

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

School Food Authority: Garden Homes Lutheran School Agency Code: 40-2468

School(s) Reviewed: Garden Homes Lutheran

Review Date(s): December 13-14, 2018

Date of Exit Conference: 12/14/2018

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](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Garden Homes Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff at Garden Homes for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through the assistance given to students during the lunch service, the time allotted to sitting down and eating and the attention to the counting and claiming process, ensuring no one has missed been missed. We were impressed with the respectful behavior of the students during meal service.

The DPI review team is confident that Garden Homes Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)/Compliance Reminders

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- A [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility), (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) specific to CEP schools, is available on the DPI CEP website.
- SFAs are 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.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the 'Wisconsinized' version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.

- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (https://www.fns.usda.gov/school-meals/translated-applications).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- For CEP schools, two DC runs, at a minimum, must be completed during the school year. The runs should include full enrollment by school code (only list students with access to at least one meal per day). One run should be completed by October 31st and the second by April 1st.

Meal Counting and Claiming

Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
 - When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
 - Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
 - **A review of the claim for the Review Month was conducted. Consolidation errors were noted, resulting in an underclaim for both lunch and afterschool snack. It is recommended that the current tally sheets have manual subtotals at bottom of each day. Additionally, subtotals by grade level should be built into the consolidation spreadsheet. This will allow for easier matching between the hand tally count and the consolidation.**
 - Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school. CEP schools may claim visiting students in the total meal count.
 - REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.
- ❑ **Finding #1:** Several meal count consolidation errors were identified in reviewing the lunch and snack claims for the month of review (and prior month), resulting in underclaims.
Corrective Action Needed: 1. Please submit a statement of understanding of the importance of accurate claim consolidation. 2. Please submit to reviewer: all tally sheets for lunch, breakfast and snack, the corresponding Excel count spreadsheets and the edit checks for month of December, prior to submitting December claim.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff of Garden Homes Lutheran School and the representatives from Taher, Inc. We appreciate your time and efforts spent preparing for and participating in the onsite review. All those involved with the Administrative Review were welcoming and showed positive attitudes. The teachers and staff assisting in the cafeteria had pleasant and encouraging interactions with the students during

meal service. It is apparent that all school staff appreciate the importance of the school meals programs for their students.

Offering multiple fruit and vegetable options daily at lunch on the Fruit & Vegetable Bar is a great way to increase consumption. Additionally, batch cooking the hot vegetables keeps them at their peak for students throughout service. Offering a vegetable daily at breakfast teaches students that vegetables can be a part of all meals. Thank you for all that you do for the students of Garden Homes Lutheran School!

Comments/Technical Assistance/Compliance Reminders

Crediting and Documentation

- There were a few crediting discrepancies for items offered the week of review between the products, recipes, and production records.
 - The meat/meat alternate in the Turkey and Cheese Wrap credits as 2.5 oz eq. The recipe states 2.25 oz eq and the production record states 2 oz eq.
 - The meat/meat alternate in the Ham and Cheese Wrap credits as 2 oz eq. The recipe states 2.5 oz eq, but the production record states 2 oz eq.
 - The 1 oz eq grain from the popcorn chicken is not included on the Parmesan Chicken Bites recipe. This was correctly written in on the production record for that day.
- The crediting documentation submitted for the week of review was missing or inaccurate for a few items offered during the week. Accurate crediting documentation was requested and received for these products during the onsite review.
- When available, a Child Nutrition (CN) label is the preferred form of crediting documentation for products offered as part of the school meals programs. CN labeled products provide assurance that they credit toward the meal pattern components as labeled.
- A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- In accordance with USDA's "[Alternate Protein Product Requirements.](https://fns-prod.azureedge.net/sites/default/files/APPRequirements.pdf)" a CN label or product formulation statement (PFS) should have APP documentation attached that shows how the APP meets the regulation (<https://fns-prod.azureedge.net/sites/default/files/APPRequirements.pdf>).
- Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

Production Records

- Accommodations for students with special dietary needs must be documented on the production record when they are outside of the planned menu.
- Milk usage is being recorded separately from the production record. It is recommended to retain these records together to show all components of a reimbursable meal were offered.

