

# Administrative Review Report

Webster School District

## Review Schedule:

Schedule Type	Start Date	End Date
On-Site Review Review Site Webster Middle School	03/11/2024	03/12/2024

## Commendations:

Thank you to all staff at Webster School District for the warm welcome and cooperation during this Administrative Review (AR). A special thanks to the Food Service Director and Authorized Representative for sending the required documentation ahead of time and having documentation prepared for review during onsite visit; this helped expedite the AR. The meals served during the onsite visit looked appealing, nutritious, and tasted delicious, too! It was a pleasure observing the Fresh Fruit and Vegetable Program at the Elementary school where kids shared with the State Agency that carrots support their eyes! Thank you to all of the school nutrition professionals and administrative staff for running and supporting such a great school nutrition program.

## Recommendations:

Join the DPI School Nutrition Team for SNST 2024 at Northeast Wisconsin Technical College in Green Bay, WI. Our summer training conference will kick off the afternoon of Monday, July 15, with classes running through Wednesday, July 17. Stay tuned for the conference schedule and registration, coming in early April. Get ready to champion excellence in school nutrition! For more details, check out the School Nutrition Summer Training Webpage (<https://dpi.wi.gov/school-nutrition/training/school-nutrition-summer-training>).

## Findings and Corrective Action:

<b>Form Name</b>	Certification and Benefit Issuance (100 - 121)
<b>Question #</b>	113
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFA is not in compliance with disclosure requirements per 7 CFR 245.6(i) and the Eligibility Manual. The SFA allows individuals to have access to the benefit issuance system that do not need access.</p> <p>Corrective Action 1: Review who within the district has access to the benefit issuance system. Determine who has a "legitimate need to know" and upload the final list of which positions will maintain access into SNACS.</p> <p>Corrective Action 2: Provide a statement of the procedures that will be used to ensure only those with a "need to know" will have access to the benefit issuance system or eligibility information.</p>
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705, 777)
<b>Question #</b>	700
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding 1: On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category (7 CFR 210.19) There were revenues reported for nonprogram foods, but no expenses were reported. WSDMP revenue should only be the reimbursement received from free or reduced milks \$4,634.97.</p> <p>Corrective Action 1: Review the Annual Financial Report webcast or manual on the DPI website. Print a copy of the 2022-23 Annual Financial Report and notate the updates required to show the revenues and expenses broken out by program and</p>

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	category. Upload this document into SNACS. Once approved, the report will need to be updated in the online portal. If after December 31, the DPI accountant will make the adjustments in the system.
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)
<b>Question #</b>	709
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Food products ordered from food service must have a mark-up that covers all costs associated with the purchase and sale of the product. Corrective Action 1: Submit a statement of understanding that the Nonprogram Foods Revenue Tool will be utilized to set nonprogram food pricing to ensure compliance with the nonprogram food revenue ratio.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	800
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA's website does not have the full NDS or a link to the full NDS. Corrective Action: Add the current fill USDA Nondiscrimination Statement or a link to the statement to the SFA's website on the food service page.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	801
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The Public Release was posted on the school website. The Public Release cannot be posted to the SFA's website, nor to the district handbook. Corrective Action: Remove from SFA website.</p>
<b>Form Name</b>	Civil Rights (800 - 807)
<b>Question #</b>	805
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs.</p> <p>Corrective Action: Provide a timeline for when a Special Dietary Needs procedure will be put in place. Provide the name and title of the SFA representative that will ensure compliance. It is recommended that SFAs utilize the Special Dietary Needs policy template. (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx</a>).</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p>Corrective Action: Utilizing the SFA-1 form provided with the specific application and</p>

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	certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	128
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The correct income conversion factors were not used when determining meal eligibility on free and reduced-price meal applications. Applications with one income frequency were annualized.</p> <p>Corrective Action: Review the Income Conversions section of the Eligibility Manual (page 61-62). Submit a statement of understanding on the correct income conversion factors to use when determining eligibility on a free or reduced-price meal application.</p>
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	208
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA confirmed all applications, not just the applications to be verified.</p> <p>Corrective Action: Review pages 103-104 in the Eligibility Manual and submit a statement of understanding that only applications selected for verification must be confirmed.</p>
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	214
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA did not provide ten calendar days' notice to the household(s) when benefits were reduced as a result of verification (7CFR 245.6a).</p> <p>Corrective Action: Submit a statement of understanding that ten calendar days must be provided to households prior to reducing benefits, as a result of verification.</p>
<b>Form Name</b>	Civil Rights (809 - 810)
<b>Question #</b>	810
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The correct non-discrimination statement was not included on all program materials.</p> <p>Corrective Action: Update program materials (unpaid meal charge, LWP, Special Dietary Needs policy, (menu, only, can use the shortened statement)) to include the correct non-discrimination statement. Upload into SNACS a copy of materials updated.</p>
<b>Form Name</b>	Food Safety & Buy American (1400 - 1403)
<b>Question #</b>	1400
<b>Corrective Action Status</b>	Flagged

