

# Administrative Review Report

Beecher-Dunbar-Pembine School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2023	11/27/2023
On-Site Review	12/13/2023	12/14/2023
Site Selection Worksheet	10/30/2023	11/03/2023
Entrance Conference	12/13/2023	12/13/2023
Exit Conference	12/14/2023	12/14/2023

## Commendations:

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

Thank you to the school staff members for being welcoming during the review. Thank you for being available throughout the on-site visit to answer questions. The food service director was very receptive to feedback and eager to learn. The 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.

## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 02:12 PM</p>	<p>Finding: On the Annual Financial Report (AFR) for 2022-23, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). The SFA serves extra milk and adult meals which are non-program foods. There is some revenue allocated to non-program foods on the AFR, but no expenditures are allocated.</p> <p>Please see corresponding technical assistance section of this report.</p> <p>Corrective Action: Review the <a href="#">Annual Financial Report webcast</a> or <a href="#">manual</a> on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 01:00 PM</p>	<p>Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>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, (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a>), develop procedures that will be adopted by the SFA and upload into SNACS. Describe how and when the</p>

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		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.
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/21/2023 01:17 PM	<p>Finding: The current Local Wellness Policy (LWP) does not include all of the required content. Specific language regarding the triennial assessment and inclusion of the full USDA non-discrimination statement is lacking. (7 CFR 210.31).</p> <p>Further, there is some content related to school meals. However, language should be improved and specifically reference meeting the nutrition requirements under the Healthy Hunger-Free Kids Act of 2010 and include a link to the USDA meal pattern.</p> <p>See the corresponding technical assistance portion of this report for further suggestions regarding the LWP.</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1006	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 12/21/2023 01:02 PM	<p>Finding: The SFA did not share the results of the Local Wellness Policy (LWP) assessment with the public per 7 CFR 210.31.</p> <p>Corrective Action: Notify the public of the results of the LWP assessment and upload a copy of the documentation to support this or the appropriate Web site URL linking to the assessment. This could include posting the full, complete assessment on the district's website.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	Flagged 12/21/2023 11:57 AM	<p>Finding: The correct <a href="#">non-discrimination statement</a> was not included on all program materials. On the printed menus and menus posted on the school website, the statement is incorrect. On menus where space is limited, the SFA should use the shortened USDA non-discrimination statement which is "This institution is an equal opportunity provider."</p> <p>Corrective Action: Update these program materials to include the correct shortened version of the USDA non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
<b>Site Name</b>		

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<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1400	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 01:22 PM</p>	<p>Finding: The SFA does not have an SOP in the food safety plan for sharing tables, but sharing tables are operated in the meal service area at breakfast. During meal service, a sharing bin was observed near the dish return behind the point of service staff member.</p> <p>When creating the SOP, consider the following:</p> <ul style="list-style-type: none"> <li>• How will oversight of the tables be achieved to ensure items students place on the tables are wholesome?</li> <li>• How will fruits/vegetables with edible peels (like apples) be handled to minimize risk of contamination?</li> <li>• How will TCS foods be handled during and after meal service?</li> <li>• Will any items left on the tables be re-served in the meal programs? This is allowable for non-TCS food items in wholesome condition and could be simple to do for shelf-stable pre-packaged items like graham crackers.</li> </ul> <p>Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian must be made. Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state. The local regulatory authority should approve the school's SOP prior to implementation to ensure compliance with all local and state health and food safety codes.</p> <p>Corrective Action: Update the food safety plan to include an SOP for sharing tables. Please review the Sharing Table Toolkit when doing this: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-no-thank-you-toolkit.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-no-thank-you-toolkit.docx</a>. The toolkit contains detailed guidance on sharing tables, a template SOP, and a template log for tracking food leftover on sharing tables.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	318	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 01:36 PM</p>	<p>Finding: During lunch observation for the high school (the review site), it was noted that there was not an acceptable point of service (POS) for the elementary students during lunch. For the non-daycare elementary students, they are marked off on a paper sheet in the morning if they want to get a school lunch that day. The paper sheets contain all student names with their barcode that is linked to their account in the software system. This paper sheet is then scanned in by the POS person before the high school lunch is served. There is nobody observing elementary students' lunch trays at the very end of the line to ensure they have selected a reimbursable meal. Elementary students are not being marked off at the time they actually receive their meal.</p> <p>The 6th graders are part of the elementary school but eat in the same place at the same time as the 7th and 8th graders (who are part of the high school). During lunch observation, the 6th graders just left the line with their trays and sat down. The 7th and 8th graders came over to the cashier station with their trays, entered their PIN, and then sat down which is acceptable and the ideal model for end-of-the-line POS.</p> <p>Though the elementary school was not the selected review site, the POS issue requires corrective action and is subject to fiscal action.</p> <p>The elementary meal counting and claiming system at lunch does not result in accurate meal counts by eligibility (7 CFR 210.7). Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child</p>

