

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

School Food Authority: Aquinas Catholic Schools, Inc.

Agency Code: 32-9660

School(s) Reviewed: Blessed Sacrament School

Review Date(s): November 27 – 29, 2017

Date of Exit Conference: Nov 29, 2017

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.
- Beginning on October 1, 2017, the updated Child and Adult Care Food Program (CACFP) meal pattern replaces the current meal pattern options for SFAs serving infants and/or children aged 1-5 years old and not yet in kindergarten. Please visit the [DPI webpage on Infants and](#)

[Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) for more explanation and resources. (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Aquinas Catholic Schools, Inc. 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. We especially appreciated that some staff members attended a meeting with our DPI team to discuss findings after lunch was served and as observations of the recent consolidation of the three parish schools. 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 school website offered parents some information about the school nutrition programs and the menu. The SFA offers a variety of menu options that are healthy and popular to students.

The DPI review team appreciates the eagerness of the staff at Aquinas Catholic Schools, Inc. for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, and kitchen operation. We were impressed during meal service that students visited the salad bar and served themselves according to the signage of vegetable. There was discussion about operating the salad bar from both sides to make service quicker; we recommend having the students serve themselves the fruit choice.

The DPI review team is confident that Aquinas Catholic Schools, Inc. will continue to improve their knowledge and operation of child nutrition programs, through trainings and links on the DPI website.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Comments/Technical Assistance (TA)

Free and Reduced Price Meal Applications

- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for. This process was done correctly with no errors.
- Thank you for calculating an annual income only when there are different frequencies of income on an application.
- (TA) Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official. If a student is in a carryover status from the prior school year and a new application is submitted and determined, the new determination eligibility is effective immediately or within a short amount of time for the household to deposit money into the meal account (about 3 days).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

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.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

Other Source Categorical

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

Public Release

- (TA) All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1718.doc>). 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 Wisconsin version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Direct Certification

- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- The effective eligibility date for a DC eligible student is the date of the original output file.

Transferring Students

- 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.

Verification

Comments/Technical Assistance (TA)

- Thank you for completing the verification process correctly and completely by November 15. The confirming official and verifying official signed the chosen application in the designated area and dated the application. Follow up to the household with the change of benefits was completed correctly, also.
- 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.

Meal Counting and Claiming

Comments/Technical Assistance (TA)

- The meal counting and claim for the Review Month was conducted perfectly.
- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- Thank you for using the Accuclaim as the edit check to calculate your reimbursable meals by site for claim submission. The SFA is very thorough with reporting if all students were present on a particular day.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- (TA) Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to all staff at Aquinas Catholic Schools for the warm welcome to Blessed Sacrament School. All staff was pleasant to work with, receptive to feedback, and all students were polite and well behaved. Thank you to the Food Service Director for providing all documentation ahead of time in an orderly fashion. This greatly expedited the Administrative Review process. Being new to the position, the Food Service Director is doing a great job serving healthy meals to students and even had a perfect week of review for lunch. Giving students two choices at lunch has helped increase participation and the great signage by the salad bar helps students select a variety of fresh veggies. Great job serving healthy meals to the students of Wisconsin!

Technical Assistance:

Training

It is recommended that anyone involved with the School Meals Program 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) (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) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Production Records

Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was offered as part of a reimbursable meal. Fruit sizes (e.g. case count) and by type (e.g. canned, frozen) should also be recorded. Instead of "Fruit", be specific with which type is used. Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to record the leftovers of all menu items. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste.

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements ("Must haves and Nice to haves" list) can also be found at that link as well as a salad bar production record, if interested.

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 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.

Food Buying Guide

The USDA *Food Buying Guide* for School Meal Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the *Food Buying Guide* and require further documentation (a CN label or a PFS) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal

Programs. Refer to the [Food Buying Guide](#) (FBG) for more details on how specific ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>).

Crediting

Some menu items were credited incorrectly on recipes and production records during the week of review. Please note there can be a difference between serving size and crediting (meal pattern contribution). Most fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit). Processed products which cannot be credited using the FBG require additional documentation like a CN label or PFS. These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 ounce equivalent (oz. eq.) Meat/Meat Alternate (M/MA) or 1 oz. eq. grain. For example, a Chicken patty may be 3.45 ounces by weight, but will credit 2 oz. eq. M/MA, 1 oz. eq. Grain. When recording on production records, pay careful attention to the serving sizes versus the crediting of the menu item.

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 to students during the school day must meet both the general standards and nutrient standards if they do not qualify for an exemption. More information on the Smart Snack Guidelines can be found in the [Smart Snacks In a Nutshell](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/in-a-nutshell-smart-snacks.pdf>).

