

# Administrative Review Report

181554 Eau Claire Area School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/18/2019	01/20/2020
On-Site Review	02/24/2020	02/28/2020
Site Selection	11/18/2019	11/19/2019
Entrance Conference	02/24/2020	02/24/2020
Exit Conference	02/27/2020	02/27/2020
Corrective Action Deadline	3/27/2020	

## Commendations:

- Thank you to all the staff that responded to the offsite requests for documentation. This expedited the onsite review. Records were accessible, complete, and organized. Special thank you to the Food Service Director for his excellent communication and professionalism throughout.
- All staff members were kind, knowledgeable, and provided excellent customer service. It was a pleasure to visit and review your schools!
- Staff members at South Middle School did a great job accommodating special dietary needs during meal service. Wonderful!
- Thank you to Eau Claire Area School District and Prairie Ridge Early Learning School for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thank you to the FFVP Coordinator for providing documentation and answering questions for the claim validation. The claim validation did not result in any findings. Excellent work!
- The Verification Process is completed correctly and is well documented.
- Free and reduced-price meal benefits are approved correctly and in a timely fashion.
- The food service director and program staff have a strong understanding of proper disclosure for required federal and state reporting vs. local initiatives (which requires prior parental consent). The food service department maintains appropriate disclosure agreements with outside program staff. All school nutrition staff receive annual USDA/DPI-SNT Civil Rights training.
- The review period claims consolidated perfectly for all programs. Monthly claim consolidation practices are accurate and the SFA utilizes site-based edit checks, as required.
- The Unpaid Meal Charge policy is included with the free and reduced-price meal application, which is sent to all households. The policy is also posted on the district webpage. These practices ensure transparency. The district manages the challenge of unpaid meal charges through phone calls, mailings and (when available) through local donations.
- The SFA is managing a financially responsible and self-sustaining School Nutrition program. The agency has an excess cash balance and an approved spend down plan to re-invest funds in the School Nutrition programs.
- The Annual Food Service Financial Report (AFR) is accurate and provides a great snapshot of program participation and the cost/revenue per meal and snack.
- There is opportunity to increase school breakfast participation. Consider alternative service models, like expanding breakfast in the classroom, mid-morning breakfast at the middle school and high school levels, or grab-n-go stations. Elimination of the reduced and paid charges is an option and would certainly increase participation--but the district will need to determine if this practice is financially sustainable.
- Professional Standards training hours are met through relevant training topics that support professional development and competency in operating the school meal programs. Hours are clearly documented.
- Preparation and service areas are clean and tidy. Temperatures are clearly documented and records are maintained.
- Staff at Prairie Ridge Early Learning manage many special diet accommodations and have a strong understanding of the steps that need to be taken to reduce risk of cross-contact. Reviewer observed, hand washing, use of barriers, soap and sanitizing meal prep/service spaces, and clear communication, involving households, the food service department, and teaching staff.
- Staff members knew when to send students back in order to select a reimbursable meal. All observed meals were reimbursable.

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- The staff member at the point of service (POS) in the reimbursable service line at South Middle School keeps a 1/2 cup disher at the register to show the required fruit and/or vegetable amounts required. Very creative!

