

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

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**School Food Authority:** Trinity Lutheran School

**Review Date(s):** January 10-11, 2019

**Date of Exit Conference:** January 11, 2019

**Agency Code:** 707967

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at a nominal charge. 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](http://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 webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://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>). These strategies are effective and research-based.

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Trinity Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you so much for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. The DPI review team appreciates staff's willingness to make changes to meet school nutrition

program regulations. The DPI review team is confident that Trinity Lutheran School will continue to improve their knowledge and operation of school meals programs.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification, Benefit Issuance, and Verification

##### Technical Assistance:

- The Confirming Official (CO) and Verifying Official (VO) must sign every application chose and reviewed for Verification. Only the Determining Official (DO) is required to sign all applications, whether or not they were chosen for Verification.
  - The confirmation review (CO) must be done by an individual other than the individual who made the initial eligibility determination (DO).
  - The DO can be the VO; the CO cannot be the DO or the VO. The Hearing Official (HO) cannot be the DO, CO, or VO.
  - If and when staff responsibilities change, please remember to update your online contract, which can be found on the [Online Service website](https://dpi.wi.gov/nutrition/online-services) (<https://dpi.wi.gov/nutrition/online-services>).
- During application approval and denial, if Step 2 (program name and case number) of the application is properly completed, the students on this application automatically qualify for free meals and no further action on the application is required.
- Students are often found on Direct Certification (DC) runs, but have their eligibility dates on the Benefit Issuance (BI) list recorded as the application approval date. To ensure students are receiving benefits as soon as they are eligible, please be mindful of these eligibility dates.
- There are three methods for selecting applications for the Verification process. The Standard Sampling Method is only required if the SFA had a 20% or more non-response rate from households in the previous school year.

##### Compliance Reminders:

- The Verification Collection Report (VCR) must be submitted by February 1 annually.

#### Findings and Corrective Action Needed: Certification and Benefit Issuance

**Finding #1:** Additional training on free and reduced application approval and denial is needed.

**Corrective Action Needed:** Please complete the webcasts below and forward the confirmation emails to the consultant assigned to your review.

[Overview of Determining Eligibility and Verification](https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story_html5.html)

([https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story\\_html5.html](https://media.dpi.wi.gov/community-nutrition/determining-eligibility-and-verification-overview/story_html5.html))

[Getting Started in Free and Reduced Price Meal Eligibility](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html)

([https://media.dpi.wi.gov/school-nutrition/getting-started-free\\_reduced-price-meal-eligibility/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html))

[Processing Applications and Direct Certification](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html) ([https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story_html5.html))

[Filing Out Household Free and Reduced Applications](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html)

([https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html))

❑ **Finding #2:** One application chosen for Verification was verified incorrectly. The student(s) who qualified for benefits via this application qualified through a case number of an approved program (Step 2 of the F/R application). The income documentation collected was not sufficient; instead, documentation of the case number is required.

**Corrective Action Needed:** Please contact the household or the county directly (Direct Verification) – without notifying the household - to obtain the appropriate case number documentation. Send this documentation to the consultant assigned to your review.

**Additional Corrective Action Needed:** Please complete the [Verification webcast](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html) and send the confirmation email to the consultant assigned to your review ([https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/filling-out-the-household-application-for-free-and-reduced-price-meals/story_html5.html)). Thank you!

❑ **Finding #3:** Two students were receiving reduced priced meals when they did not qualify for these benefits. Please change the benefit status of these students to “paid” and notify the household with an Adverse Action letter. Fiscal action did not need to be calculated as it was below the 3% error rate threshold.

**Corrective Action Needed:** Please forward the notification letter and proof that the benefit was changed to the consultant assigned to your review.

❑ **Finding #4:** One student were receiving reduced priced meals when they did not qualify for these benefits. Please change the benefit status of these students to “paid” and notify the household with an Adverse Action letter. Fiscal action did not need to be calculated as it was below the 3% error rate threshold.

