# Administrative Review Report

Glendale River Hills School District

#### Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/01/2022	01/03/2023
On-Site Review	01/10/2023	01/11/2023
Site Selection Worksheet	12/01/2022	12/02/2022
Entrance Conference	01/10/2023	01/10/2023
Exit Conference	01/11/2023	01/11/2023

#### Commendations:

Our sincere thanks to the administration and school nutrition staff of Glendale River Hills School District. We appreciate your time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the onsite portion of the review and helping the DPI review team to gather the needed documentation and information. Thank you for what you do for kids!

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.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) offers several types of trainings to cover most areas of the school nutrition programs. In addition, the SNT offers school nutrition summer training online and in various locations around the state. Find more information on these training opportunities on the DPI School Nutrition Training webpage (<a href="https://dpi.wi.gov/school-nutrition/training">https://dpi.wi.gov/school-nutrition/training</a>).

# Administrative Review Report

## Glendale River Hills School District

#### Findings and Corrective Action:

Site Name					
Form Name	Certification and Benefit Issuance (100 - 121)				
Question #	101	101			
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	CAP Submitted				
	Flagged	Finding: Online contract does not list correct determining official.			
Corrective Action History	01/10/2023 09:39 PM	CA: Update online contract with correct name of determining official.			
	CAP Submitted	Updated Contract and submitted			
au 11	01/31/2023 12:11 PM				
Site Name					
Form Name	Certification and Benefit Issuance (100	0 - 121)			
Question #	102				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged	Finding: SFA not providing the meal application FAQs along with application and instructions			
Corrective Action history	01/10/2023 10:02 PM	CA: Upload FAQs to website along with application and instructions and ensure available with paper applications. Upload screenshot of document on website.			
Site Name					
Form Name	Verification (200 - 204)				
Question #	201				
TA Log#	TA Log# exists				
Due Date					
Corrective Action Status	CAP Submitted				
	Flagged	<b>Finding:</b> The Online contact does not have the correct person listed as the Verifying Official. The Verifying Official is the person who completes the verification process for the SFA.			
	01/10/2023 09:40 PM	CA: Update the contract to accurately reflect who the Verifying Official is. Notify the Nutrition			
Corrective Action History		Program Consultant once completed.			
	CAP Submitted	Contract updated and submitted			
Cita Nama	01/31/2023 12:43 PM				
Site Name Form Name	Verification (200 - 204)				
Question #	202				
TA Log #	No TA Log# found				
Due Date	TA EOG# TOURIN				
Corrective Action Status	CAP Submitted				
- Control Chomotatus		Finding: The Online contact does not have the correct person listed as the Confirming Official.			
Corrective Action History	Flagged 01/10/2023 09:40 PM	The confirming official reviews each application selected for verification to ensure the initial determination was accurate. This must be done by an individual other than the one who made the initial determination.			
		CA: Update the contract to accurately reflect who the Confirming Official is. Notify the Nutrition Program Consultant once completed.			

# Administrative Review Report

	CAP Submitted	Updated and submitted
	01/31/2023 12:43 PM	
Site Name		
	Mark Counting and Chinains (200, 24	4)
Form Name	Meal Counting and Claiming (300 - 31	1)
Question #	305	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/11/2023 08:01 PM	Finding: The adult price listed in the online contract (\$4.70) is not what is programmed into POS (\$4.65).  CA: Correct contract or update POS. Upload screen shot of changed POS or contract to SNACS.
Site Name		
Form Name	Maintenance of Non-Profit School Foo	od Service Account (700 - 705)
Question #	700	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/09/2023 10:16 AM	Finding: 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: 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.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
	Flagged	Finding #1: The Public Release was not distributed to the required locations.
Corrective Action History	01/11/2023 12:49 PM	CA 1: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.  Finding #2: The Non-discrimination statement is not in the correct format.  CA 2: Submit a statement of understanding that the non-discrimination statement must be in the same format as the rest of the document and cannot be shrunk to fit on one page. Upload a sample of the updated form with the NDS in the correct format.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	

