

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

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**School Food Authority: Monticello**

**Agency Code: 23-3696**

**School(s) Reviewed: Monticello Middle School**

**Review Date(s): February 7-8, 2018**

**Date of Exit Conference: February 8, 2018**

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

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

**Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at the Monticello 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 DPI review team appreciates the eagerness of the staff 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 the attention given food safety, menu, service, local wellness policy and organization.

The DPI review team is confident that Monticello will continue to improve their knowledge and operation of child nutrition programs.

- Of the 129 students eligible for free or reduced price meals in January, a sample of 97 students was reviewed and 2 were determined incorrectly.

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Certification and Benefit Issuance

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

##### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. **An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.**
- **Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.** It was noted for 3 students that the Determining Official's effective date of benefit eligibility was different than the BI list from the POS system.
- All free/reduced applications and the direct certification runs were available for review.
  - **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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1718.pdf) one would look at the amount of their income under the column indicating that stated 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>).

##### 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.
- **IEGs 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.**

##### 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. It was found that the IEG were sent to households with the application. This is not allowed. **The USDA complete non-discrimination statement, in its original form and entirety must be included as part of the application packet.**

##### Public Release

- **All SFAs are required to distribute a [Public Release](#) before the start of the school year** (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals 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 Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

#### Limited English Proficiency (LEP)

- 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 Wisconsinized 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.

#### 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. **One meal application for benefits was from a transfer student into Monticello and that determination (correct) was given to the transfer student.**
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- 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.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

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

- ❑ **Finding #1:** Two students were receiving reduced price benefits, but should have originally been denied.  
**Corrective Action Needed:** Notify the household(s), whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. Record the date that corrective action is taken on the SFA-1 form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (January) and month of on-site review (February). Corrected on-site. No further action is necessary.
- ❑ **Finding #2:** Effective date on the BI list for 3 students does not match the determination/signature date of Determining Official  
**Corrective Action Needed:** Please send a statement indicating correction and assurance that POS effective date matches Determining Official's date of determination/effective date.
- ❑ **Finding #3:** Income Eligibility Guidelines are sent home to households with the Application Packet  
**Corrective Action Needed:** Discontinue this practice, effective immediately. IEGs cannot be sent home to households. 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. IEGs 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. Please submit a statement indicating what will be included in the application packet and send a scan of the corrected 17-18 application packet.
- ❑ **Finding #4:** Practice of Carryover of Benefits not implemented correctly. Carryover benefits from the previous school year carry over automatically for 30 operating days into the new school year, unless a new determination (application or DC) is made prior to 30 operating days into school year. Applications are not required by a certain date in order for carryover of benefits.  
**Corrective Action Needed:** Please provide a statement of understanding, going forward that carryover automatically is extended for 30 operating days of the new school year, unless a new determination occurs before the end of the 30-operating day period.
- ❑ **Finding #5:** The applications had income annualized.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will not be converted to yearly unless more than one frequency of income is reported.
- ❑ **Finding #6:** The district is disclosing individual free and reduced meal eligibilities for local initiatives such as school fee waivers without obtaining *prior* parental consent. Local officials with access to free and reduced data do not have USDA disclosure agreements on file.  
**Corrective Action Needed:** Discontinue the practice of disclosing meal eligibility without parental consent. Reviewer suggests implementing a [Sharing of Information Form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications), or having the household "self-disclose" by bringing in a copy of their free/reduced approval notice or direct certification approval letter to the designated official operating the outside program. The second option removes food service from these types of requests and is preferred. DPI recommends limiting the number of staff

members responsible for collecting this data (e.g., one school secretary who has been trained on confidentiality, rather than each athletic coach).

- ❑ Submit a written statement explaining how the district will handle/improve free and reduced data disclosure moving forward. Additionally, submit copies of the signed [disclosure agreement form](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#sharing-disclosure>) for anyone working outside of food service, who is determined to need access to this information (e.g., IT, secretaries handling local fee waivers, staff handling state/federal reporting individual F/R data). The goal is to limit the number of people who need to know this information and make sure these individuals understand the consequences of improper sharing/release of this information.

**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).

## Verification

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

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- DPI has [verification templates](#) on the website for tracking the steps and dates involved with verification.

