

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: La Crosse School District

Agency Code: 322849

School(s) Reviewed: Northside Elementary School, Southern Bluffs Elementary School, Longfellow Middle School

Review Date(s): November 27-30, 2017

Date of Exit Conference: 11/30/17

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, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Thank you to the staff of the School District of La Crosse (322849) for the courtesies extended to us during the on-site review. Thank you for being available to answer questions and for providing additional information when necessary. 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. It was a truly a pleasure visiting and working with the School District of La Crosse (322849).

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with documentation and/or households when necessary. The DO is detail-oriented and organized, two excellent characteristics that aid the DO in the correct processing of meal benefits.

525 of 2544 eligibility determinations were reviewed. The following error was identified:

- 1 student received free meals via case number for a non-qualifying program.

The DO corrected the error during the on-site visit. Thank you for the prompt attention to this error. No further action is needed. Overall, kudos to the DO for a job well done.

The following technical assistance was provided during the on-site visit and/or is included as a beneficial reminder for the District.

Effective Date of Eligibility

Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official (DO), except when the SFA has been approved to use the *Effective Date of Eligibility Flexibility* noted below and described in SP 11-2014. In order to use the flexibility, the SFA must follow procedures noted in their application provided to the DPI School Nutrition Team (SNT). Thank you to the DO for following up with the DPI SNT for approval of the SFA's procedures. The SFA is encouraged to send a reminder to all building secretaries to date stamp all applications upon receipt from households.

Limited English Proficiency (LEP)

As a reminder, 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

A child that transfers within the same LEA/SFA 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/SFAs 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/SFAs to immediately accept the eligibility determinations made at a student's previous LEA/SFA (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 (a copy of the original meal application or Direct Certification run). The transfer of eligibility between LEAs/SFAs for students attending CEP schools will be required by July 1, 2019.

Disclosure

The LEA/SFA must seek written consent from parents or guardians to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, etc. Consent must be obtained each school year.

The LEA/SFA is seeking written consent from parents or guardians for decreased bus fees. Following review of the form, the SFA should update the release language to allow household to choose whether or not they would like to release their meal benefit information to potentially qualify for decreased bus fees. Households are required to have the option to disclose or withhold meal benefit information. The current form does not provide an option but rather notes meal benefit information will be verified to qualify households for reduced bus fees.

The LEA/SFA and individuals receiving eligibility information should be completing a [Disclosure Agreement](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx). The SFA and individuals receiving eligibility information are reminded that benefit information is only to be used for purposes agreed upon by the household in the consent form or as described in Section 5 of the [Eligibility Manual for School Meals](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf).

Findings and Corrective Action Required: Certification and Benefit Issuance

❑ Finding #1: One (1) certification and benefit issuance error was identified that will to be included in fiscal action calculations. The error was noted on the SFA-1 form provided to the SFA.

Corrective Action Required: The error was corrected during the on-site visit. No further corrective action is required.

Verification

La Crosse School District accepts both electronic and paper applications. Paper applications are entered into the Skyward operating system by the Determining Official (DO). La Crosse School District received guidance from DPI earlier in the school year that a Confirmation Review was not required due to the high accuracy of the operating system. However, following review of the verification process, the Confirming Official should confirm any applications selected for verification that originated as paper applications to ensure data was entered into the system accurately by the DO.

Additionally, the SFA has a regulatory obligation to verify “for cause” all approved applications that may be questionable, including applications with case numbers that do not qualify for free meals via Direct Certification. Please refer to the Section 6 of the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) for more information (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Meal Counting and Claiming

Southern Bluffs Elementary School:

Tuesday, November 28 - Lunch: No non-reimbursable meals were observed.

Longfellow Middle School:

Wednesday, November 29 - Breakfast: Observation of Breakfast in the Classroom (BIC) indicated meal counts are not being obtained through a qualified Point of Service (POS). Most breakfast meals are bagged and dropped off at each classroom. Students are billed and claimed for the meals they order unless the bagged breakfast is returned to the cafeteria. This leaves the potential for students to be billed when absent or for other students to take the meal and not be properly billed and claimed. Two classrooms receive tubs of breakfast foods but there is no adult checking to make sure each student receives a reimbursable meal or that the meal is being correctly billed and claimed. As discussed during the on-site visit, a recalculation of breakfast counts at Longfellow Middle School is required. Please see the Finding and Corrective Action below that addresses this issue.