# Administrative Review Report

	- Gieriaale N	iver tills school district			
Corrective Action History	Flagged 01/09/2023 01:47 PM	Finding: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1).  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			
	CAP Submitted	representative that will ensure compliance.  Doc 3 Upload Posted to website for access to families			
	01/31/2023 12:34 PM	bod o opiobal i osted to website for access to families			
Cita Nama	01/31/2023 12.541 141				
Site Name					
Form Name	Civil Rights (800 - 807)				
Question #	805				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/11/2023 01:11 PM	Finding: All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10).  CA: Provide a detailed statement or policy indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement. See the SNT Special Dietary Needs example policy for assistance (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx).			
Site Name					
Form Name	Civil Rights (800 - 807)				
Question #	807	807			
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/11/2023 02:11 PM	Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.  CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.			
Site Name					
Form Name	Local School Wellness (1000 - 1006)				
Question #	1000				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/09/2023 01:42 PM	Finding: Current Local Wellness Policy (LWP) does not include all of the required content (insert missing content) (7 CFR 210.31).  CA: Provide updated or missing policy statement(s) and submit a timeline for bringing the LWP into compliance. Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
Site Name					
Form Name	Local School Wellness (1000 - 1006)				
Question #	1005				
TA Log #	No TA Log# found				
Due Date					

# Administrative Review Report

Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/09/2023 01:42 PM	Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.  CA: Complete the assessment of the Local Wellness Policy and notify the public of the results. Upload a copy of the Report Card that includes WellSAT scores into SNACs or provide a link to this document on the district website.
Site Name		
Form Name	School Breakfast and Summer Food Se	rvice Program Outreach (1600 - 1601)
Question #	1600	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/10/2023 10:31 PM	Finding: The SFA did not adequately inform households of the availability of the School Breakfast Program. At the beginning of the school year, and multiple times throughout the school year, the SFA must notify households of the availability of the School Breakfast Program (SBP) (7 CFR 210.12).  CA: Submit a statement describing how households will be informed of the availability of the SBP. Please include the method of communication and time frame for distributing breakfast promotion materials.
Site Name		
Form Name	School Breakfast and Summer Food Se	rvice Program Outreach (1600 - 1601)
Question #	1601	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/10/2023 10:31 PM	Finding: The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP).  CA: Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.
	CAP Submitted 01/31/2023 12:20 PM	Flyer will be posted on our website and will be posted in public buildings in the community like the Glendale City Hall and River Hills Village Hall, Library and both schools.
Site Name		
Form Name	Certification and Benefit Issuance (12	4 - 142)
Question #	126	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 01/10/2023 10:44 PM  CAP Submitted	211 free and reduced meal eligibility determinations were reviewed; 36errors were identified.  Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). POS software providing wrong benefit for DC "Z" code. Verify settings within POS software immediately. Check DC codes and eligibility in POS system with next DC download. See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.  CA: Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) in the POS and send the adverse action letter to the households by the date listed on SFA-1. Upload a copy of each adverse action letter to SNACS.  Doc #5 Upload
	01/31/2023 12:45 PM	

