

# Administrative Review Report

Oregon School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/21/2023	02/09/2024
On-Site Review	02/27/2024	02/29/2024
Site Selection Worksheet	12/21/2023	12/21/2023
Entrance Conference	02/26/2024	02/26/2024
Exit Conference	02/29/2024	02/29/2024

## Commendations:

We appreciate all the time spent completing the offsite portion for this review. Thank you to the Interim Food Service Director and Assistant Food Service Director for being readily available to State Agency staff members. Excellent work with the point of service and claiming procedures. No benefit issuance errors were found.

Thank you to the food service staff at Oregon School District for their hospitality. Everyone was friendly, knowledgeable, helpful and clearly willing to learn and make adjustments where needed. Students are offered a wide variety of appealing options and positive interactions between students and staff were observed. You are doing a great job recording items separately on the production record by type, especially milk and breakfast items.

Additionally, a la carte items are being correctly rung in individually to comply with Smart Snacks.

## Recommendations:

It is common and worthwhile practice for schools to portion fruit servings in half-cup increments for the ease of identifying reimbursable meals. A reminder that if Oregon School District cuts oranges into quarters or "smiles" that all slices of the 134 count whole fruit need to be portioned together in order to credit as 1/2 cup.

It is recommended that the District and School Administration collaborate with the Foodservice Department for when there are changes with the meal service schedules. On the day of review at Oregon Middle School, it was observed that the 7th grade meal service was unexpectedly changed so all students came down at once. The foodservice staff were unaware of this change until right before the lunch bell rang. This led to a bit of chaos and all hands on deck situation to keep the lines full and moving. Foodservice staff did a great job!

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)	
<b>Question #</b>	112	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/29/2024 10:10 AM	Finding: The SFA's benefit issuance list contained a few duplicate entries. Corrective Action: Remove any duplicates from the benefit issuance list and upload a copy into SNACS.
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (809 - 810)	
<b>Question #</b>	810	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2024 08:04 AM	Finding: The <a href="#">non-discrimination statement</a> was not included on all required program materials: Local Wellness Policy, School Lunch Program Policy, and School Lunch Program-Administrative Guidelines Policy. Corrective Action: Add the Nondiscrimination statement to required program materials and upload updated materials into SNACS.
<b>Site Name</b>	Oregon 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>	Flagged 02/28/2024 01:40 PM	Finding: There was a shortage of the bean/peas/legume vegetable subgroup during the week of review. One portion of hummus was served, which according to the Product Formulation Statement credits as 3/8 cup legumes. The minimum portion size for a week is 1/2 cup. Corrective Action : Please submit a statement indicating how this will be adjusted on future weeks at the Middle School. This can be adjusted by increasing the portion size of the hummus, finding a new product that credits as 1/2 cup, or serving an additional legume on a different day of the week.
<b>Site Name</b>	Forest Edge Elementary School	
<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>	Flagged 02/27/2024 10:08 AM	Finding : There was a shortage of the bean/peas/legume vegetable subgroup during the week of review. One portion of hummus was served, which according to the Product Formulation Statement credits as 3/8 cup legumes. The minimum portion size for a week is 1/2 cup. Corrective Action : Please submit a statement indicating how this will be adjusted on future weeks. This can be adjusted by increasing the portion size of the hummus, finding a new product that credits as 1/2 cup, or serving an additional legume on a different day of the week.

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<b>Site Name</b>	Oregon Mid	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)	
<b>Question #</b>	431	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2024 01:44 PM	Finding: It is a requirement to indicate total number of planned meals and total number of meals served each day of the production kitchen. This can assist substitutes in recognizing trends and knowing how much food to prepare when meal counts are not taken. Corrective Action : Please review the production records requirements on DPI's Menu Planning and Production Records Webpage ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a> ) and start having each site at Oregon School District record the number of planned and actual numbers of meals prepared/served as well as the planned/actual quantity prepared in bulk units.
<b>Site Name</b>	Oregon Mid	
<b>Form Name</b>	Civil Rights (811-812)	
<b>Question #</b>	811	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 02/28/2024 01:33 PM	Finding: The nondiscrimination " <a href="#">And Justice for All</a> " poster is not located in the meal service area and/or not visible to students (FNS Instruction 113).  Corrective Action: Hang the USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met. If corrected while onsite, no further action required.

