

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
St Anthony School-DSM (17378106)
January 14 – 20, 2020

Program Year: 2020
Month of Review: December
Lead Reviewer: Christine Crow
Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>1. There was one income application with one student reviewed that provided free benefits to the student when he was only eligible for reduced benefits according to the income and family size. The letter of notification of eligibility was sent to the family to inform them that their eligibility was changing after the required appeal period. TA provided to the determining official on why the original determination was made in error and the letter to send to notify the family.</p> <p>2. There were 11 students who were provided benefits via elookup but the students listed on the elookup list had different birthdays from those listed in the SFA's point of service system. Those students should not have been given free benefits and must be notified that their eligibility is changing to paid with a letter of notification of eligibility. Families whose benefits are being decreased must have 10 calendar days to appeal and the school has up to 10 operating days after the appeal period to change their benefits. TA provided to the determining official on checking the name and birthday on the</p>	<p>1. Send a copy of the point of service report that lists the current eligibility status of the students provided benefits in error (see list of students with errors attached below). This list must provide the students name, birthday, current eligibility status and the date their status changed. If a student resubmitted a new application after receiving information that their benefit status changed, submit a copy of the new application.</p> <p>2. Because the number of certification and benefit issuance errors exceeded 5%, the SFA is required to conduct an independent review of applications. This requires that two people within the school watch the Application Approval and Direct Certification webinar that will be conducted and recorded in July 2020 and review and sign all applications and students on the DC list. Patti Harding will send the determining official an email at the beginning of the 2020-2021 school year requesting documents. List the two people who will be responsible for taking the training and</p>	

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		DC list to ensure it is the correct student. Fiscal action may be taken.	processing applications and students on the DC list.	
200 - Verification	V-0200	Verification documents including the original application, the letters of notification of verification selection (Download Forms ELIG137) and results sent to the family selected for verification, and the income documentation received from the family was not available to show that verification was completed for the 2019-2020 or 2018-2019 school year. All school nutrition program documents, including all verification documents, must be kept for three years plus the current year. Since the documentation was not available, SA is not able to tell if the verification process was done accurately and the verification process must be done again. TA provided.	The SFA selected an application to verify and sent a letter of notification while SA was onsite. Attached is the original application selected for verification and the letter of notification of verification selection that was sent to the family. Submit the income information that was provided by the family, and the letter of notification of verification results that was sent to the family. If the eligibility status changed due to verification results, provide a copy of the point of service system screen that show the student's status was changed.	
700 - Resource Management	V-0700	Small purchase bid documentation was requested for the 2018-2019 school year. Small purchase bid documentation received was for the 2017-2018 school year as 2018-2019 bid documentation was not available. All products that the SFA plans on purchasing and an estimated amount of each product should be provided to potential bidders so that they know how much the school plans on purchasing. Unless the original bid reported that it applies for multiple school years, SFAs must send out a bid annually. Since there was not a 2018-2019 milk or bread bid available, the SFA must send out a milk and bread bid for the 2020-2021 school year. The bid must include product, quality, and delivery specifications as well as all required terms and conditions. SA provided procurement technical assistance and encourages the SFA to	New solicitation must be prepared and price quotation requests must be sent out to at least two vendors for milk and bread. The contract must be finalized in time effective for next school year and must be awarded to the lowest most responsive and responsible vendor. Describe who will be responsible for writing the 2020-2021 small purchase bids for milk and bread and who will evaluate the bid responses.	

