

Administrative Review Report

Lake Mills School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/13/2023	01/10/2024
On-Site Review	01/30/2024	01/31/2024
Site Selection Worksheet	11/13/2023	11/17/2023
Entrance Conference	01/30/2024	01/30/2024
Exit Conference	01/31/2024	01/31/2024

Commendations:

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

Thank you for being available throughout the on-site visit to answer questions. The FSD was very organized and knowledgeable. The school nutrition professionals at the review site 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 staff.

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

The Determining Official does an excellent job managing the meal benefit eligibility. Their organization, attention to detail, effort put into utilizing resources, and good recordkeeping resulted in zero errors in the benefit certification portion of the review. Keep up the good work!

The Director of Business Services does a great job managing the financial aspects of the programs. Their organized spreadsheets and attention to detail are noteworthy. Thank you for your hard work!

Findings and Corrective Action:

Site Name		
Form Name	Meal Counting and Claiming (300 - 311)	
Question #	305	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:44 PM</p>	<p>Finding: All SFAs must have a written Unpaid Meal Charge policy that is communicated and distributed in writing to all households, annually. (SP 46-2016). The SFA has a policy, and it is posted online in board policies.</p> <p>However, the SFA did not sufficiently communicate the policy in writing to all households. They did include a link to the board policies in the required online registration module that all households complete each school year, with the requirement that the adult household member sign off that they are aware of the policies and will follow them. The policy should be more explicitly and clearly provided to the households. Please refer to the USDA Unpaid Meal Charges: Guidance and Q&A.</p> <p>Corrective Action: Provide a statement describing how all households will be provided the unpaid meal charge policy in writing at the start of each school year.</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	

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Corrective Action History	<p>Flagged 02/02/2024 02:09 PM</p>	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA attempted to complete the DPI Nonprogram Foods Revenue Tool, but did not include all required information into the tool (7 CFR 210.14).</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 federal reimbursement rates and paid student prices entered in the program food section are accurate. Be sure to use the 2023-24 reimbursement rate chart. For breakfast, use the non-severe need numbers. For lunch, use the numbers in the column "Less than 60% including PBR." • Double check the adult lunch raw food cost. It typically should match the student lunch raw food cost since they receive the same meal options. • Ensure the total number of milks in the top non-program food section includes extra milk/cold lunch milk and paid elementary milk break for the grades older than 4K. The paid milk break milks for grades 1st-3rd are considered non-program foods since they do not get claimed for reimbursement under any programs. • Accurately report the Special Milk Program information in the bottom program foods section. Based on how the district operates the SMP, this is how the SMP information should be shown: <ul style="list-style-type: none"> ○ SMP Free; raw food cost = \$0.30, selling price = \$0.00, reimbursement = \$0.30 ○ SMP Reduced; raw food cost = \$0.30, selling price = \$0.00, reimbursement = \$0.2625 ○ SMP Paid; raw food cost = \$0.30, selling price = \$0.05, reimbursement = \$0.2625. <p>Corrective Action: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:25 PM</p>	<p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)). The SFA met the media requirements but did not send or post the public release at any grassroots organizations. Examples of "grassroots organizations" could be a local library, grocery store, food pantry, WIC clinic, community center, etc.</p> <p>Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:23 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). The full USDA non-discrimination statement is needed as is specific content related to updating/informing the public. Please refer to the LWP webpage, specifically the policy checklist and policy builder (which has canned language that can be adopted into an existing policy).</p> <p>Corrective Action: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>
Site Name		

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Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:49 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years. The documentation provided for the assessment was only the WellSAT portion from 2021. Please refer to the Triennial Assessment information section of the LWP webpage and be sure to use the provided report card for completion of the assessment.</p> <p>Corrective Action: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.</p>
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:21 PM</p>	<p>Finding: The most current, full, correctly formatted USDA non-discrimination statement (NDS) was not included on all program materials as required. Please update the NDS in the following materials: Board Policy 8500 and the food service webpage. The NDS in board policy 8500 is incorrect and is not the USDA 2022 version that schools participating in NSLP need to use. The content of the NDS on the food service webpage is correct, but the formatting is not the exact formatting required by USDA.</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		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:53 PM</p>	<p>Finding: The food safety plan at the elementary school did not have a Standard Operating Procedure (SOP) for breakfast in the classroom. This meal service model has its own unique food safety concerns that should be addressed in detail in an SOP. There is template SOP for this on the Food Safety webpage under Templates - Forms.</p> <p>Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>Corrective Action: Update the food safety plan so it includes an SOP for breakfast in the classroom and upload the updated SOP into SNACs.</p>
Site Name	Lake Mills Elementary School	
Form Name	Meal Counting and Claiming - Review Period (322-325)	