Fundraisers

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. If a fundraiser sells Smart Snack compliant products, there are no limits as to how much or how long these products can be sold. All exempt and nonexempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

Breakfast Participation

Participation in the School Breakfast Program is important – primarily as a way to help meet the nutritional needs of students, but also to help schools receive maximum reimbursement and run a successful program. The [Serving Up a Successful Breakfast Program](#) Toolkit contains information on how to improve participation in an existing program (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/serving-up-a-successful-school-breakfast-program.pdf>). Successful meal service requires student satisfaction, a positive meal image, and a supportive environment. This resource includes information on the different service models with tips on how to implement them in your school. In addition, it provides many marketing and promotional ideas that include videos, letters and inserts to send home with students.

Additional information on breakfast, including meal pattern and menu planning tools, can be found on the [School Breakfast Program](#) webpage (<http://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Vegetarian Recipes

Vegetarian and “Meatless” recipes were discussed onsite. For specific recipe ideas, visit the Vegetarian Recipes from DPI’s [On, Wisconsin! Lunch Cycle Menus](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetarian-recipes-on-wi-cycle-menu.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetarian-recipes-on-wi-cycle-menu.pdf).

Item at Breakfast

An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat/meat alternate, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve, four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal. The following item credits as less than 1.0 oz eq grain: Sausage Links (2 each), which credit as 0.75 oz. eq. M/MA. Please note that because this is less than 1.0 oz. eq., this cannot be considered an item. Therefore, if a student were to select this option, it would not count as an item and they would have to select three other items, one of which is ½ cup fruit or vegetable or combination of both.

Extras on the Salad Bar

Extra items such as string cheese, yogurt, shredded cheese, and whole grain croutons are frequently offered on the salad bar, but not credited toward the meal pattern. Keep in mind that these foods must be included in the dietary specifications (calories, saturated fat, trans fat, and sodium). While offering extra items on occasion is allowable and can be an incentive for program participation, staying within the dietary specification limits can be very difficult when extras are frequently served. These foods also add to the cost of the meal without the value of being creditable components of a reimbursable meal. Because these ingredients can in fact be credited toward the meal pattern, consider offering them as part of a reimbursable meal (e.g. students can select a 1 ounce string cheese as a meat/meat alternate).

Forecasting

Make sure to use past production records as an aid to forecast the amount of food needed for the salad bar. During the day of onsite observation, many of the fresh vegetables on the salad bar ran out by the time the last group of students went through the line. All students should have a fair opportunity to choose from these types of vegetables.

Crediting Mixed Vegetables

Mixed vegetables may be credited in a few ways. If there is documentation showing the proportion of each vegetable included, either from the manufacturer or with a recipe, the vegetables may be credited to the respective subgroups. If the exact composition is unknown and the mix contains vegetables from multiple subgroups, it credits as an *other* vegetable. If the exact composition is unknown and the mix contains vegetables from multiple subgroups, including starchy, it credits as an *additional* vegetable. This still counts towards the daily vegetable requirement, but does not count towards a specific vegetable subgroup.

Standardized Recipes

All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. 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. In some cases, the crediting listed on the standardized recipes did not match what was

written on the production records. Crediting should be updated to reflect the quantities and specific products being served. Additionally, the procedures listed on standardized recipes should include specific amounts. For example, replace phrases such as “place hot ham” with “place 2 oz. of hot ham” for clearer instructions. More information can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Crediting of Components

Fruits and vegetables are credited by volume and must always be rounded down to the nearest $\frac{1}{8}$ cup. Meat/meat alternate and grain products credit by weight and must always be rounded down to the nearest quarter (0.25) ounce equivalency. Record volume measures (such as cups) for portion sizes of fruits and vegetables, and use weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

Cycle Menus

Adding a week to the cycle menu may provide students with more menu choices and increase participation. Recipes and resources to meet the required meal pattern can be found as part of the WI SNT [Cycle Menu Resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu) and on USDA’s [What’s Cooking?](http://whatscooking.fns.usda.gov/) website (whatscooking.fns.usda.gov/).

Milk recipe

You may choose to use a milk recipe instead of recording daily milk usage by type on the production record. A milk recipe is documentation of average milk usage by meal (breakfast or lunch) and grade group. When a milk recipe is on file, total milk usage must still be recorded on production records. Milk recipes must be updated twice per year or when you notice that students’ preferences have changed. You can find instructions and a milk recipe template on our [Meal Pattern Components](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

$\frac{1}{2}$ Cup Fruit, Vegetable, or Combination Requirement

Under OVS, students must select at least $\frac{1}{2}$ cup of fruit, vegetable or a combination as one of their three components of a reimbursable meal. At the point of service you may encourage students to select additional fruits or vegetables to meet the $\frac{1}{2}$ cup requirement.