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		use the Small Purchase (3 Bids and a Buy) Procurement template found in Download Forms. There are procurement training opportunities in Central Iowa in April 2020 and June 2020. SA strongly encourages the SFA to send at 2 people to procurement training.		
1000 - Local School Wellness Policy	V-1000	Although the wellness policy contains goals on nutrition education, physical activity and education, and other school related activities, it does not contain goals on food and beverage marketing or nutrition promotion. The wellness policy must be updated every three years and made available to the public. The committee must also assess the progress of the implementation of the goals written within the policy and be made available to the public. TA provided on wellness policy requirements including a handout describing the requirements.	Describe when the SFA will update their policy, assess the implementation of the wellness policy goals, and how they will make the policy and assessment available to the public.	
1400 - Food Safety	V-1400	The SFA's HACCP plan has many required and applicable Standard Operating Procedures (SOP). It is missing an SOP for the control and clean-up of blood and bodily fluids as well as an SOP for pest control. Iowa State University Extension and Outreach has excellent sample SOPs which can be found on their website: https://www.extension.iastate.edu/foodsafety/haccp-school-foodservice TA provided to the food service director.	Submit a copy of the SFA's individualized SOP for pest control and control and clean-up of blood and bodily fluids.	
1400 - Food Safety	V-1400	The external thermometer for milk cooler #2 was at 46 degrees when it must be at 41 degrees or less. Sometimes the external thermometers are not always accurate and SA suggests getting a thermometer to put inside the milk cooler. The cooler must be investigated and repaired to	1. Document the action taken to repair the milk cooler #2. 2. Document the action taken to control pests in the kitchen.	

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		<p>operate at the correct temperature. While SA was onsite, there was a mouse found in the kitchen. Pests can compromise food safety, pest management must be a priority. TA provided.</p>		
<p>RMCR - Nonprofit School Food Srvc Acct</p>	<p>V-RMCR</p>	<p>1. When the SA arrived onsite the 2018-2019 IowaCNP financial report had not been completed. This report must be completed annually in IowaCNP and is due by the end of September to document the financial details of the previous school year. A worksheet describing what information must be included in each line and webinar link on completing the financial report was provided to the food service director. SA encourages the food service director and business manager to work together annually to complete this. The food service director and business manager completed the SY 2018-2019 financial report while SA was onsite and have agreed to meet in September 2020 to complete the financial report for SY 2019-2020. No further action needed.</p> <p>2. SFAs must report their revenue for the year in the IowaCNP financial report, including the beginning fund balance. In working with the business manager, it was discovered that if the school nutrition fund had a positive balance at the end of the school year it was transferred to help pay for other school or church expenses. If the school nutrition account was negative at the end of the school year, such as in SY 2018-2019, revenue from other church or school programs was used to help pay for the school nutrition expenses. The school nutrition program account funds may not be used to supplement other school or church activities, as all federal dollars must be spent on items that are used to</p>	<p>Provide written confirmation that going forward, the school nutrition account balance will remain in the school nutrition fund and will only be spent on allowable costs.</p>	

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		<p>provide healthy breakfast and lunch meals to students.</p> <p>3. In the 2018-2019 school year, the school nutrition fund spent \$200 for a food and supplies to provide a staff Christmas party which is not an allowable expense. TA provided to the business manager and principal on allowable expenses and a handout and the USDA Indirect Cost manual was issued. Since the school nutrition fund in 2018-2019 school year ended with a negative balance and they received support from the church and/or other school funding sources in excess of \$200, no further action is needed.</p>		
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Site - Level Findings: St Anthony School (8106)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Breakfast	V-0300	<p>A Point of Service (POS) is required at the location and time where the student is served to ensure all students get counted and claimed accurately. There must be some exchange with the student for the meal—name, ticket, PIN#, card, etc. The SFA has a POS system and the line at lunch is very well organized as students go through the line and punch their number in the key pad to get counted and charged for the meal. The line is more disorganized at breakfast, as some students key their number in the key pad while other students wander off to their seat. This leaves a lot of room for error in not counting and claiming accurately. TA was provided to the cashier who states that since she knows the students, she can type in their name or number to make sure students get charged. If someone else filled in for the regular cashier or if she did not see a student, errors could be made. This is</p>	<p>Describe how the breakfast point of service line will be organized to ensure all students check out with the cashier and provide a medium of exchange before sitting down.</p>	

