

Administrative Review Report

Delavan Christian School - 647041

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/13/2023	04/07/2023
On-Site Review	04/20/2023	04/20/2023
Site Selection Worksheet	03/13/2023	03/13/2023
Entrance Conference	04/20/2023	04/20/2023
Exit Conference	04/20/2023	04/20/2023

Commendations:

Our sincere thanks to the administration and school nutrition staff of the SFA. We appreciate the time and effort spent preparing for and participating in the administrative review process. Thank you for your availability during the on-site portion of the review and helping the DPI review team to gather the needed documentation and information. We especially appreciated the look and appearance of the lunch on the day we visited. It was a nicely presented wrapped sandwich with colorful, nicely placed sides. 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](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training).

From the Public Health Nutritionist: Thank you to all staff at Delavan Christian School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the school staff for sending documentation ahead of the onsite visit in a timely manner and for the quick response to questions; this greatly expedited the AR. The kitchen and documentation is neat and organized! Thank you for serving healthy, nutritious meals to your students!

Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	110	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 11:16 AM</p>	<p>Finding: The SFA's direct certification notification letter does not include all required information including: explain that the child is eligible for free benefits without further application; free meal benefits extend to all school-aged children in the household; how to notify the SFA of any additional school-aged children in the household not listed on the notification and explain how the household can decline the benefit (7 CFR 245.6).</p> <p>CA: Provide a statement that the SNT template letter will be used or upload a corrected letter template for direct certification notification to the household into SNACS.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	700	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/04/2023 11:18 AM</p>	<p>Finding: The SFA has received Supply Chain Assistance Funds and not in compliance with the Attestation signed when receiving these funds. The SFA is not aware of what the funds can be spent on, the funds are used on unallowable costs and/or the funds are not being tracked separately.</p> <p>CA: Provide a statement of understanding of what the Supply Chain Assistance Funds can be used for and provide the process that will be used to track how the funds are spent.</p>
Site Name		
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	

Corrective Action History	Flagged 05/04/2023 11:21 AM	Finding: State Agency unable to verify allowable costs allocated to nonprofit school food service account while on-site. CA: Provide ledger, report or spreadsheet indicating all of the expenses allocated to the nonprofit school foodservice account for the month of February 2021. Upload into SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	801	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/24/2023 03:00 PM	Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/24/2023 03:03 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 representative that will ensure compliance.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	806	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/24/2023 03:05 PM	Finding: Civil Rights training did not occur or documentation was not available to support that this training was provided to all staff who interact with

		<p>program participants in the current school year (FNS Instruction 113-1).</p> <p>CA: Provide the civil rights training to all staff that interact with program applicants found on the DPI website. Upload the sign in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p>
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	807	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/24/2023 03:07 PM</p>	<p>Finding: The Civil Rights Compliance Self Evaluation Form (PI-1441) was not completed by October 31.</p> <p>CA: Complete the Civil Rights Compliance Self Evaluation Form (PI-1441) form and submit as corrective action.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1001	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/24/2023 03:11 PM</p>	<p>Finding: The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.</p> <p>CA: Notify the public of the LWP and upload documentation for how the public was notified.</p>
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1005	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged</p> <p>04/20/2023 02:21 PM</p>	<p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years.</p> <p>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</p>

		SNACs or provide a link to this document on the district website.
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/20/2023 01:52 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.
Site Name		
Form Name	Meal Counting and Claiming (314 - 316)	
Question #	314	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/20/2023 01:01 PM	Finding: SFA is not following the current approved contract. CA: Submit a statement of understanding regarding meal accountability system noted in the contract. Update the 2023-24 online contract accordingly.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/20/2023 11:24 AM	Finding: The correct non-discrimination statement is not included on all program materials. CA: Update program materials (parent-student handbook reference to USDA National School Lunch Program) to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.
Site Name		

Form Name	Professional Standards (1210 - 1219)	
Question #	1212	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 01:06 PM</p>	<p>Finding: The Food Service Director was hired after July 1, 2015 and does not meet the Professional Standards hiring requirements for this SFA (7 CFR 210.30(b)(1).</p> <p>CA 1: Review the Professional Standards hiring requirements on the School Nutrition Team website and submit a statement of understanding of the hiring requirements for your SFA.</p> <p>CA 2: Complete the Professional Standards Exemption form and submit to Karrie Isaacson at karrie.isaacson@dpi.wi.gov for review.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1213	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 01:12 PM</p>	<p>Finding: The new Food Service Director did not meet the food safety training requirements of 8 hours of food safety training within 5 years prior to starting date or within 30 days of hire (7 CFR 210.30(b)(v).</p> <p>CA: Complete 8 hours of food safety training and provide documentation of completion.</p>
Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1217	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 01:20 PM</p>	<p>Finding: 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.</p> <p>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.</p>

