

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

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**School Food Authority: Milwaukee Pubic Schools**

**Agency Code: 40-3619**

**School(s) Reviewed: 15 schools/18 sites**

**Review Date(s): 2/11/19-2/15/19**

**Date of Exit Conference: 2/21/2019**

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

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

**Appreciation/Commendations/Noteworthy Initiatives**

Thank you to the staff at Milwaukee Public Schools (MPS) for the courtesies extended to us during the on-site review week. The review team realizes the scope of preparation that is required to make documents and resources available for us during the review process. Thank you for being available to answer questions and providing additional information as we requested it. With 167 schools to manage, the DPI staff understands the daily efforts MPS staff put forth to operate a nutrition program that focuses on the student. The review team was duly impressed with the efficiency of the MPS dietitians in responding to our questions and inquiry's throughout the audit. Our requests for documentation and the response to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Please commend the staff at each of the sites for their commitment to serving students of MPS through the school nutrition programs. Commendations and comments from the DPI consultants after each onsite visit found site managers and nutrition staff to be warm, welcoming and knowledgeable about USDA nutrition program regulations and engaged with their students as noted below.

- **LA Causa:** "Everything looked good and the meals were great quality! The kitchen and storage are clean and organized. The cafeteria has nice artwork of fruits and vegetables."
- **Hmong Peace Academy site 1:** "The lunchroom environment is warm and friendly. The meal service program is organized and offers a great selection of appealing food items to students."
- **Hmong Peace Academy site 2:** "Breakfast and lunch service ran smoothly and efficiently. The staff were engaging and friendly with the students. Students were extremely well behaved and followed directions well."
- **Barack Obama SCTE:** "The kitchen manager and school nutrition professionals are innovative, coming up with various solutions to address issues related to the flow and placement of food on service lines."
- **Greenfield Bilingual:** "Staff did a fantastic job with meal service, even being short staffed two positions the day we observed, but they hustled and made sure service ran smoothly."
- **Mitchell Elementary:** "The menu was colorful and well-prepared. Kitchen space was clean and tidy."

- **Milwaukee High School of the Arts:** “School nutrition professionals were very knowledgeable, friendly, and willing to accommodate the review team as needed.”
- **Lincoln Middle School:** “Kudos to the staff at Lincoln Middle School. Lincoln has a great afterschool program. We were impressed with the number and types of enrichment activities.”
- **Spanish Immersion I:** The food service staff looked so professional in their uniforms and everyone was smiling. We could see they were very passionate about students and serving healthy food.”
- **Story Elementary:** “The MPS staff at Story Elementary were a joy to work with. The site manager has a good understanding of USDA regulations and a great relationship with the students. They love her!”
- **Central Nutrition Office:** “The MPS dietitians were great to work with. We especially appreciated all of the kindness and networking that occurred between central office dietitians and the food service staff at each site during our visits.”

## REVIEW AREAS

### SECTION #1: MEAL ACCESS AND REIMBURSEMENT

#### Corrective Action: Claims

**Finding #1A:** The reported ADA on the December meal claim does not match the ADA reported in the software driven edit check. It appears as if the *ADA column* on the edit check document (reported each day of the month) is a count of the number of enrolled students in attendance by day rather than an ADA for the month. When calculating the sum of the daily ADAs from the edit check divided by the total number of days in the month, the ADA reflected a different number than reported in the monthly claim.

**Corrective Action Needed:** Please work with the software vendor and/or the district attendance office to determine an accurate ADA for the April 2018 claim month. Submit a detailed statement explaining the steps that were taken to correct the ADA for the claim along with a copy of the April Edit check documents for each of the selected review sites of the AR.

#### Corrective Action: Point of Service (POS) Counts/Breakfast in the Classroom:

**Finding #1B:** Observation of meal counting during breakfast in the classroom (BIC) did not reflect an accurate counting system in the following sites:

- **Greenfield Bilingual:** Students are not counted as they receive a reimbursable breakfast. It appears as though faculty responsible for marking the meals did not have a good understanding of what was required for a reimbursable breakfast. Meal observation on the day of the onsite visit noted several students that only selected a milk, or a fruit cup rather than a reimbursable breakfast. These students were marked off as receiving a reimbursable breakfast. The non-reimbursable meals are subject to fiscal action and will be disallowed.
- **Mitchell Elementary:** In some classrooms, students were not counted during breakfast service when they received the meal, but were counted after the fact. In one classroom the December and November 2018 count sheets for breakfast showed all students were marked for reimbursable breakfast every day. Attendance sheets did not support this for either month. In addition, tardy students go directly to the cafeteria and are entered directly into the software. The count sheets in the classroom do not reflect this and could result in students being counted twice. A full recalculation with fiscal action is required.

### **Corrective Action Needed:**

- **Greenfield Bilingual:** Please correct the system for BIC to ensure that meals are counted through an accurate and acceptable POS. Retrain staff to recognize a reimbursable meal and appropriate counting practices or develop a BIC system that allows food service staff to monitor and count the meals at a central POS site rather than each classroom. Submit a detailed statement indicating the steps taken by the district to correct the POS.
- **Mitchell Elementary:** Please correct the system for BIC to ensure that meals are counted through an accurate and acceptable POS. Retrain staff to recognize a reimbursable meal and appropriate counting practices or develop a BIC system that allows food service staff to monitor and count the meals at a central POS site rather than each classroom. When the POS is corrected, submit 30 consecutive days of data using the updated counting system. The corrected data will be used to recalculate breakfast counts from the beginning of the school year.