## Recommendations/Comments:

- The Local Wellness Policy (LWP) meets all minimum required content areas. However, the policy should be clarified to identify *the* official/title of the person responsible for the LWP oversight, rather than the whole LWP committee.
- To complete the LWP triennial assessment, which is due in June of 2020, utilize the Report Card in combination with the WellSAT. The Report card will help you assess how you are meeting your goal and objectives while the WellSAT will compare your policy to a model policy. Both resources are found on the DPI SNT LWP webpage: <https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy> .
- A long-standing practice of dismissing students for meal service by gender was recently discontinued by administration at South Middle School. USDA guidance memo SP 31-2015 <https://childnutrition.ncpublicschools.gov/regulations-policies/usda-policy-memos/2015%20folder/sp-31-2015.pdf> supports this change in practice. Separation by gender is prohibited.
- Special Dietary Needs:
  - Under USDA guidelines for Accommodating Special Dietary Needs schools may not offer juice in place of milk to manage lactose intolerances unless the request is accompanied by a medical statement signed by a licensed medical authority. USDA requires that if schools choose to make accommodations outside of Offer vs. Serve for students with lactose intolerances, they must offer a milk substitute with the same nutrient profile as cow's milk. The USDA memo on milk substitutions provides additional guidance. If the school decides to offer a milk substitute other than lactose reduced/free milk the nutrition profile for the substitute needs to receive Pre-approval from DPI.
  - During the review staff requested guidance on a signed medical statement indicating a student be allowed to eat school lunch from "a la carte". USDA regulations clarify that meal modifications for accommodating special dietary requests are required within the USDA reimbursable meal program. This means the school must provide a safe meal for students with signed medical statements at no extra charge within the National school lunch program, School Breakfast Program and Afterschool Snack program. Ala Carte foods served outside of the school nutrition programs are considered non-program foods. In the case of the Ala Carte request, it is reasonable that the SFA provide a safe meal that meets the student's disability for program meals and snacks in efforts to meet the students nutritional needs. Allowing the student to select the foods from the offered reimbursable meal on an "Ala Carte" basis meets this request while meeting the nutritional needs of the student. Allowing the student to select a meal at no charge from the Ala Carte line fundamentally alters the nature of the program since Ala Carte foods are provided outside of the school nutrition program and as such are not considered program foods. Students requiring special dietary modifications should have access to purchase Ala Carte non program foods that will accommodate their disability if they wish to do so. However foodservice must address the request to make a safe meal available to them at no additional charge for all program meals.

Resource: USDA's Q&A on Accommodating Special Dietary Needs [SP 26-2017](https://www.fns.usda.gov/sites/default/files/cn/SP26-2017os.pdf)  
(<https://www.fns.usda.gov/sites/default/files/cn/SP26-2017os.pdf>)

## 20. Can an SFA decline to provide a requested meal modification?

It is almost never appropriate for an SFA to decline to provide an effective meal modification to accommodate a child's disability, if the modification request is related to the child's disabling condition. The exception would be a modification request that would fundamentally alter the nature of the Program (see page 7 of SP 59-2016).

## B. Assessing Requests for Substitutions and other Modifications

SFAs may consider expense and efficiency in choosing an appropriate approach to accommodate a child's disability. SFAs are not required to provide the specific substitution or other modification requested, but must offer a reasonable modification that effectively accommodates the child's disability and provides equal opportunity to participate in or benefit from the program

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Resource: [USDA Handbook](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf) on Accommodating Special Dietary Needs  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf>)

### III. Reimbursement

Reimbursement for modified meals served to children with disabilities that restrict their diet is at the appropriate rate based on the child's eligibility for free, reduced price, or paid meals for the applicable Program, regardless of the meal modification. As noted above, these meal modifications do not have to meet the Program meal pattern requirements in order to be claimed for reimbursement if they are supported by a medical statement. However, SFAs should ensure that meal modifications meet the nutritional needs of the child.

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Findings and Corrective Action:

<b>Form Name</b>	<b>Civil Rights (800 - 807)</b>
<b>Question #</b>	803
<b>Corrective Action</b>	<p>Findings: The SFA does not have procedures for handling discrimination complaints <i>specific to the school meal program</i> (FNS Instruction 113-1).</p> <p>CA: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. Example template complaint procedures can be found on the SNT Civil Rights webpage. <a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights</a></p>
<b>Form Name</b>	<b>Certification and Benefit Issuance (124 - 142)</b>
<b>Question #</b>	126
<b>Corrective Action</b>	<p>580 free and reduced-price meal application determinations were reviewed, one error was identified. This is a very low error rate. The agency will not have to conduct an Independent Review of Applications. No fiscal action will be assessed. Keep up the good work!</p> <p>Finding: The SFA did not process a household application in compliance with 7 CFR 245.6(a). A Badger Care case number was accepted as a categorically free eligible program on the application under Step 2.</p> <p>CA: Correct the error by contacting the household and obtaining income information and re-determining the application. If income information cannot be obtained, send a letter of adverse action. Provide 10 calendar days for the household to appeal prior to changing the meal benefit to paid in your point of service software. Upload a copy of the corrected application and or adverse action letter in SNACS.</p>
<b>Form Name</b>	<b>Meal Counting and Claiming/ Smart Snacks in Schools</b>
<b>Question #</b>	316
<b>Corrective Action</b>	<p>Finding: A second meal is available for students to purchase at a unit price, which does not comply with Smart Snacks.</p> <p>Corrective Action: Discontinue selling second meals as a unit. Evaluate each part of the meal under Smart Snacks (snack/side/beverage/entrée) and set a la carte prices in your point of service terminal. Submit a statement in SNACS agreeing to correct this finding with a timeline for implementation.</p>
<b>Form Name</b>	<b>Civil Rights (809 - 810)</b>
<b>Question #</b>	810