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Question #	322	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/02/2024 01:30 PM</p>	<p>Finding: SFA did not have sufficient internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The SFA is using the wrong software report to compile reimbursement claims and therefore not fully completing the required monthly edit check. In Skyward, the AccuClaim report must be used for breakfast and lunch claims--not the daily or monthly activity or sales reports. Please work with your software vendor regarding any questions about the details of these various reports.</p> <p>Corrective Action: During the on-site visit, copies of the AccuClaim reports were provided to the reviewer. These will be compared to the submitted reimbursement claims for 23-24 and fiscal action will be applied for the elementary school breakfast and lunch claims back to the beginning of the school year. Please submit a statement confirming the AccuClaim reports will be used for all lunch and breakfast claims going forward.</p>
Site Name	Lake Mills Elementary School	
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	403	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/21/2024 11:32 AM</p>	<p>Finding: Milk and Fruit components were located after the Point of Service at breakfast. The Breakfast in the Classroom meal service process must be restructured so that all components are consistently offered prior to the POS.</p> <p>Corrective Action: Please submit a statement which details the changes that will be made to bring the BIC meal service process into compliance such that all meal pattern components are available prior to the point of service.</p>
Site Name	Lake Mills Elementary School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	410	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 02/21/2024 11:40 AM</p>	<p>Finding: Quantity Shortages - Upon reviewing documentation for the week of review, several quantity shortages were identified. For detailed information on meal service line setup and suggested improvements, please refer to the Technical Assistance linked to SNACS #437.</p> <p>Daily Vegetable Quantity Shortage: Only 1/2 cup of vegetable is served on Mondays, Wednesdays, and Fridays in the Bistro Box (cold) line. The daily minimum requirement is 3/4 cup. This is a repeat violation from the 2017-2018 Administrative Review. Fiscal Action is required for findings of repeat insufficient daily quantities. Fiscal Action will be assessed on the Yogurt Bistro Box lunches served on Wednesday, January 6th, 2024, and Friday, January 8th, 2024 (80 and 36 lunches, respectively). Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.</p> <p>Weekly Vegetable Quantity Shortage: Across the week of review, the Bistro Box (cold) line offered a total of 3-1/2 cups of vegetables. Specifically, on Monday, Wednesday, and Friday, 1/2 cup of vegetables was offered, while on Tuesday and Thursday, 1 cup of vegetables was offered. This cumulative total amounted to 3-1/2 cups vegetables offered across the week. The weekly minimum requirement is 3-3/4 cups. This is a repeat violation from the 2017-2018 Administrative Review; however, Fiscal Action will be assessed only for the daily insufficiency as noted above. Please note that on future Administrative Reviews (AR), repeat violations</p>

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		of minimum quantity shortages may result in fiscal action. Corrective Action: Please submit a menu planning worksheet for K-5 Lunch for the week of review (December 4-8, 2023), showing that all components and quantities will be met on both service lines. This worksheet should reflect all changes to the originally served menu. Menu Planning Worksheets (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-5.doc) and the Lunch Meal Pattern Table (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern.pdf) can be found on our Menu Planning webpage along with other fantastic resources (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning).
Site Name	Lake Mills Elementary School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	435	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2024 11:51 AM	Finding: Inaccurate Standardized Recipes. The Chicken Fajita and Turkey Roll-up Bistro Box recipes are not accurate to current kitchen practices. Updates are required. Corrective Action: Please update and submit the standardized recipes for the Chicken Fajita and the Turkey Roll-up Bistro Box.
Site Name	Lake Mills Elementary School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/21/2024 11:53 AM	Finding: Missing Vegetable Subgroups (Dark Green and Starchy). During week of review, romaine, corn, peas, and potatoes were served as hot vegetables paired exclusively with the hot entrée option. Students selecting the grab-and-go (Bistro) entrée did not have access to the weekly vegetable subgroup requirements. Further information is captured in the technical assistance portion of this report. This is a repeat violation from the 2017-2018 Administrative Review. Fiscal Action is required for findings of repeat missing vegetable subgroups. Fiscal Action will be assessed on the Yogurt Bistro Box lunches served on Monday, January 4th, 2024 (29 lunches). Please note that on future Administrative Reviews (AR), repeat violations of missing vegetable subgroups may result in fiscal action. Corrective Action: Submit a statement which describe how the week of review menu will be changed to meet the minimum vegetable subgroup grain requirements. Be specific and include planned serving sizes for any items that would be added to the menu.

