

Administrative Review Report

Stoughton Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/10/2023	01/05/2024
On-Site Review	01/08/2024	01/09/2024
Site Selection Worksheet	11/10/2023	11/17/2023
Entrance Conference	01/08/2024	01/09/2024
Exit Conference	01/09/2024	01/09/2024

Commendations:

Sincere thanks to the staff at Stoughton Area School District for your warm welcome. We appreciate the time and efforts spent preparing for and participating in the administrative review. We recognize and appreciate your willingness to continuously learn about the USDA School Meals Programs and be receptive to feedback and technical assistance. Thank you for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions.

The meal 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 middle school team works together very well to provide a varied menu and quality customer service to students.

The district has a webpage dedicated to wellness which has many great resources for families and that support the initiatives laid out in the local wellness policy.

The Administrative Review (AR) process has been characterized by commendable efficiency and professionalism, largely attributable to the outstanding contributions of the Food Service Director (FSD). The FSD demonstrated exemplary organization, much-appreciated responsiveness to questions, and a meticulous approach in submitting documentation.

Noteworthy, both the office and kitchen staff exhibited a high level of professionalism, showcasing a team dedicated to accommodating the review process and serving their students. It is apparent that students benefit from a thoughtfully menued selection of nutritious meals, surpassing the mandated meal pattern requirements with unlimited fruits and vegetables along with multiple menu options daily. The commitment and collaborative spirit demonstrated throughout this AR underscore the food service team's dedication to not only the Child Nutrition Program standards, but also the students in the Stoughton Area School District. Thank you for all your hard work!

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Findings and Corrective Action:

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 01/10/2024 02:28 PM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA attempted to complete the DPI Nonprogram Foods Revenue Tool, but did not include all required information into the tool (7 CFR 210.14). The tool had extra tabs from the food service management company that were supposed to pull into the revenue tool, but the data did not transfer correctly and thus the tool was not accurate.</p> <p>When completing the tool be sure to:</p> <ul style="list-style-type: none"> • use district-wide data for non-program and program foods for at least 5 consecutive school days • include adult meals in the non-program foods section • include extra milk/cold lunch milk/paid elementary morning milk break in the non-program foods section • do not include milk served for free to eligible students under the WSDMP at the elementary schools during milk break • use weighted averages for paid student meal prices in the program foods section • ensure the quantities of each item sold are accurate for the whole district for the reference period used • ensure the federal reimbursement rates entered in the program food section are accurate <p>Corrective Action 1: Watch the Nonprogram Food Revenue webcast on the DPI website (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html).</p> <p>Corrective Action 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
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	<p>Flagged 01/10/2024 02:29 PM</p>	<p>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.</p> <p>Corrective Action: Utilizing the DPI template policy as a reference, (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), 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.</p> <p>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.</p>
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	

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TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/10/2024 02:32 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>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 01/11/2024 09:40 AM</p>	<p>Finding: During the benefit issuance portion of the review, 370 student eligibility statuses were reviewed. Of these 370 reviewed, there were 23 errors identified which are subject to fiscal action. There were an additional 5 errors identified outside of the review sample which require corrective action but are not subject to fiscal action.</p> <p>These errors were discussed in detail onsite. There is a summarized Excel sheet of these errors that has been uploaded in SNACS to help with the corrections.</p> <p>This is a summary of the errors noted:</p> <ul style="list-style-type: none"> • Applications were missing for several students and they were not matched on direct certification (DC). Thus there was no documentation on file to support the meal benefits the students were receiving. • Several students were receiving free benefits as a result of sharing a household with a foster child that matched on DC with an E code. E codes may not be extended to other children in the household. Please refer to the DC manual. • Several students were matched with free DC codes earlier in the school year, but then their free statuses were erroneously overridden with a reduced-price application. Students must always receive the best benefit for which they are eligible. • Applications missing adult household member's last 4 digits of Social Security Number or not having the box checked for "No SSN." This field is required on income applications. • Application with an invalid case number reported for an assistance program. The case number reported was 16 digits, which suggests it was the card number from an EBT card but not a valid case number for an eligible assistance program. • A reported child income was skipped when calculating total household income. • Application with blank household members box, or number listed in household members box did not match number of names listed on the application. Completion of the household members box is required and the number in the box must match the number of names on the application to be considered complete. • Applications being processed using a household size that does not match the information reported on application (i.e. 3 household members names listed and 3 listed in household members box, but processed using household size of 5). <p>Corrective Action 1: Provide a written statement/plan explaining how the staff responsible for eligibility determination and benefit issuance will minimize such errors going forward. This could include additional training, streamlining processes, team collaboration to double-check applications, etc. Resources on the Free/Reduced Eligibility webpage and the online training library may help.</p> <p>Corrective Action 2: Use the Excel sheet uploaded in SNACS and the sticky notes on the erroneous applications to correct all benefit issuance errors. Correction of these items should be a top-priority following the review.</p>

