

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

School Food Authority: Wauzeka-Stueben

Agency Code: 126251

School(s) Reviewed: Middle School

Review Date(s): April 24, 25, 26, 2018

Date of Exit Conference: 4/26/2018

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 at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, 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, and 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 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 do 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](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at **Wauzeka-Stueben Middle School** for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing 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. We appreciate everyone's cooperation and willingness to learn. The Food Service Director and staff are doing a fantastic job in serving colorful, healthy, reimbursable breakfast and lunch meals to all students. Also the Food Service Director is very excited to learn more and continue doing great things with the program here at Wauzeka-Stueben. Keep up the great work! The participation is fantastic both at breakfast and lunch! It is obvious that all school staff are taking part in encouraging students to eat healthy meals at their school. The administrative assistant and business manager were especially helpful in answering our questions while on review. Thankyou to everyone!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- **37 eligibility determinations were reviewed, and 0 errors were identified.**

Public Release

All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc) before the start of the school year (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc). The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must 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 it published but must maintain documentation of whom the release was sent to along with the specific materials distributed.

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding: The Public Release was not submitted as is required by USDA to a local newspaper or distributed to 3 local grassroot organizations (public libraries, food pantry, churches, etc.) and unemployment offices.

Corrective Action Needed: Due to a turnover in staff, the Public Release was not sent out for the 17/18 school year. The previous staff person retired from her position, and the school chose not to replace her, leaving a lot of extra duties for the Administrative Assistant to the Business Manager.

Please use the DPI website to read about the Public Release and why it is necessary, and submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

Free and Reduced Applications

Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.

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, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that 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>).

❑ Finding: It was observed while reviewing applications, that the reverse side of the application has all three officials signing each application. In reviewing the previous 2015 Administrative Review Report, one finding was that the section in the application to be completed by the Determining Official had not been completed. So the corrective action was to complete that section for each application. However, the Determining Official misunderstood that to mean that each line on the back of each application needed to be signed/filled in going forward.

Corrective Action Needed: The process for determining the application, was explained in detail to the Determining Official. The corrective action will be to watch the Free and Reduced Webcast on the DPI website, and submit a statement on your school letterhead stating that you watched it, and understand the process, and how the applications should be signed. This can also count as training hours towards Professional Standards.

Verification

Commendations/Comments/Technical Assistance/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 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

The Verification Report was done correctly.

Findings and Corrective Action Needed: Verification

❑ Finding: One application was selected for the Verification Process. The process was done correctly, however, the application was not signed by anyone on the reverse side of the app. It is required that the Determining Official needs to sign the application when determining it, and after it is verified, the Verifying Official and Confirming Officials need to sign it also. It was then checked during the

Administrative Review and found to be correctly verified. The process was explained in detail to the Administrative Assistant who does the Verification process. The officials were asked to sign and date the application on site.

Corrective Action Needed: Watch the [Verification Webcast](#) on the DPI website, and submit a statement on school letterhead explaining you know and understand the Verification process and the importance of the signatures of all the officials involved (https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html).

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all the staff at Wauzeka Steuben School District for their cooperation during this Administrative Review. We appreciated the staff and Food Service Director's willingness to ask questions and to learn. Reviewers also appreciated the beautiful salad bar, with many colorful vegetables. In addition, we were greatly impressed with your breakfast participation. You have many breakfast service times (traditional, in the classroom and breakfast after the bell) and it's evident that students will eat when you have food available to them. Keep up the great work!

Comments/Technical Assistance/Compliance Reminders

Meal Pattern

As part of the Administrative Review, a week from the month of March (March 5-9, 2018) was reviewed for meal pattern compliance. Production records, recipes and crediting information for products served were reviewed for completeness and accuracy. Reviewer was unable to complete the review due to missing crediting documentation.

Crediting information is required for the following items:

- Bratwurst (lunch)
- Instant mashed potatoes (lunch)
- Bagel (Breakfast)
- Beef crumbles for sausage gravy (Breakfast)
- Biscuit (Breakfast)
- Bagelfuls (Breakfast)
- Long Johns (Breakfast)

- Combo Bar (Breakfast)
- Frudel (Breakfast)

Crediting Documentation

Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. You may need to contact the manufacturer for a PFS or you may save 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 [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record the specific foods you are using (oranges instead of “fresh fruit”), planned serving sizes for each menu item, planned and actual number of servings, milk usage by type and leftovers. Also remember to record substitutions, if any are made. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. The following is needed on each of the different types of production records in use at Wauzeka Steuben School:

Lunch

- Number of meals planned and served for students and adults
- Daily usage of milk type

Breakfast

- Planned serving size
- Number of meals planned and served for students and adults
- Daily usage of milk type
- Fruit serving sizes, and amount planned and served

Salad Bar

- Planned serving sizes

Although there is no required template for you to use, you may choose to use DPI’s [2 grade groups template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-two-grade-groups.doc) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/production-record-lunch-two-grade-groups.doc). It has space to record all the required information. Additional [Production record templates](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) for breakfast and lunch can be found on our website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).