**Corrective Action Needed:** Please forward the notification letter and proof that the benefit was changed to the consultant assigned to your review.

Resources:

- The [DPI SNT Training webpage](https://dpi.wi.gov/school-nutrition/training) is where you can find information on SNSDC summer classes and Small Victories trainings in addition to SNT webcasts (<https://dpi.wi.gov/school-nutrition/training>).
- Utilize the [Verification Tracker Packet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms-packet-1819.docx) each year when completing Verification (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms-packet-1819.docx>).
- The [Eligibility Manual](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#em) contains information regarding student meal benefit eligibilities (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#em>).

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### Meal Counting and Claiming

#### **Commendations:**

The meal counting and claiming procedures are appropriate and produce accurate counts of student meals.

#### **Technical Assistance:**

- Food service relies on the forecasting of lunch servings that happens at the beginning of the day. Please remind teachers that the accuracy of these forecasting numbers is very helpful for food service employees so that the proper number of servings are prepared prior to service.

#### Findings and Corrective Action Needed: Meal Counting and Claiming

**Finding #5:** Monthly Edit Checks are not completed by food service. This is necessary to double check meal counts *prior* to submitting online claims for reimbursement.

**Corrective Action Needed:** Upon completion, please send an Edit Check for January 2018 to the consultant assigned to your review.

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

#### **Commendations**

Thank you to the cook at Trinity Lutheran School for the time spent with the State Agency while onsite. We appreciate your eagerness to learn and comply with USDA regulations.

#### **Comments/Technical Assistance/Compliance Reminders**

Members of the School Nutrition Team (SNT) are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>). Please do not hesitate to reach out with questions- we are very willing to help.

## Menu Planning

This blank [K-8 lunch template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc) contains the basic information needed to plan compliant menus for the selected age/grade group (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-8.doc>).

Using a cycle menu may ease the burden of menu planning once the cycle has been set and help ensure meal pattern requirements are met after a compliant cycle has been planned (if served as planned). Cycle menus may also aid in purchasing if production records are reviewed and analyzed to forecast meal counts based on historical data.

When using a cycle menu, production records can be partially completed including menu items, crediting information, and serving sizes (potentially planned quantity). Photocopies can be made, or if production records are managed electronically, they can be printed and the remaining information can be completed during production and after meal service.

It is recommended to plan the menu one whole week at a time. By doing this, the planned 5-day week will meet the vegetable subgroups and weekly minimums (if served as planned).

## Resources

Links to helpful resources we recommend bookmarking and/or printing:

- [Lunch “In a Nutshell”](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>) (paper copy provided and reviewed on site 1/10/19)
- [Lunch Meal Pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>) (paper copy provided and reviewed on site 1/10/19)
- [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>) (paper copy provided and reviewed on site 1/10/19)
- [USDA Food Buying Guide for Child Nutrition Programs \(FBG\)](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>)
- [Basics at a Glance](https://theicn.org/icn-resources-a-z/basics-at-a-glance/) (<https://theicn.org/icn-resources-a-z/basics-at-a-glance/>)
- [Crediting in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/crediting-in-a-nutshell.pdf>) (paper copy provided and reviewed on site 1/10/19)
- [Vegetable Subgroups](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) (paper copy provided and reviewed on site 1/10/19)
- [Standardized Recipe template for 1 grade group](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>) (paper copy provided and reviewed on site 1/10/19)
- [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>) (paper copy provided on site 1/10/19)
- [Lunch Production Records for 1 grade group with temperature](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xlsx>) (paper copy provided and reviewed on site 1/10/19)

## Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Travel/meal expenses

are allowable food service expenses. Information on upcoming trainings can be found on DPI's [Training](#) webpage, under Upcoming Trainings (<https://dpi.wi.gov/school-nutrition/training#up>).