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		a repeat finding from the previous review and must be permanently corrected. Students must be trained to check out with the cashier and provide a medium of exchange when going through the line at breakfast. SA suggests that other school staff help guide students to check out with the cashier.		
400 - Meal Components and Quantities - Breakfast	V-0400	The breakfast food production records submitted for the review period show that the SFA was short on the daily and weekly fruit requirement. SFAs must offer at least one cup of fruit daily, five cups of fruit weekly, and only 50% of fruit served weekly can come from juice. During two days of the review period and the day of onsite observation there was only ¾ cup fruit offered. On all three of these days the SFA offered 4 ounces of juice and ¼ cup of fresh fruit. This made the review period menu short on the daily and weekly meal pattern requirements and over on the juice requirement. TA provided to the food service director prior to the onsite breakfast meal observation so that this could be corrected while SA was onsite.	Provide one week of breakfast food production records to show that the daily and weekly fruit requirement is being met.	
400 - Meal Components and Quantities - Lunch	V-0400	The food production records contain information on menu items served and serving size but do not consistently contain information on the grade groups receiving the specified serving size, the planned and actual number of servings, the total quantity prepared in a measurable amount (pounds, #10 cans, etc.), the number of planned adult meals, and leftover amounts. The above information is required to be included on food production records and can be helpful when menu planning to know how much to order and prepare for all future meals. It is also an	<ol style="list-style-type: none"> 1. Submit an approved CN label or product formulation statement for the chicken patty served on 12/03/2019 and meatballs served on 12/02/2019. 2. Watch the "New Manager Webinar #2" on Menus and Food Production Records located on the Iowa Department of Education Learning Tools - Schools website (https://www.educateiowa.gov/pk-12/nutrition-programs/learning-tools-schools). Submit documentation that states the date, time and signatures of all who watched the training. 	

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		<p>excellent way to communicate the menu needs to staff in case the food service director is not there. TA provided to the food service director on food production record requirements.</p> <p>The food production records and labels submitted for the review period indicate that the menu served during the review period was short on the dark green and red orange subgroup requirements. SFAs must offer at least ½ cup of dark green vegetables and ¾ cup red orange vegetables every week. A vegetable subgroup handout and meal pattern hand out were provided. If this menu finding is discovered on a future review, fiscal action may be taken.</p> <p>The CN labels provided for the meatballs and chicken patty were not approved labels and the SA was not able to tell if they met the requirements for the grain and meat/meat alternate. An approved CN label must come directly from the box, be a picture of the CN label on the box or a copy of the CN label on the box. A product formulation statement is also acceptable. TA provided on approved CN labels or product formulation statements.</p>	<p>3. Submit a week worth of food production records that contain all required information as described above to show that all vegetable subgroup requirements are being met.</p>	
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Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance		The free and reduced income application instructions on your website is from 2017. If the application is going to be on the SFA's website, the most current application must be provided.