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		<p>received a reimbursable meal. Meals should not be entered into the software system until after the meal is served and it is recorded as taken by the student.</p> <p>Corrective Action: Correct the elementary POS at lunch to ensure meals are counted and claimed at a reliable POS that is located after all meal components are offered and that is operated by an adult <a href="#">trained on POS</a> and what makes up a complete meal (i.e. they should have <a href="#">Offer vs. Serve training</a>).</p> <p>Provide a description of the updated process. After the updated process is implemented, submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)	
<b>Question #</b>	325	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 02:09 PM</p>	<p>Finding: The district has two distinct schools on the DPI school directory, and thus on the school nutrition contract. Both schools are located in the same building and share a kitchen/cafeteria. The SFA is correctly separating lunch counts by each school site and reporting these separately by school code for lunch reimbursement claims.</p> <p>However for breakfast, the district is reporting the total breakfast count for daycare through 12th grade under the elementary school code 40. Claims must be site-based and the meal counts must be correctly broken out for each school and recorded under the correct school code on the claims.</p> <p>During breakfast observation, all students (except daycare and 4K) come through the line co-mingled at the same time before school starts. The point of service (POS) at breakfast is an end-of-the-line paper CEP check off sheet on which every student coming through the line with a complete reimbursable breakfast is recorded with a hashmark. The software system was not used for Kindergarten – 12th grade breakfast counts and there was no breakdown of grades/schools on the check off sheets.</p> <p>In the few school years in which unique program waivers were allowed due the COVID-19 pandemic, there was some flexibility on the requirement to break out all meal counts by individual site. However, prior to the start of the 2022-23 school year, all meal claims were required to go back to the site-based claiming model for all schools and programs.</p> <p>The observed breakfast POS yields an accurate meal count total, and thus fiscal action is not required for this item though corrective action is still needed.</p> <p>Corrective Action: Modify the breakfast POS so that meals can be claimed by each school separately (daycare – 6th grade under elementary school code 40; 7th-12th grade under high school code 60). Because the district is CEP, it is not required to track meals by student name. However, the district is encouraged to explore the use of the software system for breakfast at the POS to track meals served by student name and their enrolled school. Please work with the software vendor to determine how the software settings may be utilized to achieve the POS and claiming requirements in the future.</p> <p>To resolve this corrective action item, submit a description of the updated POS process at breakfast. Submit 10 operating days of completed breakfast meal count data to demonstrate how the new process is working so that the two schools have separate, accurate breakfast counts.</p> <p>NOTE: The reviewer will check in online service that the upcoming breakfast claims are broken out by site and that all breakfast meals do not continue to be claimed under the elementary school site.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	409	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 12/21/2023 04:14 PM</p>	<p>Missing vegetable subgroup was a finding and was documented during the school year 2017-18 administrative review (AR), which is a repeat finding during the current AR for 2023-24.</p> <p>Finding: Fiscal action is required for a repeat missing vegetable subgroup. Therefore, fiscal action will be assessed on the day during the week of review (November 6-10, 2023) with the lowest participation and those meals will be reclaimed.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	430	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/03/2024 09:29 AM</p>	<p>Production records are intended to be useful tools to record production information. 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.</p> <p>Finding: Production records are old, illegible, and missing required information. Production records must contain the menued item, either the recipe name and number or the detailed name of the product, the planned portion size, either in weight (m/ma and grains) or volume (vegetables, fruit, and milk).</p> <p>Additional information can be found on the menu planning page of the <a href="#">DPI SNT website</a> in the overview section, titled <a href="#">Production Record Requirements</a>. Please continue to use the <a href="#">DPI SNT production records</a> modified for your schools specific needs, or create a production record that meets the needs of the school nutrition professionals, ensuring all required information is listed and completed daily.</p> <p>Corrective Action: Submit 2 weeks of completed lunch and breakfast production records. Additionally, submit a written statement of or verification of additional production record training (e.g. <a href="#">SNT Production Records e-learning courses</a>).</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	433	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 01/03/2024 10:29 AM</p>	<p>SFAs are required to document how foods offered credit towards the daily and weekly meal pattern requirements.</p> <p>Proper crediting documentation was not available for any of the food items being offered and served. Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS), Child Nutrition (CN) label, or USDA Product Information Sheet to document meal component crediting.</p> <p>Provide crediting information by securing a PFS directly from the distributor or the manufacturer and saving a CN label directly off the packaging. If proper documentation cannot be obtained, discontinue using the product and obtain a product that has the proper crediting documentation. The USDA Food Buying Guide (FBG) contains yield and crediting information for foods with a standard of identity ( <a href="https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs">https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs</a>).</p> <p>Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. If the product is not listed in the FBG, additional crediting documentation is required.</p>

