

Administrative Review Report

DeSoto Area School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/13/2023	01/15/2024
On-Site Review	01/16/2024	01/17/2024
Site Selection Worksheet	11/13/2023	11/17/2023
Entrance Conference	01/16/2024	01/16/2024
Exit Conference	01/17/2024	01/17/2024

Commendations:

Thank you to all staff at DeSoto Area District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director (FSD) for their great organizational skills which helped expedite this AR. All standardized recipes, production records, and crediting documentation was well-organized and easy-to-follow for nutrition staff. In addition, thank you to the school nutrition professionals who brought great energy into the cafeteria. Lastly, thank you to the administrative staff for supporting such a great school nutrition program.

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

Thank you for being available throughout the on-site visit to answer questions. The FSD was very organized and knowledgeable. The school nutrition professional at the review site was very friendly during the review and provides excellent customer service to the students. The kitchen was very clean and it was clear that food safety is valued by the staff.

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

Findings and Corrective Action:

Site Name		
Form Name	Verification (200 - 204)	
Question #	200	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/22/2024 08:19 AM</p>	<p>Finding: Verification was not completed correctly, and the verification results were not correctly reported on the Verification Collection Report (VCR).</p> <p>The application chosen for verification was originally certified as "free," which was the correct determination for the information provided on the application. The household provided pay stubs as requested for the verification process. The Verifying Official reviewed the pay stubs, made a note that the household status should remain as "reduced," made no changes to the benefit issuance list, and notified the household that their eligibility did not change. The pay stubs did support a status of "reduced" so the household should have been changed in the software from free to reduced after the verification process. However, they remained as free until the administrative review.</p> <p>On the VCR, the verification results were recorded in the section for "reduced, responded, no change." However, their results should be recorded in the section "free, responded, changed to reduced."</p> <p>Corrective Action 1: Send the household the adverse action letter provided by DPI to notify the household their status will change from free to reduced after 10 operating days. Upload a copy of the letter sent into SNACS.</p> <p>Corrective Action 2: Modify the VCR in online services before February 1 so the verification results are correctly recorded. Email the reviewer after this is complete. Refer to the VCR manual as needed.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)	

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Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/24/2024 03:39 PM</p>	<p>Finding: The Annual Financial Report (AFR) for the 2022-23 school year has errors in need of correction.</p> <p>1. The allocations on the AFR for non-program foods do not appear to be accurate. The revenue allocated to non-program foods far exceeds the reported expenses for non-program foods. This is likely due to under allocation of expenses and/or overallocation of revenues. Please assess and reallocate non-program food revenues and expenses on the report so the values accurately reflect these items. Please see corresponding technical assistance section of this report.</p> <p>2. The total revenues and ending fund balance reported on the AFR do not match the PI-1505 public school financial report for Fund 50. The total revenues on the AFR should be \$385,117.99, and thus the ending fund balance should come out to be \$159,524.16. The AFR totals must match the totals on the PI-1505 report.</p> <p>Corrective Action: Use the AFR template to manually update the appropriate sections of the report. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the Online Services portal (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-template.pdf).</p>
Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/22/2024 08:15 AM</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).</p> <p>Please correct the tool. When completing the tool be sure to:</p> <ul style="list-style-type: none"> • 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 breakfast and lunch counts in the program food section are correctly reported for the appropriate program and eligibility category • Include the Area Eligible Afterschool Snack Program in the program foods section • Ensure the federal reimbursement rates and paid student prices entered in the program food section are accurate • Double check the raw food costs for the adult meals and the program foods (reimbursable breakfast, lunch, and snack). The raw food costs should come from the FSD's menu planning and invoice data. If using the raw food cost tool to assist, be sure that is completed fully and correctly. The raw food costing tool shown to the reviewer did not include milk in the lunch calculation, and the breakfast calculation only included the hot entrée. <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		