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		<p>Provide notes in the Excel sheet regarding how the issue was resolved and the date of resolution. Re-upload the completed Excel sheet into SNACS for the reviewer to reference.</p> <p>For applications that could not be located at the time of the review, upload copies of the new applications received by the household (if applicable) into SNACS.</p> <p>If the benefit issuance correction process results in any students having a decrease in benefits, use the Adverse Action Letter template uploaded into SNACS to notify the household and ensure the household is given 10 calendar days before the status is changed in the software.</p> <p>If the benefit issuance correction process results in any students having an increase in benefits, use the Increased Meal Benefit Letter template uploaded into SNACS to notify the household and update their status in the software system in 3 calendar days or less.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	133	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/09/2024 02:25 PM</p>	<p>Finding: The SFA did not provide instructions on entering the categorically eligible program name in Infinite Campus software as notified by Infinite Campus in June 2023.</p> <p>See supplemental information regarding this information from Infinite Campus.</p> <p>Corrective Action: Update the Infinite Campus online application to include the necessary instructions to indicate the eligible program name. Upload a screenshot from Infinite Campus that includes these instructions.</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 01/09/2024 02:38 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	Verification (207 - 215)	
Question #	209	
TA Log #	No TA Log# found	

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Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/09/2024 03:12 PM</p>	<p>Finding: Verification was not completed correctly for all selected applications.</p> <p>One of the applications selected was initially approved as "reduced." However, the information reported on the application should have made it "denied." This household was contacted for verification and submitted copies of two paychecks. The verifying official used the information on the paychecks to determine the household should remain reduced. However, the submitted information from the household did not have sufficient information to make this determination, and the household was mistakenly changed to "free" on 11/15/23.</p> <p>Please note that when a household provides wage information for a job, the paycheck stub must show the gross income amount and how often pay is received. A copy of a direct deposit amount or copy of an actual paycheck received only shows the net income (instead of gross income) and likely does not provide sufficient detail to show the length of the pay period.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. The verifying official should review the verification section of the Eligibility Manual and/or the Verification online learning module. Submit a statement describing how verification will be completed correctly going forward. 2. Contact the family of the erroneous verified application. Request that they resubmit verification materials that have the correct information needed for the verification process to be completed (i.e a paystub that shows gross income and pay frequency). <p>Once the updated information is received, determine what the correct eligibility status should be. Use the verification "We Have Checked Your Application" to communicate the results of this re-verification.</p> <p>If their benefit will decrease from the current status in the software system, be sure the family is given 10 calendar days before changing the status in the software.</p> <p>Document all of this and retain with other program records. Upload the corresponding documents in SNACS showing the resolution of this issue.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/09/2024 02:33 PM</p>	<p>Finding: The most current USDA non-discrimination statement (NDS) was not included on all program materials. Please update the NDS in the following materials: 2023-24 parent handbook pages 4-5, Board Policy 8531, Board Policy 8500. Further, the full NDS should be added to Administrative Guideline 5510.</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/10/2024 11:55 AM</p>	<p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p>