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/02/2024	4217		Administrative Review		FSD			
Comments								
Catering Pricing					Created By		Created Date	
The FSD has a process in place for calculating prices for catering which considers all costs associated with execution of a catering event. There is not one set formula to use when determining catering prices. The most important thing is that you cover your full costs by charging at least the full cost of the food, the direct labor involved in preparing for and executing the event, and any supplies used. You could determine what additional markup							2/2/2024 2:18:47 PM	

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<p>may be needed to get your costs fully covered. There is not one set markup cost that you would have to charge.</p> <p>One way you could determine a possible price to charge would be to determine the raw food cost for the catering meal and plug that into your non-program food revenue tool which will then give you a suggested selling price. The suggested markup in the tool is meant to account for the food cost, labor, supplies, etc. You could then go up or down from there on the price you would charge. Again, you would want to make sure you are charging enough to cover all costs and do not have to raise the prices of your other non-program foods to meet the overall required ratio.</p> <p>While this guidance relates to the minimum prices needed to charge for catering, there are no USDA regulations that would set a maximum price for catering. SFAs have discretion to price catering as high as necessary to maintain financially sound operations. Non-program foods can be an excellent source of revenue for the non-profit food service account.</p>						
02/02/2024	4216		Administrative Review	FSD		
Comments						
Professional Standards Tracking				Created By		Created Date
<p>It appears the SFA is using an older version of the USDA professional standards tracking tool that is an Excel file. This is acceptable and is working well for the SFA. However, the SFA may also consider exploring the newest version of the USDA tracking tool which is web based and has enhanced features. If desired, the SFA can find more information on this tool on the USDA webpage.</p>						2/2/2024 2:18:22 PM
02/02/2024	4215		Administrative Review	AR		
Comments						
Annual Financial Report				Created By		Created Date
<p>On the Annual Financial Report for Child Nutrition Programs, the revenue reported for WSDMP only includes the state reimbursement received for the program (which is recorded in the year it is received and not the year it is accrued). Revenue from paid households for their child's milk break is a revenue for non-program foods since those milks are not technically part of WSDMP (i.e. they are not claimed for reimbursement) but are instead non-program foods. The expenditures for WSDMP should reflect the cost of serving the milk break for free to the free/reduced-price eligible children in the participating grades at the participating schools. Again, the milks served at milk break to the paid eligible students are considered non-program foods and are not technically part of the WSDMP.</p> <p>Further, on the AFR, a portion of all expenditure categories should be reported in the different programs including NSLP, SBP, and Non-Program Foods. On the district's 22-23 AFR, the equipment and purchased services expenses did not have any portions allocated to SBP or Non-Program Foods. Since these expenditures do support these other program categories, they should be allocated appropriately. You can use the Expense Allocation Tool to help allocate purchased services, equipment, and "other" expenses that are shared between NSLP, SBP and Non-Program Foods.</p>						2/2/2024 2:17:59 PM
02/02/2024	4214		Administrative Review	AR		
Comments						
Local Wellness Policy				Created By		Created Date
<p>As the wellness committee continues to meet and the district modifies the policy, please focus on elaborating on the different content areas and strive to include specific goals the district has for the different topics. Resources on the DPI LWP webpage can assist, specifically the LWP Policy Builder.</p>						2/2/2024 2:17:32 PM
02/02/2024	4213		Administrative Review	FSD		
Comments						
Training for Non-School Nutrition Staff				Created By		Created Date
<p>At the elementary school, teachers are responsible for the point of service (POS) for breakfast in classroom (BIC). They would be considered non-school nutrition staff members with school nutrition duties, so they would not need to complete a certain minimum number of training hours annually. However, they should receive sufficient job-specific training that supports their school nutrition duties. They should also receive the annually required USDA civil rights training. For these staff members, the SFA should maintain a record of the individual's name, title of training, training source, and dates of the civil rights and job-specific training received which may include attendance records,</p>						2/2/2024 2:16:40 PM

