

# Administrative Review Report

Gresham School District

## Review Schedule:

Schedule Type	Start Date	End Date
On-Site Review	03/29/2023	03/30/2023

## Commendations:

Our sincere thanks to the administration and school nutrition professionals of Gresham School District. We appreciate your time and efforts spent preparing for and participating in the administrative review process. Thank you for being available during the on-site portion of the review and helping us to gather the needed documentation and information. Thank you for serving healthy, nutritious meals to your students! Your quick responses to actions needed were greatly appreciated!

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

## Recommendations:

For information on the USDA Child Nutrition Programs, visit the [DPI School Nutrition webpage](#). For in depth technical assistance, including program links see the 2022-23 General Program Reminders which has been uploaded to the documents tab in SNACS.

Our annual School Nutrition Summer Training will return in the Summer of 2023. Information and registration will be posted in Spring 2023. There will be in-person at several locations around the state and virtually through live, instructor-led online courses. Please see our School Nutrition Summer Training webpage to learn more (<https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training>).

## Findings and Corrective Action:

<b>Form Name</b>	Meal Counting and Claiming (300 - 311)
<b>Question #</b>	305
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	Finding: Unpaid Meal Charge Policy cannot say students "may" be permitted to accumulate negative food service balance. May is too ambiguous and may result in a civil rights violation. CA: Please update the policy to remove ambiguous language.
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)
<b>Question #</b>	700
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	Finding 1: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19). CA 1: Review the Annual Financial Report webcast or manual on the DPI website then update the 2021-22 Annual Financial Report with revenues and expenses broken out by program and category. Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The DPI accountant will make any adjustments after December 31.
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)
<b>Question #</b>	709
<b>Corrective Action Status</b>	Flagged

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Corrective Action History	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool. (7 CFR 210.14).</p> <p>CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website (<a href="https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html">https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story.html</a>).</p> <p>CA 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
Form Name	Indirect Costs (712)
Question #	712
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: Indirect costs are being charged to the nonprofit school food service account, which is unallowable in Wisconsin (Administrative Assistant.) CA: All costs charged to the nonprofit school food service account must be made into direct costs. Please complete a week of time study for allocation of Administrative Assistant's labor that is charged to food service,</p>
Form Name	Civil Rights (800 - 807)
Question #	803
Corrective Action History	<p>Findings: The SFA does not have adequate procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).</p> <p>CA: Provide a timeline for when a school meal program civil rights complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance. <a href="#">Template Civil Rights Complaint Procedures</a></p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	128
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The correct income conversation factors were not used when determining meal eligibility on free and reduced price meal applications. Applications with one income frequency were annualized.</p> <p>CA: Review the Income Conversions section of the Eligibility Manual (pg 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.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	138
Corrective Action Status	CAP Submitted
Corrective Action History	<p>Finding: The Benefit Issuance (BI) list did not accurately discontinue meal eligibility benefits for students that did not qualify after the 30 day carryover. CA 1. Notify the household of the reduction in benefits and upload a copy of the adverse action letter into SNACS. CA 2. Provide documentation that shows the BI list and POS have been updated with the correct eligibility 10 days after the notification is sent.</p>
Form Name	Verification (207 - 215)
Question #	208
Corrective Action Status	CAP Submitted

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Corrective Action History	Finding: SFA did not complete a confirmation review before verifying application(s). CA: Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.
Form Name	Civil Rights (809 - 810)
Question #	810
Corrective Action Status	CAP Submitted
Corrective Action History	Finding: The correct non-discrimination statement was not included on all program materials. CA: Update program materials to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.
Form Name	Reporting and Recordkeeping (1500 - 1501)
Question #	1501
Corrective Action Status	CAP Accepted
Corrective Action History	Finding: SFA is not maintaining program records and documentation for three years plus the current school year (7 CFR 210.23(c)). Specifically documentation for equipment purchases. CA: Provide a statement of how the record retention requirements will be met moving forward.
Site Name	Gresham High School
Form Name	Meal Components and Quantities - Day of Review (400-408)
Question #	404
Corrective Action History	Finding: Signage was not posted at breakfast or lunch 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 ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage</a> ). Corrective Action: Submit a picture of completed signage posted near the lunch and breakfast service line. Signage was printed and posted during onsite review. No further action required.
Site Name	Gresham High School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	410
Corrective Action Status	Flagged
Corrective Action History	Finding: There was a daily fruit shortage at lunch for the following age/grade groups and days during the week of review: For K-8 (minimum of 1/2 cup required daily) 2/7: 1 clementine credits as 3/8 cup