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
02/29/2024	4379		Administrative Review		Food Service			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
<u>Non-program Food Revenue:</u> <ul style="list-style-type: none"> <li>Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, and food service operated vending machines.</li> <li>All costs associated with nonprogram foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures nonprogram foods are not supported by reimbursable meals.</li> </ul>								2/29/2024 10:19:39 AM
02/29/2024	4378		Administrative Review		Authorized Representative			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
<u>Hiring Requirements for New Food Service Directors Effective July 1, 2015:</u> The Professional Standards regulations in 7 CFR 210.30 established minimum professional standards hiring requirements for new Food Service Directors who manage and operate the National School Lunch and School Breakfast programs. The hiring requirements aim to ensure new Food Service Directors have the knowledge they need to operate School Nutrition Programs effectively. Hiring Requirements for Student Enrollment: 2,500–9,999 <ul style="list-style-type: none"> <li>Bachelor's degree, or equivalent educational experience, with academic major or concentration in food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.</li> <li>OR Bachelor's degree, or equivalent educational experience, with any academic</li> </ul>								2/29/2024 10:16:38 AM

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major or area of concentration, and a State-recognized certificate for school nutrition directors. In Wisconsin this is the GOALS Certificate.					
<ul style="list-style-type: none"> <li>OR Bachelor's degree in any academic major and at least two years of relevant school nutrition programs experience.</li> <li>OR Associates degree, or equivalent educational experience, with academic major or concentration in food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field; and at least two years of relevant school nutrition programs experience.</li> </ul>					
02/29/2024	4377		Administrative Review		Interim/Assistant Food Service Director
Comments					
				Created By	Created Date
<p><u>Unpaid Meal Charge Policy:</u> The current policy references that a la carte items may be restricted for students with a negative balance. However, it does not provide details on when this will happen. It is recommended to make this section more transparent to households by setting a negative balance limit that will cause a la carte items to be withheld.</p>				2/29/2024 10:12:51 AM	
02/28/2024	4376		Administrative Review		Interim/Assistant Food Service Director
Comments					
				Created By	Created Date
<p>NONPROGRAM FOOD REVENUE REQUIREMENTS Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by establishing requirements related to the revenue from the sale of nonprogram foods. Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CRF 210.14(f), SFAs are required to ensure:</p> <ul style="list-style-type: none"> <li>All revenue from the sale of nonprogram foods accrues to the non-profit school food service account;</li> <li>Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. Nonprogram foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account. This encompasses all foods sold in schools as well as adult meals, foods sold outside of school hours, or any foods used for catering or vending activities. For the majority of SFAs, a la carte foods offered during meal service are the largest share of nonprogram foods.</li> </ul>				2/28/2024 3:43:40 PM	
02/28/2024	4374		Administrative Review		Interim/Assistant Food Service Director
Comments					
				Created By	Created Date
<p><u>Unpaid Meal Charge Policy:</u> It is recommended to rename the <i>School Lunch Program Administrative Guidelines</i> policy to something that makes it more clear to households that this is the Unpaid Meal Charge Policy. Additionally, this policy was linked in the summer newsletter, and sent with the back to school packet. It is best practice to send this in a separate communication that way households are more likely to see it.</p> <p>Additional Information on Unpaid Meal Policies:</p> <ul style="list-style-type: none"> <li>Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement.</li> <li>Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported. Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.</li> <li>Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless paid households have chosen to donate those funds to the school food service account. Funds remaining in a reduced student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as unclaimed property.</li> </ul> <p>Resources: For a snapshot of what the policy should include, see the <a href="#">Unpaid Meal Charges In a "Nutshell"</a>. For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the <a href="#">Financial Management Webpage</a> or the <a href="#">USDA Unpaid Meal Charges Webpage</a></p>				2/28/2024 1:51:06 PM	

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02/28/2024	4368		Administrative Review		Interim/Assistant Food Service Director		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
It is recommended to put a limit on how many USDA fruit slushy cups and applesauce cups students can select at Oregon Middle School. On the day of review, several students were observed selecting 2-4 USDA fruit slushy cups. USDA regulations state to limit juice offering to half of the weekly fruit offerings. Additionally, these items are higher cost products. It is reasonable to limit a maximum of 2 per student and charge additional selections at a la carte prices.							2/28/2024 12:43:07 PM
02/28/2024	4366		Administrative Review		Assistant/Interim Food Service Director		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
Please add a column on the a la carte tracking sheets at all Oregon School District sites for staff to add a recorded temperature. For packaged items such as string cheese or juice boxes, the temperature can be taken by placing the thermometer between the packaging. Staff cannot rely on the air temperature as an accurate measure of the food/drink temperature.							2/28/2024 11:59:43 AM
02/28/2024	4365	806	Administrative Review	ALL	Assistant/Interim Food Service Director		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
It is best practice to have foodservice staff sign/attest to completing the civil rights training. It is recommended to use the DPI civil rights training attendance log for this. <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/civil-rights-attendance-record.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/civil-rights-attendance-record.docx</a>							2/28/2024 11:57:06 AM
02/28/2024	4364		Administrative Review		Interim/Assistant Food Service Director		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
It is best practice to have all foodservice employees sign the 2020 version of the Employee Reporting Agreement in addition to the New Employee/Orientation Agreement. <a href="https://datcp.wi.gov/Documents/foodemployeeereportingagreementsupplement.pdf">https://datcp.wi.gov/Documents/foodemployeeereportingagreementsupplement.pdf</a>							2/28/2024 11:52:57 AM
02/28/2024	4358		Administrative Review		Interim/Assistant Food Service Director		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
Catering Events: For better tracking of catering events, it is recommended to add invoice numbers and the date payment was received to the catering request forms. The date payment is received to foodservice should also be recorded on internal foodservice catering excel sheet.							2/28/2024 10:04:00 AM
02/28/2024	4357		Administrative Review		Determining Official		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
When manually processing income applications, it may be helpful to use this calculator tool. <a href="https://reports.educateiowa.gov/ICAVES/Home/Calculator">https://reports.educateiowa.gov/ICAVES/Home/Calculator</a>							2/28/2024 10:00:56 AM
02/28/2024	4355	101	Administrative Review	ALL	Determining Official		
<b>Comments</b>							
					<b>Created By</b>	<b>Created Date</b>	
When processing income applications that only report the annual income, it is best practice to follow up with the household before processing it. Household income should be reported							2/28/2024 9:58:42 AM

