Administrative Review Report
Poynette School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/30/2023	02/19/2024
On-Site Review	03/06/2024	03/07/2024
Site Selection Worksheet	11/30/2023	12/08/2023
Entrance Conference	03/06/2024	03/06/2024
Exit Conference	03/07/2024	03/07/2024

Commendations:

Thank you to all the staff at Poynette School District for the warm welcome and cooperation during Poynette School District's Administrative Review (AR). Thank you to the Food Service Director (FSD) for being available during the on-site portion of the review and helping gather the needed documentation and information prior to the visit. The manager at the elementary school was knowledgeable on meal pattern requirements, Offer versus Serve, and was very receptive to the technical assistance provided on-site. Thank you for serving healthy, nutritious meals to your students!

Thank you for sending documentation and completing the off-site questions in advance. All staff members were very welcoming to the review team and willing to answer questions. The 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 meal program. The director works hard to ensure all program requirements are met and that there are healthy, appealing meals served every day.

Findings and Corrective Action:

Site Name	
Form Name	Verification (200 - 204)
Question #	200
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	Flagged 03/12/2024 02:13 PM	Finding: The Verification Collection Report (VCR) contained errors. While the version of the VCR generated by the district's software program may be helpful, it is important to validate the data aligns with the DPI instructions for the VCR. 1. The number of schools reported was 4. However, it should have been 3. The JEDI virtual school does not participate in the NSLP or SBP and therefore should be included in the school count on the VCR. 2. The district enrollment reported on the VCR included students that do not have access to meals under NSLP and SBP. However, enrollment total should reflect the number of enrolled students with access to the NSLP and/or SBP as of the last operating day in October. 3. The results of verification were reported incorrectly. It was noted that one application for three students was certified as free but did not respond and was changed to paid. However, the household did respond and should have remained as free. Corrective Action: Submit a plan describing how the VCR will be submitted correctly going forward.

Site Name	
Form Name	Meal Counting and Claiming (300 - 311)
Question #	305
TA Log #	No TA Log# found
Due Date	

Administrative Review Report

Poynette School District

Corrective Action Status	Flagged

Corrective Action History	Flagged 03/12/2024 02:09 PM	Finding: The SFA does have a written unpaid meal charge policy and has distributed a version of it to all households in writing. However, two different versions of the policy currently exist, and the households have been sent an abbreviated version that omits key information that they must be informed of. The policy 8500.05 explains the "emergency meal" procedures for negative account balances, that the district may file a claim against households in small claims court or utilize a collection agency for outstanding balances, and that participation in graduation and other ceremonies may be impacted by unpaid meal accounts. These items were excluded from the version of the policy households received in the back-to-school newsletter/packet—these are important consequences that households must be notified of. Further, the policy 8500.05 explains that an "emergency meal" will be available for a student with a suspended account for 3 days and will be charged at $1.35 to the household account. This procedure for the alternate meal does not align with requirements since the meal is being sold as a bundled item that likely would not meet Smart Snacks requirements as a bundled item. Please review the alternate meal section of the Unpaid Meal Charges In a Nutshell for more information. Corrective Action 1: Update the unpaid meal charge policy that is sent to households, so it is consistent with the corresponding board policy, or simply ensure that the full board policy 8500.05 is provided to all households in writing each school year (and eliminate the abbreviated version that was in the back to school information). Provide a copy of any policy updates. Please also describe how you will ensure families will be fully informed of the entire unpaid meal charge policy, including all potential consequences they may incur for unpaid balances. Corrective Action 2: Modify the SFA's process for alternate meals (i.e. "emergency meals") to ensure it meets program requirements. Please review the alternate meal section of the Unpaid Meal Charges In a Nutshell and the USDA Overcoming the Unpaid Meal Challenge section for "Providing Alternate Meals."

Site Name	
Form Name	Civil Rights (800 - 807)
Question #	803
TA Log #	No TA Log# found
Due Date	

Corrective Action Status	Flagged

Corrective Action History	Flagged 03/12/2024 02:07 PM	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). See corresponding technical assistance portion of this report for additional guidance on this topic. Corrective Action: Utilizing the DPI template policy as a reference, (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sfa-civil-rights-complaints-procedure-template.pdf), develop procedures that will be adopted by the SFA and upload into SNACS. Describe how and when the procedures will be communicated and implemented in the SFA. Note: The SFA does not need to delay submission of this corrective action for board approval, but rather provide information on the procedures that are expected to be adopted and the plan for this.