Wednesday, November 29 - Lunch: Two (2) non-reimbursable lunches were observed.

- One meal included ½ cup pasta (1 oz eq grain), 1 breadstick (1 oz eq grain), and ½ cup oranges. The meal required a third component to be reimbursable.
- One meal included ½ cup pasta (1 oz eq grain), 1 breadstick (1 oz eq grain), and ½ cup leafy greens, crediting as ¼ cup dark green vegetable. The meal did not meet the ½ cup fruit and/or vegetable requirement.

Northside Elementary School:

Thursday, November 30 - Breakfast: One (1) non-reimbursable breakfast was observed.

- The meal included cereal (1 oz eq grain) and ½ cup of fruit. The meal required an additional item to be reimbursable.

Thursday, November 30 - Lunch: One (1) non-reimbursable lunches were observed.

- The meal included the chicken patty on a bun (2 meat/meat alternate, 3 oz eq grain), a milk (1 cup), and ¼ cup lettuce, crediting as 1/8 cup dark green vegetable. The meal did not meet the ½ cup fruit and/or vegetable requirement.

October 2017 Breakfast and Lunch Claims for Reimbursement:

National School Lunch Program (NSLP): No issues noted with the October 2017 NSLP claim for reimbursement.

School Breakfast Program – (SBP) - No issues noted with the October 2017 SBP claim for reimbursement.

School Breakfast Program – Severe Need (SBP-SN) – No issues were noted with the process of transferring data from the SFA’s software system to the DPI SNT claim for reimbursement template. However, as a recalculation is required for BIC at Longfellow Middle School, the SBP-SN cannot be validated.

The SFA indicated school site managers are reviewing edit checks for each of their schools prior to submitting the claim for reimbursement. The SFA is encouraged to include [edit check](#) review training annually for all school site managers to ensure all questionable meal counts are being reviewed prior to submission of the monthly claim for reimbursement (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/editcheck.doc>). Additionally, school site managers of Community Eligibility Provision (CEP) schools should follow review guidance outlined in the [CEP edit check](#) form (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/cep-editcheck.xlsx>).

Findings and Corrective Action Required: Meal Counting and Claiming

❑ Finding #2: Observation of Breakfast in the Classroom (BIC) at Longfellow Middle School indicated meal counts are not being obtained through a qualified Point of Service (POS). Most breakfast meals are bagged and dropped off at each classroom. Students are billed and claimed for the meals they order unless the bagged breakfast is returned to the cafeteria. This leaves the potential for students to be billed when absent or for other students to take the meal and not be properly billed and claimed. Two classrooms receive tubs of breakfast foods but there is no adult checking to make sure each student receives a reimbursable meal or that the meal is being correctly billed and claimed.

Additionally, non-reimbursable meals were noted Longfellow Middle School for lunch and at Northside Elementary School for breakfast and lunch.

Corrective Action Required: Please submit 30 days of meal counts for Longfellow Middle School Breakfast in the Classroom (BIC) once corrected counting procedures have been implemented. These meal counts will be used in fiscal action calculations. Include the start and end date for the 30 days of corrected meal counts. Additionally, please include a detailed summary of how Longfellow Middle School has corrected their meal counting and claiming procedures.

Additionally, please submit a summary of any training completed with school site staff, specifically at Longfellow Middle School and Northside Elementary School, to ensure all future meals meet the requirements for reimbursement.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to all staff at the La Crosse School District for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Supervisor of School Nutrition Programs and the Nutrition Specialist for providing all documentation ahead of time in an orderly fashion. This greatly expedited the AR process. All kitchens were incredibly clean and well-organized, with food service staff that were positive, enthusiastic, motivated to improve their operations, and had great rapport with students.

