#### Administrative Review Report

LaCrosse School District

#### Commendations:

Our sincere thanks to the staff at LaCrosse School Districtfor 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.

We were impressed with how well the food service staff work together as a team. They maintain a very clean and pleasant environment. They have friendly smiles for the students, greet them by name, and very obviously take a lot of pride in their work! We also enjoyed seeing the quality and variety of the fruit and vegetable options on the salad bar.

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

#### Recommendations:

- See the DPI School Nutrition Webpage for up-to-date guidance, forms, and training opportunities.
- The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT will offer School Nutrition Summer Training online and in person.
- For in depth technical assistance, including program links see the 2023-24 General Program Reminders which has been uploaded to the documents tab in SNACS.
- Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays the week of January 1519, 2024. Take the pledge to participate in any capacity from adding a new dip or seasoning to showcasing several new dishes. It is up to you! Visit the Around the World in 80 Trays webpage to take the pledge and find more event information. Document the event (pictures, video, sound clips, etc.) and send to DPIFNS@dpi.wi.gov so we can share your success!

### Administrative Review Report

LaCrosse School District

#### Findings and Corrective Action:

Tindings and Corrective			
Form Name	Meal Counting and Clair	ming (300 - 311)	
Corrective Action History	Flagged 12/13/2023 02:32 PM	Finding: The unpaid meal charge policy does not contain the nondiscrimination statement and indicates no refunds for amounts less than five dollars. In Wisconsin, all amounts must be refunded. If a refund cannot be made, the balance must be submitted to Wisconsin Unclaimed Property.  Corrective Action: Upload the unpaid meal charge policy with the nondiscrimination statement and with the incorrect portion of the refund policy removed.	
Site Name			
Form Name	Civil Rights (800 - 807)		
Corrective Action History	Flagged 12/13/2023 02:40 PM	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 (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx), develop procedures for the SFA and upload into SNACS.	
Site Name			
Form Name	Local School Wellness (1000 - 1006)		
Corrective Action History	Flagged 12/13/2023 01:16 PM	Finding: SFAs are required to have language in their Local Wellness Policy (LWP) that relates to all the content areas listed in the LWP checklist found on the LWP section of the DPI SNT website. This finding is based on the current LWP policy found on the LaCrosse school district website.  The following required areas are missing or contain incorrect information: Public Involvement Foods Sold Outside of the Meal Programs Food and Beverage Marketing Triennial Assessment Update/Inform the Public  The LWP is in the process of being updated. This new policy was reviewed as a courtesy. The recommended revisions shall be made available for the school district Wellness Coordinator. Per USDA guidelines, the LWP should be developed, revised, and implemented by a Wellness Committee comprised of various stakeholders including the public. Because the LWP affects the district as a whole, it is recommended that this is coordinated by the school district	

# Administrative Review Report

		Wellness Coordinator and/or school district administration.	
		<b>Corrective Action</b> : Provide a timeline for when the new policy will be completed, approved, and shared with the public.	
Site Name			
Corrective Action History	Flagged 12/13/2023 02:20 PM	Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). 1. One household received free meal benefits when they should have received reduced price meal benefits. 2. One household reported five household members, with only three names listed.  Corrective Action:  1. Notify the household of the correct meal benefit, giving the family 10 days' notice. Upload a copy of the letter to the	
		household and documentation that the benefit issuance list has been updated into SNACS.  2. The DO confirmed the family has five household members, so the original determination was correct. NO FURTHER ACTION NEEDED.	
Site Name			
Form Name	Certification and Benefit Issuance (124 - 142)		
	Flagged 12/12/2023 04:01 PM	<b>Finding</b> : Applications with one income frequency were annualized. Only applications with more than one income frequency should be annualized.	
Corrective Action History		Corrective Action: Review the Income Conversions section of the Eligibility Manual (page 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.	
Site Name			
Form Name	Verification (207 - 215)	Verification (207 - 215)	
	Flagged 12/12/2023 04:15 PM	<b>Finding:</b> One application chosen for verification was not approved correctly. The household number did not match the number of names listed on the application. The confirmation review of this application did not show a correction for this	
Corrective Action History		Corrective Action: Review pages 103-104 in the Eligibility Manual and submit a statement of understanding on how to handle applications when the confirmation review does not support the original eligibility determination.	
Site Name			
Form Name	Verification (207 - 215)		
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# Administrative Review Report