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700 - Resource Management		<p>PROCUREMENT:</p> <ul style="list-style-type: none">· The procurement plan was completed but is missing some required information. The procurement plan must be completed annually and the date which the plan was completed needs to be included. The plan must also include the local purchase thresholds if available, and all purchases made with school nutrition dollars, including micropurchases and sole source purchases such as emergency food purchases and the point of service update. The anticipated value of each procurement event must be included. TA provided to the food service director.· The code of conduct included with the 2019-2020 IowaCNP application does contain the required elements including language on conflict of interest, and a gift policy, but does not include a disciplinary policy. TA provided.· Small Purchase Method: The required terms and conditions were not listed on the small purchase milk or bread bid. The Buy American provision, equal employment opportunity provision, the termination for cause and convenience, targeted small business certification, and debarment certification statement are required for small purchases. SA encourages the SFA to use the Small Purchase (3 Bids and a Buy) Procurement Template located in Download Forms that includes all the required terms and conditions as well as other bid requirements. All products that the SFA plans on purchasing and an estimated amount of each product should be provided to potential bidders so that they know how much you want to purchase. Unless the original bid reported that it applies for multiple school years, SFAs must send out a bid annually. The bread bid was only sent to one bread vendor when SFAs must send it to at least two vendors (three is preferred).· SFAs are required to conduct contract management. Although the SFA checks to ensure all products that are ordered are delivered, no one at the SFA is checking the invoice to make sure that they are charging the agreed upon price. Price lists sent from the milk company or the prime vendor have not been saved. SFAs must save all invoices and all weekly/monthly price lists for three years plus the current year and must regularly compare invoices to the price lists to make sure they are charging the correct price.
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		<ul style="list-style-type: none"> · Micropurchase Method: The micropurchase documentation provided suggests that the SFA made more than one purchase at the vendor selected for micropurchase review. However, there was only one receipt available to review. Therefore, the SA was not able to determine if all prices were reasonable and purchased items were allowable. SFAs must keep all invoices for three years plus the current year. SFAs must also keep a micro purchase log to document all micro purchase events. A micro purchase log template is available in Download Forms. TA provided on requirements and resources. · A Buy American exception log is also required to be kept. The SFA must document any agricultural item purchased or received that does not meet the Buy American provision. The item, it's country of origin, and the reason the Buy American provision was not followed must be documented. There is a Buy American exception log in Download Forms that the SFA can use.
800 - Civil Rights	801 Did the School Food Authority publish a public release as required for the School Year being reviewed?	The SFA must send the public release to the local media outlet every year before school starts to inform all interested families within the community that the school participates in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The public release is found in Download Forms (ELIG080) and is updated annually. The SFA must save the letter or email sent to the local media outlet to show that the public release was sent. TA provided.
800 - Civil Rights	803 What is the SFA's procedure for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs?	The USDA has procedural requirements for what actions must be taken in the event that a civil rights complaint has been made against the school nutrition program. The complaint procedure and form were provided to the principal. TA provided.
800 - Civil Rights	809 a. Are denied applications disproportionately submitted by minority households?	The ethnic racial form located in Download Forms (ELIG085) is required to be completed annually to show that the SFA has not discriminated against any racial or ethnic groups in providing benefits. The SFA completed the form for the 2019-2020 school year but with errors. This form must be completed annually starting on October 1. TA provided to the SFA on completing the ethnic racial form so that the total number of students in the ethnic section and racial section are

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		equal.
800 - Civil Rights	810 Review program materials.	The full Iowa and USDA nondiscrimination statements are required to be on all program materials including the website where information is kept regarding the NSLP and SBP. The abbreviated statement is on the menu but the website does not contain either statement. The full USDA and Iowa nondiscrimination statements can be found on the Iowa Department of Education's Nutrition Program page: https://www.educateiowa.gov/pk-12/nutrition-programs#USDA_Nondiscrimination_Statement
1200 - Professional Standards		The regulations that must be followed to participate in the National School Lunch Program are often best managed by more than one person. In order for the SFA to be successful in meeting USDA requirements, SA encourages the SFA to provide additional administrative support by providing assistance with or delegating some of the administrative duties such as application approval and Direct Certification issuance, verification, procurement, and/or resource management to other individuals within the school. Support can also be received by paying for the food service director and/or other food service staff to attend training. Training opportunities are available every summer for food service directors and staff and SA encourages the food service director to attend the School Meal Pattern Essentials on August 5 as well as a procurement training in April or June 2020. The principal or another administrative staff person within the school may also consider taking over the authorized representative role. The authorized representative is the contact person for the Iowa Department of Education Bureau of Nutrition and Health Services, must receive 4 hours of training in school nutrition program topics annually, and can help the food service director ensure all requirements are being met and communicated to the correct individuals.
1200 - Professional Standards	1214 Validate the SFA's response to Question 1204 on the Off-site Assessment Tool.	The food service director is required to have 12 hours of training in school nutrition programs annually. Nutrition staff that work less than 20 hours per week must have four hours of training annually and staff that work more than 20 hours per week in the school nutrition program must

