtime? • A site-specific SOP would need to be developed and incorporated into the school's food safety plan for this model as it would have particular food safety concerns to address. <p>If low breakfast participation is a concern, the SFA may consider some of the other alternative breakfast models described earlier in this report before beginning to serve breakfast on the playground.</p>						3/05/2024 12:24:16 PM	