Lacrosse school district			
Causadina Aatian History	Flagged 12/12/2023 04:21 PM	<b>Finding</b> : The three verification notification letters (we mustcheck, follow-up, and we have checked)did not contain the current USDA nondiscrimination statement.	
Corrective Action History		<b>Corrective Action</b> : Upload into SNACS a copy of each letter with the correct nondiscrimination statement (found on DPI School Nutrition Website) added.	
Site Name	Central Hi		
Form Name	Meal Counting and Claiming - Day of Review (317-321)		
Corrective Action History	Flagged 12/14/2023 10:18 AM	Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not recorded as the student received their reimbursable meal. For students served outside of the cafeteria, meals were counted when the adult picked up the meals instead of when the student received the meal.  Corrective Action: Provide a statement of how the meal counting process was corrected to ensure that meals are counted and recoded as the student receives the meal.	
Site Name	Emerson Elementary		
Form Name	Meal Components and Quantities - Day of Review (400-408)		
Corrective Action History	Flagged 12/12/2023 02:12 PM	Finding: Signage was not posted at lunch at Emerson Elementary 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.  The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).  Corrective Action: Submit a picture of completed signage posted near the lunch service line.	
Site Name	Central Hi		
Form Name	Meal Components and C	Quantities - Day of Review (400-408)	
Corrective Action History	Flagged 12/13/2023 04:51 PM	Regulations in 7 CFR 210.10(a)(2) require schools to identify reimbursable meals to students; this aims to reduce the unintended purchase of a la carte items and help students make healthy food choices.  Finding: Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage	

### Administrative Review Report

		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.
		The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).
		<b>Corrective Action</b> : Submit a picture of completed signage posted near the lunch lines B and C and breakfast service line.
Site Name	Emerson Elementary	
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)
Corrective Action History	Flagged 12/14/2023 12:49 PM	Finding: There was a weekly grain shortage at lunch during the week of review for the K-5 meal pattern at Emerson Elementary and Hintgen Elementary. Only 7.5 oz eq grain was offered over the course of the week, which does not meet the minimum 8.0 oz. eq. grain requirement for the K-5 meal pattern.  Monday: Yogurt meal (1.0 oz eq)  Tuesday: Both entrees (2.0 oz eq)  Wednesday: Yogurt meal (1.0 oz eq)  Thursday: Both entrees (2.0 oz eq)  Friday: Sub on 3.5" bun (1.5 oz eq)  Corrective Action: Submit a statement explaining how this weekly grain shortage will be fixed during the week of review for the K-5 meal pattern. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.
Site Name	Central Hi	
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)
Corrective Action History	Flagged 12/14/2023 12:39 PM	<b>Finding</b> : There was a weekly grain shortage at breakfast during the week of review at Central High School. The weekly minimum quantity offered was 8.25 oz eq grain over the course of the week, which does not meet the minimum 9.0 oz. eq. grain requirement for the 9-12 breakfast meal pattern.

# Administrative Review Report

Lacrosse School District			
		Monday: WG Snack bread or Cereal (1.0 oz eq)	
		Tuesday: Donut Holes (1.5 oz eq)	
		Wednesday: Multiple entrees with minimum grain choice (2.0 oz eq)	
		Thursday: Biscuits and Gravy (1.75 oz eq)	
		Friday: Multiple entrees with minimum grain choice (2.0 oz eq)	
		Corrective Action: Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation.	
Site Name	Central Hi		
Form Name	Meal Components and C	Quantities - Review Period (409-412, 430-437)	
Question #	430		
TA Log #	TA Log# exists		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 12/14/2023 06:43 AM	Fruits and vegetables on a garden bar can credit towards the meal pattern. Even with garden bars, the menu planner must plan a specific portion size that they intend students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/2 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.  Finding: There were no planned serving sizes on the garden bar production records at Central High School. Garden bar production records must meet the same criteria as production records used to record main line items. Review the Production Record Requirements (https://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/production-record-requirements.pdf).  Corrective Action: Submit updated garden bar production records with serving sizes for each menu item- for Central High School. Although not required, DPI's Salad Bar or	
		garden Bar Production Records may be used (https://dpi.wi.gov/sites/default/files/imce/school- nutrition/xls/salad-bar-production-record.xlsx); (https://dpi.wi.gov/sites/default/files/imce/school- nutrition/xls/garden-bar-production-record.xlsx).	