## **SECTION #2: MEAL PATTERN**

### **Commendations/Appreciations**

Thank you to all staff at MPS for the cooperation and extensive work put forth during this Administrative Review (AR). Thank you to the MPS School Nutrition department for gathering documentation prior to the AR and for working well with DPI during onsite visits. Thank you to the MPS dietitians for accompanying DPI onsite and answering questions. Comments by DPI reviewers included observations of the food service managers taking pride in their work, connecting with students, and working well together. MPS does a truly commendable job of serving over 55,000 healthy meals each day to students. They are also supporting local initiatives including procuring local, seasoned potato wedges and breakfast potatoes from Plover, Wisconsin and local Sidekicks, a frozen fruit item. They incorporated all natural, local beef hot dogs onto menus and worked with local farmers to provide local vegetables, which were processed into fresh Pico de Gallo.

The MPS School Nutrition department accommodates many meals for religious practices and dietary restrictions including gluten-free, egg-free, pork-free, and meatless menu options. They have menus translated into seven different languages including Arabic, Burmese, Hmong, Karen, Rohingya, Somali, Spanish, and English. They offer a nice variety of menus including BIC hot and cold, traditional breakfast, and hot and cold items at lunch. Many menu items are cooked from-scratch and service lines include fresh fruits and vegetables options. Ethnic dishes, like Asian, Italian, Mexican, and American are served at MPS including Orange Chicken with whole grain Lo Mein Noodles, Quesadillas, and Tacos. Staff at each school were friendly and hard working. MPS is doing a great job managing a number of federal school nutrition programs including NSLP, SBP, Fresh Fruit and Vegetable Program (FFVP), and the Afterschool Snack Program. Thank you for serving healthy meals to the students of MPS!

### **Corrective Action: Meal Pattern and Offer Vs. Serve (OVS)**

**Finding #2A:** Additional OVS training is needed for breakfast and lunch. This includes training staff on what is 1.0 item versus 2.0 items at breakfast and what constitutes a reimbursable breakfast and a reimbursable lunch. Specific scenarios of misunderstanding are outlined in the technical assistance section of the report. During the days of onsite observation, the following meals were non-reimbursable:

- **Mitchell Elementary** - 10 (5 not offered the hot dog, 3 did not select full ½ cup fruit and/or vegetable, 2 provided juice in place of milk without medical statement).
- **Lincoln Middle School** - 6 (3 did not select full ½ cup fruit and/or vegetable, 3 did not select three, full, and different components)

- **Greenfield Bilingual** - 1 (only selected milk)
- **Obama SCTE** - 15 at lunch (5 did not select full ½ cup fruit and/or vegetable, 7 did not contain three full and different components, and 3 were not offered full cup of fruit), and 2 at breakfast (did not select full ½ cup fruit and/or vegetable)
- **Carmen South** - 3 (1 did not select full ½ cup fruit and/or vegetable, 2 not offered full cup of fruit)
- **HAPA I** - 2 (did not select full ½ cup fruit and/or vegetable)
- **Milwaukee High School of the Arts** - 4 (did not select three, full and different components)
- **Milwaukee Spanish Immersion I** - 1 (student only selected milk at breakfast)
- **James Madison Academic Campus** - although no non-reimbursable meals, staff were somewhat unclear about the OVS requirements. Additional training recommended.
- **Milwaukee High School of the Arts**- 4 meals. Students went through the meal line but were not monitored by staff.

**Fiscal action will be taken for these 47 non-reimbursable meals and is subject to the NSLP \$600 disregard as part of MPS's AR.**

**Corrective Action Needed:** Please submit a detailed written plan explaining how you will ensure that all food service staff, especially POS staff, are trained on OVS. Include who will conduct the training, what resources will be used, and when the training will be completed. For training ideas, consider using either [OVS webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (https://dpi.wi.gov/school-nutrition/training/webcasts#ovs). TA Section 2 Offer vs. Serve (OvS)

**Finding #2B (Meal Pattern, Yield):** An in-house yield study is needed for the yam sticks and jicama sticks demonstrating a uniform serving size that can be used district-wide.

**Corrective Action Needed:** Submit one in-house yield study for the jicama sticks and one in-house yield study for the yam sticks. View the [In-house Yield](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) documents for directions and documentation (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy). TA Section 2 In-House Yield Study

**Finding #2C (Meal Pattern Signage):** Menu signage at Reagan High School and Siefert Elementary did not include that students take at least ½ cup fruit, vegetable, or combination.

**Corrective Action Needed:** Submit a photo or template of the signage showing the addition of the ½-cup fruit and/or vegetable verbiage. Refer to the technical assistance *Signage* section for specifics. TA Section 2 Signage

**Finding #2D (Meal Pattern Pre-K):** The CACFP is not followed at MPS for non-commingled, Pre-K students claimed under NSLP. This includes the following schools: Greenfield Bilingual, La Causa II, Mitchell Elementary, Siefert Elementary, Milwaukee Spanish Immersion II, and Obama SCTE.

**Corrective Action Needed:** Submit a detailed written plan specifying how you will ensure the CACFP meal pattern is being met for this population going forward. Include specifics of what will change to your current processes. TA Section 2 CACFP

**Finding #2E (Meal Pattern Pre-K Family Style):** Family style meal service is not properly implemented for Headstart students claimed under NSLP at Siefert Elementary.

**Corrective Action Needed:** Submit a statement explaining how family style meal service will be properly implemented going forward at Siefert Elementary. TA Section 2 CACFP Family Style

**Finding #2F (Meal Pattern Production Records):** Production record requirements are not met in the following circumstances:

- All production records lack the total planned number of meals.
- All satellite site production records (i.e. one that receive meals from a central kitchen) lack the total planned number of meals, total served number of meals, serving site, grade groupings, and crediting of menu items. Production records sent for the week of review that lack this information include HAPA, I HAPA II, Siefert Elementary, Cooper Elementary, Stars Early Learning, and I.