The Wisconsin Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. Information, including dates and locations, will be posted on the SNT [Training](#) webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>). The following classes are highly recommended for the food service staff at Trinity Lutheran School to attend in summer 2019:

- Nutrition 101
- The Whole Enchilada (highest priority)
- Offer vs. Serve (if applicable)
- Adding It Up
- Special Dietary Needs
- Food Safety Plan
- ServSafe (if applicable)

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>). Please see finding #23 (under "Professional Standards") for a list of the webcasts food service staff must watch for corrective action.

### Weight vs Volume

	Measures	Measured In	Conversions	Tools Used
<b>WEIGHT</b>	Meat/meat alternates Grains	<b>Ounces (oz)</b> Grams (g) Kilograms (kg) Pounds (lb or #)	1 lb = 16 oz 1 oz = 28 g	Scale
<b>VOLUME</b>	Fruits Vegetables Milk	<b>Fluid ounces (fl oz)</b> Tablespoon (T or TBSP) Teaspoon (t or tsp) Cups (c) Pint (pt) Quart (qt) Gallon (gal) Liter (L)	3 tsp = 1 TBSP 16 TBSP = 1 c 1 c = 8 fl oz 1 pint = 2 c 1 quart = 2 pints 1 gallon = 4 quarts	<b>Spoodles</b> , measuring cups, measuring spoons, scoops, dishers, ladles

**WEIGHT AND VOLUME ARE NOT EQUAL OR INTERCHANGEABLE... OUNCES ≠ FLUID OUNCES**

### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

**\*\*Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.**

**\*\*☐ Finding #6: Missing vegetable subgroups during week of review**

0 cups of red/orange, 0 cups of dark green, and 0 cup of bean/peas (legumes) were served during the week of review. It is required to offer K-8 students  $\frac{3}{4}$  cups of red/orange,  $\frac{1}{2}$  cup of dark green, and  $\frac{1}{2}$  cup of bean/peas (legumes) must be offered weekly. Only starchy and other vegetables were offered during the week of review.

**Corrective Action Needed for Finding #6:** Complete [menu planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xls) for an upcoming week (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/production-record-lunch-one-grade-group-with-temp.xls>). Ensure that all vegetable subgroup requirements are met.

**\*\*☐ Finding #7: 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 fat-free (skim) and low-fat (1 percent) flavored and unflavored milk. PK students have access to 1% white milk on Monday-Thursday. PK students have access to 1% white milk and FF chocolate milk on Fridays.

**Corrective Action Needed for Finding #7:** View the “Milk” webcast (CA #23). Submit a week of production records showing milk use by type (CA #10). Submit a signed statement of understanding from the PK teacher(s) and FSD that all students must have access to a variety of milk types daily.

**☐ Finding #8: K-8 meal pattern**

Currently, different portion sizes are served to students based on grade (eg, K4-2 and 3-8). **While there is a separate K-5 and 6-8 meal pattern, there are not K-2 and 3-8 meal patterns. It is highly recommended that Trinity Lutheran School utilize the K-8 meal pattern for all students. All K-8 students should be served the meal pattern for K-8 students. All students must have access to the minimum weekly and daily food quantities.** Menus must be planned to meet meal pattern requirements for the grade group being served.

**\*\*During meal service on 1/10/2019 seventeen meals were served to students who did not have access to the minimum required amount of vegetables. Following the K-8 meal pattern, students must have access to  $\frac{3}{4}$  cup of vegetables. These seventeen students only had access to  $\frac{1}{2}$  cup vegetables ( $\frac{1}{4}$  cup hash brown and  $\frac{1}{4}$  peas). These meals are subject to fiscal action.**

**This is a repeat finding from the review conducted in 2015:**

**Finding #3:** Prior to lunch meal service on day of review, it was found that daily minimum requirements for fruits and vegetables were not planned. Additional fruits and vegetables were available to meet daily requirements.