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<b>Corrective Action History</b>	<p>Finding: The SFA did not have a copy of the food safety plan at each school and/or was not site specific. Each school within the SFA must have a written site-specific food safety plan, including the required elements, for compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13).</p> <p>Corrective Action: Update the food safety plan to be specific for each participating school in the SFA, ensure a copy is provided to each school and upload the updated food safety plan(s) into SNACS.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)
<b>Question #</b>	323
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Average Daily Attendance (ADA) is not calculated before claim submission.</p> <p>Corrective Action: Provide a statement that ADA will be calculated monthly before the claim is submitted. Submit ADA calculation for the month of March.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)
<b>Question #</b>	406
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The same meal pattern is used for grades 6-12. Because there is no overlap with the dietary specifications for these age groups under the NSLP, a separate 6-8 and 9-12 meal pattern must be followed.</p> <p>Corrective Action: Submit a statement explaining how a separate 6-8 and 9-12 meal pattern will be followed going forward.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	430
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Currently, school nutrition staff are unclear about production record requirements and their central role in demonstrating that reimbursable meals were planned and served.</p> <p>Corrective Action: The FSD and school nutrition professionals responsible for completing production records must complete the Production Records webcast from the School Nutrition Online Learning Library ( <a href="https://dpi.wi.gov/school-nutrition/training/online-learning#production-records-standardized-recipes">https://dpi.wi.gov/school-nutrition/training/online-learning#production-records-standardized-recipes</a> ). Complete the training individually or as a group. Submit a certificate of completion for</p>

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	each individual or a meeting agenda detailing date, time, attendees, and agenda items, including the required training.
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	431
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The planned servings sizes for fruits and vegetables, total quantity prepared in bulk units, planned number of servings, and component crediting were not consistently filled in or correctly filled in daily on production records during the week of review for breakfast and lunch. Menu items were lacking in detail, i.e. the production record listed "Cereal" for Marshmallow Mateys, Shredded Wheat, and Cinnamon Toast Crunch. Production records are intended to be useful tools to record information prior to production, during production, and following production. Review the Production Record Requirements (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf</a>). Additionally, please utilize the two-grade group production record template to document the meal pattern for K-8 and 9-12 individually as there is no meal pattern overlap (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-two-grade-groups.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-two-grade-groups.xlsx</a>).</p> <p>Corrective Action: Submit one full week of completed production records for breakfast and lunch, including meals planned, planned/actual quantity prepared in bulk units, component contribution, planned serving sizes, and menu item details recorded daily. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412, 430-437)
<b>Question #</b>	434
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: Standardized recipes are required for all menu items made in-house with more than one ingredient. There was no standardized recipe for the following items:</p> <ul style="list-style-type: none"> <li>Gluten free pizza</li> <li>Gluten free grilled cheese</li> <li>Ham sandwich</li> </ul> <p>Corrective Action: Submit a standardized recipe for the menu items listed above. Be sure to include all requirements of a standardized recipe, including serving size and yield. Templates and other resources can be found on the Standardized Recipes webpage (<a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes</a>).</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Civil Rights (811-812)
<b>Question #</b>	811
<b>Corrective Action Status</b>	Flagged

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<b>Corrective Action History</b>	<p>Finding: The nondiscrimination "And Justice for All" poster is not located in the meal service area (FNS Instruction 113).</p> <p>Corrective Action: Hang the USDA nondiscrimination "And Justice for All" poster in a prominent location in the meal service area. Provide a statement or image of how this requirement will be met. If corrected while onsite, no further action required.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)
<b>Question #</b>	1406
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a statement and/or photo of where the most recent food safety inspection report will be posted and visible to the public. If corrected onsite, no further action required.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)
<b>Question #</b>	1409
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: SFAs must ensure that food storage, preparation and service is in accordance with the state and local sanitation and health laws and regulations (7 CFR 210.13). The freezers, and refrigerators need internal thermometers. Corrective Action: Place internal thermometers in all equipment. Send a statement and picture to show this is complete.</p>
<b>Site Name</b>	Webster Middle School
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)
<b>Question #</b>	1411
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Finding: The following products were identified in the SFA's storage area as non-domestic and are not listed on the SFA's Buy American Noncompliant Product List or SFA equivalent:</p> <ul style="list-style-type: none"> <li>Olives (Egypt)</li> <li>Jalapeno (Egypt)</li> <li>Grapes (Chile)</li> <li>Bananas (Guatemala)</li> <li>Broccoli, Frozen (Mexico)</li> </ul> <p>Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. If no country of origin is identified on the label, then the SFA must get documentation/ certification from the distributor or supplier. This was completed onsite. No further action required.</p>

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## Technical Assistance Entries:

### Comments

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese, peanut butter and jelly sandwich, tomato soup). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the Standardized Recipes webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

### Comments

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). Spoodles, which are used to measure volume, are often referred to as a "4 oz spoodle" for example. A 4 oz or ½ cup spoodle is actually 4 fluid oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).