# Administrative Review Report

Site Name	Emerson Elementary		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/14/2023 12:45 PM	<b>Finding</b> : While the intended portion from the garden bar is 1/2 cup at the K-5 level at Emerson and Hintgen Elementary, the menu planner must plan a specific portion size that they intend students to take of each offering. As the vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/2 cup each should be communicated to students. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected.	
		Corrective Action: Submit an updated production record template with serving sizes for each menu item offered on the garden bar indicated. Although not required, DPI's Salad Bar or Garden Bar Production Records may be used ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/salad-bar-production-record.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/garden-bar-production-record.xlsx</a> ).	
Site Name	Central Hi		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Question #	431		
TA Log #	No TA Log# found		
Due Date			
Corrective Action Status	Flagged		
Corrective Action History	Flagged 12/14/2023 12:44 PM	SFAs are required to use production and menu records. This requirement can be particularly helpful for sub sandwich bars. Production and menu records demonstrate how the meals offered contribute to the required food components and food quantities for each age/grade group every day. These records can be helpful when developing sub bars because they promote consistent food quality and predictable yields, control food costs, and help with inventory control. The record should be constructed based on a typical day.	
		Finding: At Central High School, the production record lists "Sandwich: Sub Lunch Choices" and recipes were provided; however, the sub line is set up as a build your own and no menu items are combined prior to the service line. In this case, each lunch meat and cheese must be listed individually on the production record with the intended portion size of each menu item.  Corrective Action: Submit a sub bar production record template that will be implemented moving forward, including	

# Administrative Review Report

		all types of meats and cheeses, bread offerings, toppings, sun chips offered with their portion sizes.	
Site Name	Emerson Elementary		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
	Flagged 12/12/2023 02:31 PM	<b>Finding</b> : Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the side salad on the garden bar, or a standardized recipe was not being utilized.	
Corrective Action History		Corrective Action: Submit a standardized recipe for the side salad. Be sure to include all requirements of a standardized recipe, including serving size and 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). Or describe how the process will change if the school chooses to go with a "build-your-own" side salad, serving all vegetables separately to the students; serving sizes should be detailed in the corrective action for the garden bar.	
Site Name	Central Hi		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/14/2023 06:37 AM	Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. 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).  The breakfast bowl was not being made with the diced ham, the side salad did not have a recipe, the fruit and yogurt parfait was made with 1/2 cup yogurt, ½ cup fruit, and 1 oz of granola, and the fish basket was made with the fish fillet or fish sticks: both should have their own standardized recipe.  Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There were no standardized recipes for the side salad, fruit and yogurt parfait, breakfast scramble bowl, or fish basket for the fish fillet and a separate one for the fish sticks.  Corrective Action: Submit a standardized recipe for the side salad, fruit and yogurt parfait, breakfast fowl, and fish basket with the fillet and fish basket with the sticks. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage	

# Administrative Review Report

	(https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).		
Site Name	Emerson Elementary		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/14/2023 12:47 PM	Finding: For grades K-12, up to 2 oz eq of grain-based desserts per week are allowed in the NSLP. The K-5 menu for the week of review at Emerson and Hintgen Elementary exceeded the grain-based dessert limit. The production records list "Snacks: WG Assorted Lunch Choice" with bug bites (1.0 oz eq), gripz (1.0 oz eq) as options. Each individual school is able to select the grain that they would like to serve that day. It is unclear that there is a limitation to the graham cracker options being served or are available each day, and thus appears that students may select a 1.0 oz eq grain-based dessert Monday-Thursday during the week of review for a total of 4.0 oz eq.  Corrective Action: Submit a statement that explains your plan to reduce the amount of grain-based desserts	
		offered at lunch for K-5, or to detail how the production record will indicate that no more than 2.0 oz eq of grain-based desserts may be served in the week.	
Site Name	Central Hi		
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)		
Corrective Action History	Flagged 12/14/2023 10:48 AM	Finding: At least 80% of the grains offered weekly on each serving line must be whole grain rich. Only 25% of products offered on the sub line during the week of review were whole grain rich.  Daily: 3.0 oz eq enriched sub bun  Daily: 1.25 oz eq WGR Sun Chips  Total: 6.25 oz eq WGR/21.25 oz eq total x 100% = 29.4% WGR  Corrective Action: Describe how the menu would be changed to comply with the 80% whole grain-rich requirement. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for items that would be planned in place of enriched grain items.	
Site Name	Central Hi	<u> </u>	
Form Name		Quantities - Review Period (409-412, 430-437)	
Corrective Action History	Flagged 12/14/2023 06:41 AM	As detailed in 210.10 (k) (2) Opportunity to select, Schools that choose to offer a variety of reimbursable lunches, or provide multiple serving lines, must make all required food	

