Administrative Review Report
Royall School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/07/2024	04/18/2024
On-Site Review	04/16/2024	04/18/2024
Site Selection Worksheet	03/07/2024	03/07/2024
Entrance Conference	03/11/2024	03/11/2024
Exit Conference	06/17/2024	06/17/2024

Commendations:

Thank you to all staff at Royall School District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director for their great organizational skills which helped expedite this AR. Her passion to feed children shines through the hours of work put in to make sure regulations are met and children are fed. In addition, thank you to the school nutrition professionals who brought great energy into the cafeteria and work diligently to ensure kids have the nutrition needed to succeed. Lastly, thank you to the administrative staff for supporting such a great school nutrition program.

Recommendations:

No Recommendations found for this review.

Administrative Review Report

Royall School District

Findings and **Corrective Action:**

Site Name	
Form Name	Certification and Benefit Issuance (100 - 121)
Question #	110
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 06/17/2024 09:15 AM	**Finding:** The SFA's direct certification notification letter does not include all required information including: information on how households that qualify can opt out of Summer EBT. **Corrective Action 1:** Provide a statement that the SNT template letter will be used, or upload a corrected letter template for direct certification notification to the household into SNACS. The DPI template letter is found here: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/direct-certification-letter.docx. **Corrective Action 2:** Provide the Summer EBT opt out information to all households that qualified for free or reduced meals in SY 2023-2024. Upload copy of what was communicated to households in SNACS.

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	Flagged 06/17/2024 09:39 AM	**Finding:** The SFA does not have an Unpaid Meal Charge Policy in place. All SFAs must have an Unpaid Meal Charge policy that is communicated and distributed to the households, annually. (SP 46-2016). More information and guidance on Unpaid Meal Charges can be found on the DPI Financial Management webpage here: https://dpi.wi.gov/school-nutrition/program-requirements/financial-management#:~:text=SFAs%20operating%20the,02/13/14. **Corrective Action:** Provide a timeline of when the policy will be completed and implemented and how households will be notified annually.

Site Name	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
Question #	700
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	Flagged 06/17/2024 10:07 AM	**Finding:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). **Corrective Action:** Review the Annual Financial Report webcast (https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story.html) or manual (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afr-manual.pdf) on the DPI Financial Management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-

Administrative Review Report

Royall School District

		management#:~:text=All%20SFAs%20participating,in%20Online%20Services). Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.
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	Flagged 06/17/2024 09:18 AM	**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)). For further guidance regarding the Public Release, please see the DPI Civil Rights webpage (https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights#pr:~:text=religious%20tenet(s).-,Public%20Release,to%20participate.%20Maintain%20documentation%20of%20where%20the%20public%20release%20was%20sent.,-Racial%20and%20Ethnic). **Corrective Action:** Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 06/17/2024 09:43 AM	**Finding:** The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). **Corrective Action:** Utilizing the DPI template policy (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sfa-civil-rights-complaints-procedure-template.pdf), develop procedures for the SFA and upload into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 06/17/2024 09:45 AM	**Finding:** Two areas of the Dietary Modifications Policy need to be changed. 1. In situations where a medical statement or IEP is not immediately available, is incomplete, or requires additional clarification, USDA regulations require that the meal modification still be made if there is enough information to provide a safe meal. The USDA does not specify how long to wait or how many attempts are needed to receive documentation before discontinuing a meal modification. However, reasonable attempts should be made to get the correct documentation. 2. SFA should not ask for a student's medical condition, but only how the condition or symptom affects the student's diet.

Administrative Review Report

Royall School District

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<td>The Special Dietary Needs Policy Template is available on the DPI Special Dietary Needs webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx) with all required components and appropriate verbiage.

Corrective Action:
1. Remove the language from the Dietary Modifications policy that indicates documentation must be submitted "within five (5) school days…or the dietary modification may be discontinued until such a statement is received". I recommend changing this to "must be submitted from a health care provider with prescriptive authority in the State of Wisconsin."
2. Change the items the certification must identify to:
A. an explanation of how the child's physical or mental impairment restricts the child's diet
B. the food(s) to be avoided
C. the food(s) to be substituted

Provide a timeline for when the Dietary Modifications policy will be changed and the name of the person responsible for ensuring the update is made.</td>
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<td rowspan="2">**Corrective Action History**</td>
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06/17/2024 09:42 AM</td>
<td>**Finding:** Civil Rights training did not occur or documentation was not available to support that this training was provided to all staff who interact with program participants in the current school year (FNS Instruction 113-1).