**Corrective Action Needed:**

- Submit one production record template from a preparation site that shows a spot for the total planned number of meals to be recorded.
- Submit one production record template from a satellite site that shows a spot for the total planned number of meals, total served number of meals, serving site, grade groupings, and crediting of menu items. TA Section 2 Production records

**Finding #2G (Meal Pattern Production):** The following meal pattern findings were from the week of review:

- Mitchell Elementary
  - A milk variety at breakfast was not recorded on production records.
- Milwaukee Spanish Immersion I
  - Weekly red/orange vegetable subgroup shortage at lunch ( $\frac{5}{8}$  c offered,  $\frac{3}{4}$  c required)
- Obama SCTE
  - Weekly red/orange vegetable subgroup shortage at lunch (sweet potatoes [ $\frac{3}{4}$  c] + carrots [ $\frac{1}{4}$  c] = 1.0 c,  $1\frac{1}{4}$  c required)
- Madison High School
  - Daily fruit shortage on 12/5/18 at lunch (one orange offered [ $\frac{1}{2}$  c, 1.0 cup required]). **Repeat violations of a daily fruit shortage during subsequent Administrative Reviews may result in fiscal action and will be assessed district-wide on like menus.**
- Carmen South
  - Daily grain shortage on 12/5/18 (1.25 oz. eq grain offered, 2.0 oz. eq required) and 12/6/18 at lunch (1.0 oz. eq grain offered, 2.0 oz. eq required). **Repeat violations of a daily grain shortage during subsequent Administrative Reviews may result in fiscal action and will be assessed district-wide on like menus.**
  - Weekly grain shortage at lunch (8.75 oz. eq grain, 10 oz. eq required). **Repeat violations of a weekly grain shortage during subsequent Administrative Reviews may result in fiscal action and will be assessed district-wide on like menus.**
  - Daily fruit shortage on 12/6/18 at lunch ( $\frac{3}{4}$  c offered, 1.0 cup required). **Repeat violations of a daily fruit shortage during subsequent Administrative Reviews may result in fiscal action and will be assessed district-wide on like menus.**

**Corrective Action Needed:** Submit a statement for each site and shortage listed above explaining what will be done to the week of review menu to bring it into compliance. Include applicable product information, crediting documentation, serving size(s), and on what day(s) these will take place. TA Section 2 Meal Pattern/Standardized recipes/Planned menu

**Buy American**

Great job to MPS for keeping documentation of all products that do not meet the Buy American Provision. There were no Buy American findings because of this record keeping. No Corrective Action Required.

## SECTION #3 RESOURCE MANAGEMENT

### Commendations/Appreciations

The acting foodservice director does an excellent job of maintaining the nonprofit foodservice accountability system. She is to be commended for her attention to detail and the accurate reporting and management of school nutrition program funds.

### Corrective Actions: Nonprofit School Food Service Account

**Finding #3A: Excess Cash Balance** - The district fund balance exceeds the 3-month operating costs allowed by USDA regulations to meet non-profit status. CA includes a detailed statement indicating the steps the district will take to ensure the fund balance does not exceed the 3 month operating costs requirement for non-profit status.

**Corrective Action Needed:** Submit a detailed statement indicating the steps the district will take to spend down the fund balance to meet USDA regulations for maintaining nonprofit status in the school foodservice account.

### Corrective Action: Revenue from Nonprogram Foods

**Finding #3B:** The district did not document the nonprogram foods ratio for school year 2018-19. While assessment of nonprogram foods for the district indicates compliance with the nonprogram foods rule, the information must be documented.

**Corrective Action Needed:** Please complete and submit a copy of the Nonprogram Foods revenue tool for school year 2018-19. TA Section 3 Nonprogram foods

## SECTION #4: GENERAL REVIEW AREAS

### Corrective Action: Civil Rights

**Finding #4A:** Several of the review sites did not have documentation to verify civil rights training had been completed for those considered frontline staff. This includes teachers marking students off rosters during breakfast in the classroom, lunchroom aides, office staff members, adults serving and counting afterschool snacks, volunteers and others working to promote and support the USDA child nutrition programs within the SFA.

**Corrective Action Needed:** Please have all persons working as front line staff at the AR sites complete and sign off that Civil Rights training was received. In addition, submit a detailed statement explaining how the district intends to ensure that in the future Civil Rights training is conducted to ensure that all frontline staff have received this training. Resources include the [USDA Civil Rights Training power point](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>) and attendance sheet on the DPI School Nutrition Team webpage.

**Finding #4B:** At Greenfield Bilingual School, students from some classrooms were required to sit in the cafeteria by alternating gender of boy/girl/boy/girl. It appeared this was happening for only selected age groups. Not all classrooms were subject to this procedure as there were more boys than girls in those classes. This is not allowable per [USDA SP31-2015](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-31-2015.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-31-2015.pdf>) which requires prior written permission to separate children by gender.

**Corrective Action Needed:** Submit a detailed statement indicating the steps that have been taken at Greenfield Bilingual School to discontinue the practice of separating children by gender during meal service. Include language that addresses how the district will ensure this practice is not in place in other district meal service sites.

**Corrective Action: Local Wellness Policy**

**Finding#4C:** The district wellness policy has not been updated since 2014.

**Corrective Action Needed:** Use the [Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf) and other wellness resources located on DPI's [Wellness Policy](https://dpi.wi.gov/school-nutrition/wellness-policy) webpage (https://dpi.wi.gov/school-nutrition/wellness-policy) to develop and update the wellness policy so it meets USDA criteria and is also a working document for schools of the district. Submit a timeline of compliance.