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		<p>Finding: Crediting documentation for the meals offered during the week of review (November 6-10, 2023) was not provided.</p> <p>Corrective action: Using the week of review (November 6-10, 2023), provide all crediting documentation for the items offered. If the product originally offered does not have crediting documentation, choose a different, creditable product and send the PHN on the review this documentation and update the weekly menu.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	436	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>01/03/2024 10:42 AM</p>	<p>Without further documentation the menu currently appears to have a daily and weekly grain shortage. Once all documentation has been gathered, additional information may appear.</p> <p>Finding: There was a daily grain shortage on Thursday November 9, 2023 during the week of review. A grain product was not offered with this meal. This is short of the required daily minimum of 2oz eq grain for grades 9-12.</p> <p>Corrective Action: List which product will be offered with this meal when it is offered on the menu again. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be added or substituted on the planned menu.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1406	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	CAP Submitted	
<b>Corrective Action History</b>	<p>Flagged</p> <p>12/13/2023 03:08 PM</p>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>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. If corrected onsite, no further action required.</p>
<b>Site Name</b>	Pembine Hi	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>01/03/2024 09:50 AM</p>	<p>Finding: Products ordered/delivered are not being monitored following the <a href="#">Buy American Provision</a>.</p> <p>Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. Provide a copy of the form(s) that will be used and include any noncompliant products.</p> <p>The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is</p>