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sign in sheets, email confirmations, etc. Please refer to the Professional Standards In a Nutshell .								
02/02/2024	4212		Administrative Review		AR			
Comments								
Summer Food Service Program Promotion				Created By		Created Date		
The SFA promoted the Summer Food Service Program (SFSP) to its families by posting information on the food service webpage. While this would minimally fulfill the USDA requirement, the SFA is encouraged to advertise this more robustly to families to help them locate free summer meals for their children. This could be accomplished by sending out information in a newsletter, poster, email, etc. Please consider additional ways to notify households about the SFSP for summer 2024. Refer to the SFSP Outreach webpage for more guidance and suggestions.						2/2/2024 2:16:21 PM		
02/02/2024	4211		Administrative Review		AR			
Comments								
Unpaid Meal Charges				Created By		Created Date		
<p>The SFA's unpaid meal charge policy is included as part of board policy 8500. While the content of the unpaid meal charge policy is largely up to local discretion, there are some portions of the policy the SFA may consider editing for clarity and to reflect the actual procedures being used.</p> <ul style="list-style-type: none"> The policy states, "Students may be permitted to accumulate negative food service account balance as determined by the District Administrator. The District Administrator shall determine the manner of determining permissible account balances by grade level." This language does not clearly communicate if there is a cutoff for allowable meal debt, what that amount is, or specifically how it is determined. Conversations during the onsite visit indicate that there is not an established permissible vs non-permissible negative account balance, and that all students may continue to accumulate meal debt from selection of reimbursable meals. Consider revising this portion of the policy. The policy also states, "all students that are receiving free or reduced-price meals will be permitted to purchase a USDA approved meal if the student has the necessary funds with them to purchase the meal." This statement may be confusing as students receiving free meals should not have meal debt nor would they need funds on-hand to purchase a reimbursable meal. As noted in the Unpaid Meal Charges In a Nutshell, the policy must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service. If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay unpaid charges if the child intended to use the money to purchase that day's meal. Consider revising this portion of the policy to better reflect that paid students with money in hand to purchase a reimbursable meal will receive a meal regardless of account balance. 						2/2/2024 2:15:58 PM		
02/02/2024	4210		Administrative Review		AR			
Comments								
Kitchen Remodel				Created By		Created Date		
The SFA has some tentative plans to remodel the kitchen at the high school, including replacing the grease trap system. The kitchen remodel plan may be part of a larger district plan to update other parts of the high school. The SFA is highly encouraged to review the Renovating a School Kitchen In a Nutshell resource and consult with a member of the DPI Procurement Team as they plan and begin this project. There may be certain expenses included in the remodel that can and cannot be charged to Fund 50, so research and consultation ahead of time can help avoid charging any unallowable costs to Fund 50.						2/2/2024 2:15:39 PM		
02/02/2024	4209		Administrative Review		AR			
Comments								
WSDMP Claim – Cost per Half Pint				Created By		Created Date		
When completing the annual claim for the Wisconsin School Day Milk Program (WSDMP), please ensure the reported cost per half-pint of milk is as accurate as possible. The						2/2/2024 2:15:23 PM		

