

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Oregon School District

Agency Code: 13-4144

School(s) Reviewed: Rome Corners Intermediate School and Oregon High School

Review Date(s): 12/5/17-12/7/17

Date of Exit Conference: 12/7/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Appreciation/Commendations:

Thank you to the Food Service Director, Food Service employees and District staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Everyone was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. Thank you for all that you do to feed the students healthy meals! You are much appreciated!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance/Compliance Reminders

- 289 eligibility determinations were reviewed; 4 errors were identified.

Carryover

- Eligibility status from the prior school year carries over in to the next school year until the 30th operating day (school day). If a family submits an application, then their status will change once that application is determined.

Disclosure

- For any staff that has access to students' eligibility status that isn't the Food Service Director they must sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This includes the cashiers and any other district staff. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the

SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Two students were receiving free benefits, but should have been determined as reduced eligible from an income application.
Corrective Action Needed: Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #2:** One student was receiving reduced price benefits, but should have originally been denied.
Corrective Action Needed: Notify the household, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- ❑ **Finding #3:** One student was receiving free meal benefits stating the student was directly certified. However, the student was not found on any direct certification run from the 17-18 SY. There were no applications on file to support the eligibility status either.
Corrective Action Needed: Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

Verification

Commendations

Verification was well done and completed in a timely manner. Four applications were verified. A confirmation review took place and the Confirming Official signed off on this task. The DPI notification letters were used for Verification. The Verification Collection Report was completed prior to the February 1 due date and was completed correctly. Job well done!

Technical Assistance/Compliance Reminders

- When a benefit eligibility decreases, the change must take effect 10 calendar days from the date the notice of adverse action, with appeal rights procedures, was sent (date on the letter).
- Consider using the [Verification Tracker sheets](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) to keep track of applications selected for Verification (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).

Meal Counting and Claiming

Commendations

The correct reports are used to complete the monthly claims for reimbursement. The Breakfast and Lunch claims for October were done correctly with no errors.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Oregon School District for their hospitality. Everyone was friendly, helpful and clearly willing to learn and make corrections 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.

Comments/Technical Assistance/Compliance Reminders

Offer versus Serve (OVS)

As long as students have selected a reimbursable meal, they cannot be required to take any additional items. For example, if the student has selected chicken nuggets (which credits as a full meat/meat alternate and full grain component) along with ½ cup apple slices, they cannot be required to take additional fruit/vegetable.

Students who did not have a full half cup of fruit or vegetable were almost always sent back for more. However, it is recommended that a fruit basket or additional fruit or vegetable offerings are available at the point of service to avoid the following scenarios that may occur when sending a student back:

- If the student is charged and then sent back they may leave the line without actually take a fruit.
- If they are not charged, they may not come back to the register and leave the line without being charged.

Meal Pattern Requirements

When multiple entrées are offered, the weekly minimum meat/meat alternate (m/ma) is determined by the sum of the daily meat/meat alternate minimums for the week (the daily minimum is determined by the entrée offering the least amount of meat/meat alternate). The same is true for determining the weekly grain minimum.

Portion sizes

Be careful with the difference between weight and volume. Spoodles measure fluid ounces, not ounces by weight, so it is not appropriate to use a 4 fluid ounce spoodle for an intended 4 ounce (by weight) serving, and conversely, it cannot be assumed that 4 oz (by weight) provides a ½ cup serving. It is recommended that food service staff receive additional training on this concept. Visit our [SNT Webcasts](#) webpage for the What's the Scoop on Portion control and What's the Yield with Standardized Recipes training (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

- For example, the turkey ham used in the chef salad is portioned with a #16 scoop. This is a volume measure that provides 2 fl oz or ¼ cup of meat. However, as meat/meat alternate is credited based on weight, we weighted this ¼ cup serving and determined it to be 1 oz. Using the Food Buying Guide, 1 oz of turkey ham credits as 0.5 oz eq m/ma.

Whole Grain-Rich Requirements

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain 100 percent whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50 percent is whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

Grains that are not whole grain-rich cannot be credited towards daily or weekly meal pattern requirements. USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Crediting

Two different sized applesauce cups were found during the on-site review, a 4 oz cup and a 4.5 oz cup. The smaller cup is 4 oz *by weight*, crediting as 3/8 cup of fruit. As additional fruit offerings are also available, no issues were found with the daily minimum fruit requirement. However, keep in mind that students selecting a 4 oz applesauce cup must have additional fruit and/or vegetable to meet the ½ cup requirement under OVS.

