

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Hope Christian School Via

Agency Code: 51-1711

School(s) Reviewed: Hope Via

Review Date(s): 12/14-15/2016

Date of Exit Conference: 12/15/2016

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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, 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 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, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Hope Via for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

Hope Via staff should be commended for the overall administration of the Child Nutrition Programs. The SFA is only in the second year of operation and participation in USDA programs and has been diligent in making certain that they understand and complete all program requirements as required by USDA regulations. Food service staff do a nice job of interacting with students and providing a breakfast and lunch environment that is pleasant for students.

Meals served during the review period and on the day of review met all meal pattern requirements. The vendor does a great job of ensuring that school staff are trained to understand portion sizes and serving requirements. Onsite staff did a nice job of completing the daily production records.

Comments/Technical Assistance/Compliance Reminders

USDA has recently updated their guidance on providing meals to students requiring food modifications because of a disability. The SFA currently has one student with a documented allergy that is being managed through the meal pattern. Guidance was provided during the onsite visit to ensure understanding of accommodating students with special dietary needs. This requires that any medical statement signed by a licensed practitioner (In Wisconsin, the individuals licensed to write prescriptions) must be accommodated. For additional information on accommodating students with special dietary needs please access the DPI website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs> .

Hope Via may wish to consider serving school meals that incorporates Offer vs. Serve (OvS). Under OvS, students must select at least ½ cup of fruit or vegetable (or a combination) plus two other components in their full serving size for lunch and at least three of four items at breakfast including at least ½ cup of fruit or vegetable (or a combination). The purpose of OvS is to reduce plate waste and allow children some choices. Studies show that when students are allowed to freely choose the foods they want to put on their tray, they are more likely to consume the food. Extensive technical assistance on OvS was provided to the Authorized Representative during the onsite visit. Additional information on OvS is available on the DPI website at: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning> .

Just a reminder for staff to make certain all volunteers are trained to portion the scoops using a level measure.

It is a reminder that the annual public release document must be submitted to area publications and grassroots organizations but SFAs are not required to pay to have it published.

Findings and Corrective Action Needed

MEAL ACCESS AND REIMBURSEMENT – CLAIMS AND EDIT CHECK

❑ **Finding #1:** The November 2016 claim was submitted in error. The SFA was utilizing the monthly sales summary rather than the edit check document to submit claims. Due to a technical issue with how the lunch codes were entered into the software system the sales summary did not capture all student meals. As a result there was an under claim of 4 meals for the review month. Technical assistance was provided to the SFA on utilizing an appropriate edit check, developing procedures for checks and balances to ensure accurate claims and monitoring practices to verify integrity of the system.

Corrective Action Needed:

Please submit a copy of the December 2016 claim along with a copy of the December edit check document. In addition submit a detailed statement indicating the steps the SFA has taken to ensure that future claims submissions are accurate.

Note: It appeared as though there was a significant under claim in September 2016. Because the error was not intentional but rather an issue with a new software system, a claims amendment for the 260 meals not included in the September 2016 claim may be submitted. To do this please send a copy of the original September claim with the corrected numbers as part of the corrective action.

RESOURCE MANAGEMENT – ANNUAL FINANCIAL REPORT

❑ **Finding #2:** The annual financial report was submitted with errors triggering a comprehensive review of SFA resources. The report didn't include revenues received from USDA or expenses for labor and neglected to pro-rate expenses for breakfast and lunch. In addition the report was submitted showing a negative fund balance, which is not allowed by USDA, and a funds transfer from the general fund into the food service fund in excess of the amount required to create a zero balance. A comprehensive review of financial management protocol for this SFA included a detailed review of expenditures and revenues for school year 2015-2016. There were not significant findings or misappropriation of funds found during this portion of the administrative review with the reporting error appearing to be a miscommunication on how to complete the report. Technical assistance included detailed guidance on completing the annual financial report and advisement of a new DPI reporting system for school year 2016-17. For additional information on financial management please refer to the DPI website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial> .

Corrective Action Needed: Please amend and submit the annual financial report to the reviewer by the action date listed on the signature page.

2. GENERAL PROGRAM COMPLIANCE – SCHOOL WELLNESS POLICY

❑ **Finding #3:** The school wellness policy is a blanket policy created for all schools operating under the HOPE governance rather than a school specific policy. School wellness policies have been required for all SFAs participating in USDA child nutrition programs since 2004. The original rule required that schools develop policies with a committee of invested stakeholders including a school administrator, faculty member, parent, and if possible a student along with other interested parties.

The policy was intended to provide schools with the tools to effectively address student health and wellbeing. In 2016 the requirements of the school wellness policy were expanded to include minimum policy requirements, ensure stakeholder participation in the development and updates of the policy, and assess and disclose compliance with the public.

Corrective Action Needed: Please submit a timeline for creating a school specific wellness policy developed under the guidelines listed above. The outline should include the names of committee members, a meeting timeline, and anticipated date of completion. Resources for completing a school wellness policy are listed below.

DPI Wellness Policy Webpage: <https://dpi.wi.gov/school-nutrition/wellness-policy>

School Wellness Policy summary of the final rule: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>

Wisconsin Wellness: Putting it into Practice – A comprehensive online tool: <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>

Local Wellness Policy Builder:

<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1> .

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

