

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

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**School Food Authority:** Hope Christian Schools, Inc.: Semper

**Agency Code:** 40-1656

**School(s) Reviewed:** Hope Christian Schools, Inc.: Semper

**Review Date(s):** 12/12/18

**Date of Exit Conference:** 12/12/18

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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.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](https://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- All School Food Authorities participating in the National School Lunch Program are eligible to apply for the [USDA NSLP Equipment Grant](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) (https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant). Two pieces of equipment can be requested per SFA. Priority for this grant will be given to schools that have 50 percent or higher free and reduced-price meal eligibility and have not previously received an equipment grant. Requested equipment must cost more than your SFA's established capitalization threshold or \$5,000, whichever is less. New this year, Congress has specified that the threshold for the purchase of each piece of equipment cannot be lower than \$1,000. The application period will be open from October 16, 2018 to December 21, 2018.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Hope Christian Schools, Inc.: Semper for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. The Food Service Director, on-site Manager, and food service staff were very receptive to recommendations and guidance. All staff are doing a fantastic job with encouraging students to take a breakfast and a lunch during the school day.

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. This has allowed us to expedite the review process and use more time to offer our technical assistance.

The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations. The staff is doing a wonderful job implementing the program regulations to ensure students are receiving nutritious meals throughout the school day.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The SFA operates CEP SFA-wide. No issues at this time.

#### Meal Counting and Claiming

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Visiting students may be claimed as long as they are school age students and have taken a reimbursable meal. Document the number of reimbursable visiting student meals you have each month on your Edit Check form to ensure you are not over claiming.
- The NSLP claim for the review period was well done with no errors.
- The SBP – SN claim for the review period resulted in an underclaim. Be sure to count all check off marks on the POS sheets and consolidate the counts in an excel spreadsheet.

### 2. MEAL PATTERN AND NUTRITIONAL QUALITY

#### Commendations

Thank you to the staff at Hope Christian School: Semper for your cooperation during the administrative review. Thank you for supplying the requested documentation in a timely manner.

#### Comments/Technical Assistance/Compliance Reminders

##### **Production Records**

The November menu stated that graham crackers were served for a few meals during the week of review (November 26-30th), however, production records did not list graham crackers. Production records are the proof that reimbursable meals were served to students. If a food was not listed on production records then it cannot be assumed that it was served. Be sure to include all foods included in the meal on production records.

Remind staff at the school to check production records and foods received for completeness. Even though a vendor prepares your foods, Hope Christian School: Semper is ultimately responsible for ensuring students are receiving reimbursable meals. If staff notice any discrepancy between the food received and the production records, it should be brought to vendor's attention to ensure the correct foods in the correct amounts are being served.

Please refer to the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) for a list of all mandatory items that must be listed and filled in on production records (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf).

## Crediting Documentation

The CN label for the french toast sticks indicated a different grain contribution (1 oz eq grain) compared to what the vendor was crediting it for (1.5 oz eq grain). After discussing with the vendor, it was noted that the CN label was updated by the manufacturer but the vendor did not notice the change. For this reason crediting documentation should be updated at least twice per year and as new products are purchased or substituted. Since the french toast sticks only credited as 1 oz eq grain, and not 1.5 oz eq grain, this led to a weekly grain shortage.

## Offer vs Serve

Offer versus Serve (OVS) is not being properly implemented. Students are given a pre-plated tray with all the components, except the milk. The students are not able to select three components and decline two components of their choosing. Instead, students are given the pre-plated tray and are only able to decline the milk (however, reviewers did observe some teachers telling students to select a milk). As a reminder, OVS is intended to give students choice in what they want to eat. When students are able to choose their foods, there is usually less food waste.

When this was discussed with the food service director, she noted that students could ask for a separate tray with only the items they want on it. However, reviewers did not see this happen. Under Offer vs. Serve, it is not required for students to select a milk, nor do they have to take all the components. Students should be allowed to decline up to two full components and still have a reimbursable meal, as long as they have 3 full components on their tray, including a ½ cup fruit or vegetable.