La Crosse School District's school nutrition program, "[Smart Eats](#)," incorporates fresh, locally grown produce into students' daily diets and conducts student and adult cooking classes, farm tours, and cooking contests! (<https://www.lacrosseschools.org/departments/school-nutrition/>). Great job serving healthy, nutritious meals to the students of La Crosse, Wisconsin.

Training

It is recommended that anyone involved with the School Meal Programs attend DPI training classes. The classes are offered in the summer months and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](#) (<https://dpi.wi.gov/school-nutrition/training#up>). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](#) (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Documentation

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the *USDA Food Buying Guide* for School Meal Programs. Please keep updated copies of CN labels on file. It is important that CN labels are taken directly from the box. They can be kept in their original format or photocopied as a clear, legible photocopy with the entire label visible. When CN labels are not available for products, those products must have a current, accurate PFS detailing product composition and crediting information in order to be served.

Product Formulation Statement (PFS)

A complete PFS must be directly from the manufacturer and 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 preferred 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 original documentation provided with the Apple Oatmeal Bar was not a valid PFS as it did not include the weights of raw and cooked ingredients. A new, correct PFS with the weights was provided.

Crediting

It is important that recipes are standardized and written clearly to reduce confusion among food service staff. Including the proper measurements and ingredients also ensures appropriate crediting for the age/grade group being served, accurately predicts food cost, and produces a consistent, high-quality yield each time the recipe is prepared. Recipes, CN labels, PFS, and production records should be reviewed and revised to reflect accurate crediting, and be consistent across all materials for the same menu item(s)/product(s). The following recipes had crediting discrepancies:

Cheeseburger Macaroni: credited as 2.5 ounce equivalent (oz. eq.) M/MA; should be 2.75 oz. eq. M/MA

- Cheese: PFS states 6 oz. = 2 oz. eq. M/MA. If using a 5 lb. pouch, will get 26.66 oz. eq. M/MA (wait to round and add).
- Beef Crumbles: CN label states 1.05 oz. = 1.0 oz. eq. M/MA. If using 8 oz., will get 7.6 oz. eq. M/MA (wait to round and add).
 - $26.66 \text{ oz. eq. M/MA (cheese)} + 7.6 \text{ oz. eq. M/MA (beef)} = 34.26 \text{ oz. eq. M/MA} \div 12 \text{ servings} = 2.85 \text{ oz. eq. M/MA (round down to the nearest quarter oz. eq.)} = 2.75 \text{ oz. eq. M/MA}$

Ham & Cheese Sub: credited as 2 oz. eq. M/MA; should be 1.5 oz. eq. M/MA

- Turkey Ham: PFS states each slice is 0.5 oz. and 1.5 oz. = 1.0 oz. eq. M/MA, therefore 3 slices = 1.0 oz. eq. M/MA (wait to add)
- Cheese Slice: 1 slice (0.5 oz.) = 0.5 oz. eq. M/MA (wait to add)
 - $1.0 \text{ oz. eq. M/MA (turkey ham)} + 0.5 \text{ oz. eq. M/MA (cheese)} = 1.5 \text{ oz. eq. M/MA}$

Chicken Alfredo: credited as 2 oz. eq. M/MA; should be 1.75 oz. eq.

- Chicken: PFS states 1.375 oz. = 1.0 oz. eq. M/MA. If using 3 lbs. (48 oz.), will get 34.91 oz. eq. M/MA (wait to round and add).
- Cheese Sauce: PFS states 3 oz. = 1.0 oz. eq. M/MA. If using 106 oz. (1 pouch), will get 35.33 oz. eq. M/MA (wait to round and add).
 - $34.91 \text{ oz. eq. M/MA (chicken)} + 35.55 \text{ oz. eq. M/MA (cheese)} = 70.24 \text{ oz. eq. M/MA} \div 36 \text{ servings} = 1.95 \text{ oz. eq. M/MA (round down to the nearest quarter oz. eq.)} = 1.75 \text{ oz. eq. M/MA}$

Taco, Beef: (Middle School) - instructions, serving size, crediting, and measurements unclear