Site Name		
Form Name	Professional Standards (1210 - 1219)	
Question #	1219	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 01:21 PM</p>	<p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30).</p> <p>CA: Provide a training plan for the current school year, for all non-school nutrition staff, with school nutrition program responsibilities.</p>
Site Name		
Form Name	Food Safety & Buy American (1400 - 1403)	
Question #	1400	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 12:58 PM</p>	<p>Finding: The SFA's written, site-specific food safety plan does not include all required elements for compliance with Hazard Analysis Critical Control Points (HACCP). It is missing employee reporting agreements for employees and volunteers who work in the meal program. (7 CFR 210.13).</p> <p>CA: Complete employee reporting agreements for those employees and volunteers who work in the program. Keep signed copies in Food Safety Manual. Upload the completed documents into SNACS.</p>
Site Name	Delavan Christian School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	318	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 05/04/2023 11:26 AM</p>	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Meal counts in pre-kindergarten classroom were not taken as the student received their reimbursable meal.</p> <p>CA: Correct the meal counting process to ensure meals are tracked as the student receives their meal. Then</p>

	submit 15 consecutive operating days of meal counts and corresponding edit check reports. Accurate meal counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim.	
Site Name	Delavan Christian School	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	320	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 12:42 PM</p>	<p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Day of review meal counts are not combined and recorded correctly. Morning meal order counts are removed for billing if student did not take an ordered meal. Households would be billed if student didn't take meal and "backout" is forgotten. Households cannot be billed for meals not taken.</p> <p>CA: Correct the meal counting process to ensure meal counts are correctly counted. Separate the meal order system from the meal billing system. Submit a statement describing the corrected system along with a timeline for implementation.</p>
Site Name	Delavan Christian School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	431	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 04/20/2023 12:19 PM</p>	<p>Finding: The menus served to preschool students at lunch are slightly different than the menu items served to K-8. Preschool students do not consistently receive both fruit and vegetable offerings and do not receive chocolate milk. These differences in menus should be denoted on the daily production records.</p> <p>Temperatures of TCS foods should also be recorded upon receipt from vendor. Please record these temperatures on the daily production records or a delivery slip.</p> <p>Corrective Action: Submit one full week of completed production records, clearly denoting what menu items are served to preschool students and the temperatures of TCS foods upon delivery, if not recorded on a delivery slip. Choose a week (Monday-Friday) that occurs after</p>

		the completion of this Administrative Review (AR), but before the corrective action due date.
Site Name	Delavan Christian School	
Form Name	Meal Components and Quantities - Review Period (409-412, 430-437)	
Question #	432	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 04/20/2023 12:20 PM	<p>Finding: Bulk quantities of each menu item are sent from Delavan-Darien School District to Delavan Christian School daily. Most items come refrigerated or frozen and cooking of the foods occurs onsite at Delavan Christian. There is currently no documentation of what is received from Delavan-Darien School District (i.e., a delivery slip). This information should be tracked by Delavan-Darien School District and confirmed by Delavan Christian daily. Please add this information to the current production record or develop a separate delivery slip to send with orders.</p> <p>Corrective Action: Send a sample of the delivery slip or updated production record demonstrating this information is tracked.</p>

Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
04/19/2023	3467		Administrative Review		Determining Official			
Comments								
<p>Households must be notified, either in writing or verbally, of their child's eligibility status within 10 operating days of receipt of the application [7 CFR 245.6(c)(6)]. LEAs are permitted to communicate the written notification via e-mail to the adult household member who signed the application. Determining officials must record the eligibility determination as follows: • Indicate the approval date; • Indicate the level of benefit for which the children or each child is approved (if the levels are different); and • Sign or initial and date the application.</p> <p style="text-align: right;">4/19/2023 11:25:17 AM</p>								
04/19/2023	3466		Administrative Review		Determining Official			
Comments								
<p>If no new application is submitted and eligibility is not established through direct certification by the end of the 30-day carryover period, a child's eligibility for free or reduced price meals expires and the LEA must discontinue benefits. The LEA cannot send a notice of denial or adverse action if a child's eligibility expires at the end of the 30-day carryover period. The household does not have a right to appeal a discontinuation of benefits due to the expiration of the carryover period because no eligibility determination was made during the current school year.</p> <p style="text-align: right;">4/19/2023 11:22:47 AM</p>								

03/29/2023	3329	431	Administrative Review	Delavan Christian School	FSD			
Comments								
Technical Assistance: Production records are intended to be useful tools to record production information. The following are not consistently recorded on lunch production records: planned number of meals, quantity prepared in purchase units (i.e., 2- #10 cans, 10 lb. case, 2-96 count case), leftovers of each menu item, and condiment usage. Please consistently document for all menu items daily.								
3/29/2023 10:54:58 AM								

General Program Reminders

USDA Child Nutrition Programs, Nutrition Program Consultant Review Areas

Afterschool Snack Program (ASP)	13
Certification and Benefit Issuance	13
Civil Rights	16
Community Eligibility Provision (CEP)	18
Food Safety and Storage	18
Food Service Management Company (FSMC)	20
Fresh Fruit and Vegetable Program (FFVP)	20
General Recommendations for Report	21
Indirect Costs	21
Local Wellness Policy (LWP)	21
Meal Counting and Claiming	22
Non-program Food Revenue	23
Non-profit School Food Service Account	23
On-site Monitoring	25
Paid Lunch Equity (PLE)	25
Point of Service (POS)	25
Professional Standards	25
Reporting and Recordkeeping	26
School Breakfast Programs & Summer Food Service Program Outreach	27
Special Milk Program (SMP)	27
Supply Chain Assistance (SCA) Funds	27
Unpaid Meal Charge Policy	28
Verification	28
Water	29
Wisconsin School Day Milk Program (WSDMP)	29
Appendix	30

Hint: Pressing Ctrl and Click on a topic allows you to jump to that area in the document

Afterschool Snack Program (ASP)

- Each site participating in the Afterschool Snack Program (ASP) is required to conduct an onsite monitoring review within the first four weeks of operation and a second review within the school year. The [onsite monitoring form](#) is found on the [Afterschool Snack Program](#) webpage.
- Area Eligible Afterschool Snacks are claimed at the free rate. No students should be charged for snacks served in the Area Eligible Afterschool Snack Program. Families who have paid for afterschool snacks that were claimed at the free rate should be refunded.
- Each afterschool snack location is required to provide educational or enrichment activities in an organized, structured, and supervised environment. It is required to maintain documentation supporting reimbursable snacks are provided to students, including production records with snack items, and serving size. Menus are not required but encouraged. Production record templates and snack count sheets are on the [Afterschool Snack Program](#) webpage.

