

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

School Food Authority: New Beginnings

Agency Code: 352540

School(s) Reviewed: New Beginnings

Review Date(s): November 29-30, 2018

Date of Exit Conference: 11/30/2018

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Free and Reduced Price Meal Applications

Application should be provided to households and households have the option to fill them out if they choose to do so. Households are not required to fill out applications. Technical assistance was provided as the school was requesting all households to fill out applications.

Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.

When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual income. But using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>).

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 become \$0 for the income on the application.

Income Eligibility Guidelines

The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf>). Household Size Box

The total household member size box (Step 3G) 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/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Other Source Categorical

If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, 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.

Applications that indicate a child is a foster child are categorically 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 (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)

SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).

Direct Certification

As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.

The effective eligibility date for a DC eligible student is the date of the original output file.

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.

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- 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 on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding #1:** The finding was a benefit issuance list was not available. Technical assistance was required.

Corrective Action Needed: Please develop a benefit issuance list, which includes name, effective date, meal benefit status and source of benefit. **Corrected on-site no further action needed.**

- ❑ **Finding #2:** The finding was that the instructions for how to fill out an application were not provided to households with the application template.

Corrective Action Needed: Please submit a statement moving forward how you will address this finding in the future.

Verification

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- When applications are 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.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- 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.

Findings and Corrective Action Needed: Verification

- ❑ **Finding:** The finding was verification was not completed correctly. The application selected should not have been in the application pool as the household showed up on direct certification before the application was submitted. In addition, there was misunderstanding of the role of the confirming official. There was no way to determine that a confirmation review took place. **Technical assistance** was required and resources were left on-site.

Corrective Action Needed: Please review the [verification website](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) including the [webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#verif) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>; <https://dpi.wi.gov/school-nutrition/training/webcasts#verif>). Please submit a statement of understanding

regarding the removal of applications if the household shows up on direct certification prior to October 1. Also, describe the role of the confirming official and when they are required to sign an application.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning). Technical assistance was provided.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

Findings and Corrective Action Needed: Meal Counting and Claiming

- Finding:** The school has only 15 children enrolled with attendance nearly at 100 percent however it was determined that edit check was not used to determine the number of reimbursable meals to be claimed by eligibility for claim submission.

Corrective Action Needed: Please submit completed [edit check](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming) for the months of November and December to reviewer(https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Sincere thanks to everyone at New Testament Church (NTC) Christian Academy. We appreciate your time and efforts spent preparing for and participating in the onsite review. Thank you to the food service director for responding to the Public Health Nutritionist's (PHN) questions and concerns prior to the onsite review, including modifying the menu for lunch meal observation to ensure reimbursable meals were planned, offered, and served to all students. We appreciate the open communication with the principal, bookkeeper, and food service director. Your willingness to learn from reviewers and from School Nutrition Team (SNT) resources and trainings will greatly enhance the Child Nutrition Programs offered to your students. Please do not hesitate to call or email with questions or concerns.

Technical Assistance and Program Requirement Reminders

USDA Meal Patterns

NTC Christian Academy, serving students in grades kindergarten through 12, inappropriately utilizes the Child and Adult Care Food Program (CACFP) meal pattern for grades K-12. According to [USDA memorandum SP 01-2018](#), while many of the recent changes to the infant and preschool meal patterns make them more consistent with the requirements for older grade groups (K-12), some of the meal pattern requirements for infants and preschoolers are different (https://fns-prod.azureedge.net/sites/default/files/cn/SP01-2018os.pdf). The infant and preschool meal patterns are specifically designed for this younger age group and their nutritional needs. Following the National School Lunch Program (NSLP) meal pattern and aligning with the USDA age/grade groups are critical to ensuring minimum daily and weekly requirements are met within the appropriate dietary specifications. The students of NTC Christian Academy must be grouped based on one of the following options: K-5, 6-8, and 9-12 **OR** K-8 and 9-12.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The current production record template does not meet the production record requirements per the "[Must Haves and Nice to Haves](#)" list (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Production records submitted for lunch for the review period were not filled in completely nor consistently. The following information must be corrected to meet the production record requirements:

- Grade grouping(s)
- Menu item with **recipe name/reference number or product name/description**
- Planned serving size (weight or measure) for each grade group and adults
- Planned/actual quantity prepared in purchase units - If the actual number of purchase units prepared is different from what is planned, record both numbers.