Corrective Action: Provide the civil rights training to all staff that interact with program applicants, the training is located here: https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</td>
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<td rowspan="2">**Corrective Action History**</td>
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06/17/2024 09:41 AM</td>
<td>**Finding:** The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.

Corrective Action: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action. The form is located here: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/1441-civil-rights-compliance-self-evaluation.doc.</td>
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<td>**Form Name**</td>
<td colspan="2">Local School Wellness (1000 - 1006)</td>
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<td>**Question #**</td>
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Administrative Review Report

Royall School District

Corrective Action Status	Flagged

Corrective Action History	Flagged 06/17/2024 10:11 AM	**Finding:** SFA has completed a triennial assessment of the Local Wellness Policy (LWP), but did not complete both the LWP Report Card and the WellSAT 3.0 to meet this requirement. The LWP Report Card Template can be found on the DPI LWP webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx). **Corrective Action:** Complete the Report Card component of the Local Wellness Policy assessment and upload into SNACS.

Site Name	
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	140
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged

Corrective Action History	Flagged 06/17/2024 09:58 AM	**Finding:** The SFA did not update student eligibility changes to the benefit issuance list or the point of service (POS) after each direct certification run accurately and in a timely manner. **Corrective Action 1:** Correct the benefit issuance list for any students in error and upload into SNACS. **Corrective Action 2:** Submit a statement outlining how the SFA will ensure that updates to the benefit issuance list or point of service are done accurately and timely.

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	Flagged 06/17/2024 10:18 AM	**Finding:** The non-discrimination statement was not included on all required program materials. The non-discrimination statement is incorrect on the Verification letters and webpage, incorrectly shortened on the Special Dietary Needs form, and contains an unallowable additional sentence on the Food Services Board policy PO-8500. The correct USDA non-discrimination statement can be found on the DPI Civil Rights webpage (https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs). **Corrective Action:** Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS. In the case of the material missing the correct non-discrimination statement being a board policy, provide a timeline for when the policy will be updated with the correct non-discrimination statement, and provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.

Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	

Administrative Review Report

Royall School District

Corrective Action Status	Flagged

Corrective Action History	Flagged 06/17/2024 09:47 AM	**Finding:** Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. The DPI professional standards training tracking tool can be found on the DPI Professional Standards webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx). **Corrective Action:** Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.

Site Name	
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1403
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted

Corrective Action History	Flagged 04/17/2024 07:47 AM	**Finding:** The following products were identified in the SFA's storage area as non-domestic and not documented: Black Olives (Morocco) Frozen Broccoli (Mexico) **Corrective Action:** Complete and submit a noncompliant Product List Form for the non-domestic products listed above. This was completed onsite; no further action required.

Site Name	Royall Elementary
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	406
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted

Corrective Action History	Flagged 04/17/2024 08:06 AM	The SFA is serving the 4K students the preschool meal pattern. The infant and preschool meal pattern replaces the previous meal pattern options for School Food Authorities (SFAs) serving infants and children aged 1-5 and not yet in kindergarten. Meals served under these meal patterns include a greater variety of vegetables and fruits, more whole grains, and less added sugar. Information on these meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool). For this meal pattern, offer versus serve is not an allowable meal service type, and the meal pattern must follow product-based sugar limits, e.g. less sugar yogurt and cereal, no flavored milk. As the preschool meal pattern is distinctly different from the K-8 meal pattern, the preschool meals should be tracked independently on a production record and not lumped in with the K-8 meals. Grain-based desserts are not creditable toward the grains component under the preschool meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. For a complete list of foods considered to be grain-based desserts, please refer to the Grain-Based Desserts resource (https://www.fns.usda.gov/tn/grain-based-desserts-cacfp). Up to three times a week, meat/meat alternates can be substituted for the entire grain component. **Finding:** A grain-based dessert (UBR breakfast round, shaped like a cookie) was served to preschool students and credited toward the grain

Administrative Review Report

Royall School District

component. A string cheese, 1 cup fruit, and 1 cup unflavored milk were served with the breakfast round; meals were still reimbursable.