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	<p>produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).</p> <p>The following information must be recorded on a Buy American Non-Compliant Product List:</p> <ul style="list-style-type: none"> <li>● Date</li> <li>● Name of product</li> <li>● Country of origin</li> <li>● Reason</li> <li>● Cost analysis</li> <li>● Seasonality</li> <li>● Availability</li> <li>● Substitution</li> <li>● Distribution</li> <li>● Other</li> </ul> <p>A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (<a href="https://dpi.wi.gov/school-nutrition/procurement/buy-american">https://dpi.wi.gov/school-nutrition/procurement/buy-american</a>).</p>
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## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/03/2024	3980		Administrative Review		FSD and SFA			
<b>Comments</b>								
<b>Training</b>				<b>Created By</b>			<b>Created Date</b>	
<p>Webcasts and self-guided e-learning courses are available in the Online Learning Library (<a href="https://dpi.wi.gov/school-nutrition/training/online-learning">https://dpi.wi.gov/school-nutrition/training/online-learning</a>). Check our Training webpage for additional training opportunities (<a href="https://dpi.wi.gov/school-nutrition/training">https://dpi.wi.gov/school-nutrition/training</a>).</p> <p>Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of DPI SNT staff can be found on our website (<a href="https://dpi.wi.gov/school-nutrition/directory">https://dpi.wi.gov/school-nutrition/directory</a>).</p> <p>Those involved with USDA School Meal Programs are encouraged to attend Wisconsin Department of Public Instruction (DPI) trainings. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. Travel expenses are allowable food service expenses. More information can be found on the Training webpage (<a href="https://dpi.wi.gov/school-nutrition/training">https://dpi.wi.gov/school-nutrition/training</a>).</p>							1/3/2024 10:03:16 AM	
01/03/2024	3979		Administrative Review		FSD			
<b>Comments</b>								
<b>Crediting the Garden Bar</b>				<b>Created By</b>			<b>Created Date</b>	
<p>Fruits and vegetables on a garden bar can credit towards the meal pattern. Even with garden bars, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.</p> <p>Production records must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the Production Records webpage (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a>).</p> <p>A Vegetable Subgroup handout that identifies common vegetables with their respective subgroups is also available (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf</a>).</p> <p>Using the vegetables on the garden bar/salad bar to meet the weekly vegetable requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. Salad Bar Signage Template can be found on our Signage webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx</a>).</p>							1/3/2024 9:37:18 AM	
12/21/2023	3978		Administrative Review		AR			

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Comments						
Student Helpers			Created By	Created Date		
<p>The SFA sometimes struggles with staffing in the kitchen. The district may consider enlisting the help of student volunteers with certain kitchen tasks, as this is a possibility if certain requirements are met. Please consider the following:</p> <ul style="list-style-type: none"> <li>The student helpers should NOT be the person checking off students at the POS and should NOT be the person determining if the meal is reimbursable at the POS.</li> <li>The student helpers should all sign <a href="#">employee health reporting agreements</a> to ensure they will not work with food when they are sick. It is important that the student helpers understand the content of the agreement.</li> <li>Student helpers should complete basic training in general safety and in food safety to ensure they are following proper protocols. They should also receive training on their particular job duties. For example, if they are serving food they must know the correct serving size and how to make level scoops.</li> <li>Some other specific training they may need is <a href="#">Civil Rights Training</a>. Depending on what you are hoping to have your student helpers do and what equipment they may use, you may need to check the Department of Labor's laws on child labor. There are certain types of equipment that children must 18 or over to use, such as deli slicers. As always, it is highly encouraged to consult with the local regulatory authority or sanitarian if there are any other specific food safety questions or concerns.</li> </ul>				12/21/2023 3:37:49 PM		
12/21/2023	3977		Administrative Review		AR	
Comments						
Specia Dietary Needs			Created By	Created Date		
<p><b>Special Dietary Needs</b> - 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><b>Policy Requirements</b> - 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 <a href="#">Special Dietary Needs Policy template</a> 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><b>Medical Statement</b> - It is recommended, but not required, for SFAs to use the <a href="#">prototype Medical Statement for Special Dietary Needs</a> posted on the <a href="#">DPI SNT website</a>. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:</p> <ol style="list-style-type: none"> <li>an explanation of how the child's physical or mental impairment restricts the child's diet</li> <li>the food(s) to be avoided</li> <li>the food or choice of foods that must be substituted</li> <li>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.</li> </ol> <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><b>Brand Names</b> - 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>				12/21/2023 3:37:23 PM		



