

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

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**School Food Authority: Waupun Area School District**

**Agency Code: 20-6216**

**Schools Reviewed: Waupun Junior High and Waupun Senior High Schools**

**Review Date(s): February 26 – 28, 2018**

**Date of Exit Conference: February 28, 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 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, 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 Waupun Area School District 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. The preparation for this Administrative Review was very well organized and timely.

The DPI review team appreciates the eagerness of the staff at Waupun Area School District for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness and completed training. We were impressed during meal service observation at Waupun Area Junior High and Senior High with the inviting food picture signage and salad and fruit offerings in the mobile food bars. Serving utensils are changed after each serving period.

The School Nutrition Director is well-trained and leads a qualified staff of school nutrition professionals to provide wonderful meals to students. The Director of Business Services partners with the School Nutrition Director to complete tasks related to the district.

The DPI review team is confident that Waupun Area School District will continue to improve their knowledge and operation of child nutrition programs. They currently operate National School Lunch, National School Breakfast, Afterschool Snack Program, Special Milk Program and Wisconsin School Day Milk Program. Thank you.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

##### **Comments/Technical Assistance (TA)**

- Three hundred forty-one eligibility determinations were reviewed, with only two errors identified.
- The determining official is thorough and confidential during the free and reduced meal eligibility approval process, often contacting households to receive a complete application to process.

#### **Free and Reduced Price Meal Applications**

- Applications have been reviewed in a timely manner. An eligibility determination is made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application, usually within a few days.
- The determining official signs each application and makes follow up calls to households to receive the information needed to complete the determination. She adds notes on the application for clarification.
- All free/reduced applications and the direct certification runs were available for review. Applications have been approved and students are receiving the benefits they have been determined eligible for.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the determining official correctly uses the income frequency and [Income Eligibility Guidelines](#) and does not convert to annual.
- 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.

### **Income Eligibility Guidelines**

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications, whether manually or electronically. If done through software, please check that the income levels are updated each year after July 1.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parent-guardian-letter-faq.docx>).

### **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. Thank you for your follow up with households to have this completed before determining the application.

### **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.

### **Other Source Categorical**

- (TA) 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. Thank you for reaching out to the schools the Amity students hail from in order to provide meal benefits according to confirmed documents.
- 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.

## Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk 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 Employment Office (as applicable)
- The Public Release is not to be sent to households as it includes include the specific income amounts for free or reduced benefits.
- 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)

- 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.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsin version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- 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.

## Direct Certification

- Thank you for running the Direct Certification (DC) matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students. DC runs are conducted monthly.

## Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires *source documentation* of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

## 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.
- Waupun Area School District offers fee waivers to households eligible for free or reduced meals and includes households with DC matched eligibility.

- The LEA seeks 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, school supplies, 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>).
- For anyone working outside of food service, who is determined to need access to this confidential information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data) should have a signed disclosure agreement on file. **Note:** aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).

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

- ❑ **Finding #1:** Two students in the review sample were in a household with three others, but not matched in the Direct Certification runs before or during the Review Period of January, 2018. This finding will be subject to fiscal action.  
**Corrective Action Needed:** Normally, you would send the Adverse Action letter to the household giving 10 calendar days before changing the five students to Paid status; however, one of the household members was matched with Food Share benefits on 2/1/2018, extending the benefit to all household students. **Corrected onsite 2/27/2018; no further action required.**
- ❑ **Finding #2:** The [Public Release](#) must be submitted to local media, grass root organizations and the employment office annually before the start of school.  
**Corrective Action Needed:** Submit a statement of the process Waupun Area School District will use for the 2018-19 School Year.

**Verification**

**Comments/Technical Assistance (TA)**

- 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. If the software system, Infinite Campus, is being used as the confirming official, indicate that with a printout of selected applications and be sure they were picked by the correct sample method.
- (TA) 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.
- It is recommended to use the [Verification Tracker form](#), found on page 5, as the verification process is completed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>).
- Reference the sample method sheets to select the correct number of applications for the verification process.
- The verifying official sends the required second notice to the household to complete the verification request. Thanks.

- An SFA may employ the option to *directly verify* applications pulled for verification establishing a partnership with county offices or [consortia](https://www.dhs.wisconsin.gov/forwardhealth/imagency/index.htm) (<https://www.dhs.wisconsin.gov/forwardhealth/imagency/index.htm>).
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.