Site Name	
Form Name	Local School Wellness (1000 - 1006)
Question #	1005
TA Log #	No TA Log# found
Due Date	

Administrative Review Report

Poynette School District

Corrective Action Status	Flagged
Corrective Action History	Flagged 03/12/2024 02:07 PM	Finding: SFA has completed part of the triennial assessment of the Local Wellness Policy (LWP) but did not complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement. Only the WellSAT was completed. Please refer to the [Triennial Assessment information section of the LWP webpage](#) and be sure to use the provided report card for completion of the assessment. Corrective Action: Complete the full [LWP Report Card](#). Upload into SNACS and post this final assessment on the school website in addition to, or in place of, the WellSAT results that are currently posted.
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
	
	03/12/2024 02:03 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)](#). The SFA has posted SFSP information of their website near the end of the school year, however, this is not sufficient program outreach for households. Additional action must be taken to proactively notify families about SFSP, such as sending out information in a spring newsletter or family email blast.
		
		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.
		
		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.
		    • To find free summer meal locations:
		        ○ 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](#)
		
		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.

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	Flagged 03/12/2024 02:10 PM	Finding: During the benefit issuance review, 179 student eligibility statuses were reviewed—5 errors (affecting 3 families) were identified. Due to the low error percentage, fiscal action is not required. 1. An income application was submitted with 3 names listed and the required household members box was left blank. The application was processed based on 4 household members. The income reported will result in a free meal status regardless of which household size is used, however this application is incomplete due to the blank household members box.

Administrative Review Report

Poynette School District

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2. Benefits were extended to two children without sufficient documentation supporting that they shared a household with a directly certified student. It appears the benefits were extended based on an address match in the software system that was not fully verified. It is unclear if the children listed at the address did indeed share a household in the 23-24 school year.

3. Benefits were extended to another child without sufficient documentation supporting that they shared a household with a directly certified student. In this case, it appears an extension may have been implemented based on a shared address of an apartment building without unit numbers. It is unclear if the children listed at the address did indeed share a household in the 23-24 school year.

Corrective Action:

1. Contact the household to confirm household size. Fill in the household members box number based on the discussion and ensure all household members names are listed on the application—the number in the box must match the number of names. Make notes about the conversation on the application, initial, date, and upload the final modified application into SNACS to show the issue was resolved.

2. Contact the household to inquire if they shared a household with any other people as of 1/2/24 (the date the benefit was extended). If they did share a household with a directly certified student at that time, please notate this for future reference and the children may keep their free benefit. If they did not share a household with any other directly certified students at that time, notate this and send the family in question the adverse action letter. The letter advises they will be changed to "paid" after 10 calendar days. Upload any supporting documentation into SNACS regarding this resolution.

3. Contact the household to inquire if they shared a household with any other people as of 7/20/24 (the date the benefit was extended). If they did share a household with a directly certified student at that time, please notate this for future reference and the children may keep their free benefit. If they did not share a household with any other directly certified students at that time, notate this and send the family in question the adverse action letter. The letter advises they will be changed to "paid" after 10 calendar days. Upload any supporting documentation into SNACS regarding this resolution.

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Site Name	
Form Name	Verification (207 - 215)
Question #	208
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	Flagged 03/12/2024 02:11 PM	Finding: SFA did not complete a confirmation review before verifying application(s). 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. 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. 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.
Site Name	