During the AR, MPS staff met with the DPI review team to discuss policy initiatives, the toolkit and resources for creating a policy that will meet the needs of the district. Technical assistance and resources were provided as part of that discussion including the [Wellness Policy Builder](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf).

**Corrective Action: Smart Snacks**

**Finding #4D:** Fundraisers are not tracked at Obama SCTE and Cooper Elementary. There is also no consistency with the tracking of fundraisers district-wide. All exempt and nonexempt fundraisers must be tracked. Having a tracking system in place district-wide is highly recommended.

**Corrective Action Needed:** Submit a written plan stating how fundraisers will be tracked at Obama SCTE and Cooper Elementary. Include who will be in charge of this and what tool(s) will be used.

**Finding #4E:** Obama SCTE and Milwaukee High School of the Arts sell non-compliant products. These sales must be discontinued.

**Corrective Action Needed:** Submit a written plan stating what each school listed above will do to bring the products sold into compliance. Include details about how each grade group will only have access to beverages that are compliant for their grade group.

Findings and Corrective Action Needed: Food Safety

**Corrective Action: Food Safety**

**Finding #4F:** Food Safety Plans and SOP's were not up to date at several of the reviewed schools. Missing items and needed updates include:

- **STARMS:** Number of meals served, number of employees.
- **Mitchell Elementary:** SOP for Breakfast in Classroom, SOP #5 and #17.
- **Story Elementary:** Remove SOP #18. Add SOP for field trips and milk barrels.
- **Lincoln Middle School:** SOP for Breakfast in Classroom, SOP for insulated bags.

- **La Causa I:** SOP for sharing table. Plan of action for sharing table if the plan is to continue to offer it. As a reminder, foods that have been on a child's tray and placed on a sharing table should not be put back into service or reimbursed a second time.

**Corrective Action Needed:** Submit documentation showing each of the issues have been addressed and updated as required. Submit a plan for maintaining individual site based food safety updates on a regular basis.

## **SECTION #5 OTHER FEDERAL PROGRAMS REVIEWS**

### **Corrective Action: Afterschool Snack Program**

**Finding#5A:** The Average Daily Attendance (ADA) used in the afterschool snack claim during the review month was based on total school enrollment rather than the enrollment of the afterschool snack program.

**Corrective Action Needed:** Submit the April 2019 afterschool snack claim with an accurate ADA along with attendance sheets for the month of April for Lincoln Middle School.

### **Corrective Action: Fresh Fruit and Vegetable Program (FFVP)**

#### **Commendations/Appreciations**

Thank you to MPS for participating in the FFVP! A special thanks to the FFVP Coordinator for providing documentation for the claim validation. The claim validation for Obama SCTE and Siefert Elementary did not result in any findings. Excellent work!

### **Corrective Action: Fresh Fruit and Vegetable Program**

**Finding #5B:** At Siefert Elementary, the FFVP snack was served to Head Start students during lunch. The FFVP is required to be served outside of the National School Lunch Program and School Breakfast Program meal periods.

**Corrective Action Needed:** Submit a statement detailing Siefert Elementary School's action plan for bringing the Head Start FFVP snack into compliance with this requirement and the timeline for implementation.

### **Corrective action: Community Eligibility Provision (CEP)**

**Finding #5C:** The required public release document was not submitted to local media and grassroots organizations as defined by USDA regulations.

**Corrective Action Needed:** A copy of the public release was prepared, approved and submitted to the Milwaukee Public Schools media list, which includes local media and grassroots organizations on February 20, 2019. An email documenting the release was submitted to DPI of February 20, 2019. No further corrective action is required. Thank you for your prompt response to this CA request.

**Finding #5D:** Households were not notified that all students attending MPS would receive free breakfast and lunch at the beginning of school year 2018-19.



**Corrective Action Needed:** To avoid possible confusion for participating households this school year, DPI approval was obtained for MSP to send the letters to households prior to the start of school year 2019-2020. Please submit a detailed written statement indicating the steps the district will take to that households are informed at the beginning of each school year concerning the availability of free meals under CEP.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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.

### **USDA Child Nutrition Programs Administrative Review Technical Assistance**

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**School Food Authority: Milwaukee Public Schools    Agency Code: 40-3619**

**School(s) Reviewed: 15 schools/18 sites**

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#### **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 U.S. 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 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>).

*Technical assistance is referenced by Section for each corrective action finding in the AR summary report. Technical assistance is offered to advise schools of federal regulations for child nutrition programs in each area of the AR and to assist them in managing the corrective action response.*

## SECTION 1: TECHNICAL ASSISTANCE

### MEAL ACCESS AND REIMBURSEMENT

#### Claims

- The average daily attendance (ADA) calculated for the month cannot exceed the reported enrollment. This figure is entered as a whole number, not a percent, and is the number of students attending school who have access to the lunch program. It is not the number of students eating a lunch (participation). The ADA must be entered each month for all sites for which meals are claimed.
- The ADA is required to calculate the schools attendance factor and is obtained by dividing the average daily attendance for all students with access to school meals by the school enrollment. The attendance factor is the percentage of students in attendance and is not the percentage of students **participating** in the school lunch program or separated by eligibility categories.
- USDA regulations require that the attendance factor must be calculated at least once each school year but may be computed each month. An accurate monthly ADA is generally more advantageous to the school since it reflects attendance during the meal claim period.