### Findings and Corrective Action Needed: Verification

- ❑ **Finding #1:** Verification was not completed by November 15<sup>th</sup>. The verification process has specific required timeframes that must be followed by the SFA in order to be in compliance with FNS regulations. The LEA must complete the verification activities specified in this section no later than November 15 of each school year [7 CFR 245.6a(b)(1)].  
**Corrective Action Needed:** Provide a statement of understanding regarding the timeframes required for verification.

## Meal Counting and Claiming

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

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

- The meal counting and claim for the Review Month was conducted perfectly.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

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

- ❑ **Finding #1:** Edit check for Middle School (6-8) is combined with High School (9-12) and separate reports are run to separate out meals for Middle School. This is not allowed. **U.S. Department of Agriculture (USDA) regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program** prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made. The prototype daily participation/ edit check form is provided by DPI. However, school agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form. Those school agencies with computerized meal counting systems or in process of purchasing such a system should ask vendors about the edit check feature.

**Corrective Action Needed:** Correct POS system (Skyward) to separate Middle School entity from High School entity. Send a scan of the corrected edit checks for February and March.

**2. MEAL PATTERN AND NUTRITIONAL QUALITY**

**Commendations and Appreciations**

Sincere thanks to the Food Service Director and school nutrition professionals of Monticello School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director made herself available throughout the onsite review. She asked thoughtful questions, requested feedback regularly, and corrected errors efficiently. Placing the fruit and vegetable bar first in the meal service line encourages students to take more, and serving vegetables at breakfast is laudable. All meal pattern requirements for both breakfast and lunch were met during the review period. Well done!

**Technical Assistance and Program Requirement Reminders**

**School Breakfast Program**

Technical assistance was provided onsite during breakfast meal service. Food service staff and students were unclear of the requirements of a reimbursable meal. While the banana mini loaf was listed on signage, the string cheese was not. This led to confusion over how many items to count for the breakfast entrée. Multiple students were sent back for fruit, juice, or vegetables. A la carte juice was mistakenly identified as part of a reimbursable meal. Although all students observed at breakfast took reimbursable meals, staff must fully understand the Offer Versus Serve (OVS) requirements.

Offer Versus Serve (OVS) training in the context of Monticello School District's breakfast and lunch menus is recommended.

**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.

### **Production Records**

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as CN labels, product formulation statements, standardized recipes, or the Food Buying Guide. Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available for staff.

Graham crackers are offered daily at breakfast, paired with other 1 ounce equivalent (oz eq) grain items. During the review period, graham crackers were not recorded on production records. The Food Service Director was able to demonstrate to the satisfaction of the Public Health Nutritionist that graham crackers were served. Shortages of daily and weekly minimum requirements may result when menu items crediting towards the meal pattern are not recorded on production records.

### **Recipes for Cereal, Juice, and Other Breakfast Items**

If it becomes too time- or labor-intensive to record cereal, juice, or other breakfast item usage by type on production records, consider using recipes. Individual recipes document average cereal, juice, or other breakfast item usage by meal (breakfast or lunch) and grade group. When a cereal, juice, or other breakfast item recipe is on file, total usage must still be recorded on production records. Recipes must be updated twice per year or when students’ preferences change.

### **Crediting Documentation**

Food manufacturers continually reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Also, please be sure to discard any outdated crediting information for products that have changed or that are no longer purchased.

A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. It is highly preferable that this documentation is printed on company letterhead and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson). The Catallia Mexican Foods 12 Inch 100% Whole Wheat Tortilla (41200) documentation does not meet the requirements of a complete PFS. The documentation is missing weights of raw and cooked ingredients. Crediting the tortilla using Exhibit A results in 3.25 oz eq, 0.25 oz eq less than the 3.5 oz eq reported on the documentation.

[State-Processed Product Information](https://dpi.wi.gov/school-nutrition/usda/product-information) is updated annually and can be found on the USDA Foods Product Information webpage (<https://dpi.wi.gov/school-nutrition/usda/product-information>).

[USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets) (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>) are organized by component and updated annually. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

### **Watermarked Child Nutrition (CN) Labels**

A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document.

Manufacturers may provide schools with a CN label with a watermark during the bidding process or on

their websites. Original CN labels on product cartons will not have a watermark. Product information on the CN label with a watermark can be changed. CN labels must be verified and collected from boxes as products are delivered. Once labels have been collected, check when new shipments arrive to determine if crediting towards the meal pattern has changed.

### **Standardized Recipes**

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen.