Certification and Benefit Issuance

Free and Reduced-Price Meal Applications

- Applications must be reviewed in a timely manner. Within 10 operating days of receipt, eligibility must be determined, families must be notified of eligibility status, and the status must be implemented.
- A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which a student(s) is approved and sign or initial and date the application.
- When an application only has one frequency of payment indicated for all household reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) (IEG) one would look at the amount of their income under the column indicating that stated frequency.
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would thus become \$0 for the income on the application. The [verification webpage](#) includes examples of resources on [current tax forms](#). [These forms](#) indicate which lines should be used in reporting income from self-employment or farming.

Annual Income

- USDA SP-19, 2017 on March 20, 2017, allows households to report current income as an *annual figure*.
- Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may be processed at face value.
- However, households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, e.g., weekly, biweekly, bimonthly, or monthly.

Income Eligibility Guidelines (IEG)

- The [Income Eligibility Guidelines](#) (IEG) must be used to determine applications. If applications are electronic, ensure the income levels in the software are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either.

Household Size Box

- The total household member size box includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household.
- The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing (letter or e-mail). The determining official should document the details of the conversation plus date and initial.
- Applications missing signatures must be returned to the household adult to obtain.
- Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- An application packet includes the [Free and Reduced Price Meal Eligibility application](#), the [Instructions/How to Apply](#), and the [Letter to Parents/Frequently Asked Questions](#). Note, these documents are also available in Spanish and Hmong on the [free and reduced meal applications webpage](#).
- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition Team (SNT) at the Department of Public Instruction (DPI).
- If a SFA uses an online application, the software vendor distributing these applications to households must be approved by the SNT at DPI each year.

Other Source Categorical

- If a household submits an application that indicates *Other Source Categorical Eligibility*, such as homeless, migrant, runaway or Head Start program, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency before meal benefits can be provided.
- Once confirmed, this eligibility is only available to the designated child and is **not** extended to other members of the household. The effective date is the date the Determining Official is made aware of the eligibility.
- Applications that indicate a child is a foster child are considered *Other Source Categorical* eligible and this child is eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is **not** extended to other household members.

Public Release

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

- Local news media
- Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc.)
- Local employment office
- Major employers contemplating or experiencing large layoffs
- SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.
- [Spanish](#) and [Hmong](#) versions are also available.

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 to diminish any language barriers to participation for individuals with LEP.
- To assist SFAs in reaching households with LEP, 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](#).
- 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 (DC)

Most districts and private schools participating in the National School Lunch Program are required to run **full enrollment** student input files:

- 1st: **beginning of the year** (between July 1 - first day of school)
- 2nd: **three months after first run** (between October - December)
- 3rd: **six months after first run** (between January - March)
- 4th: **between March 15 and April 1** (for CEP proxy report)

Exceptions: Community Eligibility Provision, Special Milk Program, and Residential Child Care Institutions (see the appropriate [Calendar of Requirements](#))

- DPI recommends running DC more often than four times a year.
- A DC match should be completed when you receive a new student.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- DC runs are only for school nutrition, and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition programs. A DC run should not be completed specifically for students in parochial schools to identify eligibility for other funding sources (i.e., Title 1).

Transferring Students

- When a child transfers to a new school within the same Local Education Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a Community Eligibility Provision (CEP) school to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year.
- Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools is required.

Independent Review of Applications

- LEAs that have a 5% or more error rate during the certification review of the Administrative Review will be required to conduct a second independent review of applications in the following school year.
- More information on the Independent Review of Applications is found in the [Eligibility Manual](#). An SNT memo will be mailed from DPI during the summer following the year the review occurred with more information for those SFAs that are required to conduct an independent review of applications.

Disclosure

- The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal or milk benefits.
- Each school year, the SFA must seek written consent from the parent or guardian to use the information provided on the application or through DC for non-program purposes, such as fee waivers. Detailed consent must be obtained each school year. Find the [Sharing of Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and kept on file at the district. Find the [Disclosure of Free and Reduced-Price Information](#) template. [Spanish](#) and [Hmong](#) versions are also available on the Free and Reduced Meal Applications and Eligibility webpage.

Note: aggregate data (F/R numbers or percentages without a connection to individual names) does not require prior parental sign-off before sharing and often satisfies the request.

Civil Rights

Non-discrimination Statement (NDS)

- When including the [non-discrimination statement](#) on letters, menus, websites, and documents used to convey program information, it is necessary to use the most current full official statement. The full non-discrimination statement was revised by the USDA in 2022. The abbreviated statement remains the same.
- The abbreviated statement, “**This institution is an equal opportunity provider**”, is only used when space is limited, such as printed menus. All non-discrimination statements must be in the same size font as document’s main text. Statement words and formatting cannot be altered.
- Additional languages are found on the [USDA FNS Non-discrimination](#) webpage.
- If a private or Choice school is using the 2015 NDS and/or 2019 And Justice For All Poster, ask, “does religious exemption apply?”. If the answer is yes, no further action is needed. If the answer is no, CA to use the 2022 NDS and/or poster will apply.
- If a public or Charter school does not wish to use the 2022 NDS and AJFA poster due to content, CA would apply with the statement “the religious exemption does not apply to public schools. You should contact your school district legal team for further information.”