# Administrative Review Report

Site Name				
Form Name	Verification (207 - 215)			
Question#	209			
TA Log#	No TA Log# found			
Due Date	THO THE LOGIN TOURIU			
Corrective Action Status	Floggad			
Corrective Action Status	Flagged	Finding Application adopted for weiting to the property of the		
Corrective Action History	Flagged 01/11/2023 02:39 PM	Finding: Applications selected for verification were not verified correctly (7 CFR 245.6a).  CA: Have the verifying official watch the "Verification Process" webcast on the DPI website and upload a copy of the completed quiz into SNACS.		
Site Name				
Form Name	Verification (207 - 215)			
Question #	212	212		
TA Log#	No TA Log# found			
Due Date				
Corrective Action Status	CAP Submitted			
Corrective Action History	Flagged 01/11/2023 02:41 PM	Finding: The SFA did not meet the follow-up requirements when a household failed to respond to the request for verification (7 CFR 245.6a).  CA: Submit a statement of understanding that the SFA's verifying official must follow up with the household at least once before the verification process is complete.		
	CAP Submitted 01/31/2023 12:48 PM	Verifying Official, Karin Jamel, understands that when verification process is being completed, notification is sent out to family. If family does not respond, VO should reach out to family at least once to follow-up on information.		
Site Name				
Form Name	Meal Counting and Claiming (314 - 31	5)		
	314			
Question #	314			
Question# TA Log#	314 No TA Log# found			
TA Log#				
TA Log# Due Date	No TA Log# found	Finding: SFA is not following the current approved contract for meal accountability system at pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & amp; claim meals by eligibility, at end of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.  SFA understands importance of edit check report tying out to monthly claims of meal counts.		
TA Log # Due Date Corrective Action Status	No TA Log# found  CAP Submitted  Flagged  01/26/2023 03:34 PM	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log # Due Date Corrective Action Status	No TA Log# found  CAP Submitted  Flagged 01/26/2023 03:34 PM  CAP Submitted	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log #  Due Date  Corrective Action Status  Corrective Action History	No TA Log# found  CAP Submitted  Flagged 01/26/2023 03:34 PM  CAP Submitted	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log #  Due Date  Corrective Action Status  Corrective Action History  Site Name	No TA Log# found  CAP Submitted  Flagged  01/26/2023 03:34 PM  CAP Submitted  01/31/2023 12:46 PM	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log #  Due Date  Corrective Action Status  Corrective Action History  Site Name  Form Name	No TA Log# found  CAP Submitted  Flagged  01/26/2023 03:34 PM  CAP Submitted  01/31/2023 12:46 PM  Civil Rights (809 - 810)	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log #  Due Date  Corrective Action Status  Corrective Action History  Site Name  Form Name  Question #	No TA Log# found  CAP Submitted  Flagged  01/26/2023 03:34 PM  CAP Submitted  01/31/2023 12:46 PM  Civil Rights (809 - 810)	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & Description of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		
TA Log #  Due Date  Corrective Action Status  Corrective Action History  Site Name  Form Name  Question #  TA Log #	No TA Log# found  CAP Submitted  Flagged  01/26/2023 03:34 PM  CAP Submitted  01/31/2023 12:46 PM  Civil Rights (809 - 810)	pricing Alternate Agreement site (meal counts tallied on CEP count sheets and not counted by eligibility and families not charged.  CA 1: Correct the meal counting and claiming system to follow the approved Meal Accountability system in the contract and count & amp; claim meals by eligibility, at end of the service line.  CA 2: Watch Counting, Claiming and Point of Service Webcast. CA 3: Provide a statement of understanding regarding accurate counting and claiming.		