All fruits are credited on the production record as ¾ cup of fruit. Below is the actual crediting for each of the fresh fruits offered:

- 113 ct oranges = ½ cup
- Apples = 1 cup
- 120 ct Pears = 3/4 cup
- 150 ct Bananas = ½ cup

Students self-serve many of the fruit and vegetable offerings. It can be difficult for point of service (POS) staff to know if the student actually took a full, level scoop. Additionally, items such as apple slices do not fit nicely into a spoodle. It is important for POS staff to know how raw fruits and vegetable credit. Therefore, the quantity of each fruit/vegetable needed to credit as a specific volume must be determined. This can be done one of two ways. For example, to determine how many apple slices equals ¼ cup, either:

1. Dice up the apple slices and determine how many are needed to fill a ¼ cup spoodle.
2. Calculate the weight of ¼ cup of unpeeled apple slices using the Food Buying Guide and determine the average number needed to provide that weight using a scale.

Recipes

Standardized recipes are required for all menu items that have more than one ingredient (mashed potatoes, breakfast sandwich, spaghetti and meat sauce). 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 food service 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. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made or when optional ingredients are included. Both a weight and measure should not be included for each ingredient as they can be slightly different and result in inconsistent crediting. Instead, record weight OR measure based on how the recipe is prepared. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

If a recipe is sometime prepared with beef crumbles and other times prepared with raw ground beef, a separate standardized recipe should be developed for each scenario as quantities and yield will differ. The production record should clearly specify which recipe was used. The same applies to the muffin recipe where various ingredients are added (chocolate chips, chocolate chips plus banana, blueberries, m&m's, etc.).

Documentation

The actual products served should be documented on the production record, including any substitutions that were made. A list of production record requirements (“Must haves and Nice to haves”) and sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

- For example, the RCI production record shows sun butter sandwiches, but they actually serve pb&j.

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document.

Manufacturers may provide schools with a CN label with a watermark during the bidding process or on their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

Signage

Additional signage is recommended for breakfast and lunch at the high school to help clarify what students can select as part of their reimbursable meal and what items are offered a la carte. At breakfast, there are many a la carte items offered that are intermixed with reimbursable items. These items should be clearly separated.

At lunch, there is a sign posted behind the sub and salad bar that states that students can select “up to 3 oz protein, 1 grain, at least $\frac{3}{4}$ cup fruit, at least $\frac{3}{4}$ cup vegetable and a milk.” As the breadstick only credits as 1 oz eq of grain, it is not accurate that students should be limited to only one. The sign should reflect that they are able to select up to 1 cup of fruit and 1 cup of vegetable but must have a minimum of $\frac{1}{2}$ cup of fruit/vegetable or a combination with their meal. Finally, students do not know what 3 oz of protein means. The protein options should be more clearly labeled with how they count towards meal pattern requirements. Putting some of this information on the sneeze guard would be helpful.

Training

It is strongly encouraged that food service staff attend the Summer Nutrition Skills Development Courses to receive job specific training. There is always a session that occurs in Madison, which would be convenient option for staff. Costs associated with this training are an allowable expense from the school foodservice fund (fund 50) and hours can be counted towards Professional Standards requirements.

Findings and Corrective Action Needed

❑ **Finding #1:** Based on meal preparation observation during the on-site review, students selecting the chef salad at RCI have the option of one serving of turkey ham and one serving of cheese or two servings of cheese. A #16 scoop of turkey ham weighed 1 oz and therefore credited as 0.5 oz eq m/ma. A serving of cheese was a #30 scoop, or 0.5 oz. Therefore, the salad credited as 1 oz eq m/ma.

A 1 oz eq breadstick is offered with the salad as the grain, but students have access to other fruits, vegetables and grain options on the bar line.

As this option is available daily, this would result in a weekly meat/meat alternate minimum of 5 oz eq which is short of the requirement. *However, since no students ordered the chef salad during the week of review, this was not considered a shortage.*

Corrective Action Needed: Submit an updated recipe for the chef salad that clearly explains what the student is able to select with the entrée to meet the weekly minimum requirements.

❑ **Finding #2:** The planned menu for the the classic line at RCI for lunch on Tuesday 10/10/17 did not meet the daily minimum vegetable requirement. The planned vegetable was ½ cup of sweet potato fries.