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Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/22/2024 08:21 AM</p>	<p>Finding: The public release was sent out in December instead of at the start of the school year as required. Further, the public release was only sent to grassroots organizations, but not any media outlets.</p> <p>All SFAs are required to distribute a Public Release 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"> • Local news media • Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)) • Local employment office • Major employers contemplating or experiencing large layoffs <p>SFAs are allowed to, but not required to pay to have the public release published through a media outlet. Media outlets are allowed to establish a fee for publishing the public release, but the SFA may decline to pay for the service and forgo having the public release published. SFAs must maintain documentation of whom the public release was sent to, the specific materials distributed, and any other communications related to the public release distribution.</p> <p>Corrective Action: Submit a statement describing how the public release requirements will be met going forward. Please be sure to specify when it will be sent out, and where it will be sent.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1004	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/17/2024 12:58 PM</p>	<p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the Local Wellness Policy (LWP) committee.</p> <p>Corrective Action: Provide a statement of understanding that the LWP committee must include a diverse group of stakeholders in the review and update of the LWP. Provide a plan on how potential stakeholders will be notified of their ability to participate.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1006	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/17/2024 12:53 PM</p>	<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.</p>

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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 01/24/2024 10:14 AM</p>	<p>Finding: Of the 137 eligibility statuses review, 4 errors were identified.</p> <ol style="list-style-type: none"> 1. One income application with 2 student names was missing the social security number information for the adult household member. This is required on income applications. The application should be considered incomplete if this information is missing. 2. One income application with one student name had a reported income skipped in the income calculation. When accounting for all of the reported incomes, the application should be denied. It is recommended to call the household to confirm all reported incomes are correct before changing the status to paid—some reported incomes were difficult to read and there were several different types of income reported. 3. One student was listed as homeless, but documentation supporting their homeless status was not provided. <p>Corrective Action: Correct the issues above and upload any supporting documentation into SNACS. Be sure to clearly communicate the date of correction. Here are the specific actions needed for the items above.</p> <ol style="list-style-type: none"> 1. Obtain the SSN from the household. Add the information to the application, initial, and date. 2. Contact the household to confirm income amounts, types, and frequencies. Re-determine the application based on the information obtained. If no clarification on income can be obtained, then the application must be denied, and the family must be sent the adverse action letter. 3. Submit documentation in SNACS confirming the student's homeless status from earlier in 23-24.
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 01/22/2024 08:17 AM</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>

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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 01/22/2024 08:13 AM</p>	<p>Finding: The most current, full USDA non-discrimination statement (NDS) was not included on all program materials. Please update the NDS in the following materials: Board Policy 8531, Board Policy 8500, and Board Policy 8510. In these policies, the full statement was either not included, was outdated, or was not the exact one required by USDA. In policy 8500, it appears that the statement is actually included twice – once in part in the middle of the policy, as well as at the end.</p> <p>Further, the letter sent to households by the FSD in summer and in December had the shortened non-discrimination statement on it, but it must have the full non-discrimination statement instead.</p> <p>Corrective Action: Update program materials to include the correct non-discrimination statement. At minimum, a link to the full, correct USDA statement is needed. Upload into SNACS a copy of materials updated.</p>
Site Name	Prairie View EI	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #		
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 01/17/2024 11:07 AM</p>	<p>Finding: Though processed grain items may be credited using the USDA Exhibit A; in some cases, menu planners may want to obtain a manufacturer's Product Formulation Statement (PFS) that sufficiently documents the quantity of whole grains and/or enriched grains within the processed grain item to credit it as more than Exhibit A.</p> <p>The strawberry Nutri Grain bar planned on Wednesday, January 17, 2024 at breakfast did not have a product formulation statement and only credits as 0.5 oz eq using USDA Exhibit A; less than the desired 1.0 oz eq grain required for it to be considered an item at breakfast. Currently, there is a PFS on file for a 44 gram strawberry Nutri Grain bar that credits as 1.0 oz eq grains; not a PFS for the 37 gm bar.</p> <p>Corrective Action: Submit updated crediting documentation for the 37 gm strawberry Nutri Grain bar that includes an accurate description and amount of the creditable grain ingredient per the Food Buying Guide for the smaller product being served at the school, or indicate that only the 44 gm bar will be purchased and offered.</p> <p>Updated crediting documentation was obtained and reviewed during onsite visit. The 37 gram bar only credits as 0.75 oz eq and thus the SFA will only be purchasing the 44 gm product moving forward. No further action is required.</p>
Site Name	Prairie View EI	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