“And Justice for All” Poster

- “And Justice for All” posters must be posted where the program is offered (lunchroom, classrooms) and in easy view of the students, staff, and public.
- The “And Justice for All” poster was updated in 2022, we do not have professionally printed posters from USDA. Schools will need to post the USDA 2019 AJFA poster until the professionally printed USDA 2022 posters are available.
 - The 2019 version of the AJFA poster (AD-475A) is located on the Office of the Assistant Secretary for Civil Rights website at: <https://www.usda.gov/sites/default/files/documents/JFAgreen508.pdf>. All “And Justice for All” posters must be printed at 11” width x 17” height. The minimum text size to be used on the posters is 14-point.
- If a private or Choice school is using the 2015 NDS and/or 2019 And Justice For All Poster, ask, “does religious exemption apply?”. If the answer is yes, no further action is needed. If the answer is no, CA to use the 2022 NDS would apply. Give TA to use the 2022 poster when it is available.
- If a public or Charter school does not wish to use the 2022 NDS and AJFA poster due to content, CA would apply with the statement “the religious exemption does not apply to public schools. You should contact your school district legal team for further information.”

Civil Rights Training

- Civil rights training, such as the [Civil Rights webcast](#), must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program including nonfood-service staff.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form must be completed by October 31 annually. This is kept on file at the SFA until requested by DPI.

Processes for Complaints

- Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous.
- All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. It is recommended SFAs use the [Template Civil Rights Complaint](#)

[Procedures](#) to create written procedures.

- An SFA may always attempt to resolve a situation that is occurring in real time; however, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file.
- If a complaint of discrimination is received at your district, the following procedures should be followed:
 1. Document the complaint using the [USDA Program Discrimination Complaint Form \(Espanol\)](#).
 2. Submit complaints within five days of receiving the complaint to:
Wisconsin Department of Public Instruction (DPI)
 - Mail:
Director, School Nutrition Team
125 S. Webster Street
Madison, WI 53707-7841
 - Fax: (608) 267-0363
 - Email: jessica.sharkus@dpi.wi.gov
 3. Maintain a [Civil Rights complaint log](#) at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members with a legitimate need to know.

Special Dietary Needs

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

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

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

Dietary Needs webpage; however, SFAs are responsible for ensuring the substitute they are providing meets the nutrition requirements.

- Resources - The [Special Dietary Needs Flowchart](#) outlines the process of accommodation determination. The [USDA Q&A on Accommodating Special Dietary Needs resource](#), the [USDA Special Dietary Needs Handbook](#), and [Q&As: Milk Substitution for Children with Medical or Special Dietary Needs \(Non-Disability\)](#) contain additional detailed information.

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced-price benefits.
- SFAs must ensure meal prices and/or benefit status is not visible on the computer screen or point of service (POS) documents where they can be viewed by students.
- Please see the USDA guidance, [Preventing Overt Identification of Children Certified for Free or Reduced Price School Meals](#).

Community Eligibility Provision (CEP)

- It is necessary to maintain all certification documents supporting participation in CEP.
- CEP participating schools must 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 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 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 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.

Food Safety and Storage

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, which typically includes a food safety inspection and a review of the site's food safety plan.
- The most recent food safety inspection report must be posted in public view.
- If you request a food safety inspection but are not able to obtain one, document the request date and retain any correspondence (email, letters, phone call details) with the local regulatory authority that conducts inspections. SFAs are responsible for requesting food safety inspections from the local regulatory authority and documenting their efforts.

Temperatures

- Staff must record temperatures daily using temperature logs. For cooling equipment, posting temperature logs directly on the equipment can make recording convenient and routine.

Food Safety Plans

- SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles. This requirement covers any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other Child Nutrition Programs.
- Food safety programs 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.
- Schools must have a comprehensive, site-specific food safety plan which includes HACCP process 1, 2, and 3 items, SOPs, equipment list, and food service staff list. 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.

- All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan.
- [A Flash of Food Safety](#) A Flash of Food Safety is a video series designed to help school nutrition professionals understand and apply safe food practices. The [Office of Food Safety](#) website includes additional food safety resources.

Employee Reporting Agreements

- All food service employees must have a signed [Employee Reporting Agreement](#) on file. The agreement helps ensure employees properly notify the person in charge when they experience specific illness symptoms or diagnoses.
- There are no requirements as to how frequently food service employees must sign an Employee Reporting Agreement form. It is best practice for each food service employee to annually review and sign an updated agreement to reinforce food safety reporting information.

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)).

Time as Public Health Control

- Time/temperature control for safety (TCS) foods may be held without temperature control if specific conditions are met under a practice called “Time as a Public Health Control.”
- To utilize “Time as a Public Health Control,” the school must have a corresponding SOP in the site-specific food safety plan. Template SOPs are available on the SNT Food Safety webpage.
- If any TCS food is held without temperature control during service, including TCS foods on garden bars, all leftover TCS food must be discarded.
- Please refer to the [Wisconsin Food Code Fact Sheet: Time as a Public Health Control](#) for detailed procedures.
TCS foods include:
 - Milk and dairy products
 - Shell eggs
 - Meat (beef, pork, and lamb)
 - Poultry
 - Fish
 - Shellfish and crustaceans
 - Baked potatoes
 - Heat-treated plant food, such as cooked rice, beans, and vegetables
 - Tofu and other soy protein
 - Sprouts and seeds sprouts
 - Sliced melons
 - Cut tomatoes
 - Cut leafy greens
 - Untreated garlic-and-oil mixtures
 - Synthetic ingredients, such as textured soy
 - Protein in meat alternatives

Administrative Review Report

Delavan Christian School

Sharing and No Thank You Tables

Both sharing tables and no thank you tables are permitted in Wisconsin and do not require approval from the DPI SNT. However, there are considerations for School Food Authorities (SFAs) and Local Educational Agencies (LEAs) that must be followed to safely and responsibly implement each type of table. Refer to the [Sharing and No Thank You Tables Toolkit](#) for a comprehensive guide including standard operating procedures.