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	<p>For 9-12 (minimum of 1 cup required daily) 2/6: 1/2 cup grapes 2/7: 1/2 cup grapes, half an orange credits as 1/4 cup (3/4 cup total) 2/8: 1/2 cup grapes, half an orange credits as 1/4 cup (3/4 cup total) Corrective Action: Describe specifically how the daily minimum requirement for fruit will be met at lunch for each grade group during the day(s) containing the shortage (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). In addition, as staff decide and prep fruit the day of meal service, detail what education will be provided to educate staff on daily meal pattern requirements for each of the age groups, K-8 and 9-12.</p>
Site Name	Gresham High School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	431
Corrective Action Status	Flagged
Corrective Action History	<p>Production records are intended to be useful tools to record information prior to production, during production and following production. It communicates the plan of the day and how the plan was executed. As a communication tool, it is beneficial to have "all hands-on deck" to understand and complete production records. All staff members should have access to this document to know which recipes are being used, which items are being served, and what portion sizes are planned for the day. Production records should also be completed for the appropriate age/grade groups. For Gresham High School (6-12), this could be a K-8 meal pattern and a 9-12 meal pattern. For improved forecasting, consider taking a hot lunch count in the morning prior to meal service or track popularity of menu items on the monthly menu so it's quicker to pull and review. The more detailed the production record, the clearer the plan for the day will be. For example, menu items such as "breakfast sandwich" or "choice of cereal" or "juice selection" should include recipe numbers, variety recipes, or have the options listed, i.e. "apple juice" "orange juice." Staff are recorded information about amounts prepared often by guestimate on scratch paper before transferring information to the production record. This occasionally leads to information missing from the production record, or inaccurate information about actual amount prepared. In addition, the fruit and vegetable production record, though it had planned serving sizes on it, staff were unsure about how much of the sliced cucumbers or baby carrots equaled a 1/4 cup or 1/2 cup serving as the production record stated to serve them with tongs which is not a volume measurement. There was also confusion about volume versus weight for vegetables served on the vegetable bar. An example was with the pre-portioned cauliflower packages (2 oz by weight) which staff thought were only a 1/4 cup serving; however, these were 1/2 cup portions.</p> <p>Finding: Although all meal components were present during onsite review at each meal, how to interpret production records and fill them out and understanding the different between weight versus volume are not fully understood by all staff. Corrective Action: Have all staff review the DPI webcast, "Production Records" (<a href="https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html">https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html</a>) and "What's the Scoop on Portion Control?" (<a href="https://media.dpi.wi.gov/school-nutrition/portion-control/index.html#/">https://media.dpi.wi.gov/school-nutrition/portion-control/index.html#/</a>). Please upload certificates of completion for staff members who viewed the webinar.</p>

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Site Name	Gresham High School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	435
Corrective Action Status	Flagged
Corrective Action History	<p>Creating and reviewing standardized recipes are an on-going process. FSMC corporate recipes are quantity recipes that need to be revised and updated as requirements and ingredients change. A standardized recipe should be available for all food items prepared that contain two or more ingredients. A recipe should even be created for bread and butter as it contains more than one ingredient. Remember to use the Food Buying Guide , CN labels, or USDA Foods nutrition information sheets for crediting information. Recording total volume/yield on recipes provides the documentation to show how planned portion sizes contribute to meal pattern requirements. Steps for creating standardized recipes can be found at <a href="http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ra_stand.pdf">http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ra_stand.pdf</a></p> <p>Finding: While there is a buttered noodles recipe on file with the food service management company, it was not being followed, nor had it been standardized to the production kitchen. The recipe called for 7 lb whole grain penne, 12 oz butter blend, 16 oz grated parmesan cheese, and 2 tablespoons of parsley flakes to make 200 quarter cup servings. Instead, the staff member prepared what she estimated to be 10 lb of rotini pasta and 4 oz of butter blend. This amount was believed to prepare 200 - 1/2 cup servings; however, the yield is an estimate. It is important that standardized recipes detail exactly how a menu item is made so, that if there is a substitute cook, the cook can easily step-in and replicate the menu item. Accurate recipes are also important to credit the recipe towards meal pattern requirements and to calculate dietary specifications, such as calories, fat, and sodium.</p> <p>Corrective Action: Submit a standardized recipe for the buttered noodles. 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 (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a>).</p>
Site Name	Gresham High School
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)
Question #	437
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The weekly minimum requirement for the beans/peas/legumes vegetable subgroup was not met for the K-8 meal pattern during the review period. The following represent the planned portion sizes: Thursday 2/9: Chickpeas - 1/4 cup. The weekly minimum requirement for the beans/peas/legumes vegetable subgroup is 1/2 cup.</p> <p>Corrective Action: Describe specifically how the weekly minimum requirement for the beans/peas/legumes vegetable subgroup will be met at lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.).</p>
Site Name	Gresham High School
Form Name	Smart Snacks (1104 - 1107)
Question #	1105