Standardized Recipes

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen.

Technical assistance was given for the recipe standardization process. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization, and use all resources available to you. The recipe standardization process will take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

The following recipes need to be updated to include the required information, including total yield (number of servings the recipe makes), serving size for the different age/grade groups (K-8 and 9-12, if applicable), utensils used, instructions on how to prepare the recipe, and cooking time and temperature.

- Pea Salad
- Pickled beets
- Pasta Salad
- Muffins
- Loaded Turkey Sub from On, Wisconsin Menus
- Lunchpower! Seasoned Rice/Rice Pilaf

Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) or [contact a Public Health Nutritionist](https://dpi.wi.gov/school-nutrition/directory) for assistance (https://dpi.wi.gov/school-nutrition/directory).

Meal Pattern Components - Grains

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. This means that the first ingredient in the ingredient list will be a whole grain (eg, whole wheat, whole corn etc). The term “made with whole grains” can be deceiving and does not necessarily mean that a product is whole grain-rich. Always look at the ingredient list and if the first ingredient is enriched flour, or wheat flour then it is not a whole grain-rich product (it must say whole wheat to be considered a whole grain).

Grains that are not whole grain-rich cannot be credited toward the grain component. The following grain products being used are not WGR: Apple Zings cereal and muffin mix

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).

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, “[School Meal Flexibilities for School Year \(SY\) 2017-18](#)” for more information on the exemption process and complete the [Whole Grain-Rich Exemption Request](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf) form (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf; https://docs.google.com/forms/d/e/1FAIpQLSeU2lb9zEJTHCzwQk1xm0IV7nz8nIKATkLku6tX-Dh3Xijptg/viewform). Note that until an exemption approval has been received, WGR products *must continue to be served*.

Menus

The printed menu should list all components included with the reimbursable meal and accurately reflect current kitchen practices.

The statement on the bottom of the menu need to be updated:

Lunch: current statement says, “Lunch offered daily: Yogurt, Whole grain bread, veggies and lettuce on the salad bar.” After discussion with the food service director, this statement is no longer accurate as yogurt is not offered daily.

Breakfast: current statement says, “Breakfast offered daily *Juice*Cereal” is incomplete as fresh fruit is also offered daily. Perhaps a better choice of words would be “Breakfast offered daily includes choice of fruit, juice and cereal.”

Please update the statements on the bottom of the menu to reflect current practices.

Signage

It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. The breakfast signage should list the three components and the four items offered, and must communicate to students that under Offer versus Serve, they must select at least three food items, one of which must be at least ½ cup of fruit, vegetable, or a combination of fruit and vegetable. Signage is needed in both the cafeteria and on the breakfast cart.

Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](#) webpage. Additionally, you can order signage on the [Team Nutrition](#) webpage and complete the Resource Order Form (link on the bottom of the page) (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage; dpi.wi.gov/team-nutrition).

Offer vs serve

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for lunch and breakfast in regards to students having to take a milk. Although all students observed at lunch and breakfast took a reimbursable meal, it is important for staff to fully understand the OVS requirements. Additional training on OVS is strongly encouraged. This should limit waste and allows for student choice. Here is a summary of the requirements under OVS:

For breakfast: students must have 3 items on their tray, one of which is at least a ½ cup fruit or vegetable. Remember to communicate with staff about what food products count as one or two items (eg, the Uncrustable could equal one or two items; the pancake wrap on a stick could equal one or two items). Be consistent in how these items are credited. Therefore, a student could select a pancake wrap and a juice and this would be considered a reimbursable meal. They do not have to select a milk as long as they have the required amount of items on their tray.

For lunch: students must have 3 components on their tray, one of which is at least a ½ cup fruit or vegetable.

The [Offer Versus Serve Guidance manual](#) is available on our NSLP requirement website under the offer versus serve heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>).

CACFP

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar.

While onsite, reviewers noted that pre-K students are served separately in their classrooms for breakfast. Therefore, these students must follow the updated meal pattern. Reviewers took note that the food service director and staff were aware of the requirement that flavored milk is not allowed for pre-K students. Thank you!