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		<p>During the review, the completed USDA tracker for 22-23 was provided but there were no training hours entered into the tool yet for 23-24.</p> <p>Corrective Action: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.</p>
Site Name	River Bluff Mid	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/10/2024 04:30 PM</p>	<p>Finding: Detailed signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal.</p> <p>Corrective Action: Submit a picture of breakfast and lunch signage visibly displayed near the meal service line. The signage should clearly indicate the offered components and/or food items in each meal and incorporate the requisite OVS information for each meal service. Additional guidance and resources can be found in the Technical Assistance section of this report.</p>
Site Name	River Bluff Mid	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	436	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/10/2024 04:36 PM</p>	<p>Finding: The Shearer's White Round Tortilla Chips used during week of review are neither enriched nor nixtamalized and, therefore, do not meet the criteria for grains served under the NSLP meal pattern.</p> <p>Corrective Action: Please submit a statement addressing how such products will be assessed in the future. Additionally, please submit the product label for the alternate corn product intended for future use, ensuring it meets the necessary enrichment or nixtamalization standards.</p>
Site Name	River Bluff Mid	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>01/10/2024 04:42 PM</p>	<p>Finding: Based on the USDA required review of at least 10% of a la carte sales, several non-compliant items have been identified, as indicated in the provided list. It is crucial to note that this list is not exhaustive and there may be additional non-compliant products on the a la carte menu. Therefore, a comprehensive review of all products and recipes is recommended to ensure full compliance with Smart Snacks regulations.</p> <ul style="list-style-type: none"> • Performance Foods Brownie Mix (not a Whole Grain Product: sugar is the first ingredient) • SunChips, multiple varieties (calories from total fat exceed 35%) • Miss Vickies Potato Chips, multiple varieties (calories from total fat exceed 35%) • Klement Beef Stick (calories from total fat exceed 35%, calories from saturated fat are not less than 10%, sodium exceeds 200mg) • Rice Krispie bars, multiple varieties (calories exceed 200, contains trans fat, and/or exceeds 200 mg sodium)

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	<ul style="list-style-type: none"> Great Lakes Kettle Cooked Chips, multiple varieties (calories from total fat exceed 35%) SmartFood popcorn, multiple varieties (exceeds caloric and sodium limits) <p>Corrective Action: Please submit a detailed plan outlining the SFA's strategy for ongoing monitoring of Smart Snacks compliance.</p> <p>Additionally, submit product labels and crediting documentation for any items intended to substitute for any of the non-compliant products listed above. If a decision is made to discontinue an item without a replacement, please include this in your submission. No additional labels or crediting documentation is required for discontinued products.</p>
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Site Name	River Bluff Mid
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1405
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	<p>Flagged 01/09/2024 02:18 PM</p> <p>Finding: Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year (7 CFR 210.13). The SFA did not yet receive two food safety inspections in the current school year at the time of the review. As a result, the reviewer requested to see the two food safety inspection reports from the prior school year to verify that two inspections were received. The FSD was only able to supply the report for the second inspection in the 2022-23 school year, but not the first. This was due to unique circumstances with FSD turnover, however the new FSD should have copies of these reports in their files.</p> <p>Corrective Action: Contact the local regulatory authority to request a copy of the first food safety inspection from the 2022-23 school year. This likely would be from the fall of 2022. Upload documentation into SNACS of this communication. If a copy of the report is obtained before the corrective action due date, please upload a copy of this report into SNACS.</p>
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Site Name	River Bluff Mid
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1408
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	<p>Flagged 01/09/2024 02:14 PM</p> <p>Finding: Temperatures (refrigerator, freezer, food, milk coolers, dish machine) must be recorded daily (7 CFR 210.13). The requested temperature logs were not available for review or were incomplete. During the onsite visit, the SFA could not provide copy of December temperature logs for the coolers/freezers/dishwasher. Hot food temperatures were available as they are recorded on the production records. The SFA was able to show the completed logs for September, October, November, and start of January but December was misplaced at the time of the onsite visit. Evidence indicates temperature logs are diligently kept daily but the one month needed just could not be located when requested.</p> <p>Corrective Action: Provide a statement describing how temperature logs for prior months will be organized and retained going forward so that logs for at least the last 6 months are available at any given time.</p>
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Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/11/2024	4037		Administrative Review		FSD			