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claiming system allows for the price to be reported to four decimal places, so that is how the SFA should complete that section.								
02/02/2024	4208		Administrative Review		AR			
Comments								
Webpage Update				Created By			Created Date	
A link to a meal pattern "In a Nutshell" posted on the district's food service webpage is outdated. It is recommended to update this with a link to the appropriate DPI webpage so any future updates to the file will flow through the link provided by the district.							2/2/2024 2:14:52 PM	
02/02/2024	4207		Administrative Review		AR			
Comments								
Special Milk Program				Created By			Created Date	
<p>The SFA has a small group of AM 4K students that participate in the Special Milk Program (SMP) and have access to lunch when they stay for wrap-around care in the afternoon. The SFA consulted DPI earlier in the school year to determine if/how to allow these students a morning "milk break" and a reimbursable lunch. The SFA has implemented an acceptable process to track and account for these students to ensure they are not claimed under SMP and NSLP on the same day. This process appears to be working well for the current 4K schedule and number of children that do this. The claim preparer modifies the SMP counts each month to ensure the correct number is claimed.</p> <p>For November, the claim preparer forgot to modify the SMP counts with the 4K lunch participants and accounted for this on the December SMP claim instead. Please note that each month's claim must accurately reflect the actual number of milks or meals served that month. The claim preparer should have gone through the claim modification process for November SMP when the error was realized instead of accounting for it on the December claim. Please refer the SMP and NSLP claiming manuals for details on claim modifications. Going forward, any errors on any claims should be handled with the claim modification process and not by accounting for the error in another month's claim.</p>							2/2/2024 2:14:33 PM	
02/02/2024	4206		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 (10) 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</p>							2/2/2024 2:14:08 PM	

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

Policy Requirements - At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination. The School Nutrition Team has created a [Special Dietary Needs Policy template](#) which can be modified to fit the needs of the SFA. If the district already has a policy in place, it is recommended to compare this policy to ensure your policy includes all important information.

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

Medical Statement - It is recommended, but not required, for SFAs to use the [prototype Medical Statement for Special Dietary Needs](#) posted on the [DPI SNT website](#). This template is available in English, Spanish, and Hmong. At a minimum the statement must include:

1. an explanation of how the child's physical or mental impairment restricts the child's diet
2. the food(s) to be avoided
3. the food or choice of foods that must be substituted
4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI. This will be a physician, dentist, optometrist, podiatrist, physician assistant, or nurse practitioner.

A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.

SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within Offer vs. Serve for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance. A signed medical statement is not needed in order to provide low fat or fat-free lactose-free milk, since this is an allowable milk type and thus does meet the meal pattern requirements.

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

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

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

Resources - The [Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The [USDA Q&A on Accommodating Special Dietary Needs](#) resource, the [USDA Special Dietary Needs Handbook](#), and [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs](#) (Non-Disability) contain additional detailed information

