

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

School Food Authority: Oakfield School District

Agency Code: 204025

School(s) Reviewed: Oakfield School District

Review Date(s): May 8-10, 2018

Date of Exit Conference: May 10, 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, 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.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.US Department of Agriculture.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 Oakfield 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- 104 eligibility determinations were reviewed and 4 errors were identified.

Public Release

- School Food Authorities (SFAs) are required to distribute a *Public Release* before the start of the school year. SFAs should send the public release to local news media and grassroots organizations. In addition, SFAs should send the release to major employers contemplating or experiencing large layoffs and local unemployment offices, 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. Note, the *Public Release* cannot be posted to the SFA's website and/or district handbook

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.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- 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>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

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 includes all children and adults in the household and must match the number of names on the application for the 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. 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.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- 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) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household. **Technical assistance was provided.**
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Direct Certification

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

Disclosure

- The information provided by families 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, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

❑ **Finding #1:** The finding was that there were students that were approved on application as *Homeless* but upon review of the application it was noted that the SFA did not have supporting documentation for these students from the school's homeless liaison.

Corrective Action Needed: These errors are recorded on the SFA 1. The SFA must notify in a letter alerting households that there is a change in meal benefits. It is encouraged the district to work with the homeless liaison or contact the household to request a new application with updated information. If a new qualifying application is not received or a determination by homeless liaison is not established, the household needs to be notified in writing that their students' benefits will be decreased and that the household will be required to begin paying for meals effective 10 calendar days after the letter is sent out.

❑ **Finding #2:** The finding was that the public release was distributed at the beginning of the school year via the school generated newspaper. But to meet compliance it needs to be distributed to another news media source and any area grassroots organizations.

Corrective Action Needed: Please submit a statement on how this will be corrected.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process. Each year schools must annually verify eligibility of children from a sample of household applications approved free and reduced price benefits for that school year.

- 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:** When reviewing the application selected for verification it was found that the household that had been selected did not respond to the request for documentation. The SFA sent out a letter to the household in November notifying them that they would be change to paid status 10

calendar days after the letter was sent; however, the benefit was never changed in the point of service within the software system.

Corrective Action Needed: This benefit issuance error was documented on the SFA-1 form and fiscal action will be assessed for the meals that were incorrectly claimed. The SFA is required to notify household that their meal benefits will be changed based on the finding of the administrative review.

❑ **Finding #2:** The finding was that there is no documentation to support that a confirmation review took place.

Corrective Action Needed: Please review the verification website and submit a detailed statement on what the confirming officials role is in the verification process and in the future how the confirmation review will be conducted.

❑ **Finding #3:** The finding was that the *We must check letter* used for verification did not contain the correct non-discrimination statement.

Corrective Action Needed: Please submit a copy of an updated letter that the SFA will use in the future.

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](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.
- 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.

Findings and Corrective Action Needed: Meal Counting and Claiming

❑ **Finding #1:** The finding was that the software system does not perform an edit check for the monthly claim per food service director. The report used to submit claims does state the highest number of students that can receive meal benefits in each of the categories but does not factor in the average daily attendance. Technical assistance was provided on how to use the DPI manual edit check each month which includes factoring in the average daily attendance. It was noted to food service director to attach the manual edit check to the report each month.

Corrective Action Needed: Please submit a copy of one month of documentation to show that an edit check was performed.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director, Food Service Manager, and school nutrition professionals of Oakfield High School. We appreciate your time and efforts spent preparing for and participating in the onsite review. Menu certification workbooks for breakfast and lunch during the review period

showed all daily and weekly requirements per USDA meal patterns were met. Well done! The school nutrition staff prepared, offered, and served quality meals in compliance with daily requirements during breakfast and lunch meal observations. They worked efficiently in a dated kitchen. All school nutrition professionals, including the Food Service Director and Food Service Manager, were knowledgeable and receptive to feedback, both positive and constructive criticism.

Technical Assistance and Program Requirement Reminders

Non-Reimbursable Meals

Three students at Oakfield High School selected non-reimbursable meals during lunch meal observation on May 8. Students' meals contained fewer than three full components, though the students selected ½ cup fruit, vegetable, or combination. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Offer Versus Serve

Under Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz eq) of grain (and optional meat/meat alternate).