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Comments									
Verification					Created By			Created Date	
<p>When an application(s) is chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.</p> <p>When a household is selected for verification, it must provide "sources of information" to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.</p> <p>Acceptable documentation of income or receipt of assistance may be provided for any point in time between the months prior to application and the time the household is required to provide the documentation.</p> <p>Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.</p> <p>During the verification process, households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.</p>								1/11/2024 10:46:09 AM	
01/11/2024	4036		Administrative Review		FSD				
Comments									
Application Processing					Created By			Created Date	
<p>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. Additionally, the checkbox in this section for "categorical eligibility" is intended to be checked when the application is approved based on a case number, homeless, foster, migrant, or runaway---not income. Please also remember the DC code E (for foster) may NOT extend to other children in the household. Also, a status determined by DC should take precedence over an application unless the application provides a better benefit.</p>								1/11/2024 10:45:25 AM	
01/11/2024	4035		Administrative Review		FSD				
Comments									
Independent Review of Applications					Created By			Created Date	
<p>LEAs that have a 5% or more error rate during the certification review of the Administrative Review will be required to conduct a second independent review of applications in the following school year.</p> <p>More information on the Independent Review of Applications is found in the Eligibility Manual. An SNT memo will be mailed from DPI during the summer following the year the review occurred with more information for those SFAs that are required to conduct an independent review of applications.</p>								1/11/2024 10:40:40 AM	
01/11/2024	4034		Administrative Review		FSD				
Comments									
Incomplete 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. 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</p>								1/11/2024 10:40:22 AM	

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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.							
01/11/2024	4033		Administrative Review		FSD		
Comments							
Income Calculations on Application						Created By	Created Date
When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the Income Eligibility Guidelines (IEG) one would look at the amount of their income under the column indicating that stated frequency. Only convert income to annual if it is reported in different frequencies (i.e. some is listed as monthly and some as every 2 weeks).							1/11/2024 10:38:34 AM
01/10/2024	4031	1106	Administrative Review	River Bluff Mid	fsd		
Comments							
Fundraisers and Smart Snacks						Created By	Created Date
Currently, no food and/or beverage fundraisers take place in Stoughton Area School District. If any food or beverage fundraisers 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. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).							1/10/2024 4:43:21 PM
01/10/2024	4030	1105	Administrative Review	River Bluff Mid	fsd		
Comments							
Smart Snacks						Created By	Created Date
The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).							1/10/2024 4:41:44 PM
We recommend continuing to use the Alliance for a Healthier Generation Smart Snacks Product Calculator to assess compliance of products sold outside the reimbursable meals (https://foodplanner.healthiergeneration.org/calculator/). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.							
Review of documentation and onsite observation revealed a number of food items sold a la carte that do not meet Smart Snacks regulations. Specifics are detailed in the Findings and Corrective Action portion of this report.							
01/10/2024	4029	1104	Administrative Review	River Bluff Mid	fsd		
Comments							
Meal Service Line Setup						Created By	Created Date
Presently, both meal service lines permit students to purchase a la carte items; however, a bottleneck occurs due to a single cooler for cold a la carte beverages/items, requiring the Point of Service cashier to frequently leave their post. This disrupts the lunch line flow, and some students attempt to expedite the process by entering their PIN and leaving the line while the cashier gets the desired cold item. To enhance efficiency, it is recommended to explore an alternative service model, such as designating one service line specifically for students purchasing a la carte items (in addition to their reimbursable meals) with access to the cooler. While an adjustment for students, this approach is anticipated to streamline operations in the long term.							1/10/2024 4:40:50 PM
01/10/2024	4028	501	Administrative Review	River Bluff Mid	fsd		
Comments							
Offer vs Serve						Created By	Created Date
As highlighted during onsite discussions, it is crucial for food service staff to have a solid understanding of Offer versus Serve (OVS) to guarantee that all students choose reimbursable meals. It is advisable to incorporate periodic OVS refreshers into team							1/10/2024 4:38:00 PM