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TA Log #	No TA Log# found
Corrective Action History	<p>Finding: Competitive foods sold during the school day as defined as midnight until 30 minutes after the school day are subject to smart snacks regulations. The last bell of the school day is 3:21pm and there are two vending machines in the K4-12 building cafeteria that are turned on every day at 3:30pm and thus subject to Smart Snacks regulations. Currently, the items (20 fl oz regular soda, 12 fl oz Gatorade) do not meet Smart Snacks standards for beverages. These vending machines either need to be turned on no earlier than 3:51pm, or change their contents to meet Smart Snacks standards (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>).</p> <p>Corrective Action: State what will be done with this product to comply with the Smart Snack regulations. If products are to be swapped out, please submit smart snacks calculator printouts for items to be sold in the vending machines (<a href="https://foodplanner.healthiergeneration.org/calculator/">https://foodplanner.healthiergeneration.org/calculator/</a>).</p>
Site Name	Gresham High School
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action Status	Flagged
Corrective Action History	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and not documented:</p> <p>Roma sliced ripe olives - Product of Portugal</p> <p>Peak Produce Peppers - Product of Mexico</p> <p>Corrective Action: Update and submit your Noncompliant Product List Form with the non-domestic products listed above. Information added to list during onsite review. No further action required.</p>

## Technical Assistance Entries:

Comments
<p>Menu planners may offer similar menus to children in age/grade groups 6-8 and 9-12. The breakfast food portions for all age/grade groups overlap, so a menu planner may offer the same food quantities to all children in SBP provided that the meal meets the requirements of each grade group. There is some overlap between the grade groups in lunch; however, there are calorie differences between the 6-8 and 9-12 grade groups. One of the most straightforward ways to ease lunch menu planning for grades 6-8 and 9-12 within one school is to start with the components that overlap and make minor adjustments to the vegetables or fruits components to increase calories for students in grades 9-12. Schools must post signage at or near the beginning of the serving line to assist students in selecting appropriate quantities. For instance, a sign may read, "8th graders: 1 fruit choice, 9th graders: 2 fruit choices." Another option is to vary the grain or meats/meat alternates components (e.g., older students take a second piece of bread or cheese). This strategy relies more heavily on student education and signage but provides more flexibility for menu planners seeking to offer more or less than 2 oz. eq. of grains or meats/meat alternates daily.</p>

## Special Dietary Needs

- The USDA requires that schools participating in the National School Lunch Program and accepting federal dollars must accommodate all special dietary requests signed by a state authorized medical authority, written in an IEP and/or a 504 plan.
- Policy Requirements-** At a minimum School Food Authorities (SFAs) participating in the USDA Child Nutrition Programs must have procedural safeguards for meal accommodations that provide notice and information to parents and guardians regarding how to request a meal accommodation and their right to file a grievance and participate in the grievance process. However, we highly recommend School Districts develop a written meal accommodation policy to ensure clear communication, consistent decisions, and reduce the likelihood of receiving complaints of discrimination.

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The School Nutrition Team has created a [Special Dietary Needs Policy template](#) which can be modified to fit the needs of your school or district. If your district already has a policy in place, we recommend comparing it to this policy to ensure your policy includes all important information.