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Corrective Action History	Flagged 01/16/2024 01:39 PM	<p>Production records are intended to be useful tools to record production information. Be specific on production records about the identity, brand, portion size, and description of items served. Instead of "Fruit" at lunch, list the type of fruit and the fruit count size, as applicable, as different fruits credit differently towards meal pattern.</p> <p>Breakfast production records should list each flavor or variety of cereal, cereal bar, and Poptarts offered. This will ensure what the menu planner plans to offer each day is followed. This practice will also help with forecasting, controlling waste, and controlling food costs. If it becomes too time- or labor-intensive to record breakfast item usage by type, consider using variety item recipes. Individual recipes document average cereal, muffin, juice, or other breakfast item usage by meal and grade group. When a variety item recipe is on file, you may then continue to document total cereal usage on the production record. Variety item recipes must be updated twice per year or when students' preferences change. The variety item recipe template found on DPI website can be adjusted for use in your own kitchen (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/variety-item-recipe.xlsx).</p> <p>During the week of review, the marinara sauce served with the French bread pizza was not documented on the production record or the garden bar with condiments production record. On 12/13, the festive holiday dessert was not documented on the production record. Be sure to include all items offered with the reimbursable meal as even extras and condiments contribute to the calories, sodium, and fat of the meals. Production records are currently handwritten each morning, as the site uses a cycle menu, consider typing up production records with the planned menu and printing them out for production staff to handwrite in the day-of-service information. This will minimize errors in documenting all items served with the planned menu.</p> <p>Finding: The total quantity prepared in bulk was not consistently filled in on production records during the week of review at breakfast. Production records are intended to be useful tools to record information prior to production, during production, and following production. Production records are meant to serve as a tool to show that reimbursable meals were planned and served. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).</p> <p>Corrective Action: Submit one full week of completed breakfast production records, including total quantity prepared in bulk units. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
	Site Name	Prairie View El
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1411	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/16/2024 01:31 PM	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <ul style="list-style-type: none"> Red Grapes (Peru) <p>Corrective Action: Complete and submit a Noncompliant Product List Form for the non-domestic products; grapes. This was completed onsite; no further action required.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/24/2024	4132		Administrative Review		FSD			

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Comments						
Annual Financial Report and Non-Program Foods				Created By	Created Date	
<p>SFAs are required to ensure that all revenue from the sale of non-program foods accrues to the non-profit school food service account (7 CFR 210.14(f)). Non-program foods include any non-reimbursable foods and beverages (adult meals, a la carte, vending, catering, etc.) purchased using funds from the non-profit school food service account. Extra entrées and adult meals are non-program foods. Please refer to the Non-Program Foods In a Nutshell. Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. SFAs are required to separate non-program food costs from program food costs and food revenues from program food revenues.</p> <p>On the AFR, the non-program foods revenue must reflect all revenue from the sale of non-program foods which includes a la carte, adult meals, extra entrées, catering, and extra/cold lunch milk.</p> <p>On the AFR, the actual expenditures for non-program foods must be reported, including allocations across the different expense categories (labor, food, purchased services, etc.). Food expenditures must be the actual food costs associated with the sale of the non-program foods. This must be determined from sales reports, food cost data, and invoices. Labor expenditures must be determined based on actual labor time spent by food service staff on preparing and serving non-program foods. Ideally, labor allocations would be determined through an annual time study of staff time. For correcting the AFR, it is allowable as a one-time use to utilize the Expense Allocation Tool to reallocate some labor expenses to the category of non-program foods. This tool may always be used to help allocate purchased services, equipment, and "other" expenses that are shared between NSLP, SBP and non-program foods.</p> <p>Please ensure the district has sufficient procedures in place for allocating all categories of Fund 50 expenses to the appropriate programs on the AFR (i.e. NSLP, SBP, SMP, non-program foods). Please review the AFR and non-program food resources found on the Financial Management webpage for more details and assistance on these requirements.</p> <p>The Annual Financial Report Manual is located on the DPI website to assist you with completing the AFR. All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance. The categories of the AFR that should be addressed when tracking revenues and expenditures include:</p> <ul style="list-style-type: none"> • 'Labor' is expenses for all direct food service labor including both wages and fringe benefit costs. • 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc. • 'Food' is expenses for edible food items and beverages. • 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold. • 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc. • 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings. 					1/24/2024 3:41:46 PM	
01/24/2024	4126		Administrative Review	FSD		
Comments						
Processing Meal Benefit Applications				Created By	Created Date	
<p>Be sure that all sources of income reported on a meal application are factored into the household income calculation. This includes child income in section 3B, which is now located below the adult income section on the application.</p> <p>Applications missing adult signatures must be returned to the household adult to obtain. Income applications missing the adult household member's SSN information should be considered incomplete until the information is obtained from the household and the application is updated with the information.</p> <p>For students that are identified as homeless, be sure to retain the source documentation from the district's homeless liaison identifying the student as homeless. This is what is needed to support their free meal eligibility.</p> <p>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</p>					1/24/2024 10:20:41 AM	