Administrative Review Report

Poynette School District

Form Name	Verification (207 - 215)
Question #	209
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 03/12/2024 02:12 PM	Finding: The results from the verification process were not correctly recorded and implemented. The household was sent two notices to submit verification documentation, and they did send in a file confirming they received SNAP benefits. This should have allowed them to continue receiving free meal benefits. However, the Verifying Official did not have this result correctly entered in the verification module in the software system so the household was recorded as "no response" and they were changed to "paid." They were at paid status from mid-November until early January when they then matched on direct certification and were changed back to free. The SFA may consider refunding the family (or adjusting any accrued meal debt) for this household for the period of time when they were erroneously being charged the paid student price for reimbursable meals. Further, the household was not sent a verification results letter (i.e. "We HAVE Checked Your Application" letter) after the process was complete. This should be sent even if their status is unchanged. Corrective Action: Submit a statement describing how verification will be completed correctly going forward. It is recommended that the Verifying Official complete training on verification before completing the process in 24-25. There is an online learning module that is available all year. There are additional verification refresher trainings offered live in the fall—please watch for information on this in late summer/early fall.
Site Name	
Form Name	Meal Counting and Claiming (314 - 316)
Question #	314
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 03/12/2024 02:00 PM	Finding: The online contract for 2023-24 requires updating. The contract currently lists student prices for breakfast. However, the SFA has been offering universal free breakfast for all schools in 2023-24. Please update the breakfast meal charges on the page for "Meal Charges, Purchase, and Officials Information." For each individual school's information page on Schedule A of the contract, please also check the box for "universal free" in the Breakfast Model section. JEDI Virtual should also be added to the online contract on Schedule A and listed as "not in program" for all programs. Even though this is a virtual school that does not participate in the programs, it still must be listed on the contract. Corrective Action: Submit the contract updates in online services. Notify the consultant when completed.
Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Administrative Review Report

Poynette School District

Corrective Action History	Flagged 03/12/2024 02:02 PM	Finding: The most current, full, correctly formatted USDA non-discrimination statement (NDS) was not included on all program materials as required. Please update the NDS in the following materials: Board Policies 8500.05, 8510, 8531. Corrective Action: Update program materials to include the correct non-discrimination statement. At minimum, a link to the full, correct USDA statement is needed. Upload into SNACS a copy of materials updated.
Site Name	Poynette El	
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	Flagged 03/12/2024 02:05 PM	Finding: The values for enrollment, ADA, number of students approved free, and number of students approved reduced on the monthly claims are not fully accurate. The claim preparer should use the information for these fields that is provided on the monthly edit check report by school from the software system. Please refer to the claiming manual for details on what each field is supposed to reflect. • Student Approved Free - Enter the **highest** number of students who are approved for free meals during the claiming month at each site. • Student Approved Reduced - Enter the **highest** daily number of students who are approved for reduced price meals for each site during the claiming month. • Enrollment - Enter number of enrolled students **who had access to NSLP/SBP** at each site during the claiming month. "Enrolled" children are formally approved to attend your school. Do not include half-day kindergarten and pre-kindergarten students if they do not have access to the meal programs. • ADA (average daily attendance) - Enter the ADA for each site. This would be calculated from the edit check report by multiplying the Attendance Factor by the enrollment and rounding up to the next whole number. Corrective Action: Beginning with the March 2024 claims, start using the appropriate data from the edit check reports for these fields on the claim. If the claim preparer would like, they may send copies of the prepared March claims with the edit check reports to the consultant for a double-check before the claim is submitted online. To resolve this finding, please provide a statement describing how the claim preparer will ensure accurate values for these fields on claims going forward.
Site Name	Poynette El	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2024 08:34 AM	Finding: The weekly minimum requirement for grain was not met for K-5 for lunch during the review period. This was due to a discrepancy on the menu analysis regarding the Alpha Baking white wheat hamburger buns. It was confirmed with the prep kitchen that the elementary school receives the 3.5" white wheat hamburger buns (instead of the 4" hamburger buns). The product formulation statement (PFS) from the manufacturer shows that 1 bun (55g) provides 1.75 oz eq grain, instead of the planned 2 oz eq grain. The following represent the planned portion sizes served during lunch on the week of review: • Monday (2/12): Pizza, 2 oz eq grain