USDA breakfast meal pattern for the K-12 age/grade group requires a minimum of 1 cup of fruit to be offered. If the planned portion size is 1/2 cup, consistent with the planned portion sizes on submitted production records, then a choice of a fruit OR a juice cup (e.g. an orange OR an apple juice cup) is not allowable. The word OR limits the student to 1/2 cup of fruit at breakfast; this amount does not meet the daily minimum requirement.

Although all students observed during breakfast meal service on May 9 took reimbursable meals, staff must fully understand the OVS requirements.

OVS training in the context of Oakfield School District's breakfast and lunch menus is strongly recommended for all school nutrition professionals. Visit the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) page for additional OVS guidance (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

School Breakfast Program

According to [Serving Up a Successful School Breakfast Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf), "If breakfast is offered in a convenient way for students, they will participate in the program. A successful breakfast program is one that has high student participation. Offer breakfast in the school locations that are popular with students. The traditional way of serving breakfast – in the cafeteria before school starts – might not be the best time or location for your school. Spend the time to observe where the students socialize and at what time...serving breakfast in Grab 'n Go bags out in the hallway may work best in high schools" (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>).

Milk Component

Skim (flavored) and low-fat (unflavored) milk and bottled water were available in the meal service line at lunch. Per food service staff, milk was included in the unit price of a reimbursable meal; students were charged the a la carte price for bottled water.

Water is required to be available at no charge to students during the lunch and breakfast meal services, and schools can provide free water in a variety of ways. Currently, a water fountain is available near

the cafeteria. Providing access to water must not interfere with access to milk as part of a reimbursable meal.

Please add signage to the crate of water in the meal service line, which includes the a la carte price. Making bottled water available in the meal service line without this signage may mislead students to think that water is included in the unit price of reimbursable meals or that water is an alternative to milk.

Crediting Discrepancy

Yield and crediting errors were noted in the standardized recipe for Taco Meat (ENT 005). The ingredients call for 31.29 pounds of WI Beef Crumble, which is a cooked product and credits as 2.0 ounces to 2.0 oz eq of meat/meat alternate (m/ma). However, the total yield of the recipe is 23.67 pounds.

31.29 pounds of WI Beef Crumble divided by 250 servings provides 2.0 oz eq of m/ma per serving. 23.67 pounds divided by 250 servings is 1.5 ounce equivalents per serving. Recipe directions and conversation with the Food Service Director revealed the recipe is intended to credit as 2.0 oz eq of m/ma from the taco meat and 0.5 oz eq of m/ma from the shredded cheddar cheese.

The directions may also be clarified to indicate 2.0 ounces of taco meat and 0.5 ounces of shredded cheddar cheese are split evenly between two tortillas. Update the standardized recipe for Taco Meat (ENT 005) to reflect the products and practices that are used at Oakfield School District as well as the Meal Pattern Requirement to 2.5 oz eq of m/ma.

Portion Control

Proper portion size utensils should be used. They are especially important for self-service foods, such as lettuce salad and baby carrots. Proper portion size utensils encourage students to take the planned portion and the amount required as part of a reimbursable meal. Signage may be added to the fruit and vegetable bar to aid students when selecting pieces of fruits and vegetables with tongs.

Sodium Target 1

In May 2017, the U.S. Secretary of Agriculture announced schools must continue to meet Sodium Target 1 for school year 2017-2018. USDA recognizes that even though great progress has been made, schools and industry expressed the need for additional time and assistance to effectively achieve changes in the school meal patterns, including those related to sodium. At the same time, the WI DPI encourages schools to “keep in mind the best interests of the students and provide our school children with the most healthful and nutritious meals possible.” Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, pickles, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

Corrective Action

NONE

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

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 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>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter

- Sample robo-call script

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>).

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

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>)

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. 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 district’s total.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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>).

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.
- 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, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. 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>).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

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 an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

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.

Corrective Action

- ❑ **Finding:** The finding was that the on-site monitoring form was completed but not by the due date.