During lunch meal preparation on February 7, vegetable oil was added to rotini to prevent sticking and preserve texture. As this menu item has more than one ingredient, a standardized recipe is required. The added oil must be accounted for within the dietary specifications (e.g. calories, saturated fat, and sodium). Yield and crediting errors were noted in the standardized recipes for Pizza Parlor Pizza (ENT 048), Cilantro Lime Rice (VEG 038), Roasted Cauliflower (VEG 064), and Beef or Turkey Chili *con Carne* (ENT 021). Portion sizes on other recipes, such as Mexican Street Corn Salad “Esquites” (corn in a cup) (VEG 071), were inconsistent with portion sizes on production records.

Pizza Parlor Pizza listed Sausage and Pepperoni on one line; weights or measure for these ingredients must be listed separately. Additionally, Meal Pattern Requirements incorrectly credited the recipe as 2.0 oz eq of meat/meat alternate (m/ma). The weight of cheese was insufficient to credit as more than 1.5 oz eq per slice, and neither the sausage nor the pepperoni credited towards to meal pattern.

Total Yield and Directions for Cilantro Lime Rice do not reflect production at Monticello Middle School. Fresh Cauliflower as an ingredient for Roasted Cauliflower is not specific enough. Adding details to the recipe (e.g. fresh, frozen, as purchased, edible portion, florets) will produce consistent quality and yield. Please verify the accuracy of Total Yield as well.

Ground beef, beef crumbles, and ground turkey cannot be used interchangeably in Beef or Turkey Chili *con Carne*. According to the Food Buying Guide, these ingredients do not have the same yield factor. Please separate Beef or Turkey Chili *con Carne* into two standardized recipes.

### **Portion Control**

Proper portion size utensils should be used. They are especially important for self-service foods, such as applesauce, baby carrots, and green pepper strips. Proper portion size utensils encourage students to take the planned portion and the amount required as part of a reimbursable meal. Consider using a 4 fluid ounce spoodle for applesauce in place of a 2 fluid ounce spoodle. Signage may be added to the fruit and vegetable bar to aid students when selecting pieces of fruits and vegetables with tongs.

### **Field Trips**

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

Thank you for updating the Field Trip Form for students and chaperones.

### **Smart Snacks**



The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

The School Nutrition Team (SNT) recommends using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), found on the Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records. As a best practice, staple a complete label with nutrition facts (name of the food item, brand name, nutrition facts, and ingredients) or empty package to the printout.

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, including organization name, date(s), time(s), description of items sold, and location. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks), under the resources heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

The Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.

During the onsite review, coffee sales in the library were out of compliance with the Smart Snacks Standards. Grove Square products (e.g. Caramel Apple Cider, Caramel Cappuccino, French Vanilla Cappuccino, Milk Chocolate Hot Cocoa) prepared according to package directions were too high in calories for all grade levels. Furthermore, caffeinated beverages are not allowed for middle school students. Resources and technical assistance were provided onsite and electronically to the K-12 Business Education teacher, who manages the coffee sales.

#### **Corrective Action**

**Meal Pattern Finding #1:** Yield and crediting errors were noted in the standardized recipes for Pizza Parlor Pizza (ENT 048), Cilantro Lime Rice (VEG 038), Roasted Cauliflower (VEG 064), and Beef or Turkey Chili *con Carne* (ENT 021). A recipe for rotini with vegetable oil was not submitted.

**Required Corrective Action:** Submit updated standardized recipes for the five menu items listed above, which reflect corrected yield and crediting as applicable.

**Meal Pattern Finding #2:** Graham crackers are offered daily at breakfast, paired with other 1 ounce equivalent (oz eq) grain items. During the review period, graham crackers were not recorded on production records.

**Required Corrective Action:** Submit one week of breakfast production records with graham crackers recorded as served.

#### **Buy American**

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. The Food Service Director maintains a Buy American Noncompliant Product List, which she is actively updating. An additional attestation from food service’s distributors and/or vendors may be required. Further information 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).

Three products, canned black olives from Spain, canned jalapeno nacho slices from US & Mexico, and cucumbers from Mexico, were identified during the onsite review as non-domestic products without noncompliant product documentation.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

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

- The consultant addressed financial topics with the Laura Curry, Business Manager, including how to locate the agency's Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

##### Annual Financial Report (AFR)

- **All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program;** this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". 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.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under "Other". Only expenses for edible food items and beverages should be reported under "Food".
  - "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
  - Under "Purchases Services" report any time you pay someone for services provides such as equipment repair and health inspections.

