

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

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**School Food Authority: Prairie Catholic Schools**

**Agency Code: 127546**

**School(s) Reviewed: Prairie Catholic Schools**

**Review Date(s): March 22-23, 2018**

**Date of Exit Conference: March 23, 2018**

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

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

**General Program Reminders/Updates:**

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

## Appreciation/Commendations/Noteworthy Initiatives:

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

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

##### Free and Reduced Price Meal Applications

- 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.

##### Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

##### Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

##### Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

##### Application Forms

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.

### Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

### Limited English Proficiency (LEP)

- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](#) (<https://www.fns.usda.gov/school-meals/translated-applications>).

### Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run .
- The effective eligibility date for a DC eligible student is the date of the original output file.

### Transferring Students

#### Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](#) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

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

**Finding #1:** The finding was that Prairie Catholic is able to access free and reduced data from Prairie du Chien Area Public School. The software systems are linked together. This is not an acceptable process. This sharing of information through different school data systems raises concerns about maintaining confidentiality, preventing overt identification and the need to know. Data systems, records and other

means of accessing student's eligibility status are limited to officials directly connected to each specific school. Technical assistance was required.

**Corrective Action Needed:** Please stop this practice of the ability to share information regarding free and reduced information for the NSLP between the schools. Notify the Public school of the change. Submit a statement of understanding including a timeline of how this practice will stop and when this will occur.

**Finding #1:** The finding was that there was no way to determine that applications were determined in the 10 operating days' time period for meal benefits due to no signature on paper applications and also for applications submitted on-line.

**Corrective Action Needed:** Please review the DPI website link for free and reduced information regarding processing applications. Please submit a statement of understanding that applications will be approved within the 10 operating days' time period. In addition included in the statement how The SFA will document the dates when applications are approved.

## Verification

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- 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.

### Findings and Corrective Action Needed: Verification

**Finding #1:** The finding was that while verification was completed there was no documentation available to show that there was a confirmation review. The "*We must Check letter*" that was sent to the household selected for verification was available but the notification letter "*We have Checked*" that households receive was not available. This letter alerts the household of the meal benefit results due to the verification process. Technical assistance was provided and the tracking tool was recommended.

**Corrective Action Needed:** Please review the verification process by reviewing the verification webcasts and the verification website. Please submit a statement on how the SFA will track verification in the future, what the confirming official's responsibility is in verification and submit a letter of what letter the SFA will use to alert households of the results of verification.

**Finding #2:** The finding was that net income was used to determine the application for verification. This is incorrect as gross income is to be used to determine eligibility. This error resulted in the household having to be changed to paid meal status. **Technical assistance was required regarding what income to use regarding verification.**

**Corrective Action Needed:** Please send a letter out stating the change in the meal benefit to the household. This error was recorded on the SFA1. **Corrected on-site, no further action needed.**

## Meal Counting and Claiming

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

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- 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.

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

**Finding #1:** The finding was that the POS for Pre-K and kindergarten students was not the most acceptable practice. Tickets were bundled and placed in basket by a staff person.

**Corrective Action Needed:** Please submit a statement on how this will be corrected. Please describe the process that will be used to for the Pre-k and Kindergarten students regarding the POS. **Food service director corrected process and submitted a statement to reviewer via e-mail. No further action is needed.**

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to everyone at Prairie Catholic School for the warm welcome. We appreciate your time and efforts spent preparing for and participating in the onsite review. Thank you to the Food Service Director for sending documentation and answering questions prior to the onsite review. The Food Service Director shows great enthusiasm for the work that she does! During the onsite review, she asked insightful questions and was very receptive to all feedback.

Students at Prairie Catholic School are offered a daily Garden Bar with a colorful selection of vegetables to encourage consumption. The Food Service Director has also given certain menu items creative names, such as Rippin Refried Beans and Roarin Baked Beans to promote those items. It is clear that the Food Service Director has worked diligently to implement the updated CACFP meal pattern this school year for the students not yet in kindergarten. Thank you for all that you do for the students of Prairie Catholic School!