Administrative Review Report

Lake Mills School District

02/02/2024	4205		Administrative Review		AR			
Comments								
Angel Fund Use for School Meal Debt					Created By		Created Date	
The SFA has an "angel fund" from donations to help families with unpaid meal debt. Currently, there is a process implemented by the Determining Official for deciding when and who the angel fund is used for. The district should have written internal procedures in place to guide how angel funds are used to resolve school meal debt. This will help ensure that the funds are disbursed equitably and consistently. Please refer to pages 45-46 of the USDA unpaid meal charge resource for more information.							2/2/2024 2:13:45 PM	
02/02/2024	4204		Administrative Review		AR			
Comments								
Cafeteria Tables – Allowable Expense					Created By		Created Date	
The SFA recently purchased new cafeteria tables for the high school. The full cost of the tables was billed to Fund 50 and there was no pro-rating calculation for shared table use for other district purposes. This is allowable because the district determined the tables are used 100% for school nutrition purposes, with very rare exceptions. The space is not used for any classes, study halls, meeting, or afterschool programs and thus it is not being shared in a manner that would require pro-prating the cost.							2/2/2024 2:13:17 PM	
02/02/2024	4203		Administrative Review		AR			
Comments								
Excess Cash Balance					Created By		Created Date	
Federal regulations limit net cash resources in the non-profit school food service account. Previously, the net cash resources could not exceed a three-month average of operating expenses to remain in compliance with a non-profit status. However, recent clarification received from the USDA allows states some flexibility on this. Going forward, Wisconsin will use 6 months of operating expenses to determine if an SFA has an excess cash balance.							2/2/2024 2:13:03 PM	
Based on Lake Mill's ending fund balance on the 2022-23 Annual Financial Report, the district does have an excess of 6 months of operating expenses and can expect to receive a letter from DPI in the spring regarding spending down the excess.								
While the district has some remodeling plans for spending down the excess, they may also consider some other ways to spend the excess cash balance. Some ideas include elimination of the reduced-price category or offering universal free breakfast—in both of these cases, the students would not be charged but the SFA would still claim the meals served in the appropriate eligibility category. If the SFA is interested in these options and has questions, please contact a Nutrition Program Consultant to discuss.								
01/31/2024	4321	500	Administrative Review	Lake Mills Elementary School	FSD			
Comments								
Breakfast Service Model					Created By		Created Date	
Consider transitioning from Breakfast in the Classroom (BIC) to a Grab 'n Go (GNG) breakfast model to address teacher concerns while still maximizing student participation. With GNG, students can grab a pre-packed breakfast and decide on the extra components (fruit and milk) in a communal area before proceeding to their classrooms where they can eat. Early arriving students can also access this GNG breakfast option and enjoy their meal in the cafeteria before the start of the school day, if staffing permits. Establish a meal service area with a portable electronic Point of Service (POS) in a high-traffic area, such as the main hallway across from the gymnasium, to efficiently capture all students as they enter the building. This approach reduces administrative and time burdens on teachers and ensures food distribution and Offer Versus Serve (OVS) control remains with food service while allowing for maximum student participation. Moreover, implementing this approach enables more efficient monitoring of special situations using the electronic POS, addressing staff concerns related to instances where students take breakfast against their parents' preferences. By adopting this middle-ground solution, the school can maintain breakfast after the bell, serving a significant number of students, while addressing the challenges associated with BIC. This recommendation aims to balance the needs of the entire school community - staff and students - for increased efficiency and broad student access to breakfast services.							2/21/2024 11:54:46 AM	
01/31/2024	4320	437	Administrative Review	Lake Mills Elementary School	FSD			

Administrative Review Report

Lake Mills School District

Comments						
Multiple Serving Lines Causing Vegetable Subgroup Shortages				Created By	Created Date	
<p>The meal pattern requires a minimum quantity of each food component for each age/grade group, irrespective of the student's entrée choice. Each service line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line," and therefore needs to meet the daily as well as the weekly requirements.</p> <p>During onsite observation, it was noted that students opting for the Bistro alternate entrée (also referred to as the "cold" entrée) did not have immediate access to the hot vegetables served with other main hot line entrée option (items such as salad, corn, potatoes, etc.). For example, a side salad (Dark Green vegetable) was served on Friday during the week of review with the hot entrée only (Cheeseburger). This was the only Dark Green vegetable offered during the week. This holds true for the starchy vegetables (peas, corn, and potatoes) served on the hot line during the week of review, as well. Although all vegetable subgroups are offered on the hot line and no student selecting the Bistro Box would be denied a hot vegetable if they requested it, students selecting the Bistro Box would need to navigate past the Point of Service, without a tray (there are no trays for the cold lunch line) and request the hot vegetable. These impediments restrict vegetable subgroup access. The onus cannot be on the student to ensure their own access to all vegetable subgroups. Ensuring students have seamless and convenient access to all daily and weekly meal pattern requirements, regardless of their chosen entrée, is crucial.</p> <p>Ensuring two service lines are serving the required weekly vegetable subgroups can be tricky. To guarantee that all students meet their weekly vegetable subgroup requirements and to address this issue effectively, several strategies are recommended. First, consider relocating the Bistro Boxes to hot line. This ensures that all students have a tray and ready access to all offerings. Alternatively, implementing a garden bar may also aid in fulfilling vegetable subgroup requirements, albeit with potential challenges such as slow selection and messiness. Another recommended approach involves altering the selection of vegetables offered in the Bistro Box meals. Some well-received cold Starchy selections are peas and jicama. Romaine salads and raw broccoli are two Dark Green vegetable options that would pair well with the Bento Boxes. And, as discussed onsite, popular Beans/Peas (Legumes) options are edamame, garbanzo beans, and bean salad if the crunchy chickpea packets are unavailable.</p>						2/21/2024 11:52:43 AM
01/31/2024	4319	435	Administrative Review	Lake Mills Elementary School	FSD	
Comments						
Standardized Recipes				Created By	Created Date	
<p>Recipes should be revised to align with current practices and available products. While most standardized recipes are accurate, two require updates to reflect kitchen operations. Specifically, the Chicken Fajita recipe contains discrepancies in the number of servings and serving information, while the Turkey Roll-up Bistro Box recipe lists only one slice of turkey, contrary to onsite observations where three slices are used. Failure to adjust these recipes based on actual kitchen practices could result in further quantity shortages. Therefore, it is essential to update these recipes to accurately represent kitchen procedures.</p> <p>For more information on what essential information must be on a standardized recipe, review the Standardized Recipes in a Nutshell document (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipes-in-a-nutshell.pdf).</p>						2/21/2024 11:51:06 AM
01/31/2024	4318	405	Administrative Review	Lake Mills Elementary School	FSD	
Comments						
Family Style Meal Service				Created By	Created Date	
<p>This school effectively implements the family style meal service method for serving the Infant and Pre-K meal pattern to its 4K students. Onsite observation confirmed that all meal pattern requirements were met and the teacher demonstrated exceptional support in assisting students during lunchtime.</p> <p>If desired, the teacher has the option to join their students for school lunch, further fostering a healthy eating environment by modeling meal skills such as proper food placement on the tray and demonstrating positive eating behaviors, such as trying new foods. Supervising adults who eat with the students are allowable costs that can be absorbed by the food service account. These meals cannot be claimed for reimbursement.</p> <p>As outlined in FNS 782-5 Rev. 1, "Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may, at the discretion of the school food authority, be furnished at no charge. As such, their cost may be fully attributed to and supported by the nonprofit food service operation."</p>						2/21/2024 11:34:11 AM