There are two different taco meat recipes (#990050 for HS and #990049 for ES/MS), however on the middle school production records it states recipe #990119 - Taco: Street, HS, which matches neither the ES/MS recipe nor the HS recipe. If the HS beef recipe is actually being served to MS students, the recipe needs to be updated with this information. If using the HS street beef taco recipe:

- The crediting for this recipe states 3.0 oz. eq. M/MA, 2.0 oz. eq. grain with a serving size of “taco.” However the instructions state, “Divide 2.5 oz. taco meat and 1 oz. cheese between each shell.” If the serving size actually is one taco, and the meat and cheese are divided between two shells, the crediting will be 1.5 oz. eq. M/MA, 1.0 oz. eq. grain.
 - In comparing the measurements and instructions, it appears the serving size may actually be “1 tray,” which includes two tacos, with the meat and cheese divided between both shells.
- If each serving size receives 1.0 oz. of cheese, then the total measurement of cheese should be 1 lb. 9 oz. (25 oz.), not 1 lb. 8 oz. (24 oz.).
- The crediting for the M/MA is different on the taco meat recipe and the street taco recipe. The Taco meat recipe states, “2.6 oz. = 2 oz. eq. M/MA,” yet the street taco recipe states “2.5 oz. = 2 oz. eq. M/MA.” Make sure this is updated to reflect what is actually being used.

Taco, Chicken: (Middle School) - instructions, serving size, crediting, and measurements unclear

- See above for cheese measurement and serving size discrepancy.

Fish Sub: credited as 2.25 oz. eq. grain; should be 2.5 oz. eq. grain

- Pollock Filet: PFS states 0.5 oz. eq. grain (wait to add).
- Sub Bun: 2.0 oz. eq. grain (wait to add).
 - 0.5 oz. eq. grain (Pollock filet) + 2.0 oz. eq. grain (bun) = 2.5 oz. eq. grain

Pepperoni Pizza: (Elem) credited as 2 oz. eq. grain; should be 2.25 oz. eq. Grain

- PFS: each serving size credits 2 oz. eq. and there are 12 servings per sheet (24 oz. eq. per sheet). If using 1 ½ sheets for the pizza, this will total 36 oz. eq. grain ÷ 16 servings = 2.25 oz. eq. grain per slice.

Yogurt Parfait: fruit included in the yogurt parfait is not included on the recipe. Including fruit on this recipe would allow it to be credited toward the meal pattern.

Veggie Wrap: hummus included in the veggie wrap is not included in the crediting of the M/MA. The PFS found online for this product was incorrect as they credited tahini (sesame paste) as a sesame butter. However, the chickpeas in the hummus and on the PFS can be credited toward the M/MA component (or vegetable component, but not both). Consider obtaining a valid PFS for this product to be able to credit the hummus toward the M/MA component.

Whole Grain-Rich (WGR)

Non-WGR macaroni was used in the Cheeseburger Macaroni Casserole recipe due to decreased student acceptance of the WGR version, but was not being credited toward the meal pattern. Instead, we encourage finding a WGR product that students will accept, or creating a blend of at least 50% whole grain macaroni and an enriched macaroni product to meet the whole grain-rich requirement.

Updated CACFP Meal Pattern: Serving Sizes

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for School Food Authorities (SFAs) serving infants and children aged 1-5 and not yet in kindergarten. The amounts to serve for each component listed on the meal pattern charts are the minimum amounts that must be served for that meal. If offering smaller portions of the components to the pre-K students, it is necessary to ensure that the daily minimums are still being met. For example, when serving half a slice of pizza to the pre-K students, the meat/meat alternate (M/MA) would credit as 1.0 oz. eq. M/MA and would not meet the 1.5 oz. eq. M/MA minimum for lunch.