### Comments/Technical Assistance/Compliance Reminders

#### Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

- The current production record template is missing a column to record the planned number of portions.
- All items offered with the reimbursable meal should have a planned serving size. Currently, the items offered on the Garden Bar and the condiments do not have planned serving sizes recorded.

Technical assistance was given during the onsite review to determine the planned portion size for each item on the Garden Bar and the condiments.

- The prepared and leftover amounts recorded on the Garden Bar production record should include the appropriate unit of measure (e.g., lb., oz., cup) for clarity.
- If any substitutions are made to accommodate special dietary needs, these should be recorded on the production record.
- Fruit sizes (e.g., case count) should also be recorded on the production records.

A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

### Dietary Specifications

- Condiments can be significant sources of calories, saturated fat, and sodium in a meal. Consider procuring lower fat and reduced sodium varieties of items such as salad dressing, sour cream, and mayonnaise. The calories, saturated fat, and sodium in some of the original versions of condiments may greatly contribute toward the dietary specifications, even when used in small amounts.
- Some of the recipes submitted for the week of review indicate that salt or butter is being added to dishes during preparation. While this is acceptable if your menu meets the dietary specifications, consider adding flavor by experimenting with other seasonings instead. Start with familiar flavors like garlic, Italian seasoning, and cinnamon; then slowly incorporate flavors that are more adventurous.
- During the onsite review, the Food Service Director indicated that peanut butter and sunflower seeds were offered in the past and the school is interested in offering them again. If offered, these items must be accounted for in the dietary specifications. Portion control, total usage, and ways to monitor usage should all be taken into account when planning to incorporate these items into the menu again.

### Salad Bar Signage

As discussed during the onsite review, it is a great idea to continue with the plan to add signage to the Garden Bar to communicate what the planned serving size is to students. This may be especially beneficial for those foods, like carrot sticks, that do not fit neatly into spoodles or those served with tongs. Your idea to incorporate photos of the foods is great!

### Non Discrimination Statement

The [USDA Nondiscrimination Statement](https://fns-prod.azureedge.net/sites/default/files/cr/Nondiscrimination-Statement.pdf) must be used on all communications with the general public, including web pages. When there is not enough space to use the full statement (i.e., monthly menus), the following shortened statement can be used: **This institution is an equal opportunity provider** (<https://fns-prod.azureedge.net/sites/default/files/cr/Nondiscrimination-Statement.pdf>). This statement should be in the same font size as the rest of the document.

### Grain-based desserts in the updated CACFP meal pattern

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, cinnamon rolls, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. For a complete list of foods considered grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

### Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf).

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

**Finding# 1:** The Garden Bar was located at the beginning of the serving line, but prior to the point at which students picked up trays. Upon further clarification from the Food Service Director, it was determined that students were able to pick up a tray, and then return to the Garden Bar. Students were also able to decline the hot vegetable and return to the Garden Bar to select vegetables prior to having their trays checked for a reimbursable meal. Bowls were also available on the Garden Bar for students to fill before they picked up a tray. Since students were able to access the Garden Bar prior to trays being checked for reimbursable meals, it was determined that the vegetables offered on the Garden Bar could be credited during the week of review. This line setup was addressed during the onsite review, prior to lunch service, by moving the trays out in front of the Garden Bar.

It was noted that during the previous Administrative Review, the Garden Bar was located after the POS, so the vegetables offered could not be credited toward the meal pattern. This resulted in daily vegetable insufficiencies and weekly subgroup insufficiencies.

**Corrective Action Needed:** Please continue with the line configuration that was implemented during the onsite review, allowing students to pick up a tray, and then proceed through the Garden Bar and meal service lines. Trays should be checked for reimbursable meals after students have had access to all foods that are intended to be credited. Please submit a statement explaining that you intend to continue with the meal service setup that was implemented during the onsite review.

**Finding # 2:** An insufficient amount of vegetables from the beans/peas (legumes) subgroup was offered during the week of review. The Chili offered on Tuesday of the week of review contained  $\frac{1}{8}$  cup of kidney beans per serving. This was short of the  $\frac{1}{2}$  cup beans/peas (legumes) that is required to be offered during the week. Based on the menus submitted for review, this does not appear to be a systemic issue.