- Under “Ala Carte”, report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

### FSMC

- **Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services as was previously done for SFAs with FSMC contracts.**
- 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.

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

### 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
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

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

- ❑ **Finding #1:** On the Annual Financial Report, the expenses were only allocated to Food, Purchased Service and Other.  
**Corrective Action Needed:** Please resubmit your 16-17 Annual Financial Report with expenses for Labor broken out by program. To do this, you will need to contact Jacque Jordee at [Jacqueline.jordee@dpi.wi.gov](mailto:Jacqueline.jordee@dpi.wi.gov) or 608-267-9134 and fax or email her an updated report to complete a manual update.
  
- ❑ **Finding #2:** The cheese sandwich and milk given to students for balances below -\$20.00 are not paid for by the student; both are given gratis. The nonprofit food service account cannot absorb the cost of providing a non-reimbursable meal.  
**Corrective Action Needed:** Please explain the process by which these costs will be tallied and covered by nonprogram funds.

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

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

- **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 \$2.78.**
- 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)/Compliance Reminders**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are exempt from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- Monticello completed the nonprogram foods tool. The tool indicates that the district is in compliance with the above ratio. No additional revenue was needed to comply with the nonprogram foods regulation.

#### 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](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) 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)/Compliance Reminders**

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

- Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district’s total costs, based on volume.
- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district’s total.

#### 4. GENERAL PROGRAM COMPLIANCE

##### Civil Rights

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

##### 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.
- **There is language noted in the Monticello handbook regarding Free and Reduced Price meals that should be addressed. It references, “no child who a teacher believes is improperly nourished shall be denied a free lunch or other food because proper application has not been received...” A child’s eligibility status should not be known by anyone other than those with a need to know.**

##### Overt Identification

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

##### Processes for complaints

- **Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.**
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- 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 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 #1:** The free and reduced meal application packet sent to and available for households does not include the USDA nondiscrimination statement.  
**Corrective Action Needed:** Please correct the application packet to include the whole USDA nondiscrimination statement and provide a copy of the corrected packet indicating the correct USDA nondiscrimination statement.
- ❑ **Finding #2:** The Monticello handbook and newsletter sent to households does not contain the correct USDA nondiscrimination statement.  
**Corrective Action Needed:** Please correct the newsletter information to include the whole USDA nondiscrimination statement and provide a copy of the corrected newsletter, indicating the correct USDA nondiscrimination statement.
- ❑ **Finding #3:** The breakfast sales screen of POS had individual meal prices showing up on screen which constitutes overt identification.  
**Corrective Action Needed:** Correct POS to disable meal price from sales screen and send a screen shot or picture of the corrected screen

## On-site Monitoring

### Comments/Technical Assistance (TA)/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; 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](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

### Food Service Management Company (FSMC)

#### **The following duties may not be delegated to the FSMC:**

- **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.

## Local Wellness Policy

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

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

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

### Content of the Wellness Policy

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

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

### Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).



- Wisconsin Team Nutrition has several [wellness policy resources](#) 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:** SFA LWP meets some but not all requirements as stipulated above. Local Wellness Policy must designate an official in charge of the policy.  
**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule.

### **Professional Standards**

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

- The FSD, has all trainings tracked on DPI trainings tracker. All are on target to meeting the annual training goals. Nice job!

### **Food Safety and Storage**

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

- The food safety plan contained the required elements and is reviewed and updated on regular basis.
- Items observed in the cooler are properly date-marked.
- Temperature logs are completed as required.

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

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

- 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 Monticello USDA requires 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](#) 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](#) 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](#) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator

Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

### **Findings and Corrective Action: SBP and SFSP Outreach**

- Finding #1:** No summer food service outreach was provided to students.  
**Corrective Action Needed:** Please provide a statement that the Monticello School District will notify households of how to find the nearest Summer Foodservice Program using the [DPI program finder](#).

### **Wisconsin School Day Milk Program (WSDMP) Comments/Technical Assistance (TA)/Compliance Reminders**

- 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.
- 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 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.

### **Findings and Corrective Action: Wisconsin School Day Milk Program**

- Finding #1:** Milk cost calculated for WSDMP cannot be the highest price paid.  
**Corrective Action Required:** Please provide a statement of understanding that when calculating WSDMP milk cost, a **weighted average of cost by milk types used** for the program should be calculated and not just the highest milk price. No fiscal action.

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)).



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