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<b>Corrective Action</b>	<p>Finding: The full non-discrimination statement is not included on the free and reduced-price benefit notification letters. The letters contain the shortened statement.</p> <p>CA: Update the Direct Certification (DC) approval letter, the denial letter, and application approval letter templates to include the full non-discrimination statement. Upload copies of the corrected templates in SNACS under the documents tab.</p>
<b>Site Name</b>	<b>Prairie Ridge Early Learning</b>
<b>Form Name</b>	<b>Meal Counting and Claiming - Day of Review (317-321)</b>
<b>Question #</b>	318
<b>Corrective Action</b>	<p>Finding: Inaccurate point of service count at Prairie Ridge Early Learning during family-style meal service at both breakfast and lunch. The meal count is taken (in some classrooms) prior to a student serving themselves a 1/4 cup fruit, vegetable, or a combination of the two--which deems the meal reimbursable.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1) Review the <i>Meal Environment</i> family-style meal service resources posted on the School Nutrition serving <i>Infants and Preschool in NSLP and SBP</i> webpage: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/family-style-meal-service.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/family-style-meal-service.pdf</a> .</li> <li>2) Conduct an all-staff training at Prairie Ridge Early Learning school covering how to properly record the point of service count. Attendance must be separate from the meal participation count.</li> <li>3) Submit a training agenda showing the date the training is conducted along with staff signatures.</li> </ol>
<b>Site Name</b>	<b>Lakeshore EI</b>
<b>Form Name</b>	<b>Meal Components and Quantities - Day of Review (400-408)</b>
<b>Question #</b>	404
<b>Corrective Action</b>	<p>Finding: Signage was not posted at breakfast to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. Signage examples can be found on our <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">Signage webpage</a> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).</p> <p>Corrective Action: Submit a picture of signage posted near the breakfast service line.</p>
<b>Site Name</b>	<b>Prairie Ridge Early Learning</b>
<b>Form Name</b>	<b>Meal Components and Quantities - Day of Review (400-408)</b>
<b>Question #</b>	405

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<b>Corrective Action</b>	<p>Finding : Teachers facilitating family style meal service were not able to verbalize what is required for children to take in order for the meal to be reimbursable. Many teachers were forcing students to take all components.</p> <p>Corrective Action : Please submit a plan of action as to how the teachers at Prairie Ridge will be trained to understand the requirements of Family Style Meal Service.</p>
<b>Site Name</b>	<b>Prairie Ridge Early Learning</b>
<b>Form Name</b>	<b>Meal Components and Quantities - Review Period (409-412)</b>
<b>Question #</b>	409
<b>Corrective Action</b>	<p>Finding: Students under the age of 5 and not yet enrolled in Kindergarten must follow the CACFP Infant and Preschool meal pattern. Cereals cannot contain more than 6 grams of sugar per dry ounce. ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-infants-preschool-text.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-infants-preschool-text.pdf</a> ) Additionally, these students cannot be served grain-based desserts, such as granola bars. (<a href="https://fns.prod.azureedge.net/sites/default/files/tn/CACFPGrainBasedDesserts.pdf">https://fns.prod.azureedge.net/sites/default/files/tn/CACFPGrainBasedDesserts.pdf</a> )</p> <p>CA: Submit a statement that explains your plan to eliminate grain-based desserts offered to Pre-K students. Submit nutrition facts labels, ingredient lists and recipes, if applicable, for any substitute items .</p>
<b>Site Name</b>	<b>Prairie Ridge Early Learning</b>
<b>Form Name</b>	<b>Meal Components and Quantities - Review Period (409-412)</b>
<b>Question #</b>	410
<b>Corrective Action</b>	<p>Finding: The CACFP Infant and Preschool meal patterns requires that 1.5 oz eq M/MA be planned for lunch daily. The spaghetti and meat sauce only provides 1.25 oz eq M/MA. This is a shortage.</p> <p>CA: Submit an updated recipe, including portion size, for the spaghetti meat offered to PreK students. Alternatively, if an item is added to the menu on spaghetti day, submit nutrition facts labels, ingredient lists, crediting documentation, or recipes for the item.</p>
<b>Site Name</b>	<b>Lakeshore EI</b>
<b>Form Name</b>	<b>Food Safety, Storage and Buy American (1404-1411)</b>
<b>Question #</b>	1406
<b>Corrective Action</b>	<p>Finding: The most recent food safety inspection reports were not posted in a publicly visible location at the review sites. The reports were posted in the kitchen or kitchen office, which the public cannot access.</p> <p>CA: Inspection reports were re-located to public location while onsite. <b>Corrected. No further action required.</b></p>
<b>Site Name</b>	<b>Lakeshore EI</b>
<b>Form Name</b>	<b>Food Safety, Storage and Buy American (1404-1411)</b>