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

**Corrective Action Needed:** Submit a statement explaining how you plan to meet the beans/peas (legumes) weekly subgroup requirement. Please submit product labels for any new products added to the menu as part of this corrective action.

**Finding # 3:** There was a weekly grain insufficiency at lunch during the week of review. The daily grain amount offered during the week of review was as follows:

- Monday: 1 oz. eq. from the Chicken Patty

- Tuesday: 1 oz. eq. from Cinnamon Roll
- Wednesday: 2 oz. eq. from the Pancakes
- Thursday: 1 oz. eq. from the rotini and 1 oz. eq. from the Chicken Patty
- Friday: 1.5 oz. eq. from the Fish Sticks

The total minimum amount a student would have access to over the week was 7.5 oz. eq.; short of the required 8 oz. eq. per week.

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

**Corrective Action Needed:** Submit a written statement explaining how this grain insufficiency will be corrected. Please submit product documentation for any grain products added to the menu.

**Finding # 4:** The production record template being used is missing a column to record the planned number of portions for each menu item. Additionally, the items on the Garden Bar and the condiments need planned serving sizes.

**Corrective Action Needed:** Submit an updated production record template that includes a column for the planned number of servings for each menu item. Submit a copy of the Garden Bar and condiment production record with a planned serving size included for each item.

**Finding # 5:** The standardized recipe submitted for the Cinnamon Rolls offered during the week of review did not contain the ingredients with the corresponding weights or measures. Crediting was able to be determined from other information given on the recipe and the product documentation submitted. However, a complete standardized recipe is required for every menu item with two or more ingredients. Guidance on what a standardized recipe should include can be found on our [Recipe Resources and Tools](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

**Corrective Action Needed:** Submit a completed standardized recipe for the Cinnamon Rolls.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

##### Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for non-program 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 the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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.

- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “Ala Carte”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as 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 to have a written and clearly communicated policy that addresses unpaid meal charges.
- For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>).
- For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter
  - Sample robo-call script

#### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

**Finding #1:** The finding was that an unpaid meal balance policy or procedure was not provided in a written format to households and the food service staff at the beginning of the school year.

**Corrective Action Needed:** Please provide a statement on how this will be corrected in the future.

## **Paid Lunch Equity (PLE)**

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

- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.
- Refer to the [PLE 'In a Nutshell'](#) for more information on the PLE tool.
- Refer to the most recent [memo](#) from DPI.
- Refer to the most recent [guidance memo](#) from USDA.
- Step by step instructions to completing the PLE tool can be found on our [financial website](#) under Paid Lunch Equity.

## **Revenue from Nonprogram Foods**

### **Commendations/Comments/Technical Assistance (TA)/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 costs associated with nonprogram foods, 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.
- 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 the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult 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 # 1:** The finding was that the adult meal prices were not being charged the price listed on the contract. The staff were paying 3.15 but the actual price listed on the contract was 3.25.

**Corrective Action Needed:** Please raise prices immediately to 3.25 to meet the USDA requirements. Please submit a statement of understanding ensuring that adult meal prices will be charged according to the contract in the future.

## Indirect Costs

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

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

It was mentioned by the bookkeeper that there were no indirect costs being charged to food service currently. However, in the past they did charge some indirect costs.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

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

#### Nondiscrimination Statement

- When including the [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

#### And Justice for All Poster

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

### Civil Rights Training

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

### Special Dietary Needs

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

### Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits.

### Processes for complaints

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

- Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints  
([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).

**Technical assistance was provided to be sure the SFA had a contact within the organization for a civil rights complaint and a process in place to handle these complaints.**

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

**Finding # 1:** The finding was that civil rights training had not taken place for those involved in the food service program.

**Corrective Action Needed:** Please conduct the required training and submit a copy of the of the civil rights training roster.

### **Local Wellness Policy**

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

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

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

#### **Content of the Wellness Policy**

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

At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).