**Corrective Action Required:**

- **Submit copy of the May 2015 menu along with the menu planning worksheet completed for the week of May 4-8, 2015 showing all daily and weekly minimum quantity requirements are planned.**
- **Provide a written statement as to steps will be taken to ensure all future menus offered contain daily and weekly minimum quantities of meal components.**

**Corrective Action Needed for Finding #8:** Verified with completion of CA #6. Review the [K-8 lunch meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf>). Submit a signed statement agreeing that all students will have access to the minimum meal pattern requirements, regardless of age or grade.

### ❑ Finding #9: Offer versus Serve

During the on-site review administration was under the impression that the school was utilizing Offer versus Serve (OVS). However, it was observed on 1/10/2019 that service was much closer to “straight serve.” Staff pass the tray and put one of everything on the tray without allowing students to make selections. The meal service was not truly “straight serve” because less than ¾ cup vegetable and 1 cup milk was served on every students tray. Under “straight serve” every student must leave the line with all five component in their full quantity on their tray.

Offer versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and cost. If OVS is implemented, then students can choose three of the five components offered, including ½ cup fruit, vegetable, or combination to create a reimbursable meal.

At this time, it is highly advised that Trinity Lutheran School proceed by truly following “straight serve” for all students. Without OVS in place, grade K-8 students must be served ¾ cup vegetable, ½ cup fruit, 1 oz eq grain, 1 oz eq meat/meat alternate, and 1 cup milk daily to create a reimbursable meal. As staff become more comfortable and familiar with the meal pattern, OVS could certainly become an option. Please contact the School Nutrition Team so that we can further assist you with the implementation of either “straight serve” or Offer versus Serve. Administration and cafeteria staff must implement Offer versus Serve OR “straight serve,” which will apply to all students at all lunches.

Milk is a required component as part of the National School Lunch Program (NSLP). All students must also have access to free and potable water during mealtime. When utilizing the “straight serve” method, all students must select milk and have access to water. Milk and water are not interchangeable options.

**Corrective Action Needed for Finding #9:** View the webcast [The Lunch Meal Pattern](https://dpi.wi.gov/school-nutrition/training/webcasts#lunch) (https://dpi.wi.gov/school-nutrition/training/webcasts#lunch) (CA #23). Submit a summary of the webcast demonstrating that meal pattern without OVS is understood.

### ❑ Finding #10: Production records

The FSD began working at Trinity Lutheran School the week before the Administrative Review. Production Records were not completed during the six days between beginning employment and the SA arriving on site. Production records are required as documentation that your school is serving reimbursable meals that contain all required meal pattern components; without production records, there is no way to prove that reimbursable meals were served.

The SA provided a production record template along with TA. The FSD and SA completed two production records together while on site.

**Corrective Action Needed for Finding #10:** To ensure that production records are being completed correctly moving forward, please submit one week of completed production records.

### ❑ Finding #11: Crediting Documentation

Acceptable crediting documentation was not available for:

- Campbell’s Cream of Chicken
- The Maxx Pizza
- mixed veggie (without a breakdown of specific vegetable by volume in the mixed vegetables from a standardized recipe or PFS, the amount of each vegetable subgroup [dark green, red/orange, bean/peas, starchy, other] cannot be determined)



Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently document meal component crediting. Please provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

**Corrective Action Needed for Finding #11:** Submit acceptable crediting documentation for the products listed above. If the products are replaced, please submit crediting documentation and/or standardized recipes.

**❑ Finding #12: Non Whole-grain rich items**

All grains served and credited toward the meal pattern must be whole grain-rich (WGR), meaning 50% or more of the product must be whole grain. The remaining grain in the product, if any, must be enriched.

USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. To do this, make sure the first ingredient has the word “whole” in front of the grain (i.e. whole corn, whole wheat, or whole durum flour).

Other whole-grain products that do not use the word “whole” in their description, for example, brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, or sorghum. Enriched rice is not whole grain. When a grain name, such as wheat, rice, or rye flour is listed in the ingredient statement, but has no descriptor (such as “whole-grain” for wheat or “brown” for rice), the program operator needs to obtain further documentation from the manufacturer before purchasing the food product to ensure it meets the whole grain-rich criteria.

