

# Administrative Review Report

Barron Area School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/05/2024	04/26/2024
On-Site Review	04/23/2024	04/24/2024
Site Selection Worksheet	03/05/2024	03/08/2024
Entrance Conference	04/23/2024	04/23/2024
Exit Conference	04/24/2024	04/24/2024

## Commendations:

From Public Health Nutritionist:

Thank you to all staff at Barron Area School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The Food Service Director was very receptive to the reviewer's suggestions, and this was appreciated. Thank you for serving healthy, nutritious meals to your students!

From the Nutrition Program Consultant:

My sincere thanks to the staff at Barron Area School District for your warm welcome. I appreciate the time and efforts spent preparing for and participating in the administrative review. I appreciate the food service director's knowledge and passion for feeding students healthy meals and exploring ideas to increase participation.

I was impressed with how well all staff work as a team and how well they interact with students. The kitchens we visited were clean and organized. They very obviously take a lot of pride in their work! I appreciate everyone's willingness to be receptive to feedback and technical assistance.

Awesome job and thank you for what you do for kids!

## Recommendations:

Registration for the DPI School Nutrition Summer Training is coming soon! Our Opening Ceremonies kick off this year's conference the afternoon of Monday, July 15, with classes running through Wednesday, July 17. Stay tuned for the conference schedule and registration, coming in early April. Get ready to champion excellence in school nutrition! Also watch for our virtual summer training in August.

See the DPI School Nutrition Webpage for up-to-date guidance, training opportunities, and information related to this report.

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Meal Counting and Claiming (300 - 311)	
<b>Question #</b>	305	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/25/2024 09:37 AM</p>	<p>Finding: The Unpaid Meal Charge Policy on the nutrition webpage is outdated and does not match the school board policy 8500.</p> <p>Corrective Action: Update the nutrition webpage with the current Unpaid Meal Charge Policy. Provide a statement in SNACS that this was completed.</p>
<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/24/2024 03:29 PM</p>	<p>Finding: The SFA completed the Nonprogram Foods Revenue Tool, which showed non-program foods are not priced sufficiently to cover all costs, including food, labor, equipment, and purchased services. All costs must be covered to ensure nonprogram foods are not supported by reimbursable meals.</p> <p>Corrective Action: For the 24-25 school year, raise prices or discontinue sales of the following items: Extra breakfast entree, extra lunch entree, ice cream sandwich, cyclone, cookie, beef stick, juice bottle, Izze, Ice. In addition, evaluate all other non-program foods to ensure all costs are covered.</p> <p>In SNACS, provide a statement that non-program foods prices will be evaluated and raised as needed.</p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged 04/25/2024 09:31 AM	Findings: 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 ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx</a> ), develop procedures for the SFA and upload into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	805	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/25/2024 09:42 AM	Finding: Two areas of the Dietary Modifications Policy (school board policy 8500) 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.  Corrective Action: 1. Remove the language from the Dietary Modifications policy that indicates documentation must be submitted "within ten (10) school days...or the dietary modification may be discontinued until such a statement is received". 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.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	806	
<b>TA Log #</b>	No TA Log# found	

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<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/25/2024 08:52 AM</p>	<p>Finding: USDA Civil Rights training did not occur for all staff who interact with program participants in the current school year (FNS or Instruction 113-1), specifically school staff who operate the point of service and hand out the FFVP snack.</p> <p>Corrective Action: For the 24-25 school year, provide the civil rights training to all staff that interact with program applicants. Since this includes multiple school district staff members, it may be beneficial to include the USDA Civil Rights training in yearly training requirements for all school district staff.</p> <p>Upload in SNACS a statement of how all relevant school staff will receive USDA Civil Rights training. The training is located here: <a href="https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html">https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html</a>.</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/24/2024 06:15 PM</p>	<p>Finding: Current Local Wellness Policy (LWP) is missing the USDA non-discrimination statement.</p> <p>Corrective Action: Add the current USDA non-discrimination statement to the local wellness policy. Provide a timeline of when the updated policy will be posted on the school district website.</p>
<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)	
<b>Question #</b>	126	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 04/24/2024 06:12 PM</p>	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a).</p> <ol style="list-style-type: none"> <li>Two applications (2 students) were missing the social security number or the checked box.</li> <li>One application (3 students) was categorically approved using an ineligible program. The household</li> </ol>