#### Point of Service Counts

- USDA requires that meal claims for the school nutrition programs be based on accurate meal counts obtained at the Point of Service (POS) when it can be determined the student has selected and received a reimbursable meal with all of the required components. Counts taken after the meal has been served or based on attendance counts, tray counts, or any other counting system is unallowable. It is critical that all staff responsible for taking meal counts be trained to recognize and correctly count meals as they are served.
- A "Grab and Go" breakfast model is one way to eliminate the need for faculty to take meal counts during the busy morning routine. By creating a grab and go breakfast, station either in the cafeteria or in an adjacent hallway, this would allow students to come through the line to receive and be counted for their meal. The students could then take their meal back to the classroom to consume. The grab and go model has found success in numerous schools throughout the state and centralizes the counting process to reduce the burden to faculty.

## SECTION 2: TECHNICAL ASSISTANCE

### MEAL PATTERN AND NUTRITIONAL QUALITY

#### Standardized Recipes

Although standardized recipes were present for menu items during the days of onsite review, some staff members were not following them correctly. Standardized recipes have been tried, tested, evaluated, and adapted to the MPS food service operation and are intended to be followed exactly to produce a consistent, quality product that credits a specific way.

- **HAPA II** - The Garden Salad served did not follow the standardized recipe provided. The recipe called for 1½ cups romaine lettuce, ¼-cup jicama sticks; 5-6 pieces grape tomatoes, 1.0 packet (0.25 oz.) croutons, and 1.0 (2.0 oz.) breadstick. The Garden Salad served onsite contained less than 1½ cups romaine lettuce, no jicama sticks, 4 pieces grape tomatoes, no croutons packet, and half a breadstick, which technically did not meet the daily grain requirement of 2.0 oz. eq grain for high school. It is important that staff exactly follow recipes so that there are no shortages, like the situation above.
- **Milwaukee Spanish Immersion II** - Baked Beans were on the menu with a recipe for the day of onsite review. Instead of preparing the recipe, staff heated canned beans. Although this still met the meal pattern, this was not the intended practice, nor would the beans be similar quality to the recipe. Continue working with staff to follow recipes as written.

### Planned Menu

There needs to be more training for staff members to follow the planned menu as it was intended. The following situations occurred during the days of onsite:

- **Carmen South** - The planned vegetable was served as a portion size of ⅔ cup, not ¾ cups as menued. This did not result in shortages, but does reflect a missing link between menu planning and execution.
- **Madison High School** - The incorrect cornbread was served to the first lunch period of high school students. A 1.0-ounce equivalent (oz. eq) cornbread was on the line, therefore students should have been offered two. In addition, production records stated ¼-cup cheese, but ⅛ was being served. It is important for staff to understand which products they are ordering, serving, and in the correct portion sizes.
- **Obama SCTE** - Staff were somewhat unsure which menu items credited as 1.0 item and which ones credited as 2.0 items. Students were also confused about what they could select to make a reimbursable meal. Recommend discussing with staff the intended setup of the breakfast carts, which should have 1.0 oz. eq items in one spot and 2.0 oz. eq grain items in another. Additional signage may be helpful to assist with selections.
- **Milwaukee High School of the Arts** - Students who selected a cereal kit, which contains a juice, were also allowed to select a juice box. This may ultimately affect the weekly juice limit and conflicts with the district's limit of one juice per student. As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice.

### Signage

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. Signage is not required for Breakfast in the Classroom, but recommended. Consider affixing a plastic sleeve (into which the day's menu can be placed) or a laminated menu to the outside of the BIC insulated bags. Adequate signage helps ensure that students accurately select reimbursable meals.

- At some schools, signage was available, but missing the requirement of the verbiage: students must take at least three full components, one of which is ½-cup fruit and/or vegetable, or a combination. At Siefert Elementary, signage stated, "Must choose 1 RED (fruit) and/or 1 GREEN (vegetable)," but requires the verbiage relating to selecting at least ½ cup fruit and/or vegetable for a reimbursable meal. In addition, signage needs to be completed with the full menu to help students better understand how many items and how many components they

must select to constitute reimbursable meals. If there are a number of options daily, consider adding a typed list of daily food items to the notes section, and continue listing rotating food items in the respective component(s).

### **In-house Yield**

In-house yield data may be used for crediting food items that contribute to meal pattern requirements. An in-house yield study may be warranted if your food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying Guide (FBG). Additionally, an in-house yield study may be used for food items or sizes that are not currently listed in the FBG (e.g. 175 count apples). Documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFA's) next regularly scheduled AR.

- Jicama and yam sticks offered during the days of onsite had differing sizes and some staff considered six sticks to equal ½ cup, while others considered five sticks to equal ½ cup. An in-house yield study will create one serving size, which can be used by all. If packages of sticks come in various sites, the DPI SNT recommends doing a yield study on two different sizes and taking the average. Use this average as a reference throughout the district. Update in-house yield documentation whenever there is a noticeable difference in product change or if a new product is purchased. Consider conducting an in-house yield study for the celery sticks, which were also served during the week of review. For more thorough documentation, update as often as once or twice a school year. [In-house Yield Study Procedures](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) are available on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>).

### **Portion Control**

Planned, controlled portion sizes are essential for compliance with meal pattern requirements, ensuring desired crediting per portion (i.e. the amount needed to meet daily minimum requirements for the age/grade group). Portion control teaches students good eating habits by demonstrating and providing appropriate portion sizes of each food group at a meal. Additionally, portioning reduces food costs by minimizing waste, reducing the number of leftovers and need for substitutions, and simplifying forecasting and calculation of food quantities to purchase.

- During onsite review, some vegetables were served in portion sizes that differed from the planned menu. While this did not create any shortages at this time, it is important to note that when the portions on the menu served differ from those on the planned menu, there is opportunity for non-reimbursable meals as well as increased food waste.
- At **Lincoln Middle School**, there were inconsistent portion sizes between service lines. Some staff served very rounded scoops and some served just barely-full scoops.
- At **Reagan High School**, staff were not leveling scoops at first for the chili, which would have been a shortage. It may be helpful for line staff to see a demonstration of appropriate portioning and for each serving line to have a sample prepared prior to service for reference.