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official should document the details of the conversation plus date and initial the application updates. Reasonable effort should be made to obtain the missing information prior to denying the application.								
01/24/2024	4125		Administrative Review	FSD				
Comments								
Sharing and Disclosure of Eligibility					Created By		Created Date	
The Determining Official indicated that students' free/reduced-price meal eligibility is sometimes shared with teachers of the two available AP classes so they can communicate to the students that they can have a reduced fee for the exam. While it is not required to obtain parental consent to share student eligibility information for the purpose of AP test fee reduction, there are some important considerations. First of all, the staff members receiving this information should have a disclosure agreement on file to ensure they understand the information is confidential and may only be used for waiving/reducing the AP exam fee. Second, consider if it is necessary or appropriate to tell the students they qualify for meal benefits and thus an AP exam fee reduction. Parents/guardians may not wish for their children to know their family's economic status. Consider alternative ways for students receiving free/reduced-price meals to receive their AP exam fee reduction while keeping the information confidential and shared with as few people as possible.							1/24/2024 10:09:14 AM	
01/24/2024	4120		Administrative Review	FSD				
Comments								
Menu Raw Food Costing Tool					Created By		Created Date	
When using the menu raw food costing tool, be sure all items that are part of the meal are included in the calculation. For example, the per lunch raw food cost should include the planned entrée (grain and M/MA), vegetables, fruit, and milk. For breakfast, also ensure the calculation includes all offered items that would make up a complete breakfast. In the tool completed by the FSD, the lunch calculation did not include milk and the breakfast calculation only showed the daily hot entrée. It is suggested to revisit the calculations in this tool to get a more accurate per meal raw food cost.							1/24/2024 7:59:12 AM	
01/24/2024	4119		Administrative Review	FSD				
Comments								
Pricing for Catering					Created By		Created Date	
When the school nutrition department and its Fund 50 will be used to provide catering services, the invoices for the customer must be priced according to the USDA non-program food revenue requirements. Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines. 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. There should be some degree of mark-up on the catering above the baseline cost of the food to account for any supplies and the labor time it takes to place the order, receive the delivery, and prepare food for the event.							1/24/2024 7:53:17 AM	
01/24/2024	4118		Administrative Review	AR				
Comments								
Unpaid Meal Charge Policy					Created By		Created Date	
The SFA has an unpaid meal charge policy as required, however it is recommended to revise the policy so the expectations are clearer to families (some parts of the policy could be interpreted in different ways). The specific suggestions include: <ul style="list-style-type: none"> The policy states, "Accounts falling below \$50.00 will receive a formal letter from the district administrator requesting immediate payment or contact to discuss a payment plan." Accounts "below \$50" could be interpreted as having less than positive \$50 in the meal account, or as having more than negative \$50 (i.e. >\$50 in debt). If the district intends this to mean >\$50 in debt (i.e. a negative account balance), it should be clarified. The policy also states the district will, "assure that any alternative meals provided to any student receiving paid or reduced-price meals that is either claimed for reimbursement or charged to the student account, meets all of the requisite USDA guidelines for alternative meals... If a student has a significant negative lunch account balance, s/he shall be provided a regular reimbursable 							1/24/2024 7:42:50 AM	