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<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><b>Timing of Medical Statements</b> - Sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child’s parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child’s need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p> <p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child’s parent or guardian for 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><b>Access to Medical Statements</b> - 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><b>Resources</b> - The <a href="#">Special Dietary Needs Flowchart</a> outlines the process of accommodation determination. The <a href="#">USDA Q&amp;A on Accommodating Special Dietary Needs</a> resource, the <a href="#">USDA Special Dietary Needs Handbook</a>, and <a href="#">Q&amp;As: Milk Substitution for Children with Medical or Special Dietary Needs</a> (Non-Disability) contain additional detailed information</p>	
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12/21/2023	3975	Administrative Review	AR			
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Comments		
Point of Service (POS)	Created By	Created Date
<p>Counts used for reimbursement claims must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. The school staff responsible for the point of service must mark students off as they receive their reimbursable meals each day. Breakfast and lunch must be counted separately. These daily records showing how many reimbursable breakfasts and lunches were served to eligible students each day must be used to compile the monthly reimbursement claim. Only one meal per student per meal service may be claimed for reimbursement.</p> <p>Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students. Additionally, the number of meals served and claimed for reimbursement must have adequate documentation on file to support the claim.</p> <p>All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students.</p> <p>Some meal count systems that are not acceptable include:</p>		12/21/2023 3:36:28 PM

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<ul style="list-style-type: none"> <li>Attendance/classroom meal counts - meal counts prior to meal service are important for production purposes but do not provide an accurate count of meals served.</li> <li>Tray or entrée counts - tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal.</li> <li>Backout counts –Counting the number of leftover meals from the starting meal count as this does not account for dropped trays, or that each entrée was part of a reimbursable meal.</li> </ul>	
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**Comments**

Sharing Tables	Created By	Created Date
<p>Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) that must be followed to safely and responsibly implement each type of table. Refer to the <a href="#">Sharing and No Thank You Tables Toolkit</a> for a comprehensive guide including standard operating procedures.</p> <p>Definitions:</p> <ul style="list-style-type: none"> <li>A sharing table is a designated table for food and beverage items that students do not intend to consume. Students <b>may</b> pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.</li> <li>A no thank you table is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students <b>may not</b> pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.</li> </ul> <p>Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state. Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.</p> <p>The SFA currently has a sharing bin for students to utilize at breakfast. Students are instructed to only take 1 item and only if they have already selected a full reimbursable breakfast and ate what they wanted from it. Students are instructed to eat the food they take from the bin in the cafeteria right away before class. In general, students are not permitted to take food from their meal out of the cafeteria to save for later.</p> <p>Please note that all students should have the opportunity to take items from the sharing table if they would like, regardless of whether or not they took a reimbursable meal. Students that bring their meal from home cannot place items from their meal on the sharing table, but they should be allowed to take items other students left on the sharing table.</p> <p>There is no DPI or USDA rule that would restrict students to only taking 1 item from the sharing table. It is the SFA’s discretion as to how much students can take from the table.</p> <p>Finally, if food waste and student hunger are a concern, the district may consider allowing students to take their uneaten breakfast items and/or items from the sharing table with them after the breakfast service is over to save for later.</p> <p>It is allowable for students could choose to pick up foods from the sharing table during meal service and save it for themselves to eat later, if the SFA permits students to take food out of the cafeteria. Please note that it is not recommended to allow students to take any TCS food items (such as milk or cheese) out of the cafeteria. Students taking food out of the cafeteria is at the SFA’s discretion. School meals are still required to be served in the congregate school environment, and the meals are not to be served in a “take home” manner like what was permitted during the COVID-19 pandemic. For example, on a half day of school, students may not pick up a bagged lunch from the cafeteria and then hop on to the school bus home taking their meal “to go.”</p>		12/21/2023 3:36:02 PM

12/21/2023	3973		Administrative Review	AR		
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**Comments**

Records Retention	Created By	Created Date

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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.