The following grain products currently used are not WGR:

- Uncle Ben’s Rice

**Corrective Action Needed for Finding #12:** Submit whole grain-rich versions of the products listed above including nutrition facts labels. Alternatively, submit a written plan for how you will eliminate the non-WGR items above.

**❑ Finding #13: Use of product without proper crediting documentation**

At this time Captain Ken’s is not distributing proper crediting documentation (Child Nutrition label or Product Formulation Statement) for Captain Ken’s Taco Ground Beef. Until Captain Ken’s distributes proper documentation for products, SFAs who wish to credit the meat product toward the meal pattern must discontinue use.

**Corrective Action Needed for Finding #13:** Please submit a written statement that use of Captain Ken's products will be discontinued. Submit proper crediting documentation for the new product selected. Also submit a recipe (ex, taco meat made of beef crumbles and seasoning) if applicable.

**❑ Finding #14: Signage**

Signage was not posted to show students what makes up a reimbursable meal. Signage examples can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage>).

**Corrective Action Needed for Finding #14:** Signage posted while on-site. No further action required.

**❑ Finding #15:** During the week of review "1 cup" of nacho chips were served, which is not an appropriate serving size. Nacho chips, if whole grain rich, should be crediting by weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>).

**Corrective Action Needed for Finding #15:** Please submit a written statement explaining how nacho chips will be portioned in the future to ensure that meal pattern is met.

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

## SMART SNACKS

### Commendations

There is currently a soda machine in the cafeteria at Trinity Lutheran Menasha. Administration assured the SA that students are never allowed to make purchases from it. It is on a motion sensor timer to light up when someone approaches it. Students are not allowed to approach it. SA confirms that students had no reason to be near the soda machine during meal service and did not trigger the motion sensor. Thank you to administration for placing a sign on the soda machine reminding students that they are not allowed to make purchases from the machine. A timer may be beneficial for turning the machine off during the school day (midnight – 30 minutes after the end of instruction).

### Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Trinity Lutheran School Menasha. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

## BUY AMERICAN

## Comments/Technical Assistance/Compliance Reminders

*Please note that Buy American applies only to the inventory in the kitchen belonging to Trinity Lutheran School. This does not apply to products stored in the kitchen by Trinity Lutheran Church.*

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance 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>).

## **Findings and Corrective Action Needed: Buy American**

### **❑ Finding #16: Non-compliant items**

At the time of review no non-domestic products were identified when SA viewed a sample size of product inventory. Trinity Lutheran School does not currently have a process/template in place to track non-domestic products.

**Corrective Action Needed for Finding #16:** Please submit a copy of the tracking template to be used in the future. The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
  - a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
    - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
  - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
    - *Ex. Blueberries are not available domestically during the months of December – June.*
  - c) **Availability** – Product(s) is not available to purchase domestically.
    - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
  - d) **Substitution**- In the event a domestic product is unavailable due to a distributors’ inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
    - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*

- e) **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
  - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f) **Other**- Please provide a written explanation.
  - *Ex. The SFA received a donation of non-domestic oranges*
  - *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision>)

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### 3. RESOURCE MANAGEMENT

#### Non-profit School Food Service Account

##### **Commendations:**

Labor and food costs are appropriate. The food service account has maintained its non-profit status with the ending fund balance not exceeding three months' operating costs. Accounting policies and procedures are in place.

##### **Technical Assistance:**

###### *Annual Financial Report:*

- The Annual Financial Report (AFR) for the 17-18 school year is for all revenues and expenditures made starting on July 1, 2017 through June 30, 2018.
  - The beginning fund balance is the food service's account balance as of July 1 of that fiscal year, and the ending fund balance is the account balance as of June 30 of that fiscal year.
- **Non-program foods** include adult meals and extra milks sold during lunch service. The revenues and expenditures of these items are to be recorded under "Non-Program Foods" on the AFR.
- The **entitlement value of USDA Foods** (see CARS Report) must be recorded as School Food Revenue and School Food Expenditure for NSLP on the AFR. Any handling and processing fees must be recorded as a School *Purchased Services* Expenditure.
  - The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services webpage](#) ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).