Updated CACFP Meal Pattern: Offer versus Serve

Offer Versus Serve (OVS) is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. For more information please visit the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Updated CACFP Meal Pattern: Sugar in cereal

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6.0 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The bulk Cinnamon Toast Crunch Cereal, Trix Cereal, and Frosted Flakes Cereal were above the sugar limit for the serving size. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Updated CACFP Meal Pattern: Grain-based desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, cinnamon rolls, and brownies. Items with names such as "breakfast rounds" resemble grain-based desserts and are not a creditable grain. Homemade items and desserts made with whole grains or more nutritious ingredients like black beans/applesauce/vegetable puree are considered grain-based desserts and do not credit toward the grains component. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Breakfast Service Models

There are a variety of service models that can be used with the School Breakfast Program. Breakfast in the Classroom is currently being implemented at the middle school level, but revisions need to be made to ensure proper processes are in place. Below are examples of different breakfast service models, if interested.

Traditional breakfast is served before school, usually in the cafeteria, gym or other large area and uses a traditional serving line. Hot menu items are more common than with other service models. This option works well when students arrive before school starts with time to eat.

Grab n' Go can be served either before school begins or during a morning break. It can be set up on mobile carts or tables in high traffic areas, or can be part of a serving line where traditional breakfast and/or a la carte items are offered. This option requires a limited amount of labor for preparation, service and clean up. Breakfast items can be assembled and packed when labor is available.

Mid-Morning Nutrition Break is served during a morning break around 9:00am or 10:00am and is typically offered on mobile carts or tables in high traffic areas (it may be combined with the grab n' go model). However, depending on the setup of your school, it could also be offered in the cafeteria. Students may already have a break between classes, making this a convenient option. Also, some students aren't hungry first thing in the morning or may have eaten breakfast very early and are hungry again by the mid-morning. Mid-Morning Nutrition Break may also be referred to as breakfast after first period or second chance breakfast.

For more information on each of the service models, visit DPI's [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).

Signage, Salad Bar

Because the vegetables on the salad bar are used to meet the weekly vegetable requirements, and students serve themselves with tongs, portion sizes of at least 1/8 cup each should be communicated to students with signage. Consider adding pictures or other visuals to help them select an appropriate amount of vegetables (e.g. 4 baby carrots = ¼ cup depending on the size of purchased baby carrots).

Production Records, Leftovers

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Make sure all staff members are recording leftovers daily. They were filled out for most menu items, but not all on a consistent basis. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

Weekly Requirements with Multiple Entree Offerings

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.

DPI's Lunch in a Nutshell

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

Memo SP 10-2012 (v.9) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"

1. For menu planning purposes, when multiple choice menus are served, how are minimums calculated?

Weekly minimum - example 2: If a grade K-5 school offers a 1 oz. eq. grain item (salad) and a 3 oz eq grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz eq grain (1 oz eq x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz eq. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

Trans Fat

Anything offered and served as part of a reimbursable meal must contain 0g Trans fat (less than 0.5 grams). Naturally occurring Trans fats from dairy and meat products are exempt from this rule; so long as the manufacturer provides a statement stating the Trans fat is naturally occurring. The Land O' Lakes Macaroni and Cheese served in the Cheeseburger Macaroni Recipe contains 0.5g Trans fat. This was also a corrective action in the last AR cycle for La Crosse School District in which documentation was requested proving the Trans fat was naturally occurring. Documentation was submitted for this product as part of the corrective action. Make sure this is kept on file and submitted with the Land O' Lakes Macaroni and Cheese in the future if this product continues to be served.

Finding #3: There was a weekly M/MA shortage during the week of review for the middle school lunch menu with the following scenarios.

- Veggie Wrap (1.0 oz. eq. M/MA daily) = 5.0 oz. eq. M/MA over the course of the week
- Ham Sub (1.5 oz. eq. M/MA daily) = 7.5 oz. eq. M/MA over the course of the week

Corrective Action Required: Please state what you will do to the veggie wrap and the ham sub so that the weekly M/MA minimum requirement of 9.0 oz. eq. M/MA for 6-8 grade is met over the course of the week.