Corrective Action Needed: This was discussed during the on-site review and it was decided that the planned serving size will be ¾ cup of sweet potato fries with the breakfast for lunch menu going forward. Servers will ask students if they want a “big” scoop (6 oz spoodle) or “small” scoop (4 oz spoodle). **No further action required.**

❑ **Finding #3:** The following items served during the week of review or during the on-site observation were not whole grain-rich:

- Muffins
- Lasagna

Corrective Action Needed: Submit information and/or documentation to show how these menu items will meet meal pattern requirements. For example, for the muffins, a new standardized recipe should be submitted, and for the lasagna, either a new recipe and pasta label OR a statement describing plans to count the pasta as an extra and offer students two breadsticks.

❑ **Finding #4:** Recipes being used have not been standardized to this operation. It was not possible to accurate credit some menu items without an exact yield, accurate product information or inconsistent procedures. Additional information on the recipe standardization process can be found on the [Recipe Resources and Tools page](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) of our website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Corrective Action Needed: Please submit updated standardized recipes for the following:

- Rome Corners Intermediate:
 - Chef salad
 - Turkey and cheese sub (RCI)
 - Chicken gravy and meatless chicken gravy
 - Serving size doesn’t match production record.
 - Yield should not be the same for both when the only thing different is 3# of chicken.

- If chicken gravy recipe yield is accurate (12 cups) and using a ¼ cup serving (#16), this would credit as 0.75 oz eq m/ma.
 - Black beans and salsa
 - During observation, this was prepared using ½ can beans plus 1 cup salsa.
 - Refried beans
 - Using less refried beans, no chicken stock, getting more servings than the recipe states. Using they information provided by food service staff as to how the recipe is actually prepared, it would credit as 3/8 cup vegetable and 0.25 oz eq m/ma.
- Oregon High School
 - M&M muffin
 - Recipe yield is 100 servings, but staff stated they get 48-50 muffins.
 - An exact, consistent yield is needed, because 48 muffins= 2 oz eq, but 50 muffins= 1.75 oz eq.
 - Breakfast sandwich
 - BBQ chicken (made with turkey roast)
 - Lasagna
 - Spaghetti

□ Finding #5: Additional documentation is needed to credit the week of review.

Corrective Action Needed: Please submit the following CN labels or Product Formulation Statements (PFSs):

CN labels needed (from actual product packaging)

- Jennie-o turkey 2099
- Papetti's cheese omelet
- Tyson breaded chicken patties 16477 928 (PFS provided, but the grain documentation is not acceptable as "batter type coating" is not an ingredient in the food buying guide. If you would like to credit grain, submit actual copy of CN label from product packaging or an updated PFS)
- Breakfast burrito
- The Max – fit for kids plus, real slice, pepperoni pizza

PFS needed

- French toast sticks – need additional documentation if wanting to credit the m/ma
- Nutrigrain bars (all flavors)
- Poptarts (strawberry 2ct, fudge 1ct)
- Roast beef

□ Finding #6: Crediting for meat on the salad bar needed for RCI and OHS.

Corrective Action Needed: Submit the weight of serving of each meat/meat alternate option available on the salad bar along with the necessary documentation needed to credit. If different portion sizes are used for RCI and OHS, please specify.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware

that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action. Thank you.

3. RESOURCE MANAGEMENT

Commendations

The SFA has an Unpaid Meal Charge Policy in place and it is available with the other school policies on the website.

Technical Assistance/Compliance Reminders

Unpaid Meal Charge Policy

- The Unpaid Meal Charge Policy has very general language and it is advised that it includes more detailed information regarding a la carte purchases, unpaid balances and alternate meals to prevent the negative account balances and from having to transfer non-federal funds. Currently, any student with a negative balance can purchase any item they choose and not be penalized for it. It was noted that there were many negative accounts. To combat this, you may set a district policy to disallow a la carte sales to any student regardless of benefit status (Free, Reduced, or Paid). Create signage to teach the students that they have to take a reimbursable meal if they want to get the 'meal deal' and have bowls of whole fruit, packages of raisins, craisins or other fruit/vegetable that a student can take to make their meal reimbursable at the end of the line by the cashier. It's important to teach the students what they can take to make a reimbursable meal so that they are not charged the a la carte price. Cashiers may see if a student is free if it is deemed necessary and cannot deny a free student a meal. However, you can deny a reduced or paid student a meal if they have surpassed the negative amount (for example, -\$20.00) set in the policy. Once they surpass that -\$20.00 mark, you can offer them an alternate meal. The alternate meal is the penalty and meant to encourage students to bring money or have their parent/guardian deposit money into their lunch account. You are also still feeding the student by offering the alternate meal, but offering a less desirable meal option for them. You may refer to the [Unpaid Meal Charges "In a Nutshell"](#) to see your options regarding alternate meals. Depending on whether you claim, charge, or giveaway the alternate meals, there are rules for each option. You may have a stricter policy for the older grades than the younger grades, such as cutting the older students off from getting an alternate meal. This is a district decision.
- As a reminder regarding alternate meals, if you decide to offer them free of charge and do not claim them, be sure to keep track of the number of alternate meals you serve throughout the year. Keep track of the food cost, labor, and other expenses as well. Make a transfer from Fund 10 or another non-federal fund to Fund 50 to cover the costs of these alternate meals.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).