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meal that follows the USDA meal pattern, the cost of which shall continue to accrue to his/her negative lunch account balance." At the time of the review, the district was not offering alternative meals for negative account balances, but instead allows all students to receive the daily reimbursable meal regardless of account balance. If alternative meals are not utilized, it is recommended to remove the language about them from the policy.								
01/24/2024	4117		Administrative Review		FSD			
Comments								
Afterschool Snack Program				Created By		Created Date		
<p>The review site does not operate the Afterschool Snack Program (ASP), however the middle and high school in the district do. An off-site, abbreviated review of the program was conducted through review of the claim and supporting documentation, as well as discussions with the FSD. Based on this review, it appears the program is operating well. The snacks are provided at the middle/high school for students attending sports (no try-outs, all sports are open to anyone), art club, biology club, and homework help.</p> <p>The only item in need of change noted for this program is the average daily attendance (ADA) on the ASP claim. Currently, the ADA is entered in based on the total number of snacks served in the month divided by the number of operating days. However, the ADA for ASP must reflect the average number of students attending the afterschool snack enrichment activities--not the number of students eating snacks and not the ADA for during the school day. The FSD should collaborate with other school staff members that may be overseeing afterschool enrichment activities to determine the true ADA for the afterschool programs. Please refer to the corresponding section of the claiming manual.</p>						1/24/2024 7:34:12 AM		
01/24/2024	4116		Administrative Review		FSD			
Comments								
Prices and Symbols on Computer 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. The meal prices for the different categories was also visible to the POS operator very briefly.</p> <p>The SFA should contact their software vendor to ask about removing this information from the screen so cashiers cannot discern students' meal eligibility statuses. It does not appear that the cashiers have a "need to know" regarding student eligibility statuses, and thus should not have access to this or be able to discern this information from the POS screen.</p>						1/24/2024 7:33:50 AM		
01/24/2024	4115		Administrative Review		FSD			
Comments								
And Justice For All Poster				Created By		Created Date		
<p>"And Justice for All" posters must be posted where the program is offered (lunchroom, classrooms) and in easy view of the students, staff, and public.</p> <p>The "And Justice for All" poster was updated in 2022, DPI does not have professionally printed posters from USDA. Schools will need to post the USDA 2019 AJFA poster until the professionally printed USDA 2022 posters are available.</p> <p>The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf. All "And Justice for All" posters must be printed at 11" width x 17" height. The minimum text size to be used on the posters is 14-point.</p> <p>Any posters older than 2019 must be removed—this would include any with the Statue of Liberty image. During the review, it was noted that the correct poster was posted. However, several of the old posters with the Statue of Liberty were also posted. One was removed during the onsite visit. Please ensure all other outdated posters are also removed and discarded.</p>						1/24/2024 7:33:27 AM		
01/24/2024	4114		Administrative Review		FSD			