Administrative Review Report

Poynette School District

		- Tuesday (2/13): Pancake Wrap, 1 oz eq grain - Wednesday (2/14): Chicken Nuggets (5), 1 oz eq grain - Thursday (2/15): Hamburger Bun, 1.75 oz eq grain - Friday (2/16): Corndog, 2 oz eq grain The weekly minimum requirement for K-5 is 8 oz eq grain. Corrective Action: Submit a statement describing specifically how the weekly minimum requirement for grain will be met for lunch during the review period.
Site Name	Poynette El	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	430	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/07/2024 08:36 AM	Finding: The production records were not consistently filled in during the week of review and do not meet production record requirements. The following required information was missing or inconsistently filled in on breakfast and lunch records: - Planned/actual number of servings prepared - Planned/actual quantity prepared in bulk units - Amount leftover - Planned serving size and usage for condiments - Number of reimbursable and non-reimbursable meals planned and served Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf). Corrective Action: Submit one full week of completed breakfast and lunch production records, including all requirements recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.
Site Name	Poynette El	
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1406	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 03/12/2024 02:06 PM	Finding: The most recent food safety inspection report was not posted in a publicly visible location. Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/12/2024	4487		Administrative Review		FSD			

Comments		
Unpaid Meal Charges	**Created By**	**Created Date**
Per USDA policy memo SP 46-2016, no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review.		3/12/2024 1:59:13 PM

Administrative Review Report

Poynette School District

Policies regarding the collection of unpaid meal charges should be included in the written unpaid meal policy. SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).

The policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in-hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intends to use the money to purchase that day's meal.

The policy should be implemented and enforced SFA-wide, though local discretion may be exercised to vary policy based on student grade level.

The policy must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year--only posting the policy to the school website does not meet the requirement.

The policy must also be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.

Resources: 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, see the Unpaid Meal Charges section of the Financial Management Webpage or the USDA Unpaid Meal Charges Webpage.

03/12/2024	4486		Administrative Review	FSD			

Comments		
Professional Standards	Created By	Created Date
The professional standards tracking tool should be modified so it also contains each staff member's original hire date. 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 "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." Staff that are full-time (20 or more hours per week worked in school nutrition) that are not considered managers must complete 6 hours of annual training.		3/12/2024 1:58:47 PM

03/12/2024	4485		Administrative Review	FSD			

Comments		
Food Safety Plan	Created By	Created Date
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. 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. Please ensure the food safety plan is reviewed/updated annually, and that it is site-specific, so it only contains information relevant to the specific operation.		3/12/2024 1:58:26 PM

03/12/2024	4483		Administrative Review	FSD			

Comments		
And Justice for All Poster	Created By	Created Date
The correct version of the And Justice for All poster is posted on the cafeteria wall as required. However, it is posted high on the wall making it unreadable by the elementary students. The intention of the poster is for program participants to read it if they want to. Please move the poster down lower so it is at a readable level for the students.		3/12/2024 1:57:48 PM

03/12/2024	4482		Administrative Review	FSD			

Administrative Review Report
Poynette School District

Comments		
Sharing Table	**Created By**	**Created Date**
The SFA uses a sharing table at the elementary school at both breakfast and lunch time. The school has a specific SOP in the food safety plan that has been discussed with the local sanitarian. Some suggestions for the sharing table include: • Consider collecting time-temperature control for safety (TCS) foods into temperature control (such as an insulated, ice-lined container). This is not necessarily required since the table is only operating for about an hour for each meal period, and all leftovers at the end of the meal period are discarded. However, if could improve food safety and quality for the TCS foods. • Consider logging what is left on the sharing table at the end of each meal service to track waste. While this is not necessarily required, it may help inform on the amount of food waste and impact future menu planning. • Consider what changes could be made to eliminate students grabbing food from the sharing table first then bringing it up to the meal service line and grabbing food from the line. This was a rare occurrence, and the cashier was mostly able to identify when this happened, but it may still be an issue. Students should not be bringing any items they picked up at the sharing table with them through the meal service line.		3/12/2024 1:57:05 PM

03/12/2024	4481		Administrative Review		FSD			

Comments		
Special Dietary Needs	**Created By**	**Created Date**
SFA's Policy - The SFA should review and modify the special dietary needs/dietary modifications policy included in Board Policy 8500 as parts of the policy do not align with USDA guidelines on the topic. The policy states, "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 medical certification must identify: the student's medical condition or symptoms of a condition that restricts one (1) or more major life activity or function…" In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. The USDA does not specify how long to wait or how many attempts are needed to receive documentation before discontinuing a meal modification. However, reasonable attempts should be made to get the correct documentation. Additionally, the SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet. **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. **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. **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.		3/12/2024 1:56:43 PM

Administrative Review Report

Poynette School District

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.