Co-mingling flexibility for students not yet in kindergarten

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Students not yet in kindergarten are allowed to be served the K-5 or K-8 menu at lunch (or K-12 at breakfast) if they are served at the same time and in the same place as the other age/grade groups, under the co-mingling flexibility from the USDA. In determining whether the service area qualifies as being the same for co-mingling purposes, schools should consider how difficult it would be to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. Factors such as being able to distinguish preschoolers from older children and switching out line items between groups should be taken into account. If a school determines that their service area cannot be adapted to appropriately serve different meal patterns to different age groups, the co-mingling flexibility may apply. Additional resources can be found on 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>).

Condiments on Production Records

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Consider promoting correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon of Ranch dressing looks like, purchasing single-use one ounce cups to aid in portion control, or using signage such as “One squeeze, please!” on self-serve squirt bottles. More information on sodium targets is found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>) under the Sodium heading. The optional “Weekly Nutrient Calculator” tool to help monitor compliance with sodium targets is also found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>) under the Menu Planning Tools heading.

Findings and Corrective Action Needed:

- ❑ **Finding #1: Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich**, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The Hospitality Crisp Rice Cereal served during the week of review and the English Muffins found in the cooler were not whole grain-rich.

Corrective Action Needed: Find a new, whole grain-rich version of the Hospitality Crisp Rice Cereal and the English Muffins and submit nutrition facts labels, ingredient lists and recipes, if applicable.

- ❑ **Finding #2: There was a daily fruit shortage at breakfast on Thursday, October 5, 2017 during the week of review.** Only ½ cup fruit was recorded on the production records. Under the K-12 breakfast meal pattern, a full 1 cup of fruit needs to be offered daily.

Corrective Action Needed: Please state what you will do to Thursday, October 5, 2017 so that a full 1 cup of fruit is offered at breakfast.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Comments/Technical Assistance (TA)

- The controller, president, principals and office staff work closely with the school nutrition director for accounting procedures and coding expenses to the child nutrition programs. Nice work!
- The Annual Financial Report was revised to balance the nonprogram foods line with expenses to revenues and the transfer of funds.
- The SFA has created an unpaid meal charge policy and communicated it to households.

Equipment Preapproval

- If you plan to purchase equipment that has a useful life of more than one year with funds from the nonprofit food service account and the estimated cost exceeds the School Food Authority’s (SFA) capitalization threshold or \$5,000 (whichever is less), you will need to factor another step or two into your procurement process.
 1. Review the [Equipment Preapproval List](https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval) (<https://dpi.wi.gov/school-nutrition/procurement/equipment-prior-approval>) or
 2. Complete an Equipment Approval Request Form

- If your SFA is purchasing new equipment, you may be eligible for DPI's [Equipment Grant](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>)

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. The SFA's current weighted average price for School Year 2017-18 is above the USDA equity price of \$2.86.

Revenue from Nonprogram Foods

Comments/Technical Assistance (TA)

- Nonprogram foods include: Adult Meals, milks sold at breakfast or lunch and milk break.
- 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. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the [USDA Nonprogram Food Revenue tool](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).
- (TA) If the SFA continues to allow parts of a reimbursable meal to be selected by students and not claimed as a reimbursable meal, the SFA will be required to complete a [USDA Nonprogram Food Revenue tool](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the [minimum](#) pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Findings and Corrective Action Needed: NonProgram Foods

- **Finding #3: The SFA allows non-reimbursable meals to be selected by students**, who are charged for the meal, but the meal is not claimed, so no reimbursement to the SFA. Per the USDA Smart Snacks in Schools rule, all food or beverage items sold to students during the school day outside of the reimbursable meals must meet the Smart Snacks nutritional profile.

Corrective Action Needed: Provide a statement of the SFA's practice moving forward, whether to allow students to purchase items of the meal rather than the complete reimbursable meal or to discontinue this practice by encouraging students to select a complete meal at the Point of Service

(POS). If you still allow the current practice, a NonProgram Food Revenue tool will be required to be completed for a 5 day reference period including all items sold to students. The cost of the items would need to be higher than the cost of the typical meal. If you choose the new option to have students select a complete reimbursable meal, use discussed strategies of offering fruit or vegetable items at the POS.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Comments/Technical Assistance (TA)

Nondiscrimination

- (TA) Every month the principal rotates the children's seating arrangements at the cafeteria tables, providing them with an opportunity to meet students outside of their homeroom. While this is a great way for children to interact with new students, be sure to co-mingle the boys and girls at each table.

And Justice for All Poster

- "And Justice for All" posters are correctly posted in public view where the program is offered.

Civil Rights Training

- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc) form was correctly completed by October 31 annually for both NSLP schools and the SMP-only schools (https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc).

Special Dietary Needs

- (TA) All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)
- (TA) School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Civil Rights

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- (TA) 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 Child Nutrition Programs. 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](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Findings and Corrective Action Needed: Civil Rights

- **Finding #4: The SFA had a policy for handling general Civil Rights Complaints.** However, there must be specific language pertaining to the NSLP process to handling civil rights complaints.