### **Child and Adult Care Food Program (CACFP)**

The CACFP meal pattern must be followed at breakfast and lunch for students claimed under NSLP that are not yet in kindergarten and that are not commingled with other students (i.e. come through the meal service line separately).

#### Co-mingling Flexibility - Misuse (CACFP)

Preschool students are allowed to be served the K-5 (8 or 12 at breakfast) menu if they are served at the same time and in the same place (i.e. commingled) as the other age/grade groups. This flexibility may be used in situations in which it would be a challenge for staff to determine during meal service if a

child is in preschool or K-5. During on-site observation, preschool students were served the K-12 breakfast menu, or K-8 lunch menu, but were not served at the same time and in the same place as the K-5 students. The sites that were not following the CACFP meal pattern include: Siefert Elementary, Milwaukee Spanish Immersion II, Mitchell Elementary, Obama SCTE, La Causa II, and Greenfield Bilingual. Training and 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>).

### Sugar (CACFP)

Cereal can be a source of added sugar. The CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. The following cereals are non-compliant in the CACFP meal pattern:

- Cocoa Puffs, Trix, Lucky Charms, Golden Grahams, Kellogg's low-fat Granola, and Fruity Cheerios.
- Yogurt can also be an added source of sugar. The CACFP meal pattern requires yogurt to contain no more than 23 grams of total sugar per 6 ounces. All yogurts served at MPS are compliant.

### Grain-based Desserts (CACFP)

Grain-based desserts are not creditable toward the grains component under the CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet piecrusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Although some of these products may or may not be served to pre-k students at MPS, the following products used are non-compliant with the CACFP meal pattern:

- Nature Valley Crisps (chocolate chip or cinnamon), Benefit Bars (chocolate chunk or oatmeal chocolate chip), Quaker Chewy Granola Bar, Whole Grain Rice Krispy Treat, Zee Zee's Nutrition Bar, and Crunchmania Cinnamon Bun.

### Milk Types (CACFP)

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk (e.g. chocolate) may not be served.

### Offer Versus Serve (OVS) (CACFP)

OVS is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the 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. Refer to the [meal pattern table](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) to ensure all meals meet the updated CACFP meal pattern ([https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf)). For more information, 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>).

### Family Style Meal Service (CACFP)

For family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full-required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full-required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service; however, children must be served the full serving of milk when doing so. K-12 students and co-mingled pre-K students must, at a minimum, take the ½-cup portion of a fruit or vegetable for a reimbursable meal. Pre-K students following the CACFP meal pattern are required to select ¼ cup of fruit and/or vegetable for a reimbursable meal.

Training resources on family style meals may be found on SNT's [Infant and Preschool in NSLP](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>).

### Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner and individual site managers with forecasting, ordering, menu planning, and reducing food waste. The current production records also lack required information:

- All satellite production records (HAPA I and HAPA II, Siefert Elementary, Cooper Elementary, Starms Early Learning) lack the serving site (was handwritten for Cooper), total planned number of meals, total served number of meals (there is a number written on the top, without an indicator of what it is), and grade groupings. Even if meals are prepared at another site, what is listed above must be recorded. With meals prepared elsewhere and brought to a satellite, the satellite production records also require the crediting of each menu item to aid in OVS, unless the crediting can be supplied in another easily accessible format.
- All regular production records lack the total planned number of meals. The MPS RD stated that is what the “amount prepared” column is, but this information is where the amount planned/prepared for each *menu item* must go, not the total meals planned. Looking at the following example of Obama SCTE Breakfast 12/3/18:
  - Breakfast Fruity Cheerios Kit - amount prepared: 135
  - Pineapple Cup - amount prepared: 135
  - Milk - Skim White - amount prepared: 3
  - Milk - 1% White - amount prepared: 90
    - These rows in the amount prepared column do not indicate the total number of meals planned for this day. These indicate the total planned amount of each menu item.

Refer to the [Production Record Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf) for a list of what must be included (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>).

Work with site managers to ensure that data is properly and thoroughly transferred from hand-written production records to electronic production records. There were a number of products that were not recorded on production records during the week of review, that were first considered as missing components or shortages. Only after invoices and hand-written productions records were sent as proof were these not considered missing components or shortages.

- **Story Elementary** - During the week of review for lunch, there were three servings of turkey ham recorded as the alternate for those with a dairy allergy. However, no grain for this option was documented on production records. Upon review of invoices, it was proven that a 4” hamburger bun was offered to these students.

- **Mitchell Elementary** - During the week of review for breakfast, there was no milk variety recorded on production records. Unfortunately, no documentation could be provided proving this.
- **Milwaukee Spanish Immersion II** - Broccoli (½ c) was not recorded on 12/3/18 lunch production records. This was first considered a missing dark green vegetable for the week (as this was the only dark green menued) and a daily vegetable shortage, both of which were repeat findings from the previous AR and must be assessed district-wide for all K-8 menus. MPS provided an invoice and hand-written production records proving broccoli (½ c) was served, therefore no repeat finding.
- **Obama SCTE** - On 12/3/18 electronic lunch production records, only kiwi (¼ c) and an orange (½ c) were recorded, which was considered a shortage for those in high school. Hand-written production records proved that the serving size for kiwi was updated to two, which equaled 1.0 cup of fruit. On 12/6/18 at lunch, a 1.0 oz. eq pan roll was offered with the Chicken Patty (2.0 oz. eq M/MA, 1.0 oz. eq grain) option, but was not recorded on production records. Proof of purchase was sent, proving this was served. On 12/7/18 at lunch, the columns for the Chicken Boneless Wing were entered incorrectly. In reality, chicken chunks with a serving size of five each were served.
- **Greenfield Bilingual** - The menu listed Cocoa Puffs cereal kits. Onsite observation revealed Trix and Lucky Charms cereal kits were mixed in with the Cocoa Puffs cereal kits. These should be recorded on production records.
- **La Causa I and II** - Be specific on production records about the identity, brand, and description of the items served. Instead of “Bun,” “Chicken Breast,” and “Bread,” list out exactly what product and its product number. There is a wide variation in these types of products and it is important to be specific. Fruit sizes (e.g. case count) should also be recorded. Instead of “apple”, indicate exactly how many come in a case.