## **Meal Counting and Claiming**

### **Comments/Technical Assistance (TA)**

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- (TA) When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. The edit check sheets must be verified by a SFA employee, rather than a Food Service Management Company employee.
- 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.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations and Appreciations**

Sincere thanks to the Food Service Director and school nutrition professionals of Waupun Junior and Senior High Schools. We appreciate your time and efforts spent preparing for and participating in the onsite review. The production kitchen was very clean. Food and equipment storage areas were well-stocked and organized. Production records and a kitchen scale were easily accessible to food service staff, who completed records thoroughly and accurately. A Hazard Analysis Critical Control Point poster is prominently displayed in the kitchen. The Food Service Director was highly responsive. All daily and weekly meal pattern requirements were met for both breakfast and lunch at Waupun Junior and Senior High Schools during the review period. Well done!

### **Technical Assistance and Program Requirement Reminders**

#### **Non-reimbursable Meals**

One student at Waupun Senior High School selected a non-reimbursable meal during lunch meal observation on February 26. The student’s meal contained two pancakes, one sausage patty, 1/2 cup tater tots, and 1/2 cup applesauce. Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.

#### **Crediting**

Yield and crediting errors were noted in the standardized recipes for Soft or Hard Shell Tacos (ENT 005) and Grilled (toasted) Cheese Sandwich (SAND 001), and on production records for Cobblestreet Market Provolone Cheese.

Any processed product that is not listed in the USDA *Food Buying Guide* for School Meal Programs requires a current CN label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include weights of raw

and cooked ingredients, based on entries in the *Food Buying Guide*. “Liquid White Egg” listed on the 72/3.5 oz 6” Cheddar Cheese Omelet, Silver Brook (Code No: 22486-16183-00) PFS is not based on an entry in the *Food Buying Guide*.

### **Condiments**

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium targets remain in effect. Condiment usage is not monitored nor are portion sizes communicated to students. Please monitor your school’s condiment usage and communicate appropriate portion sizes to students.

Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon looks like, purchasing single-use portion cups to aid in portion control, or using signage on self-serve pumps. More information on sodium targets is found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Sodium heading. According to the [Smarter Lunchrooms Movement](https://www.smarterlunchrooms.org/) (https://www.smarterlunchrooms.org/) a flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors. Calorie free and sodium free spices and flavors are recommended. The first ingredient of the Bacon & Cheese, Buffalo Wing, Ranch, and Sour Cream & Onion seasonings, currently on the flavor station, is salt. Consider replacing these with lemon juice, parsley flakes, garlic powder, cinnamon, chives, vinegar, or hot sauces.

### **Milk Component**

Skim (flavored and unflavored) and low-fat (unflavored) milk and bottled water were available in the meal service lines at breakfast and lunch. Per food service staff, a choice of beverage was included in the unit price of a reimbursable meal. If a student selected both milk and bottled water, he or she was charged for one of the beverages. This is unallowable, as milk is a required component of the School Breakfast Program (SBP) and the National School Lunch Program (NSLP).

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 and bottle filling station are available in the cafeteria. Providing access to water must not interfere with access to milk as part of a reimbursable meal.

### **Duplicate Juices**

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. It is possible to offer juice daily and meet the 50 percent juice limit if it is offered along with fruit (fresh, frozen, dried, or canned). Use caution when determining if students can select duplicate juice cups with meals. SP 10-2012, Questions and Answers on the Final Rule defines an “offering” of fruits or vegetables for the purposes of assessing the juice limit, as “the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables.” The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.”

When analyzing the juice limit, consider the total amount of fruit students are able to select each day and how much juice they have access to. Use signage to communicate juice limits to students.

### **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. A consolidated tracking tool is recommended for Waupun Junior and Senior High Schools. A binder containing request forms is maintained by the Activities Director. Please update the request form and/or tracking tool to include fundraiser times and locations.

Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines.