# Administrative Review Report

From Name Professional Standards (1220 - 1219)  Question # 1217  TA Log # No TA Log # Grown  Due Date Professional Standards (1220 - 1219)  Corrective Action Status Plagged  Corrective Action History  Thingsed Out 17,12023 12.14 PM Carticular History  Carticular History Professional damagnetis from the being maintained or tracked outdennession complainers with amount of anime requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional Profes		Gieridale N	iver milis School district		
Site Name  Professional Stunder's (1218 - 1227)  Coursetine At 1927  TA Lag # No TA Lag# found  2111 12223 12:14 PM  Professional Stunder's (1218 - 1227)  Finding Decumentation of school food service staff training is not being maintained or tracked to disconnectivate compliance with an amount raining requirements per 75-87 3 10.3.  Carrective Action Stuns  Finding Decumentation of school food service staff training is not being maintained or tracked to disconnectivate compliance with an amount raining requirements per 75-87 3 10.3.  Carrective Action History  From Name  Food Safety & Buy American (1400 - 1403)  Question # 1400  TA Lag # No TA Lag# found  Disconnective Action Stutus  Flagged  Flagged  Flagger The STA does not have an elevated fit to solve the professional stunders in the improvement per 75-87 10.3.  Flagged  Flagger The STA does not have a selevate shell for the solve plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled decrees, for compliance with Hazard Analysis (Flagger Coursel Phone (PHCCP). The food safety plan including the recalled courseless of the PHCP.  Generative Action Status  Carrective Action Status  Carrective Action Status  Carrective Action Status  Carrective Action Statu		Flagged	<b>Finding:</b> The correct non-discrimination statement was not included on all program materials.		
From Name Professional Standards (1220 - 1219)  Question # 1217  TA Log # No TA Log # Grown  Due Date Professional Standards (1220 - 1219)  Corrective Action Status Plagged  Corrective Action History  Thingsed Out 17,12023 12.14 PM Carticular History  Carticular History Professional damagnetis from the being maintained or tracked outdennession complainers with amount of anime requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional History Professional damagnetis requirements part 7 CFR 210.50.  Carticular History Professional Profes	Corrective Action History	01/11/2023 02:14 PM			
Question # 1217 TA Log # No TA Log # Ground    Flagged	Site Name				
To Log # No TA Log# found  Due Date  Corrective Action Status   Flagged    Floring Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with amount training roquiments per 7 CFR 210.30.  CA Include all training hours completed this chool year for each school food service employee onto the USDA or DPI professional standards training tracking tool and selected in complete the school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and selected in the SNACS.  Site Name   Food Safety & Buy American (1400 - 1403)    Question # 1400   1400    TA Log # On TA Log # found   Finding The SFA does not have a site specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Including the required elements, for consiliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan including the required elements, for consiliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan including the required elements, for other first programs (7 of 20.23.13).  Corrective Action History   Log and Control Points (HACCP) The food safety plan to be specific for each perticipating school in the SFA Add SOP for Paloging food from NS and Process 1.2 3 to all monitores. Ensure a copy is provided to safety plan to be specific for each perticipating school in the SFA add SOP for Paloging food from NS and Process 1.2 3 to all monitores. Ensure a copy is provided to safety plan to be specific for each perticipating school in the SFA Add SOP for Paloging	Form Name	Professional Standards (1210 - 1219)			
Corrective Action Status  Flagged  Gravetive Action Status  Flagged  Gravetive Action History  Corrective Action History  Flagged  Finding Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CTR 210.30.  CAL Include all trainings hours completed this school year for each school lood service employees onto the USDA or DPI professional standards training tracking tool and upload into SNACS.  Site Name  Food Safety & Bay American (1400 - 1403)  Question #  1400  TA Log #  Due Date  Finding The SFA does not have a site-specific food safety plan. Each school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan. Fach school within the SFA must have a written site specific food safety plan including the required elements for compliance with Hazard Amayor in Critical Control Polestia HACE(P). The food safety are bodied over any facility of the specific food safety plan including the required elements for one participating school in the SFA add SOP for granger (7 CFR 210.13).  Call Update the food safety plan to be specific food safety plan to be specific for each participating school in the SFA add SOP for granger (7 CFR 210.14).  Call Update the food safety plan to be specific for each participating school in the SFA add SOP for school and upload frequired elements into SAACS.  Call Update the food safety plan to be specific food safety plan to be specific for each participating school in the SFA add SOP for school and upload frequired eleme	Question #	1217			
Corrective Action Status   Flagged   Flindings Dacumentation of school food service staff training is not being maintained or tracked by Corrective Action History   Corrective Action History   Corrective Action History   Flagged   Flindings Dacumentation of school food service estaff training is not being maintained or tracked by Corrective Action History   Corrective Action History   Corrective Action History   Corrective Action History   Flagged   Flindings The SFA does not have a site-specific food safety plan Each school work for each participating school in the SFA must be active and active active active active active active Action History   Flagged   Flindings The SFA does not have a site-specific food safety plan Each school within the SFA must be active activ	TA Log#	No TA Log# found			
Flagged   Display   Flagged   Display   Flading   Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.   Call Fiddle all Training hours completed this school year for professional standards training tracking tool and upload into SNACS.   Site Name   Food Safety 6 Buy American (1400 - 1403)	Due Date				
Corrective Action History  02/11/2023 12:14 PM  25 Cal Include all training hours compliance with annual braining requirements per 7 CFR 210.30.  25 Cal Include all training hours compliated this school year for each broof food service enployee onto the USDA or CPI professional standards training tracking tool and upload into SNACS.  26 Can Name  26 Corrective Action Status  27 Corrective Action Status  28 Flagged  29 Corrective Action History  29 Corrective Action History  20 Corr	Corrective Action Status	Flagged			
CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.  Site Name  Form Name  Food Safety & Buy American (1400 - 1403)  Question #  1400  TA Log #  No TA Log # General  Flagged  Flagged  Flagged  Flagged  O1/10/2023 10:21 PM  Flagged  Finding: The SFA does not have a site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan. Each school within the SFA and SFA must have a written site-specific food safety plan. Each school within the SFA and SFA programs (PC FER 2013).  Corrective Action History  Corrective Action History  Glem Hills Mid  Glem Hills Mid  Meal Counting and Claiming: Day of Review (317-321)  318  TA Log #  TA Log # odds  CAP Submitted  Corrective Action History  Corrective Action Histo		Flagged			
Form Name Food Safety & Buy American (1400 - 1403)  Question # 1400  TA Log # No TA Log# found  Due Date  Corrective Action Status Flagged Flagged O1/10/2023 10:21 PM Flagged o1/10/2023 11:43 AM Fla	Corrective Action History	01/11/2023 12:14 PM	CA: Include all training hours completed this school year for each school food service employee		