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<b>Question #</b>	1410
<b>Corrective Action</b>	<p>Finding: The following products were identified in SFA's storage area as nondomestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent.</p> <ul style="list-style-type: none"><li>· Pineapple- Thailand</li><li>· Mandarin oranges- China</li></ul> <p>Further information can be found in Buy American in a Nutshell (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-anutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-anutshell.pdf</a>).</p> <p>Corrective Action: Submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buyamerican-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buyamerican-noncompliant-list.docx</a>).</p>
<b>Site Name</b>	<b>South Mid</b>
<b>Form Name</b>	<b>Food Safety, Storage and Buy American (1404-1411)</b>
<b>Question #</b>	1410
<b>Corrective Action</b>	<p>Finding: The following products were identified in SFA's storage area as nondomestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent.</p> <ul style="list-style-type: none"><li>· Cucumbers- Mexico</li><li>· Bananas- Honduras</li><li>· Lunch bunch grapes- Chile</li><li>· Pineapple- Thailand</li><li>· Mandarin oranges- China</li><li>· Frozen broccoli- Mexico</li></ul> <p>Further information can be found in Buy American in a Nutshell (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-anutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-anutshell.pdf</a>).</p> <p>Corrective Action: Submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buyamerican-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buyamerican-noncompliant-list.docx</a>).</p>
<b>Site Name</b>	<b>Prairie Ridge Early Learning</b>
<b>Form Name</b>	<b>Food Safety, Storage and Buy American (1404-1411)</b>
<b>Question #</b>	<b>1411</b>
<b>Corrective Action</b>	<p>Finding: The following products were identified in SFA's storage area as nondomestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent.</p> <ul style="list-style-type: none"><li>- Mandarin Oranges- China</li><li>- Pineapple Tidbits- Philippines</li><li>- Apple Juice- Argentina</li></ul>

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- Bananas- Honduras
- Lunch bunch grapes- Chile

Further information can be found in Buy American in a Nutshell  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/buy-american-in-anutshell.pdf>).

Corrective Action: Submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory  
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buyamerican-noncompliant-list.docx>).

Technical Assistance:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/26/2020	1822	1700	Afterschool Snack Program (ASSP)	Lakeshore El				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
SFAs staff responsible for the oversight of the Afterschool snack program, must conduct an on-site monitoring visit within the first 4 weeks of operating the program and again towards the end of the school year. The monitoring form can be found on the SNT Afterschool snack webpage: <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/as_review_13a.doc">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/as_review_13a.doc</a>							2/26/2020 7:51:32 PM	
02/25/2020	1778	410	Standardized Recipes	Lakeshore El				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
It would be beneficial to put the number of servings and portion sizes on sub-recipes. For example, the taco meat recipe yields 6.25 gallons, which is then portioned into ¼ cups per the taco recipe. Write the number of ¼ cup portions on the taco meat recipe, as well as the total yield of 6.25 gallons. Alternatively, write the taco recipe for multiple servings, using all 6.25 gallons of taco meat.							2/25/2020 2:19:46 PM	
02/25/2020	1777	1104	Smart Snacks Sold in Schools	South Mid				
<b>Comments</b>								
						<b>Created By</b>	<b>Created Date</b>	
Although all Smart Snacks at South MS are compliant, healthier options could be made available. Note that reimbursable meals could potentially be made in the a la carte line, as all components are available.							2/25/2020 2:16:32 PM	



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02/25/2020	1776	410	Standardized Recipes	South Mid				
Comments				Created By	Created Date			
Some items, such as tortilla chips and liquid cheese, are portioned by dividing the purchase unit into a known number of servings. It would be beneficial to check the weight/volume of such portions at random to ensure correct and consistent portioning.					2/25/2020 2:09:31 PM			