Klarbrunn Bubbl'r and Zevia Zero Calorie Soda sold a la carte in the cafeteria are non-compliant with Smart Snacks beverage standards for middle school students. Only plain water (flat or carbonated), milk (less than 12 fluid ounces; skim [flavored or unflavored] or low-fat [unflavored]), or 100% juice (less than 12 fluid ounces) may be sold to middle school students. Kar's Mango Pineapple Trail Mix is non-compliant with Smart Snack standards.

### **Corrective Action**

**Meal Pattern Finding #1:** Unacceptable crediting documentation for 72/3.5 oz 6" Cheddar Cheese Omelet, Silver Brook (Code No: 22486-16183-00). The PFS is not based on an entry in the *Food Buying Guide*, and the determination of creditable meat/meat alternate is incorrect.

**Required Corrective Action:** Please contact Michael Foods to obtain an updated product formulation statement (PFS) for this item, then submit. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

**Meal Pattern Finding #2:** A choice of milk or bottled water was included in the unit price of a reimbursable meal. This is unallowable, as milk is a required component of SBP and NSLP. Providing access to water must not interfere with access to milk as part of a reimbursable meal.

**Required Corrective Action:** Submit two to three sentences describing how students and staff will be informed milk is included in the unit price of a reimbursable meal. A photo of updated signage which reflects milk as a component and water as an extra is also acceptable.

**Meal Pattern Finding #3:** The required 1/2 cup fruit, vegetable, or fruit vegetable combination statement is missing from signage.

**Required Corrective Action:** Add a statement to your current signage stating a student must select at least 1/2 cup fruit, vegetable, or fruit/vegetable combination as part of his or her reimbursable meal.

**Submit a photo of updated signage.**

**Meal Pattern Finding #4:** Two beverages and one snack sold a la carte by the food service department are non-compliant with Smart Snacks standards.

**Required Corrective Action:** Please submit a statement describing how you will bring these food and beverage sales into compliance.

## **3. RESOURCE MANAGEMENT**

### **Nonprofit School Food Service Account**

#### **Comments/Technical Assistance (TA)**

- The consultant addressed financial topics with the SFA's Director of Business Services and the school nutrition director. Thank you for working together to complete the Annual Financial Report, Paid Lunch Equity Tool, and Non-Program Food Revenue Tool annually.

### **Annual Financial Report (AFR)**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements. This is a cost reimbursable contract.
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

### **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.
- 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/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found our [Financial Management](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>; <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

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

### **Comments/Technical Assistance (TA)**

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The SFA's current weighted average for 2017-18 SY tool is \$2.90.
- 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**

### **Comments/Technical Assistance (TA)**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or WI School Day milk break for paid category) and Catered Meals.
- 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.
- 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>).

## **Adult Meals**

- (TA) 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, 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) (<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) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)

## **Indirect Costs**

### **Comments/Technical Assistance (TA)**

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50. 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.

#### **Food Service Management Company (FSMC)**

- The following duties may not be delegated to the FSMC, as outlined in the following [memo](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf>):
  - Onsite monitoring – the annual requirement for the district to evaluate each “site” of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
  - Signature Authority – a representative of the SFA must sign off on the contracts for the SFA
  - Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.
- **(TA) The FSMC must develop an Advisory Board**, consisting of parents, teachers and students to assist in menu planning, per [USDA Memo SP 40-2016](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-40-2016-attachment.pdf>).

#### **4. GENERAL PROGRAM COMPLIANCE**

##### **Civil Rights**

##### **Comments/Technical Assistance (TA)**

##### **Nondiscrimination Statement**

- (TA) 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 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” poster is posted in public view where the program is offered.

##### **Civil Rights Training**

- Civil rights training is conducted on a yearly basis for all staff who administer any portion of a school nutrition program. Be sure to include translators and information technology staff that work with school nutrition program operations.

##### **Civil Rights Self-Compliance Form**

- The [Civil Rights Self-Evaluation Compliance](#) form was 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>)

- If the SFA is making accommodations for students with proper documentation, the meal 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.
- 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 allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

#### **Processes for complaints**

- All SFAs should have procedures 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 Complaint Form](#) 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)).