Paid Lunch Equity (PLE)

Commendations

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

Technical Assistance/Compliance Reminders

- If Fund 50 has an excess cash balance greater than or equal to 3 months operating expenses at the end of the school year, you may apply for a PLE exemption.

Revenue from Nonprogram Foods

Commendations

The Food Service Director ran the DPI Nonprogram Food Calculator Tool. It is well done and shows that all nonprogram food costs are being covered by what the foods are priced at.

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at Oregon School District include: Adult Meals, A la Carte, Extra Entrees, Extra Milk, and Caterings.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

- Using the Child Nutrition Program Report from the 16-17 SY and the above USDA Nonprogram Food Revenue Tool, the SFA is adequately pricing out its nonprogram food prices. However, there are some items that could be priced higher than what they are being priced at now. Oregon School District is in compliance with the USDA Nonprogram Revenue Tool.

Adult Meals

Findings and Corrective Action Needed:

- ❑ **Finding #1:** The student lunch price for the sub sandwich/salad bar line at the High School is higher than the other lunch lines. Since this is higher than the other lunch lines, the adults must pay a higher price as well, \$0.65 more than the highest student lunch price to be exact. Currently, the highest student lunch price is \$3.30 and the Adult Meal Price on the contract is \$3.90.

Corrective Action Needed: Update the contract and submit for approval or submit a statement in writing as to how you will handle the Adult meals at the sub sandwich/salad bar line. You can either add another button on the POS screen to include the higher adult meal, or you can update the adult lunch price on the contract to be the highest price, \$3.95.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed at the beginning of the school year for all staff involved with the School Nutrition Programs and eligibility statuses. The PI 1441 form was completed correctly and done prior to the October 31 deadline.

Technical Assistance/Compliance Reminders

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered. The poster must be placed in a location that enables program participants to read the text of the poster without obstruction.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals and their eligibility statuses are visible on the computer screen that can be seen by staff, substitute cashiers, students, and anyone walking by which constitutes overt identification.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Students’ meal prices and meal eligibility statuses as color circles were viewable on the point of sale screen. This is a form of overt identification and is unallowable.

Corrective Action Needed: There are two options to choose from to complete this corrective action.

- A. Configure the software to not show the student meal prices (or have the generic lunch price listed) or colored circles on the point of sale screen.
- B. Install a privacy screen at each cash register in the district to prevent any person besides the cashier to see the point of sale screen.

Submit a statement in writing to explain how you will prevent overt identification at the point of sale.

- ❑ **Finding #2:** The And Justice for All posters were posted in the service area of the high school which is gated off when meal service is not occurring. Since this is not open every hour of the day, one of the posters needs to be moved to a public space such as the cafeteria or adjacent hallway.

Corrective Action Needed: Post the poster in the cafeteria on the bulletin board or on the wall. Submit a statement in writing this was completed.

On-site Monitoring

Technical Assistance /Compliance Reminders

- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our Administrative Review webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>). A minimum of 50 percent of the schools operating the SBP under the SFA's jurisdiction must be monitored at least once every two years. Be sure to complete the SBP on-site monitoring forms by February 1.

Local Wellness Policy

Commendations

The SFA does have a Wellness Policy in place. It was last updated in 2017 and it is available on the school website. The SFA has a LWP which contains the required elements—nice job! It indicates the 'owner' of the policy as the Director of Community Education and it includes a diverse group of stakeholders, including: parents, students, community members and district staff members. The policy indicates that the committee meets twice per year and the minutes from the most recent meeting in May of 2017, with attendees' names, were available. Meeting minutes will be available on the website when the website is complete. The district is working on updating and revising their webpages.

Technical Assistance: Local Wellness Policy

The final USDA rule requires triennial assessments of the LWP: how the LWP compares to model policies, district compliance with its own policy and progress made in attaining district goals. The first of these assessments is to be completed by June 30, 2020. The following is technical assistance regarding that.