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meetings throughout the school year. If needed, OVS resources are available on the Wisconsin Department of Public Instruction's Menu Planning - OVS webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve) and can serve as valuable training aids.										
01/10/2024	4027	436	Administrative Review	River Bluff Mid	fsd					
Comments										
Corn Products						Created By		Created Date		
<p>The National School Lunch Program (NSLP) places importance on the nutritional quality of meals served to students. In the context of corn products, it's crucial to distinguish between enriched, nixtamalized, and plain corn products to ensure compliance with NSLP meal pattern requirements.</p> <p>Enriched corn products, such as cornmeal or corn flour, have undergone a process where essential nutrients like folic acid, iron, niacin, riboflavin, and thiamine are added. These enrichments enhance the nutritional value of a corn product, making it a creditable Enriched Grain product under the NSLP meal pattern. Nixtamalized corn products are likewise creditable towards the grain component. Nixtamalization is a traditional process involving soaking dried maize (corn) in an alkaline solution (typically, "limewater" or "slaked lime"), which enhances the bioavailability of certain vitamins and minerals. However, nixtamalized corn products meet the Whole Grain-Rich (WGR) criteria in addition to being creditable towards the grain component in the NSLP meal pattern. Creditable grain items are made from grains that are whole-grain flour, whole-grain meal, corn masa, masa harina, hominy, enriched flour, enriched meal, bran, germ, or be an enriched product. Plain corn products, which lack enrichment or nixtamalization, do not meet the nutritional criteria required for a creditable grain product under the NSLP meal pattern.</p> <p>To be creditable towards the grain component, corn products should either be enriched or nixtamalized to ensure they contribute positively to the overall nutritional quality of the meal.</p>								1/10/2024 4:36:02 PM		
01/10/2024	4026	434	Administrative Review	River Bluff Mid	FSD					
Comments										
Standardized Recipes						Created By		Created Date		
<p>Standardized recipes were in place for all menu items served throughout the week of review and the onsite observation days. It's worth noting that, while recipes are provided by the Food Service Management Company (FSMC) Corporate Office, some may necessitate adjustments to align with locally-procured products. Ongoing collaboration with staff is encouraged to ensure that all recipes accurately reflect the food items currently in use.</p>								1/10/2024 4:35:03 PM		
01/10/2024	4025	431	Administrative Review	River Bluff Mid	FSD					
Comments										
Production Records						Created By		Created Date		
<p>While printed production records are quite detailed, improvement is suggested when recording handwritten information. Please continue to work closely with staff to ensure comprehensive completion of all necessary fields on production records, including details for the handwritten menu additions.</p>								1/10/2024 4:34:16 PM		
01/10/2024	4024	404	Administrative Review	River Bluff Mid	FSD					
Comments										
Signage						Created By		Created Date		
<p>Signage helps students understand what components make up a reimbursable meal, ultimately helping them accurately select reimbursable meals. Generic Offer Versus Serve (OVS) signage and the weekly menu were available throughout meal service; however, it is recommended to reposition the menu closer to the meal service area for greater visibility. Consider implementing a larger display prominently positioned in the meal service area to articulate daily menu offerings and their corresponding meal pattern components. Additional signage at the fruit and vegetable bar is also suggested. When using the vegetables on a garden or salad bar to meet weekly vegetable subgroup requirements at lunch, portion sizes of at least 1/8 cup each should be communicated to students with signage. Samples of printable or updateable signage can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Detailed signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered</p>								1/10/2024 4:29:37 PM		

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components in each meal and tells students what they must select in order to make a reimbursable meal. This becomes particularly crucial during self-service situations, such as the garden bar for fruits and vegetables or when choosing from the various packaged grain items during breakfast. Implementing these signage measures will enhance meal clarity and compliance. Breakfast signage must list the three components and the four items offered, and must communicate to students that under 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. Lunch signage should list the five components and inform students that under 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.								
01/10/2024	4018		Administrative Review		FSD			
Comments								
Non-Program Foods Revenue					Created By	Created Date		
<p>Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines.</p> <p>All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals.</p> <p>SFAs are required to annually complete the DPI Non-program Food Revenue Tool or the USDA Non-program Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in Non-program Foods Revenue Rule SP-20-2016</p>						1/10/2024 2:35:06 PM		
01/10/2024	4017		Administrative Review		AR			
Comments								
Civil Rights Complaints in the School Meals Programs					Created By	Created Date		
<p>While the SFA may have an extensive board policies 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.</p> <p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.</p> <p>All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the Template Civil Rights Complaint Procedures to create written procedures.</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.</p> <p>If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> Document the complaint using the USDA Program Discrimination Complaint Form. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 <ul style="list-style-type: none"> Fax: (608) 267-0363 Email: jessica.sharkus@dpi.wi.gov Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need-to-know 						1/10/2024 2:31:17 PM		
01/10/2024	4016		Administrative Review		FSD			
Comments								
Breakfast Participation					Created By	Created Date		
<p>Breakfast participation at the middle school is low compared to the number of students attending and compared to lunch. Increased participation in the School Breakfast Program (SBP) will enable the SFA to help students start their school day with good nutrition and for the school to earn reimbursement for breakfasts served.</p> <p>Currently, breakfast is served before school, and in general, students have to choose to stay outside before school or come in for breakfast. On the day of the onsite review, there were many children inside the cafeteria before school (likely due to cold weather outside) but only a small portion of them were eating breakfast. The FSD is encouraged to explore</p>						1/10/2024 2:14:07 PM		