Fruit and Vegetable Serving Sizes

- Cherry tomatoes were offered at breakfast on the day of review. Although the planned serving size was ½ cup, they were not being measured at the beginning of service. This did not lead to non-

reimbursable meals as students did not select only the cherry tomatoes as their required ½ cup fruit or vegetable prior to this being corrected.

- Items offered as part of a reimbursable meal should be served using standardized measuring utensils. This may be difficult for items that do not easily conform to a portioning utensil, such as raw vegetables and fruits. The quantity of such fruits or vegetables needed to credit as a specific volume may be determined using the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) or by performing an in-house yield study (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).
- In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the school food authority's next regularly scheduled Administrative Review (AR). An in-house yield study may also be warranted if your food service operation consistently gets higher or lower yield from a product than the yield specified in the FBG, or if a specific food item or size is not currently listed in the FBG. Specific and verifiable procedures, which must be followed, are available on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).
- The School Nutrition Team has a [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) that contains crediting and serving size information for many common fruits and vegetables (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). Consider creating a similar fruit and vegetable serving size reference sheet for the fruits and vegetables offered at your school that staff may reference in the kitchen and at the point of service.

Fruit & Vegetable Bar Signage

It is great to see signage on the Fruit & Vegetable Bar showing students what they must take for a ½ serving of some of the fruits or vegetable offered. Consider additional signage for each specific fruit or vegetable to assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx) with pictures that can be posted on a salad or garden bar (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>). Additionally, consider promoting a particular fruit or vegetable on the Fruit & Vegetable Bar or in the serving line weekly or monthly to encourage students to try new varieties.

Items at Breakfast

The 125 count apples offered at breakfast were being credited as ½ cup fruit and were counted as 1 item. Apples this size credit as 1 cup of fruit, according the Food Buying Guide, and may be counted as two items at breakfast, if desired. Considering many whole apples were thrown away after service, it may be appropriate to offer these apples in halves to make them easier for the younger students to eat. Each half would credit as ½ cup fruit and count as one item at breakfast. On days when packaged foods are offered at breakfast, there would likely be sufficient time to slice apples during service to maintain color and freshness.

Breakfast Participation

- It is great to see that Garden Homes Lutheran School offers the School Breakfast Program for its students. However, the school is using the traditional breakfast service model and have noted that their participation rates are not as high as lunch. The school may consider a change in breakfast model to increase participation.
- Breakfast in the classroom is associated with the highest participation rates, which can be as high as 98 percent of the school's enrollment, and works best in elementary schools. Other service methods, such as Grab 'n Go and breakfast after first period, correlate with increases as much as 15-40 percent of current participation. If breakfast is offered in a convenient way for students, they will participate

in the program. Additionally, greater participation equates to more students being ready to learn, as well as higher levels of government reimbursement, which results in more revenue for the school.

- The [breakfast resources](#) webpage contains a wealth of information about the different breakfast service models (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>). For questions on breakfast models or ideas to increase participation, contact the [School Breakfast Program Specialists](#) (DPISBP@dpi.wi.gov).

Child and Adult Care Food Program (CACFP) Meal Pattern

Students not yet in kindergarten (5K) must be served the CACFP meal pattern when they do not eat meals at the same time and in the same place as the K-8 students. The 3K and 4K students are served breakfast with the older students (co-mingled service), but the 3K and 4K students do not overlap with the K-8 students in the lunch service line and are easily identifiable as pre-K students.

Some of the differences between the CACFP and K-8 meal patterns include:

- Offer versus Serve (OVS) is not an allowable service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. Students may still be offered a choice within components.
- Only unflavored fat-free or low-fat milk is allowable for 3K and 4K students under the updated CACFP meal pattern.
- Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet rolls, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. For a complete list of foods considered grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).
- A second vegetable may be served in place of the fruit component at lunch. The second vegetable must be at least the same serving size as the fruit component it is replacing. If two vegetables are served, they must be two different vegetables.