- The Ham Sub Recipe was updated from 3 slices to 5 slices of ham. This, with the cheese slice, increases the M/MA crediting to 2.0 oz. eq. M/MA, which meets the daily and weekly M/MA for this entree option. **No further action required for the Ham Sub Recipe.**
- ***Additionally, fiscal action is required for any repeat violations at the SFA level (not site-specific) from the previous Administrative Review Cycle. Because a weekly meat/meat alternate shortage at lunch was found during the last AR (Pulled BBQ Pork offered on the HS menu) as well as the current AR (Veggie Wrap and Ham Sub offered on the MS menu), fiscal action will be applied. Per page 82 of the Administrative Review Manual, there will be a re-claim for meals for one weekday with the lowest participation at each AR site with a weekly quantity insufficiency. The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review:***

“The Pulled BBQ Pork on a WG Bun (Recipe #698) served at the High School on 12/5/13 credited as 1.75 m/ma. Using the CN label conversion of 4 oz meat equals 2 oz. eq. m/ma, it was determined that only 1.92 m/ma per serving was offered. Since we are required to round down to the nearest quarter oz eq, this recipe does not meet the minimum 2 oz eq m/ma needed for the 9-12 age/grade group. In turn the weekly minimum m/ma was not met (8.75 total; 9 required).”

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

As the SFA had a fiscal reclaim in the last Administrative Review, the SFA triggered for a comprehensive review in the Resource Management – Nonprofit School Food Service Account. No issues were noted in this area following the comprehensive review.

Non-program Foods

As the SFA sells non-program foods, the SFA triggered for a comprehensive review in Resource Management – Non-program Foods.

Non-program 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 non-program food costs, including food, labor, equipment, and purchased services, **must** be covered by revenues received from the sale of these foods. Non-program foods may not be supported by reimbursable meals or have a loss absorbed by the food service account. Non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. Non-program food costs and revenues must be separated from program food costs and revenues on the Annual Financial Report (AFR) to demonstrate compliance.

The [USDA Nonprogram Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) must be, at a minimum, completed yearly (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls). The [DPI Non-program Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) aids in calculating prices of non-program foods to meet the [USDA non-program food regulation](https://www.fns.usda.gov/nonprofit-school-food-service-account-nonprogram-food-revenue-requirements) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx; https://www.fns.usda.gov/nonprofit-school-food-service-account-nonprogram-food-revenue-requirements).

Along with the DPI Non-program Food Revenue Tool, the [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 SFAs in pricing adult meals (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc).

The SFA completed the USDA Non-program Food Revenue Tool for SY 16-17 and observed a ratio of $0.098 \geq 0.099$, indicating non-compliance with non-program foods. The SFA reviewed and adjusted catering and a la carte prices accordingly.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

It is necessary to use the current [non-discrimination statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) on letters, menus, websites, and other documents used to convey USDA program information (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Both statements should be in the same size font as other text in the document and must maintain the formatting set by USDA.

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 [template Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).

SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the [DPI SNT Special Dietary Needs webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs)

School food service staff may make food substitutions, at their discretion, for children that do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Juice may not be substituted for fluid milk in the NSLP or SBP unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, SFAs must first notify the DPI SNT in writing and provide the nutrition information from the product to be served. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Overt Identification

Thank you to the school site manager at Longfellow Middle School for promptly removing the reimbursable meal price noted on one kiosk the Point of Service (POS). However, if a student solely purchases the reimbursable meal, which on the day of observation many students were, the 'Purchase Total' on the screen reveals the cost of the reimbursable meal. Discussions on-site indicated the 'Purchase Total' is required for POS staff to know in order to accurately collect payment if a student chooses to pay in cash. It is critical that meal benefit information be protected and therefore the District should consider options for protecting this information at the POS, such as installing screen protectors or guards. Please see the Finding and Corrective Action below that addresses this issue.

Additionally, as the unpaid meal charge policy drives the need for POS staff to know via coding on the POS screen which students are free, reduced, and paid, the SFA is reminded that POS staff should sign a disclosure agreement ensuring the confidentiality of meal benefit information.

❑ Finding #4: Over identification of meal benefit information was observed via the 'Purchase Total' section on the POS computer screen. Discussions on-site indicated the 'Purchase Total' is required for POS staff to know in order to accurately collect payment if a student chooses to pay in cash. It is critical that meal benefit information be protected and therefore the district must consider options for protecting this information at the POS.