##### **Compliance Reminders:**

- As of July 1, 2017, all SFAs operating the USDA School Meals Programs are required to develop unpaid meal charge policies to avoid bad debts that cannot be covered by the food service fund. This policy must be sent out to households at the beginning of each school year.

Findings and Corrective Action Needed: Non-profit School Food Service Account

**Finding #17:** Food service utilizes Scrips at nearby stores for food purchases. Scrips are beneficial for the school as they refund an amount of credit for shopping at a particular store. Going forward, these refunds *must* be put back into food service.

**Corrective Action Needed:** Please submit a statement explaining how Scrips will be handled in the future. Explain how it will be ensured that food service will receive all refund credits through Scrips purchased through the food service account and then submit this to the consultant assigned to your review.

**Finding #18:** A food service-specific unpaid meal charge policy was not developed.

**Corrective Action Needed:** Develop a policy specific to Trinity Lutheran School and include the non-discrimination statement. Please submit this to the consultant assigned to your review.

**Resources:**

- DPI SNT's [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)
- For more information on allowable expenditures to Fund 50, please see the [AFR Expenditure Categories](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc).
- For more information on revenues and expenditures for the AFR, please see the [AFR In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/new-afr-nutshell.docx).

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**Paid Lunch Equity (PLE)**

Trinity Lutheran School completed the PLE survey for the 18-19 school year and did not need to complete the PLE tool to assess its lunch prices. Despite this, Trinity Lutheran School increased its lunch prices.

**Technical Assistance:**

- Trinity Lutheran School currently charges \$2.75 for grades K4-2 and \$2.90 for grades 3-8. With a new "Serve" service model (where students take all five meal pattern components) and the fact that all students now follow the same K-8 meal pattern, all grades are to be charged the same amount for lunch.

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**Revenue from Non-program Foods**

**Commendations:**

The only non-program foods sold at Trinity Lutheran School are adult meals and extra milks. These items are priced appropriately and the revenue from non-program foods are enough to cover their costs.

**Technical Assistance:**

- Non-program foods are all foods sold to students outside of the reimbursable meals. Some of these include adult meals, extra milks, catering services, and/or a la carte items.
- The revenues of non-program foods must cover all costs. If the revenues do not cover the costs, a transfer would need to be made from the general school fund into the food service fund. Food service cannot cover the costs of non-program foods.

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## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

**Commendations:**

Civil Rights Compliance Self-Evaluation (PI-1441) was completed. Thank you!

**Technical Assistance:**

*Civil Rights Complaint Procedures*

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service (FNS) **within five days**. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual wishes 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)

**Compliance Reminders:**

- Civil Rights Training is to be completed for all staff working with the programs. Please ensure that all staff involved in the meal programs complete the Civil Rights training **annually** as well as sign-off on the participation form.
- All program materials and information that is made public (posted, sent to households) **must** contain the USDA Non-Discrimination Statement. There is a shortened version available if the longer version does not fit on program materials: ***This institution is an equal opportunity provider.***

*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. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements.

- School food service staff may make food substitutions, at their discretion, to accommodate children **without** a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

#### Findings and Corrective Action Needed: Civil Rights

- Finding #19:** The LWP and menu are missing the non-discrimination statement.

**Corrective Action Needed:** Please update the LWP and menu and submit them to the consultant assigned to your review.

- Finding #20:** The Public Release was not completed in the 18-19 school year.

**Corrective Action Needed:** Please submit a statement of understanding that this Public Release must be released at to the beginning of the school year. Also, send potential locations to which the Public Release will be sent by Trinity Lutheran school. Submit both of these items to the consultant assigned to your review.