Question #   1400	Site Name				
TA Log # No TA Log# found  Due Date  Corrective Action Status Flagged  Flagged O1/10/2023 10:21 PM Finding: The SFA does not have a site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (Pp.). The tood safety plan should cover any standard Analysis Critical Control Points (Pp.). The tood safety plan including the required elements, for compliance with Hazard Analysis Critical Control Points (Pp.). The tood safety plan including the required elements, for compliance with Hazard Analysis Critical Control Points (Pp.). The tood safety plan including the required elements, including the required elements, for compliance and programs (7 CFR 210.13).  Carective Action History  Flagged Form Name Meal Counting and Claiming - Day of Review (317-321)  Alog# exists  Carective Action Status  Cap Submitted  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7), Meal counts were not taken as the students with special needs received their reimbursable meal (Pracafasts).  Carective Action History  Corrective Action History  Cap Submitted  Cap Submitted (Caliming - Review Period (322-325)  Question #  Alog# exists	Form Name	Food Safety & Buy American (1400 - 1	403)		
Corrective Action Status  Flagged  Flagged  Finding: The SFA does not have a site-specific food safety plan. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Political Politica	Question#	1400			
Flagged O1/10/2023 10:21 PM Flagged O1/10/2023 11:43 AM Fl	TA Log#	No TA Log# found			
Flagged 01/10/2023 10:21 PM  Flagged 01/10/2023 10:21 PM  Finding: The SFA does not have a site specific food safety plan. Each school within the SFA must have a written site specific food safety plan. Each school within the SFA must have a written site specific food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).  CA: Update the food safety plan to be specific for each participating school in the SFA. Add SOP for shipping food from MS and Process 1-2:3 to all menu items. Ensure a copy is provided to each school and upload required elements into SNACS.  Site Name  Glen Hills Mid  Form Name  Meal Counting and Claiming - Day of Review (317-321)  Question #  TA Log #  TA Log # skists  CAP Submitted  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility of CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  CAR Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted  Glen Hills Mid  Form Name  Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log# exists	Due Date				
have a written site specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 20.1.3).  CA: Update the food safety plan to be specific for each participating school in the SFA. Add SOP for shipping food from MS and Process 12-3 to all menu litems. Ensure a copy is provided to each school and upload required elements into SNACS.  Site Name  Glen Hills Mid  Form Name  Meal Counting and Claiming - Day of Review (317-321)  Question #  TA Log #  TA Log # exists  TA Log # specific for each participating school in the SFA. Add SOP for shipping food from MS and Process 12-3 to all menu litems. Ensure a copy is provided to each school and upload required elements into SNACS.  Site Name  Carrective Action Status  CAP Submitted  Flagged  O1/11/2023 11:43 AM  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used through by a meal counts and corresponding edit check reports. Clean counts will be used through by a meal counts and corresponding edit check reports. Clean counts will be used through to perative operating them they claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted  O1/31/2023 12:51 PM  Site Name  Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log #  TA Log # svists	Corrective Action Status	Flagged			
Corrective Action History  Corrective Action His		Flagged			
for shipping food from MS and Process 1-2-3 to all menu items. Ensure a copy is provided to each school and upload required elements into SNACS.  Site Name  Glen Hills Mid  Form Name  Meal Counting and Claiming - Day of Review (317-321)  Question #  TA Log #  TA Log # Assists  CAP Submitted  O1/11/2023 11:43 AM  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  CAP Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted  O1/31/2023 12:51 PM  Glen Hills Mid  Form Name  Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log# exists  TA Log# exists	Corrective Action History	01/10/2023 10:21 PM	with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).		
Meal Counting and Claiming - Day of Review (317-321)   Question #			for shipping food from MS and Process 1-2-3 to all menu items. Ensure a copy is provided to		
Question # 318  TA Log # TA Log # exists  Due Date  Corrective Action Status	Site Name	Glen Hills Mid			
TA Log# TA Log# exists  Ta Log# exists  CaP Submitted  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  Carcective Action History  Carcective Action History  Cap Submitted  Cap Submitted Claims submitted through December to K. Jardaneh  Site Name  Meal Counting and Claiming - Review Period (322-325)  Question #  Ta Log# Ta Log# Action Status  Ta Log# exists	Form Name	Meal Counting and Claiming - Day of R	eview (317-321)		
Corrective Action Status  CAP Submitted  Flagged 01/11/2023 11:43 AM  Corrective Action History  Corrective Action History  CAP Submitted 01/31/2023 12:51 PM  Site Name  Glen Hills Mid  Meal Counting and Claiming - Review Period (322-325)  CAP Submitted 01/31/2023 12:51  CAL Corrective Action History  CAP Submitted 01/31/2023 12:51 PM  Site Name  Glen Hills Mid  Meal Counting and Claiming - Review Period (322-325)  TA Log #  TA Log #  TA Log #   TA Log #   CAP Submitted 1  CIaims submitted through December to K. Jardaneh 1  TA Log #   TA Log #   TA Log #   TA Log #   CAP Submitted 1  CAP Submitted 2  CAP Submit	Question #	318			
Corrective Action Status  CAP Submitted  Flagged 01/11/2023 11:43 AM  Flagged 01/11/2023 11:43 AM  CAP Corrective Action History  Corrective Action History  Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted  O1/31/2023 12:51 PM  Claims submitted through December to K. Jardaneh  Form Name  Meal Counting and Claiming - Review Period (322-325)  Question #  TALog#  TALog# exists	TA Log#	TA Log# exists			
Flagged 01/11/2023 11:43 AM Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received their reimbursable meal (breakfast).  CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted 01/31/2023 12:51 PM  Site Name Glen Hills Mid  Form Name Meal Counting and Claiming - Review Period (322-325)  TA Log#  TA Log# exists	Due Date				
Corrective Action History  Corrective Action History  CAP Submitted 01/31/2023 12:51 PM  Site Name  Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log # exists	Corrective Action Status	CAP Submitted			
Corrective Action History  meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.  CAP Submitted  01/31/2023 12:51 PM  Site Name  Glen Hills Mid  Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log # exists			eligibility (7 CFR 210.7). Meal counts were not taken as the students with special needs received		
01/31/2023 12:51 PM           Site Name         Glen Hills Mid           Form Name         Meal Counting and Claiming - Review Period (322-325)           Question #         325           TA Log #         TA Log # exists	Corrective Action History		meal. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school		
Site Name Glen Hills Mid  Form Name Meal Counting and Claiming - Review Period (322-325)  Question #  TA Log #  TA Log # exists		CAP Submitted	Claims submitted through December to K. Jardaneh		
Form Name Meal Counting and Claiming - Review Period (322-325)  Question # 325  TA Log # exists		01/31/2023 12:51 PM			
Question # 325 TA Log # TA Log # exists	Site Name	Glen Hills Mid			
TA Log# exists  TA Log# exists	Form Name	Meal Counting and Claiming - Review I	Period (322-325)		
	Question #	325			
Due Date	TA Log#	TA Log# exists			
	Due Date				