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

- Finding #3:** Household notification letters for Direct Certification approval and the "We Must Check Your Application" letter to begin the verification process contain the appropriate nondiscrimination statement, but it is not in the same size font as the rest of the document. Since the Spanish version is also used in your SFA, please make changes to that template, as well.  
**Corrective Action Required:** Please submit a sample of the two notification letters with the correct nondiscrimination statement.
- Finding #4:** The meal counting system, Infinite Campus, must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals (i.e., \$3.25, .40, 0.00) are visible on the computer screen that can be seen by students; this constitutes overt identification.  
**Corrective Action Required:** Please submit a statement of the correction for this practice and a screen shot when a meal is purchased at each of the price categories.

#### **On-site Monitoring**

##### **Comments/Technical Assistance (TA)**

- Every school year, each SFA with more than one school must perform at least 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; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

#### **Findings and Corrective Action Needed: Onsite Monitoring**

- Finding #5:** Onsite Monitoring was completed for lunch, but under the old form. Since school year 2016-17, it is required to use the new forms for lunch onsite monitoring at each site and 50% of the

breakfast sites each year. Keep in mind that the SFA must have a representative perform the onsite monitoring review.

**Corrective Action Required:** Please submit a copy of the breakfast and lunch onsite monitoring forms for the combined Junior High/Senior High schools.

## **Local Wellness Policy**

### **Comments/Technical Assistance (TA)**

- 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.
- (TA) 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. Waupun Area School District has named the district administrator to the leadership role of this policy.
- 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 #6:** Waupun Area School District's Local Wellness Policy #8510, last revised in 2015, meets some, but not all of the required content areas of a local wellness policy (LWP). The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to include language that: 1) school meals will adhere to meal regulations, 2) food sold outside of the school meal programs must adhere to Smart Snacks rule, 3) defines guidelines for foods provided but not sold, 4) address food and beverage marketing, 5) at least one goal in Nutrition Education is included, 6) at least one goal for Nutrition Promotion with evidence-based strategies, and 7) at least one goal for Physical Activity included.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule.

## **Professional Standards**

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

#### **Comments/Technical Assistance (TA)**

- 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 director at Waupun Area School District has food safety training.

- The [hiring standards for SFA directors](#) 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>).

#### **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](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- Staff have most of the training time completed for this 2017-18 school year or there is a plan to complete the training hours by June 30, which will be documented on the training tracker tool.
- The new [USDA training tracker](https://pstrainingtracker.fns.usda.gov/) is available (<https://pstrainingtracker.fns.usda.gov/>).
- **Annual Training Requirements for All Staff**  
Directors: 12 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.

#### **Water**

##### **Comments/Technical Assistance (TA)**

- Water is required to be available at no charge to students during the lunch and breakfast meal services. The Junior High and Senior High school site provides free water from a water fountain and bottle filler station.

#### **Food Safety, Storage and Buy American**

##### **Comments/Technical Assistance (TA)**

- [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.
- The most recent food safety inspection report was posted in public view.

##### **Food Safety Plans**

- The food safety plan was available for review. It was obvious in observing the food service staff 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 cooling equipment have internal temperatures taken and recorded daily on temperature logs.

- The food safety plan 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 and is reviewed annually for all staff. There is signage in the kitchen for which menu items belong in the Process 1 or 2 or 3 list and are specified on the production record.
- (TA) Review single use glove use with production staff and the importance of not cooler handles then food items.
- (TA) It was noticed that some students put unwanted, unopened items onto a small table by the breakfast serving area and others picked them up. Please address this practice as the SFA does not participate in Sharing Tables.

#### **Food Employee Reporting Agreements**

- All food service employees have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf) on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).

#### **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)).
- The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

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

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes

Cut leafy greens

Untreated garlic-and-oil mixtures

Synthetic ingredients, such as textured soy protein in meat alternative

#### **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.

#### **Buy American**

##### **Comments/Technical Assistance (TA)**

- 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.

- 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.
- More information on this new requirement, including a tool to assist with tracking noncompliant
- As part of Waupun Area School District's Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service's distributors and/or vendors may be required. Further information, including the Non-Compliant Product List template, is available on the USDA Foods [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- Seven products, canned mandarin oranges from China; canned black olives from Spain; fire roasted red peppers from Peru; glaze made with Balsamic from Italy; gluten-free pasta from Italy; grapes from Peru; cucumbers from Mexico; and bananas from Guatemala and Honduras were identified during the onsite review as non-domestic products without noncompliant product documentation. Herbs and spices in the dry storage were not labeled with a country of origin, substituting this information for "marketed by." This made identifying compliance or noncompliance with the Buy American Provision challenging.
- 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.