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ways to increase breakfast promotion and entice the students to come select a breakfast from the diverse, customizable breakfast line. The SFA is also encouraged to explore options for altering the SBP service models to increase participation.								
In addition to the traditional, cafeteria-based breakfast model, schools may also consider an alternative breakfast model. For example, "Breakfast in the Classroom" involves serving the breakfast meal to children during a morning class, often while the teacher is taking attendance or giving classroom announcements. Schools operating "Grab & Go Breakfast" serve children a breakfast "to go," often in a paper or plastic bag, before school or during a morning break. Consider offering a second-chance breakfast during late morning for students who are not hungry first thing in the morning.								
To learn more about these and other breakfast service options, please see the USDA School Breakfast Program webpage . Additional breakfast resources and contact information for School Breakfast Program specialists is available on the DPI School Breakfast webpage .								
01/10/2024	4015		Administrative Review		FSD			
Comments								
Training for Non-School Nutrition Staff				Created By		Created Date		
The non-school nutrition staff members that serve as aides for students with special needs 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.						1/10/2024 2:09:56 PM		
01/10/2024	4014		Administrative Review		FSD			
Comments								
Professional Standards Tracking				Created By		Created Date		
The SFA uses the USDA professional standards tracking tool. However, it did not appear that hours for 23-24 had been entered yet and there was confusion over whether 22-23 hours were entered correctly or not. The FSD and food service assistant should work together to improve understanding of the tracking tool to ensure it is completed fully, accurately, and in a timely fashion going forward. The USDA has resources available to help with using the tracker, including a few webinars: https://www.fns.usda.gov/cn/professional-standards .						1/10/2024 2:05:54 PM		
01/10/2024	4012		Administrative Review		AR			
Comments								
Distribution of Donated "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.						1/10/2024 2:02:52 PM		
01/10/2024	4011		Administrative Review		AR			
Comments								
Refunds When Students Leave District				Created By		Created Date		
Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. When a child leaves the district or graduates, SFAs MUST attempt to return remaining student account funds. However, SFAs may allow families that are not approved for free or reduced-price meals to donate their remaining funds to cover other unpaid meal charges that were uncollectable. Households approved for reduced-price meal benefits MUST receive a refund. There is a federal requirement that children eligible for reduced-price meals pay a maximum of 40 cents per lunch meal and 30 cents per breakfast meal. Retaining the unused funds would result in the per meal price exceeding the federal maximums. Funds remaining in a reduced-price eligible student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as unclaimed property. The district should ensure that refunds are handled in accordance						1/10/2024 1:55:50 PM		