SFA is required to complete an assessment of the LWP (1005)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance

with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

SFA required to inform the public of the results of the most recent assessment (1006)

Technical Assistance for 1006, if do have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

Since this district received the HUSSC award in 2017 for all review sites they are exempt from the Smart Snacks section of this review. However, we noted that 16 fl oz low-fat chocolate milk chugs are being sold at Oregon High School. The maximum allowable serving size for milk for grades 9-12 is 12 fl oz, which is outlined in the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) document (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf). Therefore, the milk chugs are noncompliant under the Smart Snacks regulation and their sale should be discontinued.

- *Note: Oregon School District has received an exemption to serve 1% chocolate milk, which applies to the School Breakfast Program, National School Lunch Program and as a competitive food sold to students during the school day. However, the a la carte milk must still comply with the size requirements outlined in the Smart Snacks regulations.*

All items sold to students on the school campus, during the school day should be analyzed to ensure compliance with Smart Snacks. We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Recipes that are prepared in-house and sold a la carte must first be analyzed to determine the calories, total fat, saturated fat, trans fat, sodium and sugar per serving before the Smart Snacks Product

Calculator can be used. This should be done for the trail mix, cookies, rice crispy bars, yogurt parfait, cookie bars, etc. (however, as the rice crispy bar is made with enriched cereal, it would not be compliant).

Professional Standards

Commendations

The Food Service Director is doing a wonderful job making sure staff are getting their required training hours at the beginning of the school year, that pertain to their job duties. The SFA has an organized tracking tool for professional standards.

Findings and Corrective Action Needed:

- **Finding #1:** Tracking tool used for tracking training does not contain all of the required elements. The current tracker is missing the date of hire for each employee along with the date that the training occurred.

Corrective Action Needed: It is required that the tool contain, at a minimum, the following fields: employee name, date of hire, employee category or position, hours worked per week, training title/subject, date of training and the length of the training.

The current tracker is missing: the *date of hire* for each employee along with the *date that the training occurred*. These need to be added to the tracker. **Please submit a screen shot of the corrected tracker.**

Food Safety, Storage and Buy American

Commendations

The Food Safety manuals for both review sites were available for review. They are updated annually. The temperature logs for the dish machine, coolers and freezers were also well documented and well organized.

Technical Assistance/Compliance Reminders

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.

- If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and Buy American monitoring procedures.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).
- **Label does not identify country of origin:**
In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the notes above for sample certification language. Work with your distributor/supplier to move toward compliance.

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #1:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
 - Black olives from Spain
 - Pineapple tidbits from Thailand
 - Broccoli from Mexico
 - Cucumbers from Mexico
 - Green beans from Canada

Corrective Action: The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a [Noncompliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-) for tracking nondomestic products

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-

list.docx). **Submit a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas to the Public Health Nutritionist.**

Findings and Corrective Action Needed: Food Safety

- **Finding #1:** Temperature logs were not completed at either review site (Rome Corners or the High School) for the milk coolers or air screen coolers. All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Corrective Action Needed: Submit one week of completed temperature logs, for both review sites, for all milk and air screen coolers.

- **Finding #2:** Uncategorized menu items into Process 1, 2, and 3.

Corrective Action Needed: Each, site-specific food safety plan needs categorized menu items. Categorize menu items by Process 1, 2, or 3 in each location's food safety manual. This was corrected on site, **no further action required.**

- **Finding #3:** Standard operating procedures (SOPs) are not site-specific.

Corrective Action Needed: Remove, adapt or create SOPs to reflect *site-specific* procedures—particularly referring to breakfast service at the high school and lunch service at Rome Corners. At both sites, food is removed from temperature control for service. This requires a site specific SOP for the use of **Time as a Public Health Control**. Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. This procedure applies to food that begins the 4 hour period at temperatures of 41°F or colder or 135°F or warmer. If time is used as a public health control, all food must be labeled or otherwise recorded to identify the time when the food must be discarded. The amount of time from the point the food was removed from cold/hot holding may not exceed 4 hours. If food is taken out prior to cooking, time starts when it is removed from refrigeration and the food must be cooked and served within 4 hours. Product remaining out after 4 hours must be discarded and cannot be used for any other purpose. Check with your local sanitarian for the exact SOP requirement. **Submit updated SOPs for Rome Corners and the High School to assigned DPI Nutrition Program Consultant via email.**

- **Finding #4:** The most recent food safety inspection report is not posted in a publicly visible location at the high school.

Corrective Action Needed: Post the most recent food safety inspection report in location visible to public, either in the cafeteria or in the High School office. **Submit a statement in writing this has been completed.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

- All documents pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Oregon School District, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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