While there is no required production record template, there are some examples that may be used on the [Production Records webpage](#). A PDF and a Microsoft Excel file will be emailed to the food service director for consideration.

Be specific about the identity, brand, and description of the items served. Instead of "corn dogs," "meatballs," or "noodles," list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

Use volume measures (such as cups) to record portion sizes of fruits and vegetables, including salsa, and use weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Milk Types

A variety of milk, at least two allowable milk types, is required to be offered daily at lunch and breakfast. Allowable milk types in Child Nutrition Programs include nonfat (skim) milk, flavored (e.g. chocolate, strawberry, etc.) or unflavored, and low-fat (1%) milk, flavored or unflavored. Milk types may also be lactose-reduced or lactose-free. Available milk types and actual usage by type (or a milk recipe) must be recorded on production records.

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time, when the exact procedures, equipment, and ingredients are used. Use the resources on the [Standardized Recipes webpage](#), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The PHN also encourages viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). Recipes for sloppy joes, macaroni and cheese, meatballs, and green salad are not standardized to the operation.

Offer Versus Serve (OVS)

OVS is required for the 9-12 age/grade group for lunch, but it is not implemented. Students are served all five components rather than offered and allowed to select at least three components and decline at most two components. OVS is highly encouraged for the K-8 age/grade group in order to reduce food waste and allow students to make choices about which foods they want.

The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve webcast](#) may be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance->

manual.pdf, <https://dpi.wi.gov/school-nutrition/training/webcasts>). Additionally, [Meal or No Meal](#), a training resource inspired by a game show, may be used for staff determining reimbursable meals (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>). Practice OVS in the context of NTC Christian Academy's planned menu.

Signage

The NSLP regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and posted in your school can be found on the [Signage webpage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

If you are interested in ordering signage from SNT, please visit the [Team Nutrition webpage](#) and complete the Resource Order Form, under the Resources heading (<https://dpi.wi.gov/team-nutrition>).

In-house Yield

In-house yield data may be used for crediting food items contributing to meal pattern requirements. Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR). An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying Guide (FBG). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG. [In-house Yield Study Procedures](#) are available on the [Menu Planning webpage](#) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week.

Beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes.

Dark green vegetables are especially rich in Vitamin A, Vitamin C, and calcium. There are several vegetables that are green in color but not included in the dark green subgroup (e.g. asparagus, avocado, Brussels' sprouts, green beans, green peas, lima beans, and green peppers). There are green-colored vegetables in the starchy or "other" categories because of their nutrient profiles.

Refer to the [Vegetable Subgroups handout](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) from the [Menu Planning webpage](#) to identify commonly eaten vegetables in each subgroup (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>). A copy was left onsite.

Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, 3/4 cup of romaine lettuce credits as 3/8 cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served.

Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility

category. If your school implements OVS, it must be implemented to the extent possible during field trips as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

School Breakfast Program

NTC Christian Academy does not currently participate in the School Breakfast Program (SBP). Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Furthermore, providing students with breakfast in the classroom is associated with lower tardy rates and fewer disciplinary referrals. Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or starting a program, contact the [School Breakfast Program Specialists \(DPISBP@dpi.wi.gov\)](mailto:DPISBP@dpi.wi.gov).

Training

Wisconsin Department of Public Instruction (DPI) SNT trainings are offered in the summer and select other times throughout the year. Courses provide overviews of all areas of the NSLP and SBP requirements, including Meal Pattern - The Whole Enchilada, Offer Versus Serve, and Meal Pattern for Infants and Pre-K.

Small Victories (SV) training is designed to celebrate the unique environment that is specific to schools with small student enrollments. The tools found on the [SV webpage](https://dpi.wi.gov/school-nutrition/training/small-victories) are meant to assist foodservice professionals working in small schools as they create their own *Small Victories* (<https://dpi.wi.gov/school-nutrition/training/small-victories>). Attending in-person trainings and watching available webcasts count toward [GOALS requirements](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>).

Travel and meals are allowable expenses to the nonprofit food service account. Information on upcoming trainings can be found on the [Training webpage](https://dpi.wi.gov/school-nutrition/training#up), under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts webpage](https://dpi.wi.gov/school-nutrition/training/webcasts) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Communications

Anyone involved with the USDA School Meal Programs may send an email to join-schoolmealsnews@lists.dpi.wi.gov to directly receive important School Nutrition program updates from the DPI. Additionally, the SNT Training Team hosts the [What's New with School Nutrition Webinar](https://dpi.wi.gov/school-nutrition/training/whats-new) on the second Tuesday of each month from 2:00 PM to 3:00 PM via Skype Meeting (<https://dpi.wi.gov/school-nutrition/training/whats-new>).