- Finding #21:** There is no civil rights complaint procedure in place at the SFA specific to the meal programs.

**Corrective Action Needed:** Please develop a civil rights complaint procedure that includes the full non-discrimination statement and language regarding the timeline of complaints being filed with the state agency or USDA FNS. Submit this to the consultant assigned to your review.

- Finding #22:** The new food service employee did not complete the Civil Rights training annually.

**Corrective Action Needed:** Please have this employee complete the training and submit the attendance sign-off sheet to the consultant assigned to your review.

#### **Resources:**

- [Special Dietary Needs Medical Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)
- [USDA Non-Discrimination Statement](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights)

## Local Wellness Policy (LWP)

### **Commendations:**

The LWP at Trinity Lutheran School contains all required components. Thank you!

### **Technical Assistance:**

- A LWP is in place to set the standard for student, school, and community wellness. Develop your policy to include specific goals for your school and assess these goals annually to ensure your school is promoting local wellness to the best of its ability.
  - A LWP committee must be established to annually revise and assess the school's LWP.
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## Professional Standards

### **Technical Assistance:**

- A program "director" is the person designated to perform or oversee the majority of the program duties (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).
- Professional Standards training completion and tracking is required for all food service employees. It is recommended that teachers administering WSDMP, paid and volunteer cafeteria aides, and student workers complete job-specific training and annual civil rights training. For more information on training requirements, please reference the [Professional Standards Training Requirement sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf>).
- Annual training hour requirements are as follows:
  - Food Service Director: 12 hours
  - Food Service Manager: 10 hours
  - Full-time Food Service Staff: 6 hours
  - Part-time Food Service Staff: 4 hours
- If ever Trinity Lutheran School needs to hire a new food service director, the hiring requirements must be met. These requirements are specific to food service directors and include requirements such as education, school nutrition experience, and food safety training. Reference the [Hiring Requirements for Food Service Directors](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) for more details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).

### Findings and Corrective Action Needed: Professional Standards

**Finding #23:** The new food service employee did not have all required trainings completed or tracked.

**Corrective Action Needed:** Please ensure the new food service employee completes the following DPI SNT webcasts:

[Fruit](https://dpi.wi.gov/school-nutrition/training/webcasts#fruit) (<https://dpi.wi.gov/school-nutrition/training/webcasts#fruit>)



[Vegetable](https://dpi.wi.gov/school-nutrition/training/webcasts#veg) (https://dpi.wi.gov/school-nutrition/training/webcasts#veg)

[Grains](https://dpi.wi.gov/school-nutrition/training/webcasts#grains) (https://dpi.wi.gov/school-nutrition/training/webcasts#grains)

[Meat/Meat Alternate](https://dpi.wi.gov/school-nutrition/training/webcasts#meat) (https://dpi.wi.gov/school-nutrition/training/webcasts#meat)

[Milk](https://dpi.wi.gov/school-nutrition/training/webcasts#milk) (https://dpi.wi.gov/school-nutrition/training/webcasts#milk)

[The Lunch Meal Pattern](https://dpi.wi.gov/school-nutrition/training/webcasts#lunch) (https://dpi.wi.gov/school-nutrition/training/webcasts#lunch)

[Offer versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs)

[Portion Control](https://dpi.wi.gov/school-nutrition/training/webcasts#pc) (https://dpi.wi.gov/school-nutrition/training/webcasts#pc)

[Production Formulation Statements](https://dpi.wi.gov/school-nutrition/training/webcasts#pfs) (https://dpi.wi.gov/school-nutrition/training/webcasts#pfs)

[Production Records](https://dpi.wi.gov/school-nutrition/training/webcasts#pr) (https://dpi.wi.gov/school-nutrition/training/webcasts#pr)

[Sodium](https://dpi.wi.gov/school-nutrition/training/webcasts#sodium) (https://dpi.wi.gov/school-nutrition/training/webcasts#sodium)

[Special Dietary Needs](https://dpi.wi.gov/school-nutrition/training/webcasts#sdn) (https://dpi.wi.gov/school-nutrition/training/webcasts#sdn)

[Standardized Recipes](https://dpi.wi.gov/school-nutrition/training/webcasts#sr) (https://dpi.wi.gov/school-nutrition/training/webcasts#sr)

Submit a list of each webcast watched with the date and time spent viewing it. Please send any summaries or notes made while viewing the webcasts. Food service staff needs to sign. Also, contact the PHN with follow-up questions.