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		<p>income is too high to approve the application based on income.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1. Obtain the last four digits of the social security number or check box if no SSN.</li> <li>2. Send the parent or guardian a letter indicating that the three children on the application no longer qualify for meal benefits. Note:10 days from the date of the letter must be given before changing to paid eligibility.</li> </ol> <p>CORRECTED ONSITE. NO FURTHER ACTION NECESSARY</p>
<b>Site Name</b>		
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)	
<b>Question #</b>	1400	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/24/2024 06:32 PM</p>	<p>Finding: Each school site reviewed has a well organized and site specific food safety plan. However, the following SOPs should be added to each site's (as needed) food safety plan:</p> <ol style="list-style-type: none"> <li>1. <a href="#">Time as a public health SOP</a> should be used any time food is not held under temperature control. This should be added for sites that do not have hot or cold serving units.</li> <li>2. <a href="#">Field trip meals SOP</a> should be used at each site that provides field trip meals.</li> <li>3. <a href="#">Fresh Fruit and Vegetable Program (FFVP) SOP</a> should be added for each site that provides FFVP.</li> </ol> <p>Corrective Action: After editing the SOP templates to match your operation, upload them to SNACS. Templates are found on the food safety section of the school nutrition webpage.</p>
<b>Site Name</b>	Ridgeland-Dallas El	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/24/2024 12:00 PM</p>	<p>Finding : During the week of review, 4K students had a field trip where lunch was served. 4K students are typically co-mingled with older students and are served the K-8 meal pattern. If meals are provided to children on a field trip and claimed for reimbursement, they must meet daily meal pattern requirements. The lunch production record for this day indicated that only ½ cup of vegetables (baby carrots) were offered to students on the field trip. Students must be</p>

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		<p>offered at least <math>\frac{3}{4}</math> cup of vegetables in the K-8 meal pattern.</p> <p>Corrective Action : Submit a statement explaining how these field trip meals would be changed to comply with the K-8 meal pattern and how the meal pattern will be met for field trip meals moving forward.</p>
<b>Site Name</b>	Riverview Mid	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/25/2024 09:43 AM</p>	<p>Finding: During the week of review, students had a field trip where lunch was served. If meals are provided to children on a field trip and claimed for reimbursement, they must meet daily meal pattern requirements. The lunch production record for this day indicated that only <math>\frac{1}{2}</math> cup of vegetables (coleslaw) were offered to students on the field trip. Students must be offered at least <math>\frac{3}{4}</math> cup of vegetables in the K-8 meal pattern. Future findings related to vegetable quantity shortage may result in fiscal action.</p> <p>Corrective Action: Submit a statement explaining how these field trip meals would be changed to comply with the K-8 meal pattern and how the meal pattern will be met for field trip meals moving forward.</p>
<b>Site Name</b>	Riverview Mid	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	411	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>04/25/2024 09:46 AM</p>	<p>Finding: The weekly juice limit was exceeded at breakfast during the week of review. No more than half (50 percent) of the total fruit offerings may be in the form of juice. A total of 5.5 cups of fruit (including whole fruit and juice) were offered during the week of review and of that 3 cups were juice. This means 54.55% of the fruit offered was in the form of juice. This exceeds the 50% juice limit. This is largely due to offering smoothies where fruit from smoothies must be credited as juice.</p> <p>Corrective Action: Submit a statement that explains what changes will be made to the breakfast menu for the week of review to decrease the amount of juice offered and to be compliant with the weekly juice limit.</p>

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<b>Site Name</b>	Riverview Mid	
<b>Form Name</b>	Smart Snacks (1104 - 1107)	
<b>Question #</b>	1105	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 04/25/2024 10:16 AM	Finding: The Propel flavored water is not allowable at the middle school level. Only plain water, 100% juice, or milk are allowable Smart Snack beverages in middle schools. More information can be found on WI DPI's Smart Snacks webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a> )  Corrective Action: State what will be done with this product to comply with the Smart Snack regulations.