Corrective Action: Submit a statement specifically explaining how the menu will be changed so that preschool students are no longer served grain-based desserts as a creditable grain. Submit the Nutrition Facts label, ingredient list, crediting documentation, or recipe, if applicable, for any replacement items added to the planned menu.

Site Name	Royall Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	430
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted
Corrective Action History	Flagged 04/17/2024 07:59 AM	The SFA is using old production record templates. Updated templates for breakfast and lunch can be found on our Production Records webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records). **Finding:** The SFA is following the preschool meal pattern for the 4K students at breakfast; however, preschool meals are being recorded together with K-3 grades. Since there is no overlap in the meal pattern between grades 4K and K-3 (following K-12 meal pattern), these grade groups must be recorded separately on breakfast production records. **Corrective Action:** Submit one full week of completed breakfast production records with the 4K and K-3 (K-12 meal pattern) grade groups recorded separately. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.

Site Name	Royall Elementary
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	434
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	CAP Accepted
Corrective Action History	Flagged 04/17/2024 07:59 AM	Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich), including grab and go or bagged/bundled meals. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). Currently at breakfast at the elementary school, menu items are bundled together to speed up the meal service line and reduce confusion among younger students. Standardized recipes are required for bundled meals where the intent is for the child to select the entire bundle. **Finding:** Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the mashed potatoes and rotini noodles. Though there was a recipe on file for spaghetti noodles, this recipe lacked required

Administrative Review Report

Royall School District

		information including servings per grade group, all ingredients in the ingredients list (e.g. oil), and total yield. **Corrective Action:** Submit a standardized recipe for the mashed potatoes and rotini noodles. Be sure to include all requirements of a standardized recipe, including serving size and total number of portions by grade group and total yield. Templates and other resources can be found on the Standardized Recipes webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).
Site Name	Royall Elementary	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	437	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Accepted	
Corrective Action History	Flagged 04/17/2024 08:04 AM	**Finding:** The weekly minimum requirement for the dark green vegetable subgroup was not met for K-8 at lunch during the review period. The following represent the planned portion sizes: - Tuesday: 1/2 cup romaine lettuce (credits as 1/4 cup) The weekly minimum requirement for K-8 is 1/2 cup. **Corrective Action:** Describe specifically how the weekly minimum requirement for the dark green vegetable subgroup will be met at lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/17/2024	5085		Administrative Review		AR			

Comments		
	Created By	**Created Date**
The State of Wisconsin does not allow indirect costs to be charged to the Nonprofit School Food Service Account (NSFSA). As some interest was expressed in converting indirect costs to direct costs as an allowable use of NSFSA funds in the future, please see the USDA guidance as indicated on the DPI Financial Management webpage (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management) regarding allowable conversions of indirect costs to direct costs at the following link: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-60-2016-attachment.pdf.		6/18/2024 1:01:44 PM

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/17/2024	5084		Administrative Review		FSD			

Comments		
	Created By	**Created Date**
Thank you for providing the Sharing Information with Other Programs fee waiver letter to households with students that qualify for free or reduced price meal benefits. It is best practice to include the "No -- I do not want school officials to share information from my Free and Reduced Price School Meals Application" option for households to check, in the event that they do not want their determined meal benefit to qualify the children of the household for other program fee waivers within the district. The Sharing Information with Other Programs fee waiver letter can be found on the DPI Free and Reduced Meal Eligibility webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.docx).		6/18/2024 12:35:57 PM

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/17/2024	5083		Administrative Review		FSD			

Administrative Review Report

Royall School District

Comments		
	Create d By	**Created Date**
The most current "We Must Check" and "We Have Checked" letters for Verification can be found on the DPI webpage. Utilizing the most current letter templates will help to ensure compliance with requirements. Current compliant Verification letters can be found on the DPI Verification webpage (https://dpi.wi.gov/school-nutrition/program-requirements/verification#:~:text=Verification%20Letter%20Templates%3A,CHECKED%20your%20application%20(Spanish)%20(Hmong)).		6/18/202 4 12:25:51 PM