**Additional Corrective Action Needed:** Please track these trainings on the Professional Standards training tracker (or another tracker) and submit this to the consultant assigned to your review. Thank you!

**Finding #24:** The new food service director did not complete the 8-hour food safety training requirement.

**Corrective Action Needed:** Please submit documentation showing the food service director is scheduled to complete food safety training within 30 days.

Resources:

- [DPI SNT Professional Standards training tracker](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)  
(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx)
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### **Food Safety and Storage**

#### **Commendations:**

Two food safety inspections were completed in the prior school year and the food safety plan included all required Standard Operating Procedures (SOPs).

#### **Technical Assistance:**

- Employee Reporting Agreements must be signed by each food service employee. An employee does not need to re-sign this agreement each school year.
- The school has experienced issues with outside organizations utilizing the same prep kitchen as food service. It is for the benefit and safety of the school and its student that a kitchen use policy be developed and enforced. Food service has every authority to demand the respect of this policy for the protection of its students and federal reimbursement. Some items that may support the content of this policy include:
  - Separate refrigerator for food service
  - Increased signage
  - Separate food storage
  - Food safety-trained personnel present at all times
  - Facility cleanliness standards
  - Equipment use and clean up
- The Food Safety Plan was not available for review at the time of the county's second food safety inspection of the 17-18 school year. This plan is to be reviewed annually and to be made site-specific.
- If in the future the SFA decides to offer meals through food service for field trips, a SOP for these meals must be completed and approved by a local sanitarian.

#### **Findings and Corrective Action Needed: Food Safety and Storage**

**Finding #25:** The most recent food safety inspection report was not posted in a publicly visible area on site.

**Corrective Action Needed:** *Corrected on site. No further action required.*

**Finding #26:** Storage violations were observed on site. Tupperware and previously used food containers were utilized for food storage.

**Corrective Action Needed:** Please submit a statement detailing how this violation will be rectified. Submit this to the consultant assigned to your review.

**Finding #27:** Employee Reporting Agreements were not completed for food service staff.

**Corrective Action Needed:** Please complete this agreement and submit it to the consultant assigned to your review.

**Finding #28:** Temperature logs were not available during on-site review.

**Corrective Action Needed:** Please submit a statement of understanding that these logs are to be kept **daily**. Also submit temperature logs for 4 consecutive weeks to the consultant assigned to your review.

**Resources:**

- [Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf)
- [Equipment grant webpage](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) (https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant)

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**Reporting and Recordkeeping**

**Commendations:**

The Paid Lunch Price (PLP) report, FNS-10 report, and AFR were all completed. Thank you!

**Technical Assistance:**

- All records must be kept for three years plus the current school year and temperature logs must be kept for a minimum of six-month.

**Resources:**

- The general [Calendar of Requirements](https://dpi.wi.gov/school-nutrition/calendar-of-requirements) may be referenced for all daily, monthly, and annual program requirements (https://dpi.wi.gov/school-nutrition/calendar-of-requirements).

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**Summer Food Service Program (SFSP) Outreach**

**Commendations:**

SFSP outreach was completed by the SFA.

**Compliance Reminders:**

A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, **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 webpage](http://www.fns.usda.gov/summerfoodrocks) (http://www.fns.usda.gov/summerfoodrocks)

**Resources:**

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) 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](mailto:amy.kolano@dpi.wi.gov)
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“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. Goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](#) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



*With School Nutrition Programs!*