- Definitions:
 - A **sharing table** is a designated table for food and beverage items that students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. Throughout meal service, the designated food handler(s) or trained supervising adult(s) must monitor the sharing table, inspect items for wholesomeness, and document items that are leftover. The table should not be located immediately after the point of service.
 - A **no thank you table** is a designated table placed after the point of service for food and beverage items that students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, the designated food handler(s) or trained supervising adult(s) must inspect the items for wholesomeness and document items that are leftover.
- Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.
- Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- The annual on-site monitoring requirement for SFAs with more than one site must be completed by the School Food Authority (SFA).
- A FSMC employee can serve as the Food Service Director under a vended meal agreement but not under a joint agreement.
- A representative of the SFA must sign all contracts, acting as the signature authority.
- An SFA employee must review and confirm the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.

Fresh Fruit and Vegetable Program (FFVP)

- As a reminder, nutrition education is essential to the success of the FFVP. Funding is not available through the FFVP grant for nutrition education material purchases. The [FFVP](#) webpage links to free resources found on the [Promoting Fresh Fruits and Vegetables in Schools](#) sub-page. Additional materials can be ordered through the Wisconsin Team Nutrition webpage.
- FFVP must be provided during the day outside of mealtimes and FFVP may not be taken offsite.
- FFVP must be provided to all enrolled elementary students two times per week. The school site and the FFVP application determines who is considered an elementary student.
- One adult per class is allowed to participate with the students in the FFVP snack and are the only adults allowed to participate. Teachers can model healthy eating behaviors while consuming the FFVP snack alongside students. This can be an effective way to reinforce nutrition education lessons and encourage reluctant students to try the snack. See page 10 of the [USDA's FFVP Handbook](#) for more information.
- Offering a cooked vegetable is allowable when criteria are met.
 - The vegetable must be purchased fresh and cooked in house.
 - Additional ingredients should not be added during the cooking process as the goal is still to connect students with the flavor of the actual vegetable.
 - The vegetable that is cooked should be one that is not normally eaten raw, and it must be offered as part of a nutrition education lesson.
 - Cooked vegetables are limited to one time per week.
- Dip may be served with vegetables and must be low fat or fat free with 3 grams or less of fat per serving.

Administrative Review Report

Delavan Christian School

General Recommendations for Report

- 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 will offer School Nutrition Summer Training online and in person. Find more information on these training opportunities on the [DPI School Nutrition Training 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.
- Help the SNT reach our goal of 80 SFAs participating in Around the World in 80 Trays the week of January 16-20, 2023. Take the pledge to participate in any capacity from adding a new dip or seasoning to showcasing several new dishes. It is up to you! Visit the [Around the World in 80 Trays webpage](#) to take the pledge and find more event information. Document the event (pictures, video, sound clips, etc.) and send to DPIFNS@dpi.wi.gov so we can share your success!

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to the nonprofit food service account.
- For both public and private schools in Wisconsin, any indirect type costs assessed to food service must be supported with documentation. Examples of supporting documentation for costs assessed to the nonprofit food service account could include:
 - **Rent** – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty 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** – a time study based on actual amount of time worked specifically for the purpose of school food service.
 - **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.

Local Wellness Policy (LWP)

LWP Requirements

- The LWP 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 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.
- SFAs are required to retain basic records demonstrating compliance with LWP requirements.
- If no LWP has been developed, the SFA must establish a written policy.
- For assistance in the creation of a LWP, Wisconsin Team Nutrition has several wellness policy resources available. A toolkit, a wellness policy builder, and wellness policy report card found on the [Local Wellness Policy \(LWP\)](#) webpage.

LWP Content

- SFAs are required to have language in their LWP that relates to all the content areas listed in the [LWP Checklist](#) found on the [Local Wellness Policy section](#) of the DPI SNT website.
- Sample LWP language is listed below.
 - **Policy Leadership:** *The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy.*
 - **Public Involvement:** *The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy.*
 - **School Meals:** *All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010.*
 - **Foods sold outside of school meals program:** *All food and beverages sold outside of the school meal programs*

Administrative Review Report

Delavan Christian School

shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.

- **Foods provided but not sold (e.g., class parties, class snacks, rewards):** *The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations are promoted, and a list of ideas is available to staff and family members.*
- **Food and Beverage Marketing:** *Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule.*
- **Nutrition Education:** *Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects.*
- **Nutrition Promotion:** *School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school.*
- **Physical Activity:** *The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education.*
- **Other School-Based Strategies for Wellness:** *The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year.*
- **Triennial Assessment:** *The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school follows the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture.*
- **Update/Inform the Public:** *The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.*

Marketing Your Program

Marketing refers to all the activities your SFA does to promote and sell products or services to consumers, aka the students. The goal of marketing is to match your products and services to the customers you aim to serve. The [Marketing Your Program webpage](#) provides tools and resources to market your program and show how Wisconsin School Meals Rock!