Keep working with your software program to create accurate crediting on production records.

Currently, some menu items state “½ cup” as a serving size, but “¾ cup” as the crediting, or “½ cup”, but “0 oz. eq” as the crediting. This may be confusing for staff at each site and may interfere with OVS when determining a reimbursable meal.

### **Product Formulation Statement (PFS)**

A number of PFS’s sent during the week of review were invalid, as they did not contain accurate FBG entries. For example, “Fully Cooked Egg Patty,” “Pepperoni,” “Turkey Bacon,” “Turkey Ham,” “Chicken Sausage,” and “Egg” are not entries in the FBG or were not specific enough. It is important to thoroughly review a PFS upon receiving, for accurate information when purchasing new products or when products change. If a processed item does not have a valid PFS and cannot be found in the FBG, it may not credit when served as part of the USDA Child Nutrition Programs.

### **OVS**

During the onsite review, many staff members were somewhat confused about OVS requirements.

- **La Causa I** - During breakfast, a teacher was giving students milk with their breakfast kit and only asking if they would like the additional ½ cup of fruit. Therefore, students did not have the opportunity to deny the milk component or select which milk type they would like, if they wanted it.
- **Obama SCTE** - Some staff members were making students take milk at breakfast and students were not always being made to take ½-cup fruit and/or vegetable from the breakfast carts.
- **Lincoln Middle School** - Point of Service (POS) staff had a good grasp on OVS, however there were menu items that presented consistent problems, primarily the jicama. The planned portion of jicama was ¼ cup, which was pre-portioned into individual cups prior to service. All



other items served in individual cups were ½ cup in measure. The distinction between the portion for jicama and for the remaining food items - and how this affects crediting for OVS - did not appear to have been adequately related to POS staff. Increasing jicama portions to ½ cup is recommended for ease in determining reimbursable meals in the future.

- **Siefert Elementary** - Staff should ask students if they want to select the hot and/or cold pack rather than handing them both.
- **Greenfield Bilingual** - In one classroom, the majority of students selected only milk; the teacher and the students did not realize that the cereal kit alone was a reimbursable meal, but that a milk alone was not.
- **Carmen South** - Teachers and aids, not food service staff, handle POS. Several POS staff had questions about what was a reimbursable meal, what were appropriate quantities, and what components were necessary.

## SECTION 3: TECHNICAL ASSISTANCE

### RESOURCE MANAGEMENT

#### Non Profit School Nutrition Program Fund

Schools participating in USDA Child Nutrition Programs must operate on a nonprofit basis. To maintain the nonprofit status required for the food service account, the fund balance (net cash resources) of the account must not exceed three month's average expenditures at any time.

#### Non Program Foods

The [USDA Nonprogram Food Revenue Tool](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) ([http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\\_tool.xls](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls)) must be completed annually, at a minimum, to determine if the proportion of nonprogram food revenue to total food service revenue is equal to or greater than the proportion of nonprogram food cost to total reimbursable meal food costs + nonprogram food cost.

The purpose of the Revenue from Nonprogram foods rule is to ensure that revenue from the sale of nonprogram foods generates at least the same proportion of revenue as they contribute to the LEAs food costs.

All SFAs must calculate the share of total revenue generated from nonprogram food sales over the same period. If the second figure is at least as great as the first figure, then the SFA is generating sufficient revenue from nonprogram food sales.

## SECTION 4: TECHNICAL ASSISTANCE

### GENERAL PROGRAM COMPLIANCE

#### Civil Rights

Training on civil rights requirements is mandatory for all front-line staff of the USDA Child Nutrition Programs. Front line staff is defined as anyone who interacts with program applicants or participants, and those who supervise “frontline staff,” including teachers, administrators, support staff, foodservice staff, volunteers and anyone else working within USDA Child Nutrition Programs.

#### Buy American

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



Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed by, manufactured by, or packed in, the U.S, but the country of origin is not listed, this product requires additional information from the distributor on where the product is originally from.

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>).

### Special Dietary Needs

- SFAs are required to make substitutions to meals for children with a disability that restricts the child's diet on a case-by-case basis and only when supported by a written statement from a State licensed healthcare professional, such as a physician, who is authorized to write medical prescriptions under State law (State licensed). When a meal accommodation is made for a student with a qualified medical statement on file, the meal prescription becomes the reimbursable meal for that student.
- Schools are not required, but may, provide meal substitutions for dietary requests not supported by a medical statement. However, the accommodation must meet the meal pattern requirements.
- The USA Resource on [Accommodating Children with Special Dietary Needs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf) and the [USDA Q&A on Special Dietary Needs](https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf) provide excellent resources for managing special dietary requests in schools (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/accommodating-children-with-disabilities.pdf>)( <https://fns-prod.azureedge.net/sites/default/files/cn/SP26-2017os.pdf>).
- Additional technical assistance for managing special dietary requests was provided as part of the onsite visit including :
  - Consider hiring a part time, dedicated employee in the food service central office to manage the 5,000 plus special dietary requests the district receives annually.
  - Create formal procedures for the management of special dietary requests including developing a team to address requests, guidance for households on the steps and documentation needed to make an accommodation and the process for managing requests at the POS.
  - Develop a plan of action that includes a system to meet with parents, and if applicable, students as needed to address specific requests.