For more information and resources on the CACFP meal pattern, visit the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- Meal Pattern Finding #1:** During on-site lunch meal observation, the 3K and 4K students were served the K-8 meal pattern, but were not served at the same time as the K-8 students. Children who are not yet in kindergarten (5K) must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals.
Corrective Action Needed: Submit a written statement describing specific changes that will be made to the lunch meal service in order to comply with the updated CACFP meal pattern or with the co-mingling flexibility.
- Meal Pattern Finding #2:** Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served.

Corrective Action Needed: Submit a written statement explaining your plan to make product and crediting documentation available onsite at Garden Homes Lutheran School. Please also address how you plan to ensure this information remains current.

- ❑ **Meal Pattern Finding #3:** The staff member at the point of service during breakfast counted two students for reimbursable meals that did not select the required ½ cup fruit or vegetable. This was corrected immediately and the students ultimately took a reimbursable meal. The staff member at the point of service should complete additional Offer versus Serve training to ensure only reimbursable meals are claimed.

Corrective Action Needed: Submit a certificate of training completion or a written statement explaining the additional Offer versus Serve training this staff member completes. Training resources from the DPI School Nutrition Team include:

- [Offer versus Serve webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html)
- Offer versus Serve - [Meal or No Meal PowerPoint presentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx) or [webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>; https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)
- [Breakfast OVS handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf>)

3. SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Garden Homes Lutheran School. 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>).

4. BUY AMERICAN PROVISION

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

- ❑ **Buy American Provision Finding #1:** Canned mushrooms from Spain were identified in SFA’s storage area as non-domestic and were not listed on the SFA’s Buy American – Noncompliant List.
Corrective Action Needed: Submit a copy of the non-compliant product form for the canned mushrooms from Spain.

5. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant addressed financial topics with the Authorized Representative including the agency's Child Nutrition Program report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (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 which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 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.
- **These categories of the AFR that should be addressed when tracking revenues and expenditures include:**
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
 - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
 - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under "nonprogram foods", report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.

- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually 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.

FSMC

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- **Finding #1:** On the Annual Financial Report, the revenues and expenses were not broken out by category and were all recorded in Purchased Services.
Corrective Action Needed: Please resubmit your '17-'18 Annual Financial Report with revenues and expenses broken out by program and category. This can be amended online through December 31st. After that date, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service

account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

Indirect Costs

Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:

- Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
- Utility charges - separately metered or current usage study by the local utility company.
- Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

6. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

Processes for complaints

- **Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.**
- **All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the State Agency within 5 days (page 3, point #8 of permanent agreement). You will want to make sure that this is included in the district procedures to ensure compliance.**
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A 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. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** School does not have a procedure for receiving and processing complaints of discrimination within USDA school meal programs.
Corrective Action Required: Please provide a timeline for creating a USDA school meal program complaint policy.

Local Wellness Policy

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:** SFA LWP meets some but not all requirements as stipulated above.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Professional Standards

Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements

Hiring Criteria: New Directors Minimum Requirements (hired after July 1, 2015)

Each SFA must designate at least one staff member as a program director. Program director is the person designated to perform the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, marketing, customer service, nutrition education, and general day to day program management.

SFA Enrollment under 500	SFA Enrollment under 2,499	SFA Enrollment 2,500 – 9,999	SFA Enrollment > 10,000
*High school diploma (or GED) and at least 1 year relevant experience in school nutrition	*High school diploma (or GED) and at least 3 years relevant experience in school nutrition	*Associate degree (or equivalent) with related academic major and at least 2 years of relevant experience in school nutrition	*Bachelor’s degree (or equivalent) in any academic major and at least 5 years experience in school nutrition
In addition, new directors are required to obtain at least 8 hours of food safety training, either not more than 5 years prior to their starting date or completed within 30 days of their start date.			
*Note: These are minimum standards. Reference USDA’s summary of the Professional Standards Final Rule for more information (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/profstandards_flyer.pdf).			

Professional Standards: Training Requirements

- Annual 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.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- ❑ **Finding:** Tracking tools in use do not contain all required elements and do not report correct required hours for noted positions/titles.
Corrective Action Needed: Update training trackers with required fields and correct required training hours for the positions/titles and give updated forms to reviewer. **Corrected onsite; no further action necessary.**

Food Safety and Storage

Comments/Technical Assistance (TA)/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review.
- **All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)**
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- 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.