03/12/2024	4480		Administrative Review		DO			

Comments

Meal Benefit Eligibility	**Created By**	**Created Date**
There is a report and setting in the software system that matches students based on address for extension of direct certification benefits. While this report may accurately extend benefits most of the time, it is possible that an address match could be incorrect if families move and do not update their address or are matched by apartment building. For this reason, address matches that pull on this extension of benefits report should be double checked for accuracy before the extensions are implemented.

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.

Applications that indicate a child is a foster child are considered Other Source Categorically 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.

Students that are homeless may also be designated by the district's homeless liaison or a homeless shelter official, without completion of a meal application. In these cases, the Determining Official would update the student's eligibility to Free the date they are made aware of the homeless status from the appropriate official. The effective date would not be retroactive if there a delay in communication to the Determining Official. | | 3/12/2024 1:56:24 PM |

Administrative Review Report

Poynette School District

03/12/2024	4479		Administrative Review		DO				

Comments				
DC Letter Template		**Created By**		**Created Date**
The letter that the district uses to notify households of their meal benefit approval through direct certification meets minimum USDA requirements. However, it is recommended that the SFA update the letter template to provide more clarity to households. The letter refers to an application for "educational benefits" instead of school meal benefits. The letter does not clarify that families eligible for reduced-price benefits through direct certification may be eligible for free meals if they complete an application. The SFA could also make it more clear how a family can report additional children in the household that were not already identified on the letter. Please use the DPI template letter for reference when making updates.				3/12/2024 1:56:00 PM

03/12/2024	4478		Administrative Review		FSD				

Comments				
Reporting Enrollment		**Created By**		**Created Date**
Please ensure enrollment data is correctly reported on all school nutrition reports in accordance with the instructions for each report. For monthly claims, the Verification Collection Report, full enrollment DC runs, and the FNS 10 Report, the enrollment is supposed to reflect the number of enrolled students with access to the school meal programs (lunch and/or breakfast). Students that are enrolled in the district but do not have access to meals would NOT be counted in the enrollment total for these items. For example, the 4K students and full-time JEDI students that do not attend school on-site would not be counted.				3/12/2024 1:55:46 PM

03/12/2024	4477		Administrative Review		DO				

Comments				
DC Runs		**Created By**		**Created Date**
The SFA is not correctly using the "full run" and "partial run" designation when completing direct certification (DC). The SFA is currently including 4K students and possibly some JEDI Virtual students in the full enrollment runs. Per the DC user guide, select "Full Enrollment Run" ONLY when the DC student input file is a list of all the students in your district or School Food Authority (SFA) with **access to at least one meal service (lunch and/or breakfast).** All other student input files are "Partial Enrollment Run." Please review the user guide and ensure full enrollment runs in DC are completed correctly going forward. The 4K and the JEDI students can be run through DC. However, they should be run through as "partial run" if they do not have access to at least one meal service. If there are JEDI students that are dual-enrolled and have access to meals on the days they are onsite in the school buildings, then they can be included in their other enrolled school (i.e. elementary, middle, or high school) on the full enrollment DC run.				3/12/2024 1:55:27 PM

03/12/2024	4476		Administrative Review		FSD				

Comments				
Excess Cash Balance		**Created By**		**Created Date**
Federal regulations limit net cash resources in the non-profit school food service account. Previously, the net cash resources could not exceed a three-month average of operating expenses to remain in compliance with a non-profit status. However, recent clarification received from the USDA allows states some flexibility on this. Going forward, Wisconsin will use 6 months of operating expenses to determine if an SFA has an excess cash balance. Based on Poynette's ending fund balance on the 2022-23 Annual Financial Report, the district does have an excess of 6 months of operating expenses. The agency should have recently received a notice from DPI regarding spending down the excess. Thank you for completing the form to submit your plan for the 2024-25 school year to spend down the excess. The SFA has been able to use the excess cash balance to offer universal free breakfast for several school years. The FSD inquired about raising paid student lunch prices a small amount in order to generate a bit more revenue to try to keep universal free breakfast going a bit longer, even after the Fund 50 balance gets below 6 months of operating expenses. This could be a good option to purse even though the district has had an excess for a few years. SFAs				3/12/2024 1:55:06 PM