Corrective Action

Meal Pattern Finding #1: Daily and weekly minimum requirements for fruit were not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Monday: 1/2 cup of pears
- Tuesday: 1/4 cup of blueberries
- Wednesday: 1/4 cup of mixed fruit

- Thursday: 1/2 cup of apple slices
- Friday: 1/4 cup of mandarin oranges
- Total: 1 3/4 cup of fruit

The daily minimum requirement for age/grade group K-8 is 1/2 cup, and for age/grade group 9-12 is 1 cup. The weekly minimum requirement for age/grade group K-8 is 2 1/2 cups, and for age/grade group 9-12 is 5 cups. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

Meal Pattern Finding #2: Daily and weekly minimum requirements for vegetables were not met for lunch during the review period, including weekly minimum requirement for the red/orange subgroup. The following represent the portion sizes planned, offered, and served during the review period:

- Monday: 1/2 cup of tater tots
- Tuesday: 1/4 cup of marinara, 3/4 cup of green salad (based on lettuce and carrots only)
- Wednesday: 1/2 cup of oven fries
- Thursday: 1/2 cup of green beans
- Friday: 1/2 cup of oven fries
- Total: 3 cups of vegetables

The daily minimum requirement for age/grade group K-8 is 3/4 cup, and for age/grade group 9-12 is 1 cup. The weekly minimum requirement for age/grade group K-8 is 3 3/4 cups, and for age/grade group 9-12 is 5 cups. The weekly minimum requirement for the red/orange subgroup is 3/4 cup. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

Meal Pattern Finding #3: Missing beans and peas (legumes) and dark green vegetable subgroups for lunch during the review period. The weekly minimum requirements for the beans and peas (legumes) and dark green subgroups is 1/2 cup each. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

Meal Pattern Finding #4: The daily minimum requirement for grain was not met for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:

- Tuesday: 1/2 cup of spaghetti (1 oz eq)
- Thursday: 1 cup of macaroni and cheese (0.75 oz eq)

The daily minimum requirement for age/grade group K-8 is 1 oz eq, and for age/grade group 9-12 is 2 oz eq. The weekly minimum requirement for age/grade group 9-12 is 10 oz eq. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

Meal Pattern Finding #5: A variety of milk, at least two allowable milk types, was not offered daily at lunch during the review period. This is a repeat finding subject to fiscal action.

Required Corrective Action: Please refer to the corrective action under Meal Pattern Finding #6.

Meal Pattern Finding #6: Planned portion sizes for grades K-12 are inappropriately combined on lunch production records. Separating these students is critical to ensuring minimum daily and weekly requirements are met within the dietary specifications appropriate to each age/grade group at the NTC Christian Academy.

Required Corrective Action: Complete and submit menu planning worksheets for K-8 and 9-12

age/grade groups (attached), outlining planned portion sizes for all components at lunch, which meet both daily and weekly minimum requirements.

Meal Pattern Finding #7: Production records submitted for lunch for the review period were not filled in completely nor consistently. All required information on the template must be documented for all menu items.

Required Corrective Action: Submit three days of completed production records for lunch. Select production records you are confident are filled in accurately and completely.

Meal Pattern Finding #8: Recipes for sloppy joes, macaroni and cheese, meatballs, and green salad are not standardized to the operation.

Required Corrective Action: Submit standardized recipes for these four menu items, including serving size for single portion(s), total number of portions, and total volume or measure.

Meal Pattern Finding #9: Signage was not posted at lunch to show students what constitutes a reimbursable meal.

Required Corrective Action: Submit a photo of signage posted at lunch, which includes the required 1/2 cup fruit, vegetable, or fruit vegetable combination statement.

Meal Pattern Finding #10: Staff are not trained on OVS.

Required Corrective Action: Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) (<https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs>) on the SNT [Training webpage](https://dpi.wi.gov/school-nutrition/training) (<https://dpi.wi.gov/school-nutrition/training>) or comparable training with prior approval from the Public Health Nutritionist. Submit certificates of completion for the food service director and for school staff who determine reimbursable meals at the point of service (POS). Submit three to five sentences describing development and implementation of OVS in the reimbursable meal service line.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant addressed financial topics with the school secretary including how to locate the agency's Child Nutrition Program report, which 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](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended.