LWP Triennial Assessment

- SFAs are required to complete an assessment of their local wellness policy (LWP) at least once every three years per 7 CFR 210.31(e)(2).
- The SFA's first triennial assessment must be completed by June 30, 2020.
- The assessment must measure LWP compliance, goal and outcome progress, and how the policy compares to the model policy.
- FNS recommends the [WellSAT Tool](#) as a resource to conduct the LWP triennial assessment.
- Assessment results and findings must be released to the public as a written report. There is no required template for this report.

Meal Counting and Claiming

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. Meal benefits apply only to the reimbursable meal.
- 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.
- Meals must be offered to all students each day school is in session a full day, so DPI has created Field Trip meal resources on the [Menu Planning Webpage](#) to assist schools in providing meals for field trips.
- USDA regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to submitting counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming

Administrative Review Report

Delavan Christian School

procedures so that necessary corrections are made. Those school agencies with computerized meal counting systems or in process of purchasing such a system should ask vendors about the edit check feature.

- SFAs may claim visiting students in the paid category or the individual's category with documentation (unless they are from a CEP school).

Non-program Food Revenue

- Nonprogram foods include adult meals, a la carte, extra entrees, extra milks, vended meals, catering, 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. This ensures nonprogram foods are not supported by reimbursable meals.

Non-program Food Revenue Tool

- SFAs are required to annually complete the [DPI Non-program Food Revenue Tool](#) or the [USDA Non-program Food Revenue Tool](#). The DPI tool is recommended since it aids in calculating prices of nonprogram foods to ensure USDA revenue requirements are met as found in [Non-program Foods Revenue Rule SP-20-2016](#)
- A non-program foods deficit must receive a transfer of non-federal funds into the nonprofit food service account.
- SFAs that sell only non-program milk and adult meals are [exempt](#) from completing the Nonprogram Food Revenue Tool.

Adult Meals

Food service programs must price adult meals above the overall cost of the student meals.

- Adult meal pricing must 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.

Non-profit School Food Service Account

Reporting

- The agency's Child Nutrition Program report may be obtained online, and provides you with a compilation of meals claimed, your 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](#) webpage.

Annual Financial Report (AFR)

- The [Annual Financial Report Manual](#) is located on the DPI website to assist you with completing the AFR.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance.
- 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 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 food service 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 AFR.
- 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 non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance more than three-month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child

Administrative Review Report

Delavan Christian School

nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three-month average of operating expenses to remain in compliance with a non-profit status.

- The categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - 'Other' is expenses for paper supplies, chemicals, equipment under \$5000 (or your SFA's capitalization threshold), etc.
 - 'Food' is expenses for edible food items and beverages.
 - 'Equipment' is expenses for equipment purchases over \$5000 or your SFA's capitalization threshold.
 - 'Purchased Services' is for services you pay someone to provide such as equipment repair, health inspections, etc.
 - 'Nonprogram Foods' is expenses for any food items served that are not claimed as part of the reimbursable meal. This would include adult meals, a la carte, and caterings.
 - When revenues are recorded from the federal reimbursement payments, record the full reimbursement based on the printed claim form and not what is deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling, and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.
- Revenues and expenses for the Wisconsin School Day Milk Program should be allocated as follows: Revenues are only the state reimbursement. Expenses are only the milk expense for free and reduced priced students. Revenues and expenses for paid students should be recorded under non-program foods.

Food Service Management Company (FSMC)

- Because of the Nonprogram Revenue Rule, expenses must be allocated to actual labor, food, purchased services, equipment, or other, not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.
- SFAs must be provided with annual food costs and revenues from the 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 can only be used for the operation of the school meals program including food, supplies, equipment, and personnel.

- The nonprofit school food service account cannot 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 is found within the [Indirect Costs guidance](#).
- 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](#) is found on the SNT Financial Management webpage.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges.
- For a snapshot of what the policy should include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a comprehensive overview including best practices and helpful materials, see the Unpaid Meal Charges section of the [Financial Management Webpage](#) or the [USDA Unpaid Meal Charges Webpage](#).
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. Funds remaining in a reduced student account cannot be donated to the school food service account. Any funds left in a student meal account, which cannot be returned, must be turned over to the Wisconsin Department of Revenue as [unclaimed property](#).
- FNS recommends keeping low or negative account balances confidential to minimize student distress and

Administrative Review Report

Delavan Christian School

embarrassment. Direct communications to the adult in the household privately (and ahead of time) via mail, phone, or email. If low balance reminders and/or F/R applications are sent home with the student, communicate this in a discrete manner (e.g. white paper and envelope). Consider re-evaluating current practices and centralizing communications through the determining official and/or food service director.

On-site Monitoring

- Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP.
- Monitoring is due by February 1.
- The [NSLP On-Site Monitoring Form](#) and the [SBP On-Site Monitoring Form](#) forms are on the [Onsite Monitoring](#) section of the DPI SNT website.

Paid Lunch Equity (PLE)

- Per [USDA memo SP 11-2021](#), only SFAs with a negative balance as of December 31, in the nonprofit food service account, are required to complete the [The Paid Lunch Equity tool](#) annually and raise prices accordingly with a maximum annual increase of \$0.10 (of the weighted average price).
- Refer to the [DPI SNT Financial Webpage](#) for additional guidance including the instructions for completing the PLE tool.

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.

Professional Standards

New Food Service Director Hiring Requirements

Administrative Review Report

Delavan Christian School

- Each SFA must designate one staff member as the “Food Service Director” (FSD). The Food Service Director performs and/or oversees areas such as food safety, nutrition and menu planning, food production, procurement, financial management, customer service, and day-to-day program management.
- 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 NSLP and SBP, with further flexibilities for directors hired after April 29, 2019, in SFAs with under 2500 enrollment.
- The Hiring Standards for New SFA directors are based on the size of the SFA and includes education, school nutrition and/or relevant food service or school nutrition experience, and food 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.
- Additional resources may be found on the [Professional Standards](#) webpage.