Other examples of program records that must be kept for three years plus the current year are:

- o Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters);
- o Meal count participation data by school;
- o Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data;
- o If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities,
- o Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established
- o Agreements and free and reduced price policy statements;
- o Approved and denied free and reduced price meal applications;
- o Procedures and documentation for direct certification for free meals, if applicable;
- o Procedures for alternate point-of-service meal counts, if applicable;
- o Menu and food production records and, if applicable, nutrient analysis records;
- o 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);
- o Documentation associated with the local school wellness policy;
- o Number of food safety inspections obtained per school year by each school;
- o 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
- o Records from the most recent food safety inspection;
- o Documents demonstrating compliance with Civil Rights requirements;
- o Audit reports and written responses and any related corrective action.

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Additional record retention rules apply for CEP schools. These are detailed in [7 CFR 245.9](#) and [the USDA CEP Planning and Implementation Guidance](#). The records listed below must be kept as long as the SFA is in CEP (including any extensions), plus three fiscal years after the submission of the last Claim for Reimbursement which was based on the data. In any case, if audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.

- o Data used to calculate the identified student percentage (which is usually primarily direct certification data)
- o Annual selection of the identified student percentage
  - CEP applications, annual CEP intent forms, eligibility worksheets submitted with CEP applications
  - CEP approval packets sent by DPI after application is submitted and approved
- o Total number of breakfasts and lunches served daily
- o Free and paid claiming percentages used to claim meal reimbursement
- o Non-Federal funding sources used to cover any excess meal costs
- o School-level information provided to the State agency for publication

12/21/2023	3972	Administrative Review	AR			
Comments						
Alternate Household Income Forms			Created By	Created Date		
<p>During the on-site visit, technical assistance regarding the alternate household income form was provided. This form is meant to be a simplified way for CEP schools to collect socioeconomic data for students. The income brackets on the form are broken out to indicate if the household is "economically disadvantaged" or "not economically disadvantaged." The income brackets on the form do not distinguish between "free eligible" and "reduced-price eligible." For each household size on the form, the adult household member checks one of the two boxes for income range below the household size. If they check the "\$0 up to \$xxxx" box, then they would be considered "economically disadvantaged (free/reduced). If they check the "\$xxx or more" box, then they would be considered "non-economically disadvantaged (paid)."</p>				12/21/2023 3:35:02 PM		
12/21/2023	3971	Administrative Review	AR			

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Comments							
Public Release				Created By	Created Date		
<p>All SFAs are required to distribute a <a href="#">Public Release</a> before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to:</p> <ul style="list-style-type: none"> <li>o Local news media</li> <li>o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)</li> <li>o Local employment office</li> <li>o Major employers contemplating or experiencing large layoffs</li> </ul> <p>SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.</p> <p>The SFA fulfilled the public release requirements. However, there are minimal "grassroots organizations" in the area. The SFA is encouraged to think about where they may post the public release in the future so community members know about the availability of free school meals. Posting it at the new community center once it is open is a good idea.</p>					12/21/2023 3:34:25 PM		
12/21/2023	3970		Administrative Review	AR			
Comments							
Promotion of Summer Food Service Program (SFSP)				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"> <li>• To find free summer meal locations: <ul style="list-style-type: none"> <li>o Call 211 to locate meals in the area</li> <li>o Text 'food' (in English or Spanish) to 304-304</li> <li>o Check the <a href="#">Summer Meals Site Finder Map</a> on the <a href="#">Find a Summer Meals Site webpage</a></li> </ul> </li> </ul>					12/21/2023 3:33:58 PM		
12/21/2023	3969		Administrative Review	AR			
Comments							
On-Site Monitoring				Created By	Created Date		
<p>On-site monitoring is only required for SFAs with more than one serving location. The SFA has just one kitchen/serving location even though it is technically two schools for educational purposes. Because there is a single serving site, annual completion of the on-site monitoring forms is not required. The school may use the <a href="#">on-site monitoring forms</a> if desired, however this is not a requirement.</p>					12/21/2023 3:33:36 PM		
12/21/2023	3968		Administrative Review	AR			
Comments							
Supply Chain Assistance Funds				Created By	Created Date		
<p>The district has been tracking the Supply Chain Assistance (SCA) Funds as required. Round 4 of the SCA funds was recently dispersed. They were processed on December 13th, with a deposit date of December 23, 2023. Please review the deposit and update the amount of SCA funds on the tracking tool to reflect this Round 4 payment.</p>					12/21/2023 3:33:15 PM		
12/21/2023	3967		Administrative Review	AR			
Comments							
Daycare Meals				Created By	Created Date		
<p>The district operates a school-run daycare and feeds these children under NSLP and SBP. It is crucial that the SFA is adhering to all program regulations for serving the daycare children meals under the school nutrition programs. Some technical assistance was provided on-site, but the school and daycare staff members are encouraged to reach out to the <a href="#">DPI School Nutrition Team</a> with questions. There are team members that specialize in this area able to assist by email, phone, and virtual meetings.</p>					12/21/2023 3:32:58 PM		