Corrective Action Required: Please submit a statement on how this will be corrected in the future.

FSMC

- Duties that may not be delegated to the FSMC include:
 - On-site Monitoring
 - Signature Authority
 - Edit Checks – if they are software-generated, the SFA must sign off on them

☐ **Finding:** The finding was that the SFA does not sign off on the edit check which is used for claiming meals. This is handled by the FSMC, The SFA is required to review edit checks before claims can be submitted by the FSMC.

Corrective Action Required: Please submit a statement on how this will be corrected in the future. Please include the title of the district representative whom will sign off on edit checks. If there is a change in the process of how claims are handled please submit a statement on the new process.

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.

Content of the Wellness Policy

At a minimum the wellness policy must include:

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>). LWPs should include specific goals related to:

- 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).

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). 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>).

❑ Finding: The SFA was able to provide a wellness policy but it had not been updated to meet regulations.

Corrective Action Required: Please include in the summary how the following items listed in bold below will be addressed regarding the wellness policy regulations.

SFA is required to make the Local Wellness Policy available to the public and public must be informed of updates to policy

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. Your SFA did not notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

SFA is required to review and update Local Wellness Policy

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 have a committee of diverse stakeholders and/or a roster of those involved.

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to allow parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of

the LWP. SFA wellness committees should include a diverse team of committed school and community stakeholders. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP.

SFA is required to inform potential stakeholders of their ability to participate in the Local Wellness Policy.

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of 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>).

SFA is required to complete an assessment of the Local Wellness Policy.

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.

Technical Assistance: 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.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards: New Food Service Director Hiring Requirements

Beverages

Plain water (flat or carbonated); milk (less than 12 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]); 100% juice (less than 12 fluid ounces); no-calorie beverages (<5 kcal/8 fluid oz; ≤10 kcal/20 fluid oz [flat or carbonated]); and low-calorie beverages (≤5 kcal/fluid oz [flat or carbonated]) may be sold to students in the high school age/grade group.

Diet Snapple Half 'n Half is non-compliant with Smart Snacks standards, as it exceeds calorie standards for no-calorie beverages and exceeds fluid oz for low-calorie beverages.

Fundraisers

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

❑ **Smart Snacks Finding #1:** One beverage sold a la carte was determined to be non-compliant with Smart Snacks standards.

Required Corrective Action: Submit a written statement confirming that the school will no longer sell Diet Snapple Half 'n Half. Address intentions regarding using inventories of the non-compliant product and purchasing a compliant replacement product, if applicable.

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](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 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 of employment.

Regarding food service management companies, the SFA maintains oversight and responsibility for planning, administering, implementing, monitoring, and evaluating the school meal programs; therefore, the role of program director must remain with the SFA. The SFA-State agency permanent agreement names the individual considered the SFA director or contact. This is the person, or any other designated staff who fulfills those duties, that must meet the hiring standards for new directors. Thus, in some cases, both the SFA contact and FSMC staff person must meet the hiring standards, depending on the duties of these individuals.

- With regard to training, both individuals would be responsible for meeting the training standards for program directors as they share director responsibilities. Discuss unique situations with your State agency to seek guidance. **Technical assistance** was provided regarding professional standards training.

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.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/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), Visit the [Office of Food Safety](http://www.fns.usda.gov/ofs/food-safety) website (www.fns.usda.gov/ofs/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.

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

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- 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 food service staff. 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>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- 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.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

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

- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. It was noted that in the freezer there were items stored on the floor that were not in compliance with regulations for storage due to limited space.

Standard operating procedure #10 in the SFA's food safety plan addresses storage. Technical assistance was provided to correct the problem.

Buy American

The USDA requires that a 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.

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

Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant Product List or SFA equivalent form:

- Garlic powder from China and the United States
- Granulated garlic from China
- Mandarin oranges from China

Required Corrective Action: Update the Noncompliant Product List to include any noncompliant products listed above. Provide copies of the updated forms.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

Commendations/Comments/Technical Assistance/Compliance Reminders

Breakfast

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Oakfield. 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)

Wisconsin School Day Milk Program

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.

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](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).