# Administrative Review Report

Corrective Action Status	Flagged	
	Flagged	Finding: SFA does not have internal controls to ensure the accuracy of meal counts prior to the
	01/25/2023 04:35 PM	submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.
Corrective Action History		CA: Upload monthly edit checks (for computerized POS) and meal count rosters and manual edit checks (as applicable) for breakfast and lunch for all SFA sites for January and February into SNACS. SFA will remain in claims withholding until these edit checks and counts are reviewed and approved for reimbursement.
Site Name	Glen Hills Mid	
Form Name	Meal Components and Quantiti	es - Day of Review (400-408)
Question #	402	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/11/2023 02:14 PM	<b>Finding:</b> The pre-bagged cucumbers were not a sufficient 1/2 cup serving prior to lunch service on the day of review.
Corrective Action history	01/11/2023 02.14 FW	<b>Corrective Action:</b> This was fixed on site prior to lunch service. Please ensure all proportioned vegetables are in their planned quantity by measuring/weighing to ensure accuracy.
Site Name	Glen Hills Mid	
Form Name	Meal Components and Quantiti	es - Day of Review (400-408)
Question#	404	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 01/11/2023 09:27 AM	Finding: Signage was not posted at breakfast 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. Signage examples can be found on our Signage webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).  Corrective Action: Submit a picture of completed signage posted near the breakfast service line.
Site Name	Glen Hills Mid	
Form Name	Offer vs Serve (500-502)	
Question #	500	
TA Log#	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
	Flagged	<b>Finding:</b> Offer Versus Serve (OVS) was not very understood by kitchen staff nor students and resulted in 11 non-reimbursable meals. It is critical that food service staff thoroughly understand
	01/11/2023 09:59 AM	OVS in order to ensure that all students select reimbursable meals.
Corrective Action History		Corrective Action: Please require all food service staff at Glen Hills Middle school watch the OVS webcast on WI DPI's Menu Planning webpage (https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/offer-versus-serve) and submit a document with the date of completion for each staff member.
	CAP Submitted	Staff will be watching on February 20th PD day.
	01/31/2023 12:49 PM	
Site Name	Glen Hills Mid	
Form Name	Smart Snacks (1104 - 1107)	
Question #	1105	