- **Medical Statement** - It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website. This template is available in English, Spanish, and Hmong. At a minimum the statement must include:
  1. an explanation of how the child's physical or mental impairment restricts the child's diet
  2. the food(s) to be avoided
  3. the food or choice of foods that must be substituted
  4. The statement must be signed by a state authorized medical practitioner, which is a health care provider that can write a prescription in the state of WI.
- A signed medical statement from a state authorized medical authority does not need to meet meal pattern requirements provided the statement supports food substitutions made outside of the meal pattern requirements.
- SFAs may choose to accommodate special dietary requests without a signed medical statement from a state authorized medical authority. These accommodations must meet the USDA meal pattern requirements and/or fall within offer vs. serve. for the meals to be reimbursable. If an accommodation without a medical statement is made, then all requests for meal accommodations must be met to ensure civil rights compliance.
- SFAs may offer students a fluid milk substitute that is nutritionally equivalent to cow's milk with a request from a parent or guardian. SFAs must get pre-approval from the DPI School Nutrition Team by completing the [Fluid Milk Substitute Approval Form](#). A [List of Allowable Fluid Milk Substitutes](#) is provided on the Special Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements.
- Resources - The [Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The [USDA Q&A on Accommodating Special Dietary Needs resource](#), the [USDA Special Dietary Needs Handbook](#), and [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs \(Non-Disability\)](#) contain additional detailed information.

## **Certification and Benefit Issuance**

- When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) (IEG) one would look at the amount of their income under the column indicating that stated frequency.
- Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may be processed at face value.
- However, households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, e.g., weekly, biweekly, bimonthly, or monthly.

## **Public Release**

All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to:

- Local news media
- Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.))
- Local employment office
- Major employers contemplating or experiencing large layoffs

SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

## **Non-discrimination Statement (NDS)**

- When including the [non-discrimination statement](#) on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current **full** official statement. The full non-discrimination



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statement was revised by the USDA in 2022. The abbreviated statement remains the same.

- The abbreviated statement, “**This institution is an equal opportunity provider**”, is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document’s main text. Statement words and formatting cannot be altered.
- Additional languages are found on the [USDA FNS Non-discrimination](#) webpage.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (**including gender identity and sexual orientation**), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA’s TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant’s name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

## 1. mail:

U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or

## 2. fax:

(833) 256-1665 or (202) 690-7442; or

## 3. email:

[program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

## Processes for Complaints

- Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the [Template Civil Rights Complaint Procedures](#) to create written procedures.
- An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file.
- If a complaint of discrimination is received at your district, the following procedures should be followed:
  1. Document the complaint using the [USDA Program Discrimination Complaint Form \(Espanol\)](#).
  2. Submit complaints within five days of receiving the complaint to:
 

Wisconsin Department of Public Instruction (DPI)

    - Mail:
 

Director, School Nutrition Team  
125 S. Webster Street  
Madison, WI 53707-7841
    - Fax: (608) 267-0363



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- Email: [jessica.sharkus@dpi.wi.gov](mailto:jessica.sharkus@dpi.wi.gov)
- 3. Maintain a [Civil Rights complaint log](#) at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.

## Annual Financial Report (AFR)

- The [Annual Financial Report Manual](#) is located on the DPI website to assist you with completing the AFR.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance.
- The school food service fund may not have an ending fund balance more than three-month operating expenses, as this is considered “Excess Cash Balance”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.
- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - ‘Other’ is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA’s capitalization threshold), etc.
  - ‘Food’ is expenses for edible food items and beverages.
  - ‘Equipment’ is expenses for equipment purchases over \$5000 or your SFA’s capitalization threshold.
  - ‘Purchased Services’ is for services you pay someone to provide such as equipment repair, health inspections, etc.
  - ‘Nonprogram Foods’ is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.
  - When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

## Equipment

Equipment purchased with funds from the nonprofit school food service account with a cost that exceeds the School Food Authority’s (SFA’s) capitalization threshold (or \$5,000, whichever is less), you will need to receive **prior approval**.

1. Review the [Equipment Preapproval List](#). If the equipment purchase is listed, no further action is needed. If the equipment purchase is **not** on this list, the PI-6206 form must be completed.
2. [Complete a Equipment Preapproval Request Form \(PI-6206\) \(Instructions\)](#)