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Please remember that there are special meal pattern requirements for children not yet in kindergarten, along with meal environment requirements. For example, these children may not have flavored milk and may not utilize Offer vs Serve. ALL children enrolled in the daycare must be offered meals, including infants. Further, meals served to daycare children may only be claimed for reimbursement on academic school days. This does not include teacher in-service days, winter/spring breaks, or during the summer, unless summer school is in-session. Students must be enrolled in the school at the time the meal(s) are served.									
Please utilize the resources available on the <a href="#">Infant and Preschool in NSLP and SBP webpage</a> to help with program implementation.									
12/21/2023	3966		Administrative Review		AR				
Comments									
Employee Health Reporting Agreements					Created By	Created Date			
The district had signed employee health reporting agreements on file for all food handlers as required. However, the form used was outdated. The <a href="#">form was updated in 2020</a> with some new guidance on reportable illnesses/symptoms. It is recommended that the food handlers read and sign the updated form.						12/21/2023 3:32:29 PM			
12/21/2023	3965		Administrative Review		AR				
Comments									
Professional Standards Training					Created By	Created Date			
For <a href="#">professional standards</a> purposes, staff that work 20 or more hours in school nutrition each week are "full time." Staff that work less than 20 hours each week in school nutrition are "part time."						12/21/2023 3:32:12 PM			
Full time staff need 6 hours of annual training, and part time staff need 4 hours of annual training. For staff hired January 1 or later, only half of the required annual hours are needed during the first school year of employment.									
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 <a href="#">USDA Professional Standards guide</a> for more details on what may classify someone as "manager."									
The person listed on the contract as the "food service director" who is responsible for menu planning and daily kitchen operations must meet the <a href="#">minimum hiring standards for new directors</a> (which they do for the district's size) and must earn 12 hours of professional standards training hours each year.									
The non-school nutrition staff member that serves as the fiscal manager does not need to be classified as a "manager" for professional standards purposes and does not necessarily need to complete a certain minimum number of training hours annually. However, they must receive sufficient job-specific training that supports their school nutrition duties. They should also receive the annually required USDA civil rights training.									
12/21/2023	3964		Administrative Review		AR				
Comments									
Civil Rights Training Module					Created By	Created Date			
The SFA has used training modules from a specific company to help staff achieve their required training hours. These modules include a civil rights training for child nutrition programs. However, it could not be verified during the review if that training module met the USDA requirements for civil rights training. Going forward, the SFA should just use the DPI-provided civil rights training and forgo the other civil rights module from the company - this will help ensure compliance with the annual civil rights training requirements set forth by the USDA.						12/21/2023 3:31:45 PM			
When completing the annually required civil rights training, be sure to go to the <a href="#">DPI Civil Rights webpage</a> 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									