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Comments									
Eligibility Effective Dates				Created By			Created Date		
<p>The effective date for students eligible for benefits via Direct Certification (DC) is the date of the DC Run. The effective date for free/reduced-price meal applications is the date the application is approved by the Determining Official—not the date the application is received, or the date signed by the parent/guardian.</p> <p>If the district wants to utilize the available effective date flexibility for application approval, please email karrie.isaacson@dpi.wi.gov with the following information:</p> <ul style="list-style-type: none"> State you would like to begin utilizing the flexibility offered for determining the effective date of free or reduced price eligibility as stated in SP 11-2014. Per SP 11-2014, there needs to be a system in place that would document the date of submission of a <u>complete</u> application to determine the starting date of eligibility. Describe what this process will be for your district/LEA. Please confirm that this flexibility will be utilized for all students in all schools in the district/LEA and will include all Child Nutrition Programs, including the Child and Adult Care Food Program and Summer Food Service Program, if applicable. 							1/24/2024 7:33:06 AM		
01/24/2024	4113		Administrative Review		FSD				
Comments									
Other Source Categorical Eligibility				Created By			Created Date		
<p>If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start program, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency/official before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household. The effective date is the date the Determining Official is made aware of the eligibility by the appropriate official—this is true in cases where the homeless liaison provides a list of homeless students to the determining official even if there is not an application that goes with it. Please ensure effective dates for homeless students are correctly entered into the software system when the determining official is notified of them.</p>							1/24/2024 7:32:45 AM		
01/24/2024	4112		Administrative Review		FSD				
Comments									
Non-Discrimination Statement				Created By			Created Date		
<p>When including the non-discrimination statement on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current full official statement. The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.</p> <p>The abbreviated statement, "This institution is an equal opportunity provider", is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document's main text. Statement words and formatting cannot be altered.</p>							1/24/2024 7:32:03 AM		
01/24/2024	4111		Administrative Review		FSD				
Comments									
Training for POS Staff				Created By			Created Date		
<p>Please ensure that the person operating the point of service at Stoddard Elementary receives the same training as the equivalent person at Prairie View Elementary. This should at minimum include the annual civil rights training, OVS training so they know what makes up a complete meal, and POS training. Training should be recorded on the tracking tool used for all other school staff members with school nutrition duties.</p>							1/24/2024 7:31:28 AM		
01/24/2024	4110		Administrative Review		FSD				
Comments									
Water Availability				Created By			Created Date		
<p>As a reminder, water is required to be available at no charge and without restriction to students during the lunch meal service and breakfast meal service in the cafeteria. During the review, a pitcher of water and a few cups were available on the meal service counter. However, it was placed nearly out of reach of students and very close to a sanitizer bucket.</p>							1/24/2024 7:31:10 AM		

Administrative Review Report

DeSoto Area School District

Please ensure that the water provided at meal times is easily accessible to students and away from possible sources of contamination.					
01/24/2024	4109	Administrative Review	FSD		
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 DeSoto'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>				1/24/2024 7:30:46 AM	
01/22/2024	4071	Administrative Review	FSD		
Comments					
Special Dietary Needs			Created By	Created Date	
<p>Special Dietary Needs - The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.</p> <p>The board policy for Food Services contains information regarding meal accommodations for special dietary needs. There is a section that states that "The individual making such a request of the Food Service Director shall be informed that medical certification that the student has a restricted diet, in accordance with the criteria set forth in 7 C.F.R. Part 15b., must be submitted within five (5) school days from a health care provider with prescriptive authority in the State of Wisconsin or the dietary modification may be discontinued until such statement is received." The bolded statement does not align with the USDA guidance on this topic. USDA advises that sometimes, SFAs receive a meal modification request outside the regular meal pattern before a child's parent or guardian is able to submit the required medical statement. If the SFA is aware a meal modification is needed, the SFA may not unduly delay providing the modification while awaiting the medical statement. Instead, the SFA should begin providing a reasonable modification to keep the child safe, and request the family provide a medical statement signed by a State licensed healthcare professional to support the meal modification as soon as possible. In this situation, school officials must document the initial interaction with the family where school officials first learned of the child's need for a modification. School officials should follow up with the family if the school does not receive the requested medical statement as anticipated and maintain a record of this contact. Schools should continue to follow up until the family submits a medical statement supporting the need for a modification.</p> <p>When a new medical statement is submitted, school food service professionals must work closely with the Section 504/ADA Coordinator (see: Section 504/ADA Coordinator and Team) or other designated officials so that the medical statement is clear and includes the information necessary to provide the child with safe and nutritious meals. Establishing contact with parents or guardians may help to ensure all information needed to provide a safe meal is available. If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent or guardian for 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>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>				1/22/2024 8:29:50 AM	