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with the guidance above and that the communications about this are also clear and accurate.							
01/10/2024	4010	Administrative Review		AR			
Comments							
Annual Financial Report – WSDMP				Created By		Created Date	
<p>On the Annual Financial Report for Child Nutrition Programs, the revenue reported for WSDMP only includes the state reimbursement received for the program (which is recorded in the year it is received and not the year it is accrued). Revenue from paid households for their child's milk break is a revenue for non-program foods since those milks are not technically part of WSDMP (i.e. they are not claimed for reimbursement) but are instead non-program foods. The expenditures for WSDMP should reflect the cost of serving the milk break for free to the free/reduced-price eligible children in the participating grades at the participating schools. Again, the milks served at milk break to the paid eligible students are considered non-program foods and are not technically part of the WSDMP.</p>						1/10/2024 1:54:06 PM	
01/09/2024	4009	Administrative Review		FSD			
Comments							
Summer Food Service Program Promotion				Created By		Created Date	
<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. The district fulfilled this requirement by sharing the poster promoting summer meals offered by Florence County School District.</p> <p>It is recommended to also share the following in an end of year newsletter and on the SFA website to further assist families in finding free summer meals:</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 						1/9/2024 2:23:56 PM	
01/09/2024	4008	Administrative Review		FSD			
Comments							
Records Retention				Created By		Created Date	
<p>All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents.</p> <p>Other examples of program records that must be kept for three years plus the current year are:</p> <ul style="list-style-type: none"> ○ Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters); ○ Meal count participation data by school; ○ Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data; ○ If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities, ○ Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established ○ Agreements and free and reduced price policy statements; ○ Approved and denied free and reduced price meal applications; ○ Procedures and documentation for direct certification for free meals, if applicable; ○ Procedures for alternate point-of-service meal counts, if applicable; ○ Menu and food production records and, if applicable, nutrient analysis records; ○ All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements); ○ Documentation associated with the local school wellness policy; ○ Number of food safety inspections obtained per school year by each school; 						1/9/2024 2:23:31 PM	

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<ul style="list-style-type: none"> ○ Records from the food safety program for a period of 6 months following a month’s temperature records. If temperature records are on production records, then keep for 3 years plus current year ○ Records from the most recent food safety inspection; ○ Documents demonstrating compliance with Civil Rights requirements; ○ Audit reports and written responses and any related corrective action. 	
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01/09/2024	4007		Administrative Review	FSD		
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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>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.</p> <p>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:</p> <ol style="list-style-type: none"> 1. an explanation of how the child’s physical or mental impairment restricts the child’s diet 2. the food(s) to be avoided 3. the food or choice of foods that must be substituted 4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner. <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Timing of Medical Statements - 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>1/9/2024 2:23:07 PM</p>

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<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 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.</p> <p>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.</p> <p>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</p>					
01/09/2024	4005	Administrative Review	FSD		
Comments					
Temperature Logs		Created By	Created Date		
<p>Staff must record temperatures daily using temperature logs. During the onsite review, the December temperature log for the middle school with the cooler, freezer, and dishmachine temperatures could not be located. The comparable records for September, October, November, and January were available—just December was misplaced. Please ensure temperature logs are kept daily as required and that the completed monthly logs are properly retained and organized so they are available for reference when needed.</p>			1/9/2024 2:22:18 PM		
01/09/2024	4004	Administrative Review	FSD		
Comments					
Food Safety Inspections		Created By	Created Date		
<p>Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's food safety plan. SFAs should retain copies of their inspection reports.</p> <p>During the review, the SFA was not able to provide a copy of the first food safety inspection report from the 2022-23 school year. The FSD should reach out to the local regulatory authority to obtain a copy of this inspection report and keep it with the rest of the program records.</p>			1/9/2024 2:22:03 PM		
01/09/2024	4003	Administrative Review	FSD		
Comments					
Food Safety Plan		Created By	Created Date		
<p>SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs. The plans should be site-specific and only contain the information currently relevant to that site. It is recommended that the food safety plan for the middle school be reviewed and updated so that the Standard Operating Procedures (SOPs) that do not apply at that site are removed.</p>			1/9/2024 2:21:39 PM		
01/09/2024	4002	Administrative Review	FSD		