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

- ❑ **Finding #7:** Seven products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
  - canned mandarin oranges from China;
  - canned black olives from Spain;
  - fire roasted red peppers from Peru;
  - glaze made with Balsamic from Italy;
  - gluten-free pasta from Italy;
  - grapes from Peru;
  - cucumbers from Mexico;
  - and bananas from Guatemala and Honduras

**Corrective Action Needed:** Submit a copy of the Non-Compliant Product list for the canned black olives and the fresh cucumbers.

#### **Reporting and Recordkeeping**

##### **Comments/Technical Assistance (TA)**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- 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 Comments/Technical Assistance (TA)**

- 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.
- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.

### **Breakfast Promotion**

- Consider promotion ideas to increase breakfast participation at the Waupun Junior and Senior High School. Most of the district sites serving breakfast qualify for an additional reimbursement through Severe Need Breakfast, so there should be extra effort to increase participation.
- There were questions by students whether they could have breakfast. Since it is an out-of-the-way spot, it may take some signage to encourage students to visit the nice breakfast opportunity. Many students walked into school with beverages from local spots, so maybe you could have a grab & go pack available for easy access to meal components. Students eligible for free meals are not participating in breakfast at a great percentage, so promotion of the breakfast program is very important.
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

### **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 Waupun Area School District, they offer information where their students can receive a free meal in the summer months, as required by USDA. 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 'Summer Meals' to 877-877 to find Summer sites
  - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

#### **Resources:**

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Afterschool Snacks**

#### **Comments/Technical Assistance (TA)**

- Each site participating in the Afterschool Snack Program (ASP) needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review within the school

year. The review form to complete may be found on our [Afterschool Snack Program](http://dpi.wi.gov/school-nutrition/after-school) webpage (<http://dpi.wi.gov/school-nutrition/after-school>). These were completed.

- The reviewed sites do not participate in the ASP, so an onsite review of the program was not conducted.

### **Special Milk Program**

#### **Comments/Technical Assistance (TA)**

- The school nutrition director keeps great records of the milk prices and milk claims for each location in the Special Milk Program (SMP).
- (TA) Use the dairy's monthly cost for the type of milk offered as the cost per half pint on the claim for reimbursement.
- The teachers conducting the SMP utilize a great process of marking milks served to students.
- Per the updated infant and pre-school meal pattern administered under the Child and Adult Care Food Program (CACFP), pre-school children ages 1-5 years old and not yet in kindergarten must follow the milk guidelines as listed in CACFP memo from USDA 08-2017:  
"Unflavored, whole milk must be served to children 1 year old; unflavored low-fat (1%) or fat-free milk must be served to children 2 through 5 years old; unflavored low-fat (1%), unflavored fat-free or flavored fat-free milk must be served to children 6 years old and older and adults."

Please develop a process to switch Pre-Kindergarten children's choices to 1% white and/or skim white only. This may require some training and education for the children and parents.

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

❑ **Finding #8:** This district operates the SMP participating as a pricing plan with free milk option; however, the district transfers funds to pay for the program. Students eligible for free milk through direct certification, household application or other source categorical are claimed as free and students without free milk eligibility are claimed as paid. Some households have students eligible for reduced price meals; the claim included these milks in the free category for the claim, when it should have been in the paid category as there is not a reduced price category in the SMP.

**Corrective Action Required:** Begin claiming the students with a reduced price meal eligibility status in the paid category for the February, 2018 monthly claim for reimbursement. This finding will be subject to fiscal action and no further action is required from the district. **Corrected onsite 2/27/2018.**

### **Wisconsin School Day Milk Program (WSDMP)**

#### **Comments/Technical Assistance (TA)**

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5<sup>th</sup> grade. The Waupun Area School District provides this program for students in K-1 at Meadow View Elementary School only.
- 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. Meadow View uses Infinite Campus software to document participation.
- Per the Agreement for the WSDMP 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 perhaps include that stipulation in the SFA's milk bid.
- The School Year 2016-17 claim for reimbursement for WSDMP was verified.

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



*With School Nutrition Programs!*