Corrective Action Required: Please provide a summary detailing changes the SFA will make to ensure the reimbursable meal price is only visible to staff operating the POS.

Processes for complaints

The SFA is reminded that for discrimination complaints involving USDA Child Nutrition Programs, the SFA must provide individuals with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints

(https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local 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. LWPs should include specific goals related to:

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

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

The La Crosse School District has an active wellness committee that monitors and supports the LWP. Conversations with the SFA indicate a review and assessment is being completed annually. The District is encouraged to update language in the LWP to clearly note an assessment is being completed annually and how the public can review the results of the assessment.

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 if they do not qualify for an exemption. DPI's [Smart Snacks In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) outlines these standards (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

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>) assesses product compliance.

❑ **Finding #5:** The white cheddar popcorn offered a la carte at lunch was over the 200 mg sodium limit for Smart Snacks.

Corrective Action Required: Please state what you will do to ensure this product is not sold to students. **This was corrected onsite by removing the popcorn from the a la carte offerings. There was a verbal confirmation that this popcorn will not be sold to students going forward. No further action required.**

On-site Monitoring

On-site monitoring forms were completed for the schools of focus for the Administrative Review. School site managers completed on-site monitoring reviews for their respective schools. In future years, SFA is encouraged to have school site managers review each other's respective schools for compliance.

Professional Standards

Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Annual Training Requirements for All Staff

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

The SFA maintains an Excel workbook for all staff requiring Professional Standards continuing education training hours. Staff have met required training hours for SY17-18. The SFA is reminded to include the Determining Official (DO) and claims preparer in the Excel workbook.

Food Safety and Buy American

[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). Additionally, visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators.

Sharing and No Thank You Tables

As discussed during the on-site visit, Sharing and No Thank You Tables are allowed by DPI. Definitions, considerations, and guidance for safe and responsible implementation for each type of table are outlined below. If the SFA wishes to utilize either of these options, the SFA should work with its local sanitarian to develop site-specific Standard Operating Procedures (SOPs).

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. "Wholesome" must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the SFA.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

Monitoring Log

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

Buy American Provision

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

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

SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee. If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.

What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If a label indicates a product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the Food Service Director (FSD), prior to the delivery of the product to the School. Any non-domestic product delivered to the school, without the prior, written approval of the FSD, should be rejected. Should non-domestic substitutes that were not pre-approved in writing by the FSD be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.

The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American provision. Sample written [procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america>).

There are limited exceptions to the Buy American Provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

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

The SFA has worked with their distributor to obtain documentation of compliant and non-compliant products. Additionally, the SFA is working to streamline the ordering process for its school sites, directing school site managers to order only products that meeting crediting requirements and the Buy American provision.

5. OTHER FEDERAL PROGRAMS

Afterschool Snack Program (ASP)

The October 2017 Afterschool Snack Program (ASP) claim for reimbursement was reviewed. Operators of the ASP are reminded of the following:

- Mathy and Hamilton claims are currently combined by the District for site-based claiming although they are listed as two separate ASP sites on the school nutrition contract. These two ASP sites should be separated for claiming purposes.
- The existing production records for the ASP at Northside Elementary do not include the portion sizes or crediting information. However, this information is available at the SFA. It is a best practice to include this information directly on the production records for ASP site managers.

Findings and Corrective Action Required: Afterschool Snack Program

❑ **Finding #6:** Logan Middle and Summit under-claimed by two snacks each. The average daily attendance (ADA) multiplied by number of operating days for these sites was less than the number of snacks eligible to be claimed, which prevented the actual number of snacks served from being accepted by the claiming portal. The claim preparer reduced the snack claim by two snacks at each site to account for this issue.

Further discussion indicated average daily snack counts were being used for the ADA instead of the actual ADA for each ASP site. Correcting the ADA for each ASP site should allow for the actual number of snacks served to be successfully submitted via the online claiming portal.

Corrective Action Required: Please submit documentation of how the district will communicate ADA information for each ASP site to the claim preparer. Please provide documentation showing that the November 2017 ASP claim was correctly prepared.

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

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

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