Administrative Review Report

DeSoto Area School District

<p>It is recommended that the SFA post their special dietary needs policy on the food service webpage, along with a copy of the medical statement form the district uses when families need to request a meal accommodation. It is suggested the district use the DPI template medical statement to ensure that the information required by USDA is obtained from households that do request an accommodation for a disability.</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>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>	
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01/22/2024	4069		Administrative Review		FSD		
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Comments

Roles of Officials on Contract	Created By	Created Date
<p>It is recommended that the SFA switch the roles of the Confirming Official and Hearing Official on the contract. Currently, the FSD is listed as the Hearing Official and the Superintendent is listed as the Confirming Official.</p> <p>The Hearing Official's (HO) role is to hear both sides in the event of an appeal (informal conference or formal hearing) by a household of their benefit determination or verification results. They should be a neutral party and is most often a person of higher authority. The</p>		1/22/2024 8:22:14 AM

Administrative Review Report

DeSoto Area School District

HO may not also serve as the Determining (DO), Confirming (CO) or Verifying Official (VO).								
The Confirming Official is the SFA-designated person who reviews, for accuracy and completion, applications selected for verification.								
If the officials will be changed, please update the online contract and resubmit for approval.								
01/17/2024	4051		Administrative Review		FSD			
Comments								
Farm to School					Created By	Created Date		
Improve the quality of school meals and support your local community by incorporating Farm to School (F2S) activities in school meal programs. F2S activities can include the use and promotion of locally grown foods, taste testing, agriculture and nutrition education, and hands-on learning opportunities in a school garden. Schools can participate in their own capacity and there are no requirements for involvement. The goal of F2S is to meet the needs of your community. Visit the DPI F2S webpage: https://dpi.wi.gov/school-nutrition/farm-to-school for more information.								1/17/2024 8:32:45 AM
01/17/2024	4050		Administrative Review		FSD			
Comments								
Around the World in 80 Trays					Created By	Created Date		
Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays. Take the pledge and use the week of January 16-20, 2024 to introduce new flavors, create culturally inspired dishes, explore the tantalizing world of herbs and spices and connect with students. Visit the Around the World in 80 Trays webpage (https://dpi.wi.gov/school-nutrition/programs/national-school-lunch/around-the-world-in-80-trays) for event information. Document the event (pictures, video, sound clips, etc) and send it to DPIFNS@dpi.wi.gov so we can share your success!								1/17/2024 8:32:18 AM
01/16/2024	4049	435	Administrative Review	Prairie View EI	FSD			
Comments								
Crediting Cheesy Potato Bake					Created By	Created Date		
The cheesy potato bake recipe is incorrectly credited as 1/2 cup starchy vegetable per serving. According to the Basic American Foods Product Formulation Statement:								
<ul style="list-style-type: none"> • Each 34 oz box of Shredded Potato Cheese Bake mix yields 32 - 1/4 cup servings of starchy potatoes, or 29.28 gm (~30 gm) dry mix prepare 1/4 cup serving. • Thus, if the recipe calls for one 34 oz box, this is: 34 oz x 28.34 gm/oz = 963.56 grams of dry mix • 963.56 grams dry mix / 32 servings prepared from recipe = 30 grams per serving. • 30 grams per serving / 29.28 gm (per 1/4 cup starchy veg) = 1.02 quarter-cup servings. • Each serving from the recipe as prepared credits as 1/4 cup starchy vegetable. 								1/16/2024 1:38:31 PM
This crediting error did not result in a vegetable quantity shortage on the day it was offered during the week of review.								
01/16/2024	4048	435	Administrative Review	Prairie View EI	FSD			
Comments								
Quantity Recipes					Created By	Created Date		
The recipe binder onsite contains quantity recipes from Kansas State Department of Education. Quantity recipes are a great resource to use in USDA School Meals Programs for cooking healthy and tasty recipes; however, please be aware that even though these may be referred to as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they have been tried, tested, and adapted to your food service operation.								1/16/2024 1:37:07 PM