# Administrative Review Report

Glendale River Hills School District

	-				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/11/2023 10:07 AM	Finding: The juice products that are greater than 8 fl. oz. are not allowable at the elementary school level so should not be available to the 4th and 5th graders. More information can be found on WI DPI's Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks).  Corrective Action: Submit a plan of action indicating how the larger juices will no longer be provided to the 4th and 5th grade students.			
Site Name	Glen Hills Mid				
Form Name	Food Safety, Storage and Buy American (1404-1411)				
Question #	1406				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/10/2023 10:24 PM	Finding: The most recent food safety inspection report was not posted in a publicly visible location.  CA: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. Corrected onsite, no further action required.			
Site Name	Glen Hills Mid				
Form Name	Food Safety, Storage and Buy America	in (1404-1411)			
Question #	1407				
TA Log#	No TA Log# found				
Due Date					
Corrective Action Status	Flagged				
Corrective Action History	Flagged 01/10/2023 10:28 PM	Finding: Each SFA must have a food safety plan that includes Standard Operating Procedures (SOP) (7 CFR 210.13). Practices were observed that conflict with the what is outlined in the site specific SOP's for not all food temperatures were recorded on production record, one opened food item in freezer without date mark and food containers in walk-in freezer floor).  CA: Submit a statement describing how practices will be adjusted to be compliant with the established SOP.			

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

TA Date	TA Log#	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
01/25/2023	2755	325	Administrative Review	Glen Hills Mid	Auth Rep			

#### Comments

Created By	Created Date
Created By	Created Date

#### Point of Service (POS)

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals actually served to students by category, i.e., paid, reduced-price, and free. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim. To do this, any school food service meal counting and claiming system must contain ALL of the basic elements listed below:

• Eligibility documentation • Collection procedures • Point of service meal counts • Reports • Claim for reimbursement • Internal controls.

Collection procedures refer to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange. A medium of exchange is defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal. Collection often occurs simultaneously with meal counting. With a ticket or token system, the ticket or token is presented by the student to the food service staff to obtain a meal. All tickets are tallied after the meal service to provide the count. The same payment options must be available to all students regardless of eligibility category. For instance, if students eligible for paid meals have the option to pay on a weekly or daily basis, students eligible for reduced-price meals must also have this option. All meals served in the National school Lunch and School Breakfast Program and counted for reimbursement must meet the meal pattern requirements as specified in the program regulations and be served to eligible students. Meals are counted at that point in the food service operation where it can be accurately determined that a reimbursable free, reduced-price or paid meal has been served to an eligible student. Only one meal per student per meal service may be claimed for reimbursement.