Administrative Review Report

Poynette School District

| always have the discretion to increase their paid student meal prices, even when the Paid Lunch Equity Tool is not required. | | | |

| 03/12/2024 | 4475 | | Administrative Review | | FSD | | | |

| **Comments** | | | |

Procedures for Discrimination Complaints	**Created By**	**Created Date**

While the SFA may have an extensive board policy related to discrimination, it does not appear that these policies fulfill the USDA requirements for processes for receiving and handling civil right complaints within the school meal programs. The existing policies do not contain the specific information needed related to the meal programs.
 	
Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
 	
All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.
 	
An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.
 	
If a complaint of discrimination is received at your district, the following procedures should be followed:
1. Document the complaint using the USDA Program Discrimination Complaint Form.
2. Submit complaints within five days of receiving the complaint to:
• Wisconsin Department of Public Instruction (DPI)
   o Mail: Director, School Nutrition Team
     125 S. Webster Street Madison, WI 53707-7841
   o Fax: (608) 267-0363
   o Email: jessica.sharkus@dpi.wi.gov
 	
3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need-to-know
		3/12/2024 1:54:44 PM

| 03/12/2024 | 4474 | | Administrative Review | | FSD | | | |

| **Comments** | | | |

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.		3/12/2024 1:54:24 PM

| 03/07/2024 | 4446 | 430 | Administrative Review | Poynette El | FSD | | | |

| **Comments** | | | |

Production Records	**Created By**	**Created Date**
Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Current production record templates used for both breakfast and lunch do not meet the requirements, as detailed in Finding #430. Please update the production record templates and continue to work with staff to ensure all necessary information is documented. Production record templates for breakfast and lunch can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records).		3/7/2024 8:37:42 AM

| 03/06/2024 | 4449 | 404 | Administrative Review | Poynette El | FSD | | | |

Administrative Review Report

Poynette School District

Comments		
Menu Signage	**Created By**	**Created Date**
Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select to make a reimbursable meal. The breakfast and lunch signage with menu items was posted at Poynette Elementary School, however, it was positioned above eye level at the beginning of the service line. The school also has a digital menu display that shows the breakfast and lunch menu daily. It is recommended to continue to use the digital display for the menu instead of the whiteboard signage and replace the "You have to take one level scoop of a fruit or vegetable" sign on the sneeze guards with the breakfast and lunch "signage with components." The lunch 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 breakfast signage must list the three components and the four items offered and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. Samples of signage that can be printed or updated and implemented in your school can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).		3/7/2024 8:41:22 AM

03/06/2024	4448	407	Administrative Review	Poynette El	FSD			

Comments		
Crediting Applesauce Cups	**Created By**	**Created Date**
When packaged by weight, 4.0 ounces of applesauce does not equal 4.0 fluid ounces (1/2 cup) fruit. A 4.0 ounce applesauce cup must be paired with another fruit to satisfy the required ½ cup fruit and/or vegetable requirement for a reimbursable meal. If you want one applesauce cup to meet the ½ cup fruit requirement, find applesauce cups that are at least 4.5 ounces by weight, such as the 4.5 ounce applesauce cup offered by USDA.		3/7/2024 8:40:10 AM

03/06/2024	4447	433	Administrative Review	Poynette El	FSD			

Comments		
Crediting Documentation	**Created By**	**Created Date**
Crediting documentation must be available on-site at each location within the school district. Currently, a cycle menu chart with serving sizes and crediting information is available at the elementary school, but there are no copies of the child nutrition (CN) labels, product formulation statements (PFS), or USDA product information sheets for staff to reference. Schools may have a physical binder at each site that includes copies of the acceptable crediting documentation, or access to a digital folder that includes these files. Crediting documentation should be reviewed and updated at least twice per year, and as any new products are purchased.		3/7/2024 8:38:32 AM