There are a few additional meal pattern changes that must be made in order to come into compliance with the new CACFP meal pattern at breakfast:

Cereals must meet the sugar limits

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The cocoa puffs 25% less sugar, Honey Nut Chex, Kellogg's Frosted Flakes multigrain, Lucky Charms cereals were above the sugar limit for the serving size. Discontinue the use of these cereal choices for your pre-K students.

Use the [USDA sugar limits chart](#) or the [WIC cereal list](#) to determine if a cereal meets the sugar requirements (<https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-choosebreakfast.pdf>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cereals-CACFP.pdf>).

At lunch, reviewers noted that pre-K students are commingled (they are served at the same time and in the same place as other age/grade groups). Therefore, use of the USDA commingling flexibility is OK and the current K-8 meal pattern may be followed.

For more information please refer to the [Infants and Preschool in NSLP and SBP](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Training

DPI conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. This year training will be offered in Milwaukee, Madison, Green Bay, Rice Lake and Wausau. Travel and meal expenses are allowable food service expenses and may be reimbursed through the school's nonprofit food service fund. The following classes are highly recommended for lead workers and menu planners:

Meal Pattern: The Whole Enchilada
Offer versus Serve

Information, including dates and locations, will be posted on the DPI [training](#) webpage as they are scheduled (<http://dpi.wi.gov/school-nutrition/training>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

Please note: 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.

☐ Finding #1:

Missing crediting documentation for various food items served during the week of review.

- Bratwurst (lunch)
- Instant mashed potatoes (lunch)
- Bagel (Breakfast)
- Beef crumbles for sausage gravy (Breakfast)
- Biscuit (Breakfast)
- Bagelfuls (Breakfast)
- Long Johns (Breakfast)
- Combo Bar (Breakfast)
- Frudel (Breakfast)

Corrective Action Needed: Submit product nutrition facts labels, ingredients lists and product formulation statements or CN labels for the items listed above.

❑ **Finding #2:** Production records did not record all of the required information.

Corrective Action Needed: Submit one week of completed production records, for breakfast, lunch and salad bar.

❑ **Finding #3:** Apple Zings and Muffin Mix are not Whole Grain-Rich.

Corrective Action Needed: Discontinue the use of these products. Submit a statement that explains what you will do to bring these into compliance. Please state whether you will serve a different product or discontinue the product all together. If you choose to serve a different product, submit nutrition facts labels, ingredients lists and/or product formulation statements.

❑ **Finding #4:** Statements about breakfast and lunch offerings on the bottom of the printed menu are inaccurate.

Corrective Action Needed: Please update the statements on the bottom of the menu to reflect current practices. Submit a copy of the updated menu.

❑ **Finding #5:** Missing breakfast signage in the cafeteria and on breakfast cart. Signage must tell students what they must select in order to have a reimbursable meal and it must state the requirement of having a ½ cup fruit or vegetable or combination on their tray.

Corrective Action Needed: Submit a picture of your signage.

Buy American Provision

The USDA requires that a School Food Authority (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.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

SFAs must monitor contractor performance to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating that the product, “was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can be accepted in an email.

Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.

Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.

Any non-domestic product delivered to the school, without prior, written approval of the Food Service Director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the

food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern. Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.

The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the Introduction to the Procurement Policy and Procedures Handbook. Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

More information on this new requirement, and a template you can use to [track noncompliant products](#), can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

❑ **Finding #1:** SFA does not have a noncompliant list for tracking non-compliant products. The following products were noted during the onsite review:

- Fresh celery - Mexico
- Trio Cheese Sauce mix - Canada

Corrective Action Needed: Begin using a [Noncompliant Product List](#) for tracking nondomestic products. Record the noncompliant products listed above on the tracking sheet and submit a copy as corrective action.

SMART SNACKS

Commendations

Reviewers noted that steps had been taken to bring the beverage vending machine into compliance, which included limiting access to certain rows of the machine during school hours. Thank you! Just a few additional tweaks are needed.

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption.

Grades K-12 are housed in the same school building and middle school and high school grades have access to the beverage vending machine. Smart Snacks guidelines require that if multiple age/grade groups have access to beverage sales then the products must meet the requirements for the youngest age/grade group. Beverages must meet Smart Snacks standards for the middle school.

The following products in the vending machines were found to be non-compliant with Smart Snacks standards:

- Aquafina FlavorSplash - contains the artificial sweetener sucralose

Additionally, the vending machine had a sign stating the machine was turned off from 8am-3:25pm. However, the last school bell is at 3:25pm. Therefore, the signage and machine settings need to be updated to be turned off from before school (midnight on the instructional day) to 30 minutes after the last bell, which would be 3:55pm. Otherwise, the products in the machine could be switched over to compliant products, and the machine could be on at all times.