Administrative Review Report

Lake Mills School District

<p>To ensure these meals may be covered by the food service account, supervising adults should be seated at the table with the children, actively encouraging them to accept the full required portion for each food component while also participating in the meal. A reminder that family style meal service permits children to make choices in food selection and initial serving sizes. Supervising adults should initiate the offering of the full required portion for each meal component and actively encourage children to accept the full required portion during the meal, addressing any initial refusals or incomplete servings. However, the meal is still considered reimbursable if the student declines some or all of a component.</p>							
01/31/2024	4317	403	Administrative Review	Lake Mills Elementary School	FSD		
Comments							
Breakfast in the Classroom Setup					Created By	Created Date	
<p>During onsite observation, inconsistent milk and fruit distribution was noted during Breakfast in the Classroom (BIC) with students sometimes taking these prior to the meal count and other times after. All meal pattern components must be offered prior to the Point of Service (POS). It should be noted that whole fruits are offered alongside the milk cooler; however, fruit is always incorporated into the breakfast meal kits delivered to the individual classrooms.</p> <p>Given the unique serving location of the BIC meal service areas (termed, "neighborhoods" onsite), strategic adjustments will be necessary to ensure that all components are offered prior to the POS. Possibilities were discussed with staff onsite. A long-term solution is required. The following recommendations are provided for consideration:</p> <ul style="list-style-type: none"> Institute a Policy: Implement a policy requiring students to visit the milk and fruit cooler before proceeding to their classrooms where the remainder of the breakfast meal is served. This ensures that all components are offered prior to the in-classroom POS, promoting compliance with regulations. Strategically Place Additional Coolers: Strategically place additional coolers in each neighborhood (where the entrances to classrooms are clustered). This streamlines the process and serves as a visual reminder for students and teachers that all components must be offered before a student is checked off as having selected a meal. Provide Coolers in Classrooms: Consider reintroducing the practice of placing a cooler in each classroom to streamline the distribution of milk and fruit alongside the rest of the breakfast meal. This option eliminates the need for students to visit a separate location, ensuring that all components are readily available in one place. While acknowledging that this approach has been attempted previously, it is recommended to reassess the potential benefits and challenges, particularly regarding the impact on foodservice staff time and storage. Staffing and storage adjustments may be needed to optimize the efficiency of this solution. <p>Selecting and implementing one of these recommendations will contribute to a more consistent and compliant breakfast service in the classroom.</p>					<p style="text-align: right;">2/21/2024 11:31:31 AM</p>		