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document. While there are no requirements as to how frequently food service employees must sign a Food Employee Reporting Agreement form, it is the best practice for each food service employee to annually review and sign an agreement to reinforce the information contained in the document.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Findings and Corrective Action: Food Safety

- ❑ **Finding:** Standard operating procedures (SOPs) are not site-specific.
Corrective Action Needed: Remove or adapt SOPs to reflect site-specific procedures. Submit updated SOPs as attachments to assigned DPI Nutrition Program Consultant via email.

Reporting and Recordkeeping

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

Comments/Technical Assistance (TA)/Compliance Reminders

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

Breakfast Promotion

The breakfast participation at Garden Homes Lutheran School is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as

financial models can be found in the [Serving up a Successful School Breakfast Program](http://dpi.wi.gov/school-nutrition/school-breakfast-program) guide (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.

- [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>)
- [School Breakfast Menus on the Web](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>)

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

Summer Meals

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

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

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action: SBP and SFSP Outreach

- ❑ **Finding #1:** School Breakfast Program and Summer Food Service Program outreach is not occurring as required.

Corrective Action Needed: Please provide a statement regarding how Garden Homes Lutheran School will notify households periodically, throughout the school year, of the availability of school

breakfast and how the school will notify households of the availability of the nearest Summer Food Service Program.

7. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Comments/Technical Assistance/Compliance Reminders

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school year. The review form to complete may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Area Eligible Afterschool Snacks are all claimed at the free rate.
- **To be reimbursable, snacks must include two FULL components from those listed. Students must select both full servings of the two components offered for the snack to be claimed as reimbursable.**
- Each afterschool snack location is required to maintain documentation supporting that reimbursable meals were provided to students, including production records with snack items and serving size. Menus are not required, but encouraged. Production record examples are found on the afterschool snack program webpage linked above.
- **Snacks provided to K3 and K4 students, separately from the K5-8th grade students must follow the CACFP snack meal pattern.**
- **Afterschool care programs in NSLP and the at-risk component of CACFP must maintain a roster or sign-in sheet which documents the total number of children in attendance in the afterschool care program. The roster or sign-in sheet is not intended to be used to identify which individual children receive snacks; rather, it is intended to establish the maximum number of snacks that can be claimed on a given day, and to document that a site has an eligible afterschool care program (i.e., organized, supervised, and regularly scheduled). (Afterschool Snack Q&A #3, 11/99)**
- Participating students are claimed by eligibility category (free, reduced, or paid) when a reimbursable snack is selected.
- Afterschool sites must provide educational or enrichment activities in an organized, structured, and supervised environment.
- [Snack Count Sheets](#) and [production record templates](#) are located on the Afterschool Snack webpage (<http://dpi.wi.gov/school-nutrition/after-school>).

Findings and Corrective Action Needed

- Finding#1:** Afterschool Snack Program attendance not taken consistently, in all participating areas.
Corrective Action Required: Please provide a plan for how attendance will be tracked to bring this into compliance.
- Finding#2:** Onsite monitoring of the afterschool snack program was not completed as required, within the first 4 weeks of the program commencing.
Corrective Action Required: Provide a statement of understanding that this is required twice per year, the first within the first 4 weeks of the program start date and one additional time during the program year.
- Finding#3:** CACFP snack meal pattern not being utilized for K3 and K4 students, who are not comingled with rest of students during the Afterschool Snack Program.

Corrective Action Required:

1. Please provide a statement of understanding regarding the meal pattern requirements for students not yet in kindergarten (K5) and not comingled with the K-8 students.
2. Correct the production record for ASP for the K3 and K4 students, reflecting the correct food components and provide copy to reviewer. **Corrected onsite-no further action required.**

8. COMMUNITY ELIGIBILITY PROVISION (CEP)

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 school year, 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).
- [USDA Community Eligibility Provision guidance](#) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.
- There must also be a method to accurately distinguish between forms from students in CEP versus non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review, nor do these students carry individual meal eligibilities that can extend benefit to other students.

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](#) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!