# Administrative Review Report

may be responsible. The confirming of verification to "co confirm every app. The verifying office."	he online contrac  official (DO) is the e to create and up ficial (CO) has on firm" that the ap lication submittee cial (VO) conducts selected for verifi rification Collect	odate the benefi e role: confirmat plication was ap d. This confirmat s the verification cation after the ion Report (VCR	t issuance (BI) list. The deter cion review as part of the ver proved correctly (checks for cion review is completed befi process around October 1 a CO has confirmed the applic	mining official (DO) us ification process to co math errors and comp ore the letter is sent to and must complete it b	ually completes di nfirm student eligi pleteness) at the tir the household(s) efore November 1	bility. This is the person me it was originally appi selected for verification 5. The verifying official	reviews roved. Th sends ou	each applicatione confirming of taletter notificially for meal b	on selected for fficial does not cation to the enefits. The VO may
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	11 202)								
						Created By		Cre	eated Date
				Comments					
01/10/2023	2662	201	Administrative Review	ALL	Auth Rep			1/	10/2023 10:16:32 PN
review identified u  Monitoring is du	ar, SFAs with more under 7 CFR 210. ie by February 1.	18(h) in each sch	ol must perform no less than lool operating the NSLP and On-Site Monitoring Form for	50% of schools operat	ing the SBP.	- '			eated Date
01/10/2023	2663	901	Administrative Review	Glen Hills Mid	Auth Rep				
Meals must be o meals for field trip     USDA regulation reimbursement clicorrections are management.	ffered to all stude is. is require school aim. The purpose ade. Those school	ents each day sch agencies to com of the edit check agencies with co	plete an edit check for each of its to identify errors in the sommuterized meal counting sory or the individual's category	DPI has created Field of its schools that parti chools' lunch counts ar systems or in process o	cipate in the Natio nd/or problems wit of purchasing such	onal School Lunch Progr th the meal counting and a system should ask ver	am prior	to submitting of g procedures so put the edit che	counts for the monthly o that necessary
<ul> <li>Meal benefits ap</li> </ul>	be charged to a st oply only to the re	imbursable mea	eipt of a reimbursable meal to I. The reimbursable meal incl ged for the milk as an a la ca	udes milk as one of the		penefits apply only to the		rsable meal.	
				Comments		Created By		Cua	eated Date
01/23/2023	2754	325	Administrative Review	Glen Hills Mid  Comments	Authorized Representativ	e			
01/25/2023	 I								L/25/2023 4:38:05 PN
01/25/2023								1	/25/2022 4-20-05 DN
for offsite meal se	rvice.								

- safety training. These requirements are listed in a summary document called "In a Nutshell-Hiring Requirements".
- Per SP 38-2016, SFAs may not use the nonprofit school food service account to pay the salary of a new school nutrition program director (hired on or after July 1, 2015) who does not meet
- the hiring standards. Training Requirements • Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this "In A Nutshell-Training" document.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, SNA, ICN, in-house, etc.).
- SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. The DPI Professional Standards Tracking Tool or the USDA Professional Standards Tracking Tool are encouraged but not required

1/11/2023 12:17:13 PM

# Administrative Review Report

01/10/2023	2669	Administrative Review		FSD		
			Comments			
					Created By	Created Date
caused confusion ar	nd uncertainty a	There was no line to contain and help the stu s to which students had already received a re ere to line up for breakfast and to create mo	imbursable meal or not.	It is recommend		vice management company places
01/10/2023	2668	Administrative Review		FSD		1/11/2023 10:26:07 AM
			Comments			
<b>-</b>					Created By	Created Date
	•	e the chocolate milk was on one side of the sa structured line before the POS and the stud				nilk cooler holds 1/2 chocolate milk
						1/11/2023 10:23:34 AM
01/10/2023	2667	Administrative Review		FSD		
			Comments			
					Created By	Created Date
-		rs ran out during the middle of a meal service ubstitutions or that meal components do not  Administrative Review	-	•	t on the line until the next mea	I service began. Please ensure that  1/11/2023 10:20:57 AM
01,00,2020	2017	Administrative Review	Comments	ratiritep		
			Comments			
					Created By	Created Date
implemented.  • A child is eligible for	be reviewed in or free or reduc	a timely manner. Within 10 operating days of ed-price meal benefits on the date their eligil h a student(s) is approved and sign or initial a	pility is determined by th			
01/08/2023	2646	Administrative Review		Auth Rep		
			Comments			
					Created By	Created Date
245.6(c)(2), an indiv determination is ma provided by a schoo during the carryove receiving school me schools must proces	idual student's of de, whichever co l or another pro r period are clai al benefits while as applications a	Programs, carryover refers to a child's eligibility from the previous school year (befoomes first. The 30 operating days begins on t gram sponsor [7 CFR 245.2]. Carryover applimed at the appropriate rate, depending on the families complete and submit, and schools ps they are received and promptly notify hous hold of its eligibility status [7 CFR 245.6(c)(6))	re July 1) carries over fo he first operating day of ies to eligibility establish he individual child's eligib process, applications. The eholds of their eligibility	r up to 30 operations school. Operation of through a hould status from carryover perions.	ating days into the new school y ng days are the days on which usehold application or through h the previous school year. Carr od is not intended to delay prod	year, or until a new eligibility reimbursable meals or milk are n direct certification. Meals served ryover allows students to continue cessing of applications. Instead,