Corrective Action Required: Please submit the SFA's procedure for handling Civil Rights Complaints pertaining to the NSLP, which includes contacting USDA within 3 days of the complaint.

On-site Monitoring

Comments/Technical Assistance (TA)

- Every school year, each SFA with more than one school must perform at least one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the [NSLP](#) and 50% of schools operating the [SBP](#) administered by the SFA; this is due by February 1 (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc and https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc)
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).

Findings and Corrective Action Needed: Onsite Monitoring

- **Finding #5: Since the schools consolidated into Aquinas Catholic Schools, Inc. three years ago, the issue of on-site monitoring has not be completed for the three NSLP school sites, as it was not needed before.**

Corrective Action Required: Provide a statement of the plan for the SFA to complete the On-site Monitoring requirement by February 1 to view Lunch at all three schools and Breakfast at one site this year and the other next school year.

Local Wellness Policy

Comments/Technical Assistance (TA)

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule required 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

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation. The USDA rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. This SFA is planning to revise the Local Wellness Policy which will indicate when and how the plan will be reviewed and updated.
- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.
- Designation of one or more officials as being the leader 'in charge' of the policy and the required updates.
- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>).
- 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).
- 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).
- A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Additional information about interpreting your school’s report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](http://wellsat.org)) for assistance in assessing the LWP (wellsat.org).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

- **Finding #6: The SFA’s LWP meets some, but not all requirements as stipulated above. The SFA needs to include or update the sections on policy leadership, nutrition promotion, the triennial assessment and how the LWP will be communicated to the families in your schools.**

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

Smart Snacks in Schools

Comments/Technical Assistance (TA)

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that became effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).
- The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school site per school year, per the district’s approval. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).
- (TA) Second meals or non-reimbursable meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements.

Professional Standards

Professional Standards: New Food Service Director Hiring Requirements

Comments/Technical Assistance (TA)

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- (TA) Staff have not completed the required training hours for the current school year but are planning trainings to be completed before the end of the current school year.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is being monitored and used by each school site.
- **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.

Water

Comments/Technical Assistance (TA)

Water is provided at no charge to students during the lunch and breakfast meal services. Cups are provided for the water fountain in the cafeteria.

Food Safety, Storage and Buy American

Comments/Technical Assistance (TA)

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

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: including food safety inspection and a review of the site's Food Safety Plan.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- (TA) All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site, including Field Trips options used.

Food Employee Reporting Agreements

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

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

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 school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.

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>).

Findings and Corrective Action: Food Safety

- Finding #7: Missing Food Employee Reporting Agreements.** The health agreements must be signed annually and kept onsite.

Corrective Action Needed: Complete agreements for all school nutrition staff. Submit copies of completed agreements as an attachment to assigned DPI Nutrition Program Consultant via email.

- Finding #8: Insulated milk bags are being used rather than the mechanical refrigeration unit to serve milk to students at breakfast and lunch.** In order to use this method, SFAs must create a Standard Operating procedure (SOP) using this [template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx) and follow the monitoring instructions. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop-milk-bag-temperature.docx>).

Corrective Action Needed: Provide a statement of the new system to offer milk to students at school meals.

Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- The following products may be exceptions to Buy American provisions: pineapple, mandarin oranges, olives, tuna, and bananas.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.” This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure the product received and the inventory is compliant with the Buy American procedure. [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/buy-american/monitoring) (https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) are found on the procurement webpage under Buy American.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding #9: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:**
 - Canned pineapple - Indonesia
 - Canned Mandarin oranges - China
 - Frozen broccoli - Mexico

Corrective Action Needed: Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

Reporting and Recordkeeping

Comments/Technical Assistance (TA)

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain

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

Comments/Technical Assistance (TA)

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year. Aquinas Catholic Schools, Inc. send the menu to households monthly indicating breakfast choices.

Breakfast Promotion

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

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 Aquinas Catholic Schools, Inc., they inform the district's parents of meal availability in the community through the public school district.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program (SMP)

Comments/Technical Assistance (TA)

- A quick review of the SMP offered to students at the Aquinas Middle School and Aquinas High School showed proper counting and procedures.
- These two school sites are welcome to participate in the National School Lunch Program (NSLP) and School Breakfast Program (SBP), but then would need to drop the Special Milk Program (SMP).

Wisconsin School Day Milk Program (WSDMP)

Comments/Technical Assistance (TA)

- Aquinas Catholic Schools, Inc. does not participate in the WSDMP but showed some interest as a way to provide milk at no cost for families of students approved for free or reduced meal benefits, even though it is only funded back to the program at about 50%.
- As you discuss this program, feel free to call the consultant with questions and complete this [application form](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) (https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc).

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).



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