# Administrative Review Report

	components available to all students, on every lunch line, in at least the minimum required amounts. This ensures that all students have access to all of the vegetable subgroups throughout the week regardless of the serving line selected. For example, a child who picks the pizza line consistently would have access to all vegetable subgroups throughout the week.  Finding: There are three separate service lines at Central High School; A, B, and C. Lines A and B do not have access to the hot vegetables offered, thus are unable to access all vegetable subgroups. During the week of review, the lines A and B did not have access to the starchy vegetable, and beans/peas/legumes, missing vegetable subgroups.  Corrective Action: Describe specifically how the weekly minimum requirement for the missing starchy and beans/peas/legumes vegetables subgroups will be met on lines A and B at Central High School (e.g., portion sizes increased or decreased, additional menu items, product replacements, etc.).	
Central Hi		
Offer vs Serve (500-502)		
Flagged 12/13/2023 04:28 PM	Finding: 3 non-reimbursable meals were observed at Central High School during lunch service. The meals did not contain three full components, required under Offer versus Serve.  Meatballs (2.0 oz eq MMA), 1/2 cup potatoes, 1/2 cup fruit (2)  Meatballs (2.0 oz eq MMA), ½ cup potatoes, 1/2 cup corn (1)  Corrective Action: Submit a statement which indicates understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Additionally, in this statement explain how these errors will be corrected and avoided in the future.	
Central Hi		
Smart Snacks (1104 - 11	07)	
Flagged 12/13/2023 04:47 PM	Finding: The Booster Club sells non-compliant food to students during the school day and does not qualify as an exempt fundraiser and abide by the two-week exempt fundraiser limit. Of foods reviewed, non-compliant foods include:  • Clif Bars, 68 grams (greater than 200 calories) • Double Stuf Oreos (first ingredient: sugar)	
	Offer vs Serve (500-502) Flagged 12/13/2023 04:28 PM  Central Hi Smart Snacks (1104 - 11) Flagged	

#### Administrative Review Report

LaCrosse School District

		<ul> <li>Takis, Intense Nacho (calories from fat exceed 35%, calories from saturated fat are not less than 10%, and sodium exceeds 200 mg)</li> <li>Additionally, Kit Kats, Reese's Peanut Butter Cups, Airheads, Starburst and other candies do not meet the general nutrient standards</li> <li>These non-compliant products need to follow the exempt fundraiser two-week limit per student organization, per school, per school year, or be discontinued.</li> <li>See WI DPI's Smart Snacks webpage for more information (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).</li> <li>Corrective Action: Please submit a statement after communicating with the Booster Club detailing how the noncompliant foods not meeting Smart Snack standards will be made to comply with these regulations, or how the Booster Club understands that they cannot sell non-compliant foods during the school day and thus will remain closed during the day.</li> </ul>	
Site Name	Central Hi		
Form Name	Food Safety, Storage and Buy American (1404-1411)		
Corrective Action History	Flagged 12/13/2023 02:47 PM	Finding: The most recent food safety inspection report was not posted in a publicly visible location.  Corrective Action: Corrected onsite, NO FURTHER ACTION NEEDED.	

#### **Technical Assistance Entries:**

Comments		
	Created By	Created Date

All condiments offered with the reimbursable meal contribute to the dietary specifications (calories, fat, sodium) and must be on the production record and usage tracked daily. Condiment production record templates can be found on our website (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records). Currently, at Central High School condiments are only noted on the garden bar production record if a new case is being opened for lunch service. While students had access to French, Caesar, Italian, Ranch, Honey Mustard and Caesar dressing and BBQ sauce, mayo, and ketchup not all options were listed on the production record or garden bar record.

Comments			
	Created By	Created Date	

Food service plan should be reviewed and updated each school year and be specific to each site's operation. Please work with your local health department to ensure that your SOPs are compliant.

#### Administrative Review Report

LaCrosse School District

# Created By Created Date

- 1. Please update internal special dietary restrictions form changing "doctor" to include other state authorized medical authorities (e.g., Physician, Optometrist, Dentist, Podiatrist, Physician Assistant, Nurse Practitioner).
- 2. Post procedures on the webpage telling families how to request a meal accommodation.

#### Comments

Created By Created Date

Please add the free and reduced meal application instructions and parent/guardian information letter (FAQ) to the webpage alongside the application.

#### **Comments**

Created By Created Date

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. All menu items served as part of the reimbursable meal need to be documented on the production record. Though there are recipes on file for "WG snacks, assorted" or "pizza: breakfast, assorted" and schools are able to select the variety they would like to make that day, work with staff to record the identity of the product served that day.

Additionally, other items offered as part of the reimbursable meal were not documented on the production record. For example, the whole grain sun chips offered on the sub line. Ensure that all items offered are documented on the production record. For communication purposes, it may be beneficial to place list or group menu items on the production record together or make this clear on the menu.

It was observed that while the menu planner intended for a 2 oz muffin or the cereal entrees to be able to select WG bread that all breakfast options were able to select a slice of WG bread, for example, the PBJ sandwiches. Any menu items bundled together, such as the PBJ entrée at the high school at lunch should not be individually listed on the production record but written as a recipe and indicated as such on a single line on the production record, i.e., PBJ lunch combo or PBJ lunch bundle.