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

Reporting and Recordkeeping

Reporting

- SFAs participating in USDA School Nutrition Programs agree to submit claims for reimbursements, submit program applications and submit reports each year within the required timeframes.
- The [Reporting Requirements In a Nutshell](#) provides information regarding reporting and timeframes.

Recordkeeping

- All program records related to the school nutrition programs must be kept for a period of three years after submission of the final claim for reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Refer to 7 CFR 210.23 (c) and 7 CFR 210.15 (b). This includes free, reduced-price, and denied applications, DC documents, and verification documents.
- Other examples of program records that must be kept for three years plus the current year are:
 - Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters);
 - Meal count participation data by school;
 - Documentation of edit checks, on-site reviews, internal controls, October enrollment, free and reduced price eligible data;
 - If applicable, currently approved and denied certification documentation for free and reduced price lunches and a description of the verification activities,
 - Records to demonstrate the school food authority's compliance with the professional standards for school nutrition program directors, managers and personnel established
 - Agreements and free and reduced price policy statements;
 - Approved and denied free and reduced price meal applications;
 - Procedures and documentation for direct certification for free meals, if applicable;
 - Procedures for alternate point-of-service meal counts, if applicable;
 - Menu and food production records and, if applicable, nutrient analysis records;

Administrative Review Report

Delavan Christian School

- All documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity and revenue from nonprogram foods requirements);
- Documentation associated with the local school wellness policy;
- Number of food safety inspections obtained per school year by each school;
- Records from the food safety program for a period of 6 months following a month's temperature records. If temperature records are on production records, then keep for 3 years plus current year
- Records from the most recent food safety inspection;
- Documents demonstrating compliance with Civil Rights requirements;
- Audit reports and written responses and any related corrective action.

CEP

- Additional record retention rules apply for CEP schools. These are detailed in [7 CFR 245.9](#) and [the USDA CEP Planning and Implementation Guidance](#). The records listed below must be kept as long as the SFA is in CEP (including any extensions), plus three fiscal years after the submission of the last Claim for Reimbursement which was based on the data. In any case, if audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.
 - Data used to calculate the identified student percentage (which is usually primarily direct certification data)
 - Annual selection of the identified student percentage
 - CEP applications, annual CEP intent forms, eligibility worksheets submitted with CEP applications
 - CEP approval packets sent by DPI after application is submitted and approved
 - Total number of breakfasts and lunches served daily
 - Free and paid claiming percentages used to claim meal reimbursement
 - Non-Federal funding sources used to cover any excess meal costs
 - School-level information provided to the State agency for publication

School Breakfast Programs & Summer Food Service Program Outreach

School Breakfast Program (SBP) Outreach

- SFAs must inform families of the availability of reimbursable breakfasts served under the [School Breakfast Program \(SBP\)](#) at the beginning and throughout the school year. The goal of providing school breakfast outreach is to increase participation in the SBP.

Summer Food Service Program (SFSP) Outreach

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round.
- The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months.
- SFAs can inform families of summer meals by promoting the following methods:
 - Promotion of the [Summer Meals Locator](#) on the DPI Summer Meals webpage
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' (in English or Spanish) to 304-304
 - Promotion of visiting the [Summer Food Service Program](#) webpage

Special Milk Program (SMP)

- The Special Milk Program (SMP) provides milk to children in schools, childcare institutions, and summer camps that do not participate in other Federal child nutrition meal service programs.
- Schools in the NSLP or SBP also may participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs.
- [The Special Milk Program](#) page of the DPI SNT website has important information regarding pricing plans, civil rights requirements, counting and claiming, and procurement.

Supply Chain Assistance (SCA) Funds

Administrative Review Report

Delavan Christian School

- [Supply Chain Assistance \(SCA\) Funds](#) are to be exclusively used to purchase unprocessed or minimally processed domestic food products served in the National School Lunch (NSLP), School Breakfast (SBP), and Afterschool Snack (ASP) Programs.
 - The USDA [Allocation of Supply Chain Assistance Funds to Alleviate Supply Chain Disruptions in the School Meal Programs: Questions and Answers](#) includes detailed information on allowable ways to utilize these funds.
- SFAs are required to maintain documentation supporting food purchases that are allowable for SCA purposes (i.e. unprocessed or minimally processed domestic food products) and equal in amount received, consistent with the regular program recordkeeping requirements. These funds must be tracked as they are used. DPI has developed a [Supply Chain Assistance \(SCA\) Funds Expense Tracker](#) that SFAs may use to track these funds, however, SFAs may use any form of tracking.
- SCA funds are recorded under WUFAR code **717 Revenue Source - federal reimbursement and 547 Program/Project Code – National School Lunch (NSL)**. Record the entire amount into **NSL revenue** on the AFR during the year it is received and **expense it to NSL “food”** as it is used. The NSL food expense may carry over into future AFR reporting year.