The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year. **Technical assistance** was provided regarding beginning and ending fund balances.

- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “non-program foods”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
 - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as an NSLP food expenditure for private schools and a purchased service for public schools.

Allowable Costs

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

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 snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- 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. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding:** The school has not developed an unpaid meal charge policy, which was required to be in place and distributed to families by July 1, 2017. While the school is small is is still required to inform families in writing each year regarding an unpaid meal balance policy.

Corrective Action Needed: Please develop policy and provide a timeline for when a written unpaid meal charge policy will be in place and how families will be made aware each year of the policy.

- ❑ **Finding :** The finding was that monthly expenses and revenues are being tracked however the templates being used are for CACFP accounting and not NSLP. **Technical assistance** was provided to either update the template to reflect NSLP or to use the [monthly purchase/ revenue DPI template](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) located on the DPI website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Corrective Action Needed: SFA needs to submit an updated template for one month and which includes breaking out Adult meals and extra milk.

Revenue from Non-program Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Non-program Food costs and revenues must be separated from Program food costs and revenues.
- Since non-program foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- SFAs that sell only non-program milk and adult meals as non-program foods are [exempt](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) from completing the USDA Non-program Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing->

guide.doc).

- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. Resources
- [Nonprogram Foods Revenue Rule SP-20-2016](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf)
- [Nonprogram Foods In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf)

Findings and Corrective Action Needed: Revenue from Non-program Foods

- ❑ **Finding:** The finding is that the adult meal prices are not being charged to staff. These meals are considered part of their salary. These meals are not allowable costs to the food service program and need to be paid either by staff or by another non-federal fund source. In addition, these meals need to be tracked each month in the ledger or spreadsheet and a transfer of funds or collection of revenue needs to be received to show that these meal costs are covered. This was also a finding on the previous administrative food service review.

Corrective Action Needed: Please begin to track adult meals each month on a monthly purchase/ revenue template document. Please submit one month with this breakout.

Indirect Costs

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local 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 - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).

However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, **“This institution is an equal opportunity provider.”** Either of these statements must be in the same size font as the other text in the document.

And Justice for All Poster

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

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

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

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner these accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Processes for complaints

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA](#)

[Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Technical assistance was provided to SFA to be sure to have a process or plan in place on how to handle a complaint. Also technical assistance was provided to include the civil rights statement in any handbook that may be provided to households mentioning the lunch program.

Findings and Corrective Action Needed: Civil Rights

Finding: The finding was that the non-discrimination statement was not included on the menu.

Corrective Action Required: Please submit a copy of a monthly menu with the non-discrimination statement included on it. The shorten version of the non-discrimination statement can be used.

Finding: The finding was that the civil rights self-compliance form was not completed. Technical assistance was required regarding the annual requirement of completion of this form.

Corrective Action Required: Please submit a copy of this form completed for the current school year. Corrected on-site. **No further action needed.**

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)

- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

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

Corrective Action Required: Please provide a timeline for updating your wellness policy to become compliant with the final rule. Please include how you will meet the June 30, 2020 triennial assessment.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school site per school year, per the district's approval. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Findings and Corrective Action Needed: Smart Snacks in Schools

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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

Professional Standards: New Food Service Director Hiring Requirements

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

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

Technical assistance was provided to have staff take more NSLP training in addition to the CACFP training. As currently, the school runs a daycare.

Water

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water 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.

Food Safety and Storage

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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

Food Safety Inspections

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

Temperatures

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

Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

Food Employee Reporting Agreements

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

Findings and Corrective Action: Food Safety

- Finding:** The finding was that menu items were not listed on the Process 1, 2, and 3 chart.
Corrective Action Needed: Categorize all menu items on chart for Menu Items Categorized by Process 1, 2, or 3. Submit updated chart. **Corrected on-site no further action needed.**
- Finding:** Most recent food safety inspection report is not posted in a publicly visible location.
Corrective Action Needed: Post most recent food safety inspection report in location visible to public.
Completed on-site. No further action required.

Buy American

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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

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

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. All meal claim documentation and production records must be also be kept for the three years after the final claim is submitted for the fiscal year.

Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Summer Meals

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

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

Resources:

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

5. OTHER FEDERAL PROGRAMS REVIEWS

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

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

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



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