Additionally, the FFA holds a fundraiser where they sell non-compliant soft serve ice cream every other week. The soft serve ice cream mix and ice cream cone do not meet smart snacks standards. The ice cream mix exceeds the allowable limit for saturated fat and the cone is not whole grain-rich.

A different soft serve ice cream mix and whole grain-rich cone that meets Smart Snacks guidelines could be used and the ice cream sales could continue. If the school chooses to continue with the current products then the sales must meet DPI's exempt fundraiser guidelines.

Here is a brief review of of two situations by which an organization may sell foods and beverages to students during the school day.

1. If foods and beverages sold *are* Smart Snack compliant:
 - a. These foods or beverages may be sold at any time and in any location.
 - b. The school must keep documentation on file that proves the compliance of the items. This includes nutrition facts labels for purchased foods or beverages, or recipes for anything that is made from scratch (including actual serving sizes). It is also helpful to keep printouts of the results page from the Smart Snacks calculator.
2. If foods and beverages sold *are not* Smart Snack compliant:
 - a. These are considered exempt fundraisers. Each student organization may hold two exempt fundraisers per school per school year. Each exempt fundraiser may not be longer than two consecutive weeks in length.
 - b. Exempt fundraisers **cannot** occur in the meal service area during meal times.
 - c. Someone in the school must keep track of the exempt fundraisers. Tracking exempt fundraisers is crucial to ensuring that each student organization holding fundraisers that comply with the rule. The process of tracking fundraisers simply means keeping a list of each student organization that has had a fundraiser, noting the length of time and location of the fundraiser, and ensuring that no organization has more than two fundraisers and that each fundraiser is not more than two consecutive weeks.

You can find more information on our [Smart Snacks](#) webpage, including templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #1: The following product in the beverage vending machine is non-compliant with Smart Snacks regulations for middle school students.

- Aquafina FlavorSplash

Corrective Action Needed: Submit a written statement confirming that the school will no longer sell the artificially sweetened water. If you choose to change the products in the machine, submit nutrition facts labels and ingredients lists of the new products you intend to sell.

❑ **Finding #2:** Signage on the beverage vending machine does not comply with Smart Snacks standards for being unavailable during the school day.

Corrective Action Needed: Correct signage (and machine settings) to say that rows containing non-compliant products will be unavailable before school until 3:55 pm.

❑ **Finding #3:** The soft serve ice cream and ice cream cone are not compliant with Smart Snacks standards.

Corrective Action Needed: Submit a statement with your plan of action to bring the foods into compliance. Submit nutrition facts labels, ingredients lists (and actual serving sizes for the ice cream) for the new products you intend to sell.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

The Unpaid Meal policy is current and distributed to families at the beginning of the school year in the application packet.

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from 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” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting 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 would also be included here.

- When revenues are recorded from the federal reimbursement payments, you want to 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 a food expenditure.

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, by July 1, 2017, 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>).

Paid Lunch Equity

Commendations/Comments/Technical Assistance/Compliance Reminders

The Paid Lunch Equity Tool for the School Year 17-18 was done correctly. Great job in running the tool!

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram 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 nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food

regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} > \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram 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](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<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>).

Findings and Corrective Action Needed: Revenue From Nonprogram Foods

❑ Finding: The Nonprogram Foods Revenue Tool had not been completed for the current school year. This was discussed with the Business Manager, and he viewed the instructions on the DPI website while we were there.

Corrective Action Needed: The Non-Program Food Tool was completed and a copy given to the consultant while on site. No further action needed.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

No indirect costs were found.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

The "And Justice for All" poster and Annual Inspection Reports were current and out in the cafeteria posted on the wall for everyone to view.

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 October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should 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 training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>).

Findings and Corrective Action Needed: Civil Rights

❑ Finding: The incorrect Non-Discrimination Statement was being used on some program materials related to Food Service. It was brought to the attention of both the Food Service Director and Administrative Assistant who processes much of the Food Service Program documents, applications, etc. We discussed what the correct Non-Discrimination Statement is that should be used and language related to that.

Corrective Action Needed: Submit a statement stating that you understand the current Non-Discrimination Statement is to be used on all Food Service related materials that are distributed out to public and families. Always check the DPI website at beginning of the school year to use the most current statement available. The abbreviated one may be used on the menu’s

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. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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, for children for whom they do not have 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. Accommodations made for students without a signed medical statement from a licensed medical practitioner 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.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

On-site Monitoring is current, no further action is needed.