## CACFP

Preschool students are allowed to be served the K-8 menu if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a child is in preschool or K-8. Hope Christian School: Semper is using the co-mingling flexibility. Additional training and resources can be found on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

## School Breakfast Challenge

Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement. **Deadline to apply for the grants is December 14, 2018.**

Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details. Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

You may also use this [School Breakfast brochure](#) to share the benefits of breakfast with parents ([https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/\\_files/brochure-get-school-breakfast.pdf](https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/_files/brochure-get-school-breakfast.pdf)).

Additionally, refer to the [Serving Up a Successful School Breakfast Program Toolkit](#) to find information on the different service models (starting on pg. 11) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>). Offering breakfast during the school day (as opposed to before the school day begins) allows for more students to participate.

### **Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality**

**❑ Finding:** Weekly Grain shortage. The vendor was crediting the french toast sticks as 1.5 oz eq grain, however the CN label indicates that it only provides 1 oz eq grain per serving. Additionally, the menu states that a graham cracker was served with this meal; however, production records do not list graham crackers. If it is not included on the production records, it cannot be assumed that it was served.

**Corrective Action Needed:** Submit a statement that explains what will be done to fix this weekly grain shortage.

**❑ Finding:** OVS not implemented properly during lunch service. Lunch trays were being pre-plated.

**Corrective Action Needed:** Provide a written statement on how the school will ensure that OVS is implemented properly, or indicate if the school will decide to switch to the Serve method. Include a timeline for making these changes.

*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.*

## **3. RESOURCE MANAGEMENT**

### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

#### **Nonprofit School Food Service Account**

- There were not any labor or food expenditures allocated for Nonprogram foods on the 17-18 SY Annual Financial Report.
- Students are allowed to take a non-reimbursable meal. These are being tracked during this school year, but were not being tracked prior. Non-reimbursable meals are not an allowable cost to the Nonprofit School Food Service Account.

- Calculate the average raw food cost + labor mark up for each item that a student may take. The SFA needs to make a transfer from the school's General Fund to the Nonprofit School Food Service Account to cover the cost of the non-reimbursable meals.
- The SFA has been operating at a deficit and makes a transfer in to the Nonprofit School Food Service annually to cover the Child Nutrition Programs.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

##### Public Release

- The SFA publishes the Public Release in a local paper and also posts it at local libraries. Great job!

##### Local Wellness Policy

##### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

##### Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).

- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

#### Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

#### **Findings and Corrective Action Needed: Local Wellness Policy**

- ❑ **Finding:** The Local Wellness Policy does not list specific measurable goals.

**Corrective Action Required:** Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf). **Submit a statement in writing as to when you plan to have the policy updated with the measurable goals.**

#### **Smart Snacks in Schools**

##### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

At the time of the on-site review there were no competitive foods or beverages sold at Hope Christian School: Semper. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

#### **Professional Standards**

##### **Commendations/Comments/Technical Assistance (TA)/Compliance Reminders**

- Professional Standards training hours are being tracked annually on the DPI tracking form. The SFA is doing a great job updating the spreadsheet as trainings are occurring.

## Food Safety and Storage

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

#### Food Safety Plans

- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

#### Findings and Corrective Action Needed:

- ❑ **Finding:** The Food Safety Manual was missing an SOP for Milk Bags that are used at breakfast.

**Corrective Action Needed:** Adapt a copy of the Milk Bag SOP from the Food Safety website. Submit a copy of the updated SOP to the Consultant. **Corrected on-site. No further action required.**

#### Buy American

The vendor maintains a google doc that contains all the non-compliant product information sheets for non-domestic products. This is shared with the schools. Thank you and keep up the good work!

## Reporting and Recordkeeping

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

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

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for notifying households at the beginning of the school year of the availability of breakfast and throughout the school year through newsletters. Breakfast participation is high due to the great access the students have in the morning at multiple service locations in the building prior to class. Students are able to take a breakfast as they enter the building which really increases participation. Keep up the great work!
- Thank you for sending out a flyer regarding the Summer Food Service Program to households towards the end of the school year. This is a fantastic way to make sure students and families know where they can get free meals during the summer. Great work!

## 5. COMMUNITY ELIGIBILITY PROVISION (CEP)

### Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- It is necessary to maintain all certification documents supporting participation in CEP. REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2021 - 2022 SY for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).

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 student 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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