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		have 6 hours of training annually. Topics must be related to their school nutrition program responsibilities. A summer short course training flyer and a link to training webinars was provided.
1600 - School Breakfast and SFSP Outreach	1602 For each question on the Off-Site Assessment Tool (Questions 1600-1601), do the responses provided demonstrate compliance with FNS requirements?	The SFA posts the breakfast menu on the school's website but may also consider promoting their breakfast program by posting information about the program (time of operation, cost, benefits and importance of eating breakfast) in a school newsletter and/or the church bulletin. TA provided.
RMCR - Nonprofit School Food Svc Acct	9 If the SFA encumbered bad debt from unpaid student meal accounts during the RM review period, how did it ensure that only allowable non-Federal revenues were used to restore operating losses? (Unpaid Meal Charges: Guidance and Q&A SP 23-2017)	The SFA did not have a negative balance policy. All SFAs must have a negative balance policy so that all staff and families are aware of the SFAs procedures that will be implemented when a student's lunch account has a negative balance. For example, the policy may include how delinquent meal charge debt will be collected. This policy must be provided to all families annually in a hard copy format. TA provided to the business manager and principal. The USDA memo SP 46-2016 was provided to the principal.
RMCR - Revenue From Nonprogram Foods	6 Did the SFA assess its compliance with the Revenue from Nonprogram Foods requirements?	TA was provided to the business manager on the difference between nonprogram food and program food, the nonprogram foods sold at the school, and the requirements for the nonprogram food revenue tool. Currently the SFA only sells adult meals, 2nd milks, and extra juices. The revenue for adult meals is tracked separately but the revenue received for 2nd milk and juices is not tracked separately. The cost for these nonprogram foods is also not tracked separately. Therefore, the amount of nonprogram food revenue entered into the nonprogram food revenue tool within the 2018-2019 financial report in IowaCNP only includes adult meals. The SFA sells the adult meals for \$4.00 and extra milk and juice boxes for \$0.50, which more than covers their costs. TA provided to the business manager on tracking the revenue for the adult meals, extra juice and milk boxes and including the cost and revenue of those items in the IowaCNP financial reports going forward.

Site - Level Technical Assistance St Anthony School (8106)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to	SFAs are required to post signage that describes the daily menu items being offered and how they constitute a reimbursable breakfast meal.

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	students for all applicable grade groups?	Although the menu was posted at lunch, there was no menu offered at breakfast. A sample breakfast sign was provided to the food service director along with TA on the signage requirements.
1400 - Food Safety	1405 a. In the comments section, list the dates of the two (2) most recent food safety inspections.	SFAs are required to have 2 food safety health inspections annually. If two are not received by the middle of the school year, the SFA must request a 2nd inspection by sending a letter to the inspector at the Department of Inspections and Appeals. TA provided.