### Comments

The DPI School Nutrition Team has interactive breakfast and lunch menu and production records planning tools posted on our production records webpage! These excel spreadsheets can be used for all-in-one menu planning and production records. <https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records#:~:text=Interactive%20Menu%20Planning%20Production%20Records>.

### Comments

USDA and the Department of Defense (DoD) - Defense Logistics Agency (DLA) that supplies fresh fruits and vegetable for the military services has partnered to increase availability of fresh produce to agencies participating in the USDA Foods Program through the National School Lunch Program (NSLP). Participating agencies must allocate a portion of their USDA entitlement during the annual ordering period. Ordering and distribution of allocated entitlement dollars are coordinated through the DoD Fresh Fruit and Vegetable Ordering System (FFAVORS). For more information, check out the DoD Webpage (<https://dpi.wi.gov/school-nutrition/usda/dod-fresh>).

### Comments

Promote correct serving sizes by adding signage at the condiment station with a photo of what one serving of a condiment looks like, purchasing single-use one-ounce cups to aid in portion control, or using signage such as "One squeeze, please!" on self-serve squirt bottles.

### Comments

Menu planning worksheets are helpful tools to ensure meal pattern requirements are met at both breakfast and lunch. These can be found on the NSLP Menu Planning webpage, under the Menu Planning Tools heading (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning>).

### Comments

Using a cycle menu may ease the burden of menu planning and help ensure meal pattern requirements are met after a compliant cycle has been planned. Cycle menus may aid in purchasing, if production records are reviewed and analyzed to forecast based on historical data. When using a cycle menu, production records can be partially completed prior to meal service. For more information, visit the Cycle Menu webpage (<https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/cycle-menu>).

### Comments

Grains can be credited based on weight using Exhibit A (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A is a resource that separates commonly used grain items into groups of similar products and provides information on the grams or ounces per 1.0 oz eq for each group. Exhibit A groups all grain



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products based on how much grain they contain per serving, on average. Exhibit A can be used to credit products when the baked weight is known. However, if a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the grams of creditable grain in the product. Additionally, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

## Comments

The USDA Food Buying Guide (FBG) contains yield and crediting information for foods with a standard of identity (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, grains, meat/meat alternates (M/MA), and dairy can be credited using the FBG. Most fruits and vegetables credit by volume served and most M/MAs and grains credit by weight. If the product is not listed in the FBG, additional crediting documentation is required. After logging in to the USDA Food Buying Guide (FBG), click on "Food Items Search" and type a food in the "keywords" search box. Different options may appear. Find the one that most closely matches how you purchase the product, the purchase units, and how the product is served to students (e.g. Peaches, canned, diced; purchased in pounds; served fruit and liquid). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, and purchase units for 100 servings. When servings vegetables on the garden bar with tongs, it is important to determine the number of vegetable pieces a student would have to take for the intended servings size. This can be determined by using the USDA FBG. For example, a pound of baby carrots served to students raw provides 6.45 (1/2c) servings; each serving weighs 2.48 oz (16 oz / 6.45 half cup servings). This may come out around 6 baby carrots when weighing out 2.48 oz on a scale and can be communicated to students using our Salad Bar Signage Template found on our Signage webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>). When vegetables on the garden bar/salad bar are used to meet the weekly vegetable requirements, portion sizes of at least ½ cup each should be communicated to students with signage.

## 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. The Public release may not be posted on the website. 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.

## Verification

- The verification process must be completed each year, beginning around October 1, for all SFAs with current year completed and approved applications on file.
- 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 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.
- 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.



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- Acceptable documentation of income or receipt of assistance from any of the following sources may be provided for any point in time between the month prior to application and the time the household is required to provide the documentation.
- 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 follow-up attempt to contact the household when the household does not adequately 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 a 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.
- 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 days after the notice period. If the hearing official rules that 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](#)

## 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

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“yearly” reference period for nonprogram food compliance.

- 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 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.

## Meal Counting and Claiming

- Meal benefits apply only to a reimbursable meal and must be priced as a unit. If a student decides to take only milk, this is not a reimbursable meal and milk must be charged as an a la carte item.
- Meals must be counted at the point of service and may only be charged to a student upon receipt of a reimbursable meal.
- All meals claimed for reimbursement must be counted, recorded, consolidated, and reported through a system that consistently yields accurate claims. Backout counts (only marking who is absent) and forecast counts are unallowable. (7 CFR 210.7)
- Per 7CFR 210.10 meals must be offered to all students each day school is in session a full day.
- Field trip meals are highly encouraged to ensure all children have access to food and to maintain a steady revenue stream for the food service program. DPI has created [Field Trip meal resources](#) 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 the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools’ meal counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. SFAs with computerized meal counting systems should ask software vendors about the edit check feature. DPI has created a manual [Monthly Edit Check Form](#) for SFAs using a manual counting system.
- SFAs may claim visiting students in the paid category or in the individual’s benefit category with proof of eligibility documentation (unless they are from a CEP school).