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Comments									
Symbols and Prices on Cashier Screen					Created By			Created Date	
<p>During meal observation, it was observed that three different symbols signifying "free," "reduced," and "paid" showed on the computer screen very briefly when students entered in their PINs. The screen is only visible to the POS operator and is not visible to students. At breakfast, the meal price (\$0.00, \$0.30, \$1.85) was also visible to the POS operator.</p> <p>While this may not necessarily constitute "overt identification," the SFA should consider removing this information from the screen so cashiers cannot discern students' meal eligibility statuses. These symbols may allow the POS operator/cashier to discern student's eligibility statuses and they likely do not really need to know this information. It is suggested to work with the software provider and staff members to modify how this appears on the computer screens.</p>								1/9/2024 2:21:21 PM	
01/09/2024	4001		Administrative Review		AR				
Comments									
Local Wellness Policy					Created By			Created Date	
<p>The district has a wellness section of the website, which is great. It is recommended that this page be updated as it contains some outdated information.</p> <p>Additionally, the Administrative Guideline ag5510 for Student Nutrition and Physical Activity could be considered the USDA-mandated local wellness policy, as it is clear this document has the information that USDA requires. The board policy po5510 for Student Nutrition and Physical Activity does not contain the necessary information to meet the USDA requirements for a district's local wellness policy. The district may consider modifying these to improve clarity and remove any conflicting or redundant information.</p> <p>The district is also encouraged to continue improving the content of the local wellness policy by adding more specific goals in the different content areas. Finally, the local wellness policy must include the full USDA non-discrimination statement--please add this to the policy (ag5510).</p>								1/9/2024 2:21:04 PM	
01/09/2024	4000		Administrative Review		FSD				
Comments									
Price Advertisements					Created By			Created Date	
<p>The SFA has some prices inconsistently communicated. These should be updated so all students, households, and staff members know exactly what the current prices are for meals and a la carte. There is a poster near the cashier station in the middle school that has incorrect reduced-price meal charges listed. The adult meal prices on this poster are also inconsistent with the contract. Further, the paid student breakfast prices for middle and high school students posted on the food service webpage do not match the online contract. Please investigate all places where prices are advertised and update them to the accurate prices. As a reminder, the maximum price for a reduced-price student breakfast is \$0.30, and \$0.40 for lunch.</p>								1/9/2024 2:20:40 PM	
01/09/2024	3999		Administrative Review		FSD				
Comments									
Civil Rights Training					Created By			Created Date	
<p>When completing the annually required civil rights training, be sure to go to the DPI Civil Rights webpage and use the currently posted training. There are occasionally updates to trainings, including the civil rights training, so it is important to use the most updated version of the training each year. Civil rights training should ideally be completed by all staff required to do the training before the start of the school year. This ensures staff start the year off refreshed on the requirements and expectations. During the review, it was noted that some staff members did not complete the training until a few weeks or months into the school year.</p>								1/9/2024 2:20:21 PM	
01/09/2024	3998		Administrative Review		AR				
Comments									
Supply Chain Assistance Funds					Created By			Created Date	
<p>When tracking the use of Supply Chain Assistance (SCA) funds, make sure corresponding food invoices are also kept. The products tracked as purchased with SCA funds must be domestically produced and minimally processed. Further, SCA funds can only be used for NSLP, SBP, and the Afterschool Snack Program—not the Special Milk Program or WSDMP. Please ensure the SFA only records SBP and NSLP milk on the SCA fund tracker.</p>								1/9/2024 2:20:06 PM	
01/09/2024	3997		Administrative Review		DO				

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Comments									
DC Letter					Created By			Created Date	
<p>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.</p>								1/9/2024 2:19:45 PM	
01/09/2024	3996		Administrative Review		AR				
Comments									
Brown Bag Lunches					Created By			Created Date	
<p>The district's food service webpage advertises that "brown bag lunches are available on early release days for students in grades K-8." Please ensure that these meals are being served and consumed while the school day is still in session. Congregate meals service is required in NSLP which means students may not take meals home "to-go."</p> <p>For example, on early release days, students could not be handed brown bag lunches as they board the bus home. During the COVID-19 pandemic, there were waivers available for certain program requirements (such as the non-congregate feeding waiver) that allowed things like parents picking up meals for students, grab and go take-home meals, and meal service time waivers. However, all of these waivers have expired and thus congregate feeding is required and take-home meals are not allowed.</p>								1/9/2024 2:19:20 PM	
01/09/2024	3995		Administrative Review		AR				
Comments									
Excess Cash Balance					Created By			Created Date	
<p>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.</p> <p>Based on Stoughton's ending fund balance on the 2022-23 Annual Financial Report, the district does not have an excess of 6 months of operating expenses and thus does not currently have an "excess cash balance."</p>								1/9/2024 2:19:04 PM	