Org - Level Commendations

Description
<p>CERTIFICATION AND BENEFIT ISSUANCE: • Students who received benefits in the previous school year receive benefits for the first 30 operating days. • Benefits are extended to all students within the household. • The State agency letter of notification of eligibility is provided to families on the DC list or that applied and were denied benefits. • Applications are complete with all required information including signatures, date that the SFA processed the application, household names, incomes, and social security numbers. • All denied applications were determined accurately. • Applications are available in Spanish for the families who need them. • The determining official keeps all eligibility documents confidential. • The determining official looks students up on elookup and keeps all lists on file. • Eligibility status is accurately transferred to the point of service system. • The correct income applications, income eligibility guidelines and conversion factors are being used. • The verification report was completed on time and states that the correct number of applications were selected to verify.</p>
<p>CIVIL RIGHTS: - Program materials are provided in another language to families if needed. - Civil rights training was provided to all staff with nutrition responsibilities. - The food service director offers to meet the dietary needs of any student who reports having a special dietary need. Currently, the families within the district who have students that have special diet needs stated that they will be bringing food from home. - The “And Justice For All” poster is on display in a public location. - The nondiscrimination statement is located on the menu. - No discrimination was observed while the SA was onsite.</p>
<p>FOOD SAFETY: • The food service director is ServSafe certified (10/13/2016 – 2021). • The food service director provided food safety and personal hygiene training to staff at the beginning of the school year. • The most recent health inspection report is on display. • The SFA monitors and records the temperatures of the cooling equipment. Temperatures of the hot food are monitored and recorded on food production records. • The SFA has a HACCP Plan onsite that contains many required Standard Operating Procedures.</p>
<p>MEAL COUNTING AND CLAIMING: • The edit check report matches the claim. • The edit check report for the day of observed meals is reasonable when compared to the edit check report during the review period. • The number of meals claimed does not surpass the number of free, reduced price or paid students enrolled. • The meals served during the observed breakfast and lunch were reimbursable. • The point of service line at lunch was well organized to ensure all students were counted and claimed for a reimbursable meal. • The meal counting system prevents overt identification of students receiving free or reduced meals.</p>
<p>MEAL PATTERN REQUIREMENTS AND NUTRITION QUALITY: • There are food production records that include the menu items, including the condiments and milk, for every meal being counted and claimed for reimbursement. • The daily and weekly fruit and milk requirement were met for the</p>

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lunch served during the review period and the grain and milk requirements were met for the breakfast served during the review period. • The breakfast and lunch meals served to students during the observed meals met the daily meal pattern requirements. • Grain based desserts are limited to 2 ounces or less per week. • The grains served during the review period and the day of review were whole grain rich. • More than two types of milk (approved) are being offered to students. • Free, potable water is made available to students during breakfast and lunch. • Signage is posted at lunch to show students how the menu constitutes a reimbursable meal. • Posters are displayed throughout the cafeteria to promote healthy eating. • Canned fruit served is fruit canned in light syrup or in its own juice and many canned vegetables are lower in sodium.

PROCUREMENT: • The procurement plan contains purchases made, the procurement method used, the contract award type, contract duration, evaluation method used and the individuals responsible for contract management. • The bread and milk small purchase method bids have detailed delivery specifications, evaluation methods listed, and a due date of when the bid responses must be received. • Both the milk and the bread bid are within the small purchase threshold. The SFA selected the lowest price milk vendor. • The vendor paid list suggests that the micropurchases made were within the micropurchase threshold and that purchases were spread equitably among qualified vendors.

PROFESSIONAL STANDARDS: • Training documentation is available to show all staff met the professional standards requirement. • Civil rights training is provided to all staff with school nutrition program responsibilities. • Training is tracked for school nutrition professionals.

RESOURCE MANAGEMENT: • The SFA spent their USDA commodity Paid Assistance Level dollars efficiently as 134% were utilized in the 2018-2019 school year. • The SFA charged the correct adult lunch price. • The school nutrition account had a positive balance as of December 2018 and therefore did not have to increase paid student lunch prices. • The nutrition account had less than 3 months of operating costs. •

SCHOOL WELLNESS POLICY: - The SFA recently was awarded a grant to purchase and install a water bottle filling station. - No competitive foods are sold during the school day other than 8 oz. cartons of milk and 4 ounces of 100% juice. Therefore, all competitive foods sold are Smart Snack approved. - The wellness policy contains goals on nutrition education, physical activity and education, foods sold and foods provided during the school day and other school related activities.

SUMMER FOOD SERVICE PROGRAM OUTREACH: - Families are informed of the Summer Food Service Program through signs posted throughout the building, on the school's website and social media site.