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in the frequency it is received by the household and in the gross amount.							
02/28/2024	4354	500	Administrative Review	Oregon Mid	Interim/Assistant Food Service Director		
Comments							
					Created By	Created Date	
<p>Per civil rights legislation, school districts must ensure children with disabilities participate along with children without disabilities to the maximum extent appropriate. Under some circumstances it may be appropriate for children with certain disabilities to sit at a separate table or to not come to the cafeteria to choose their meal. However, schools may not separate children from the regular meal service due to their disability for convenience purposes. The 504 coordinator or school administration can make the decision for alternate meal service that is in the best interest of the child. The USDA does not require written documentation to change the way a lunch is served when it is in the best interest of the child. However, it is recommended that this be written into an IEP or 504 plan, to help ensure administration, teaching staff, food service, and parents/guardians have the same understanding. If an adult picks up a meal for a child, the adult should not choose the components for the student. A student can choose from a menu or pictures what they would like to eat each day, then the adult can pick up those items. It is also acceptable for the adult to take all components on a tray and then have the student select the items they would like to have on their own tray. Please note: the student must choose a reimbursable meal which includes selecting ½ cup fruit or vegetable along with two other components at lunch. If a child has a disability which creates challenges with choosing a reimbursable meal, the IEP, 504 plan or a medical statement could list the meal accommodation needed. For example, a student with autism spectrum disorder does not want a fruit or vegetable on their tray. The IEP could state "(Student name) has (type of disability such as autism spectrum disorder with selective eating challenges) and can choose what he/she would like from the day's menu". Knowing it does take some time for an IEP to be changed, food service should make the accommodation while waiting for the IEP anticipating that the IEP will include the meal accommodation in a reasonable amount of time and the foodservice department must have a copy of the medical statement or the portion of the IEP/504 plan pertaining to meal service, on file. If an IEP, 504 plan, or medical statement has a meal accommodation request the USDA requires: 1. The child's physical or mental impairment as it relates to the diet (i.e., autism spectrum disorder with selective eating and sensory challenges) 2. The foods to substitute 3. The foods to omit (i.e., in the example above, sub and omit is anything the child does or does not want to eat from the day's menu). If a meal is picked up by an adult for a student, there must also be a system in place to count the meal when the student receives the meal. If the meal is counted when the adult picks it up there needs to be a system that determines that the student accepted the meal (even if they don't eat the meal) and a method of allowing the student to choose the items, they would like on the tray. A checklist in the classroom with the student's name and the components they selected is acceptable; however, the adult must be trained in reimbursable meals and OVS. In the event the meal is partially or completely rejected, other students/adults cannot consume any part of the meal.</p>						2/28/2024 9:57:56 AM	
02/28/2024	4353	141	Administrative Review	ALL	Determining Official		
Comments							
					Created By	Created Date	
It is recommended to add a notes column to the benefit issuance list. In the notes section, record who meal benefits are extended from. You may need to work with your software vendor on this.						2/28/2024 9:55:23 AM	
02/27/2024	4340	404	Administrative Review	Forest Edge Elementary School			
Comments							
					Created By	Created Date	
<p>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. Forest Edge does have menu signage posted at lunch, but indicates that students should select three items, instead of the correct wording of informing 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. The key word at lunch is components. New signage will be available to schools in the spring; the online order form will be on the Signage Webpage: <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/signage</a></p>						2/27/2024 9:34:00 AM	