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

#### Resources:

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

### **Findings and Corrective Action Needed: Local Wellness Policy**

**Finding # 1:** The finding was the SFA had a wellness policy but it was not updated to meet all regulations. The SFA did not comply with alerting the public yearly of the opportunity to participate on the committee, making it available to families, and monitoring how the wellness policy is meeting its goals. In addition, please include a statement of understanding about the triannual reporting requirement of the wellness policy.

**Corrective Action Needed:** Please submit a statement summary on how the SFA will update the policy to meet content requirements, inform families about the opportunity to be on the wellness committee, how the public will be aware of the policy, how the SFA will monitor the policy and an understanding of requirement of the triannual assessment.

### **Smart Snacks in Schools**

- Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

- Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

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

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

### **Findings and Corrective Action Needed: Smart Snacks in Schools**

#### **Professional Standards**

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

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program "director". A program "director" is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the 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.
- The SFA's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

#### **Professional Standards: New Food Service Director Hiring Requirements**

#### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](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 of employment.

#### Findings and Corrective Action: Professional Standards

**Finding:** Training is not being monitored using a tracking tool for food service and non-food service staff. In addition, it was noted there is a short fall of training hours.

**Corrective Action Needed:** Create a tool, which includes the required minimum components, or use the DPI tool to include all current training hours for each food service employee, and subs. For those non-food service staff that have some duties in food service they are required to keep track of their training hours. Please include a copy of a tracking tool for their hours. In addition, please include a statement of what plans there are to meet the required hours for each of the food service and non-food service employees.

#### Water

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

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

#### Food Safety and Storage

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

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

#### Food Safety Inspections

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

### Temperatures

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

### Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually.
- A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.

### Food Employee Reporting Agreements

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

### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

### Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

### Time as Public Health Control

- When using "Time as a Public Health Control:"

- The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
- TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

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

**Finding # 1:** The finding was that **Employee Reporting Agreements** were not signed by all persons involved in food service. This includes subs and student workers.

**Corrective Action Needed:** Have all persons involved in food service completed the Employee Reporting Agreements. Submit copies of completed agreements

**Finding # 2:** Since the salad bar contains TCS foods, which are held outside of mechanical refrigeration, Time as a Public Health Control must be used.

**Corrective Action Needed:** Adapt site-specific Time as a Public Health Control, SOP to the food safety plan and submit an updated SOP.

### **Buy American**

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

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- 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 as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) 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 accepted within an email.

- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that 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 the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be 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 as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking 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**

**Finding # 1:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List:

- Mandarin Oranges - China
- Canned Tropical Fruit Salad - Thailand
- Canned Black Olives - Spain

**Corrective Action Needed:** Begin using a Noncompliant Product List for tracking non-domestic products. Submit copies of the completed form for the products listed above. There are four pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
  - a. Cost analysis
  - b. Seasonality- record the months that the domestic product is not available

- c. Availability
- d. Substitution- record the reason the distributor substituted the product
- e. Distribution- record the reason the distributor carries the non-domestic product
- f. Other- explain

You may record additional information if you find it beneficial.

A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Non complaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Special Milk Program (SMP)**

The Special Milk Program (SMP) provides milk to children in schools, child care institutions, and summer camps that do not participate in other Federal child nutrition meal service programs. The program reimburses sponsors for the milk they serve.

Schools in the National School Lunch or School Breakfast Programs also may participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs. There is no federal requirement that free milk is provided.

Point of Service Counts (POS) for the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.

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

#### **Findings and Corrective Action: Special Milk Program**

**Finding #1:** The finding was that the POS for SMP was not the most acceptable process. The POS for the SMP needs to be modified so that someone is checking off milk as students receive it. In addition, there is a need to update the checklist as the SFA was using a WSDM checklist.

**Corrective Action Required:** Please submit a statement on what the process will be regarding the checkoff at the POS. In addition, send me a copy of the checklist that will be used for the SMP.

**Copy of checklist was submitted via e-mail, but there is still a need for a statement.**

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

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

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



*With School Nutrition Programs!*