Unpaid Meal Charge Policy

- Per USDA policy memo [SP 46-2016](#), no later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to unpaid meal charges. Policies developed at the SFA level must be provided to the state agency during the administrative review.
- Must explain how the SFA will handle situations where children eligible to receive reduced-price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service.
 - If a child has money to purchase a reduced-price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child’s money to repay unpaid charges if the child intended to use the money to purchase that day’s meal.
- Should be implemented and enforced SFA-wide.
- Local discretion to vary policy based on student grade level.
- Must be provided in writing (mail, email, back-to-school packet, student handbook, etc.) to all households at the start of each school year and to households transferring to the school district during the school year. Only posting the policy to the school website does not meet the requirement.
- Must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported.
 - Schools may not enlist the assistance of unauthorized persons, such as parent or guardian volunteers, to follow up with debt collection efforts.
- Polices regarding the collection of unpaid meal charges should be included in the written unpaid meal policy.
- SFAs are encouraged to review the policy on a regular basis (e.g., annually or biannually).

Verification

- When an application(s) is chosen for verification, the person designated as the *Confirming Official* must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the *Confirming Official* to sign and date on the back of the application.
- After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected [7 CFR 245.6a(e)(2)]. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request. This action should be documented.
- When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA. DPI has created a [We MUST CHECK your application](#) sample letter for verification purposes with required documentation included.
- When a household is selected for verification, it must provide “sources of information” to the LEA to confirm current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records.
- Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the months prior to application and the time the household is required to provide the documentation.

Administrative Review Report

Delavan Christian School

- Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient. If the household submits a pay stub including overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.
- Section 9(b)(3)(F) of the NSLA and Program regulations at 7 CFR 245.6a(g) permit LEAs to “directly” verify approved applications selected for verification. Direct verification involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. LEAs are not required to conduct direct verification.
- The LEA must make at least one attempt to contact the household when the household does not respond to the request for verification [7 CFR 245.6a(f)(6)]. “Non-response” includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children’s eligibility for free and reduced-price meals. The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.
- When a benefit eligibility status increases, the change must take place within three days. When benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures. DPI has created a [We HAVE CHECKED your application](#) letter template for LEAs to use after verification is completed.
- According to 7 CFR 245.7(b)(1), when a household appeals a reduction or termination of benefits within the 10-calendar day advance notice period, the LEA must continue to provide the benefits for which the child was originally approved, until a final determination is made.
- The LEA may continue to claim reimbursement at the original level during this period. When a household does not request an appeal during the 10-calendar day advance notice period, benefits must be reduced or terminated no later than 10 operating days after the notice period. If the hearing official rules the child’s benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official’s decision.
- Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year, and schools should remind families their children may become eligible for meal benefits if the household unit experiences a change in financial circumstances (i.e., household size goes up or income goes down). However, if benefits to a household have been terminated because of failure to complete the verification or verification for cause process and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Assistance Programs at the time of reapplication [7 CFR 245.6a(f)(7)]. These are not considered new applications.
- Apart from the required verification of a specified number of approved applications, regulations at 7 CFR 245.6a(c)(7) require LEAs to verify any questionable application including, on a case-by-case basis, verifying any application for cause when the LEA is aware of additional income or persons in the household. This is known as “verification for cause.”
 - Determining officials are strongly encouraged to contact the household to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households. Verification for cause cannot delay the approval of applications, and LEAs can begin the verification process only after the determination of eligibility has been made. If an application is complete and indicates the child is eligible for free or reduced-price benefits, the application must be approved while the LEA begins verification for cause.
- The standard sample size for verification must be used by an LEA unless the LEA qualifies to use an alternate sample size. Instructions for standard and alternate sample sizes can be found in the [Eligibility Manual](#).

Water

- Water is required to be available at no charge and without restriction to students during the lunch meal service and breakfast meal service in the cafeteria.
- Water can be provided in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.
- For more information and resources on the water requirement visit the [Water Availability](#) webpage.

Wisconsin School Day Milk Program (WSDMP)

- The Wisconsin School Day Milk Program (WSDMP) reimburses schools for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students who are eligible for free or reduced-price meals.
- One half-pint of milk may be claimed per eligible student each school day for students identified as free or reduced-price status. Milk served to students with paid eligibility status is counted as a non-program food cost and revenue.
- If milk served to students is claimed under the federal Special Milk Program (SMP), it may not be claimed under the WSDMP.

Administrative Review Report

Delavan Christian School

- Point Of Service for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one.
- Per the Agreement for the WSDMP, schools are required to serve Wisconsin-produced milk. Check with your distributor to verify it is WI produced milk and consider including that stipulation in the SFA’s milk bid.
- Fluid milk substitution rules apply to all federal school nutrition programs except the Wisconsin School Day Milk Program (WSDMP). WSDMP allows juice as a milk substitution and is reimbursable.

Appendix

Acronyms and Abbreviations

AFR	Annual Financial Report
ASP	Afterschool Snack Program
CEP	Community Eligibility Provision
DC	Direct Certification
DPI	Department of Public Instruction
FFVP	Fresh Fruit and Vegetable Program
FNS	Food and Nutrition Service
FSMC	Food Service Management Company
HACCP	Hazard Analysis Critical Control Point
IEG	Income Eligibility Guidelines
LEA	Local Education Agency
LEP	Limited English Proficiency
LWP	Local Wellness Policy
NSLP	National School Lunch Program
PLE	Paid Lunch Equity
POS	Point of Service/Sale
SBP	School Breakfast Program
SFA	School Food Authority
SFSP	Summer Food Service Program
SMP	Special Milk Program
SNT	School Nutrition Team
SOP	Standard Operating Procedure

Administrative Review Report

Delavan Christian School

TCS Time/Temperature Control for Safety

WSDMP Wisconsin School Day Milk Program

The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. The School Nutrition Team believes that child nutrition programs play a critical part in this path to graduation. Well-nourished children are ready to learn and thrive. We 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.