## Technical Assistance Entries:

Comments		
	Created By	Created Date
Water availability during breakfast and lunch service is a requirement of the USDA child meal programs. At Riverview Middle School, the nearest water station has only a bottle filler. Cups should be provided for students that do not have a bottle during meal service.		4/25/2024 10:45:07 AM
Comments		
	Created By	Created Date
It is recommended to use a common form for meal accommodation requests that are made outside the USDA meal pattern whenever possible. Posting a medical form on the school district website where families can easily access it will help encourage the use of a common form. The form must include 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. The DPI medical statement is not required but is recommended as it includes information of requirements and is simple and clear. The form is also fillable; therefore, can be completed electronically.		4/25/2024 9:56:33 AM
Comments		
	Created By	Created Date
Standardized recipes exist, but some recipes are not accurately crediting the meat/meat alternate component toward the meal pattern: Sloppy Joe recipe: The recipe calls for 30# (480 oz) of USDA beef crumbles for 210 servings. According to the USDA product information sheet, 1.15 ounces (by weight) of crumbles equals 1 oz eq m/ma, which is a yield of 87%. $480 \text{ ounces} \times 0.87 = 417.6 \text{ ounces m/ma}$ divided by 210 servings = 1.98 oz eq m/ma (rounded down to 1.75 oz eq m/ma) per serving. BBQ chicken recipe: This recipe calls for 5 bags of USDA diced chicken. According to the USDA product information sheet, bag weights can vary (either 5# or 10#), so TA was given to indicate the number of pounds of diced chicken on the recipe rather than the number of bags. Depending on the bag size, this recipe could credit anywhere from 1.5 oz eq to 3.25 oz eq m/ma.		

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4/25/2024 9:48:00 AM		
<b>Comments</b>		
	<b>Created By</b>	<b>Created Date</b>
<p>The “amount prepared in purchase units” column was not consistently filled out on lunch production records at Riverview Middle School during the week of review. Continue to work with staff to record amount prepared in this column for every product served. Be specific on production records about the identity, brand, portion size, and description of items served. Instead of “cereal bar”, list each type separately to clearly indicate what was served. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff to fill in all columns on the production record for additional items added to the production records. For example, if there are apples served on Tuesday that are leftover from Monday, make sure the planned serving size, purchase units, and leftovers are filled in even though apples were not originally on the menu.</p>		
4/25/2024 9:41:49 AM		
<b>Comments</b>		
	<b>Created By</b>	<b>Created Date</b>
<p>The local wellness policy includes required areas found on the DPI LWP checklist; however, some areas such as nutrition education, nutrition promotion, and physical education are vague. It is recommended to review the policy and add more specific content, so stakeholders are aware of all the school district does to promote wellness. It is also recommended to add restrictions to food fundraisers during meal service.</p>		
		4/24/2024 6:20:54 PM
<b>Comments</b>		
	<b>Created By</b>	<b>Created Date</b>
<p>A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Eligibilities cannot be backdated to the date of application submission.</p>		
		4/24/2024 3:11:50 PM
<b>Comments</b>		
	<b>Created By</b>	<b>Created Date</b>
<p>In the USDA Child Nutrition Programs, subsidies are given for children’s meals only. Adult meals must be priced so the cost of food, labor, equipment, and purchased services are recovered by revenues received from the sale of those meals. This ensures adult meals are not supported by reimbursement for children’s meals. A Wisconsin Adult Meal Pricing Worksheet has been developed to assist the SFA in pricing adult meals. For the 24-25 school district, Barron Area School District can use the pricing formula with the 23-24 SY reimbursement rates.</p>		
		4/24/2024 3:09:25 PM
<b>Comments</b>		
	<b>Created By</b>	<b>Created Date</b>
<p>Field trip meals must be counted at the point when the student receives the meal, and this meal count is then entered into the point of service system. Meal counts taken before the field trip, should not be entered into the point of service system.</p>		
		4/24/2024 2:37:23 PM



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Comments		
	Created By	Created Date
<p>The “amount prepared in purchase units” column was not consistently filled out on lunch production records at Ridgeland-Dallas Elementary during the week of review. Continue to work with staff to record amount prepared in this column for every product served.</p>		
		4/24/2024 12:04:41 PM
Comments		
	Created By	Created Date
<p>If an organization is selling foods or beverages that meet the Smart Snacks standards: 1) These foods or beverages may be sold at any time and in any location. 2) The organization must keep documentation on file that proves the compliance of the items. This may include nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch. It is also helpful to keep printouts of the results page from the Smart Snacks calculator. If an organization is selling foods or beverages that do not meet the Smart Snacks standards: 1) These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may be no longer than two consecutive weeks in length. 2) Exempt fundraisers cannot occur in the meal service area during meal times. 3) Someone in the school must keep track of the exempt fundraisers.</p>		
		4/24/2024 11:35:30 AM