Local Wellness Policy

Commendations/Comments/Technical Assistance/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 2016-2017 and full compliance with the requirements 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 each school complies with the policy.

SFA is required to review and update Local Wellness Policy (1002)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. Your SFA has not reviewed nor updated your policy within the past three years. Additionally, your SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.

SFA is required to complete an assessment of the Local Wellness Policy (1005)

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>). A sample model wellness policy

is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your schools report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org/)) for assistance in assessing the LWP (http://wellsat.org/).

SFA required to inform the public of the results of the most recent assessment (1006)

Technical Assistance for 1006, if do not have a policy: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The first assessment should be completed within three years of your SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. Following the assessment SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. It is recommended SFAs include a plan to improve upon the results of the assessment.

Findings and Corrective Action Needed: Local Wellness Policy

Finding: Your SFAs Local Wellness Policy does not contain the required language stating who is the leader (person in charge).

Corrective Action Needed: Language must be added related to the following content areas: A Leader must be listed in the language of the policy. It cannot be a group or council. There needs to be a name and/or title, such as Superintendent. Please provide a timeline for updating your policy to become compliant with the final rule. The [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) can assist with sample language (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).

Professional Standards

Commendations/Comments/Technical Assistance/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 their SFA and includes education, school nutrition experience and food safety training requirements

(<http://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: 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, 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](http://dpi.wi.gov/school-nutrition/training/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.

Findings and Corrective Action Needed: Professional Standards

Finding: Training is not being monitored on a tracking tool to indicate how many hours each employee has accrued for the school year, as per the Professional Standards requirements. Training is being done monthly however, and an attendance roster was available.

Finding: While observing the lunch service, it was noted that there was a teacher helping do the point of service at the computer while the FSD was busy. Anyone helping in the food service program in any capacity is required to have Offer vs Serve Training and also Professional Standards Training hours.

Corrective Action Needed: If continuing to use non-food service personnel to help in the meal service, also provide documentation of Offer vs Serve training, and Professional Standards Training. Include all current training hours for each food service employee and/or non food service staff member onto the DPI tracking tool and submit a copy as part of corrective action.

Water

Commendations/Comments/Technical Assistance/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.

Water is available during meal service to all students at no charge in the cafeteria area.

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

❑ **Finding:** There is no sanitarian approved SOP for the Sharing Table that is being utilized in the cafeteria during meal service.

Corrective Action Needed: Food Service Director is to obtain a sanitarian approval for SOP (Standard Operating Procedure). Submit copy of approved, dated and signed SOP.

Food Safety and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

The Food Safety Binder is well kept and available inside the kitchen to all food service employees. Employee Reporting agreements are included. The kitchen was very clean, neat and orderly.

[A Flash of Food Safety](http://www.fns.usda.gov/ofsf/food-safety-flashes) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofsf/food-safety-flashes). While you're at it, visit the [Office of Food Safety](http://www.fns.usda.gov/ofsf/food-safety) website (www.fns.usda.gov/ofsf/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is 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.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

All Food Service related materials are retained on file for 3 yrs. plus the current year.

Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach

Commendations/Comments/Technical Assistance/Compliance Reminders

Wauzeka-Stueben is currently participating in the Summer Meal Program.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like 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>)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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

Findings and Corrective Action Needed: SFSP and SBP Outreach

Technical Assistance was provided regarding outreach of the summer meal program to think about posting it on their website. Wauzeka-Stueben School District is doing a great job of letting families know about their summer meal program. They have signage outside the school building, at each end of their town boundaries, posted in the cafeteria, and a newsletter goes out to families. They are also participating in the Breakfast Program and have great participation currently! Great job in providing meals for our students!

Technical Assistance was also provided regarding organization in the classrooms of the Pre-K and Kindergarten rooms. There was not any organization as to the order of the students who requested a breakfast. The teacher on site seemed pre-occupied. It seemed chaotic at times. The Food Service staff did well in calming the students and making sure each student received a reimbursable breakfast meal. It is strongly encouraged for Food Service staff to communicate with the teacher in the classroom to have breakfast served in an orderly and timely manner.

❑ Finding: Food Service did make sure that each meal served during Breakfast in the Classroom was reimbursable, however, but the teachers were doing the meal counts. This must be done by Food Service personnel who already have the Professional Standards Training.

Corrective Action Needed: Food Service Staff must check off the reimbursable meal (breakfast or lunch) as it is being served. Submit a statement as to your plan to change the point of service to be in compliance with the USDA and National School Lunch Program regulations.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.

- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Wauzeka-Stueben School is participating in the Wisconsin School Day Milk Program. The Point of Service (POS) is being done correctly.

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 your students' success.

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