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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.									
12/21/2023	3963		Administrative Review		AR				
Comments									
Updating Information for Households					Created By		Created Date		
<p>Areas of the school website, including the <a href="#">food service webpage</a> and <a href="#">parent handbook</a>, contain out of date information that does not align with the district's current participation in CEP. Further, there was a sign displayed in the main office advertising meal prices for free, reduced-price, and paid eligible students. Advertising student meal prices by eligibility and referring to eligible students or "qualified" applicants receiving free or reduced-price meals is misleading when the district is in CEP. Under CEP, all students can receive a reimbursable breakfast and lunch for free each school day regardless of their individual eligibility.</p> <p>Please ensure all postings and communications to families regarding the school meal programs are very clear that all enrolled children can receive free reimbursable meals each school day regardless of their individual eligibility. It does make sense to advertise adult meal prices and prices for milk only since these are non-program foods that must always be purchased. Thank you to the staff members that made some updated during the on-site visit to correct some of these items.</p>							12/21/2023 3:31:21 PM		
12/21/2023	3962		Administrative Review		FSD/AR				
Comments									
Crediting Documentation and Standardized Recipes Needed					Created By		Created Date		
<p>Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, menus can be analyzed for compliance with the meal pattern requirements. Until that time, the administrative review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.</p>							12/21/2023 3:02:12 PM		
12/21/2023	3961		Administrative Review		FSD				
Comments									
Crediting					Created By		Created Date		
<p>SFAs are required to document how foods offered credit towards the daily and weekly meal pattern requirements. Proper crediting documentation was not available for any of the food items being offered and served. Processed foods that are not listed in the USDA Food Buying Guide must have a product formulation statement (PFS), Child Nutrition (CN) label, or USDA Product Information Sheet to document meal component crediting. Provide crediting information for by securing a PFS directly from the distributor or the manufacturer and saving a CN label directly off the packaging. If proper documentation cannot be obtained, discontinue using the product and obtain a product that has the proper crediting documentation.</p> <p>The USDA Food Buying Guide (FBG) contains yield and crediting information for foods with a standard of identity (<a href="https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs">https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs</a>). Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. If the product is not listed in the FBG, additional crediting documentation is required. Nutrition facts labels, Child Nutrition (CN) labels, USDA Product Information Sheets, WI-State Processed Products, and Product Formulation Statements (PFS) must be kept up-to-date. State-Processed Product Information is updated annually and can be found on the <a href="#">USDA Foods webpage</a>. USDA Foods Product Information Sheets are available online</p>							12/21/2023 3:01:08 PM		
12/21/2023	3959		Administrative Review		AR				
Comments									
Local Wellness Policy					Created By		Created Date		
<p>The district's Local Wellness Policy (LWP) contains content in the required areas of school meals, foods sold outside of the school meal programs, and foods provided but not sold, but these areas could use improvement. These content areas were not very detailed or organized in the policy. As the wellness committee continues to meet and the district</p>							12/21/2023 1:19:00 PM		

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modifies the policy, please focus on elaborating on these areas and strive to include specific goals the district has for these topics. Resources on the <a href="#">DPI LWP webpage</a> can assist, specifically the <a href="#">LWP Policy Builder</a> .			
12/21/2023	3958	Administrative Review	AR
Comments			
Civil Rights Complaint Procedures	Created By	Created Date	
<p>While the SFA does have an extensive board policy related to discrimination, the policy does not 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 <a href="#">procedures for receiving and processing complaints alleging civil rights discrimination</a> within the USDA Child Nutrition Programs. It is recommended SFAs use the <a href="#">Template Civil Rights Complaint Procedures</a> 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"> <li>1. Document the complaint using the <a href="#">USDA Program Discrimination Complaint Form</a>.</li> <li>2. Submit complaints within five days of receiving the complaint to: <ul style="list-style-type: none"> <li>• Wisconsin Department of Public Instruction (DPI) <ul style="list-style-type: none"> <li>○ Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841</li> <li>○ Fax: (608) 267-0363</li> <li>○ Email: <a href="mailto:jessica.sharkus@dpi.wi.gov">jessica.sharkus@dpi.wi.gov</a></li> </ul> </li> </ul> </li> <li>3. Maintain a <a href="#">Civil Rights complaint log</a> 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.</li> </ol>		12/21/2023 1:01:23 PM	