### On-site Monitoring

Each SFA with more than one school must review the NSLP counting and claiming system in use at each serving location annually by February 1. Necessary follow up is required for non-compliant findings. For the SBP, a minimum of 50% of the schools participating must be monitored annually by February 1, with each school operating the SBP being monitored at least once every two years.

- All monitoring site visits must be completed annually by February 1. This past school year, MPS completed a few monitoring visits after the deadline due to several unplanned school closures due to weather in January. The SFA is aware of the deadline requirement and indicated their intent to meet the requirement for the 167 school sites in subsequent years.
- The most current onsite monitoring form must be used to complete the annual monitoring visits. One monitoring form was not a current form. Technical assistance was provided on site to correct the issue. The current form is available and may be downloaded from [DPI's Reporting](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting) webpage: (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/reporting>)

## Local Wellness Policy

In 2004, Congress passed the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Reauthorization Act. This act required by law that all school districts participating in any federally subsidized child nutrition programs (e.g., National School Lunch Program, School Breakfast Program, Special Milk Program and After School Snack Program) establish a local school wellness policy (LWP) by the beginning of the 2006-07 school year. In 2010, Congress passed the Healthy, Hunger-Free Kids Act (HHFKA) and added new provisions related to implementation, evaluation, and publicly reporting on progress of local school wellness policies. On July 29, 2016, the USDA released the final rule on local school wellness policies.

- As of June 30, 2017, schools/districts must fully comply with the requirements of the final rule. The first assessment should be completed within three years of the policy being updated, but no later than June 30, 2020 to comply with the final rule.

## Smart Snacks

### Fundraisers

The DPI allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt and nonexempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). The following fundraiser violations were found during the onsite reviews:

- **Obama SCTE** - Fundraisers were not tracked.
- **Greenfield Bilingual** - A parent organization sells popcorn every Friday. The recipe and serving size were requested, but not provided. Unclear if this met smart snacks standards or if the fundraiser was tracked.
- **Cooper Elementary** - There was a Valentine's Day fundraiser for Dum Dums. It was unclear if this fundraiser was tracked.

### Vending Machines for Multiple Grades

If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group. Items like caffeinated, low-calorie ( $\leq 5$  kcal/fluid oz.) flat or carbonated, or no-calorie beverages ( $< 5$  kcal/8 fluid oz.;  $\leq 10$  kcal/20 fluid oz.), are unallowable or must be limited to just the 9-12 students. All food sold outside of a reimbursable meal must meet Smart Snack standards. The following violations were found during the onsite reviews:

- **Obama SCTE**
  - Twenty fl. oz. Gatorade (regular) flavors: orange, fruit punch, lemon lime, cool blue all exceed the calorie limits.
  - Beverage vending machines contained products that are unallowable for elementary and middle school students, but allowable for high school students. These include Fruit2O and Propel. This vending machine was not monitored during breakfast or lunch.
  - The beverage vending machine contained a regular Dr. Pepper soda logo. All food or beverage products marketed on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards.
- **Milwaukee High School of the Arts**
  - The following food and beverages were non-compliant in vending machines:
    - Brisk Fruit Punch - too high in calories
    - Brisk Lemonade - too high in calories
    - Lipton Peach Tea - too high in calories

- Gatorade Fruit Punch - too high in calories
- Gatorade Cool Blue - too high in calories
- Skinny Pop Popcorn - calories from total fat exceed 35% and calories from saturated fat not less than 10%
- Planters Peanuts, 1.75 oz. - too high in calories
- Kellogg's Pastry Crisps Blueberry - does not meet one of the general standards

### Smart Snack Resources

- [Smart Snacks In a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) contains all regulations for food, beverages, and fundraisers (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf).
- [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/) to determine if a food or beverage meets regulations (https://foodplanner.healthiergeneration.org/calculator/).
- [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, which contains tracking tools and additional resources (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

### **Professional Standards**

As part of the Healthy, Hunger-Free Kids Act (HHFKA), the USDA has established minimum *hiring* requirements for some, and *training* requirements for all school nutrition program employees. This is an important step toward ensuring that ALL of America's children receive safe, nutritious meals through efficient, cost-effective programs.

- Professional Standards (PS) training for all employees must be tracked using tools that include the employee's name, date of hire, hours of position, and name of training and date of trainings. There are several tools available on [DPI's Professional Standards](https://dpi.wi.gov/school-nutrition/professional-standards) webpage (https://dpi.wi.gov/school-nutrition/professional-standards) that will assist school in tracking PS hours for employees.
- During the review, training had been completed (or was in the process of being completed) for district employees. However, tracking was minimal, including only names and the type and date of training. Technical assistance was provided onsite after reviewing attendance rosters and the district's current tracking tools to assist MPS in creating a tracking system that will better utilize resources while maintaining the required tracking records.
- No corrective action is required for the AR. PS tracking will be assessed during the next review cycle to ensure compliance.

### **Food Safety**

School agencies participating in the school nutrition programs agree to maintain necessary facilities for storing, preparing, and serving food and to comply with health standards required by applicable state agency and/or local laws and codes. There are four food safety requirements specified by USDA for school agencies that participate in the NSLP and/or SBP.

- Request two food safety inspections from the state or local governmental agency responsible for food safety inspections each school year for each school participating in the school lunch or breakfast program.
- Publicly post the most recent food safety inspection and make a copy of the inspection report available upon request.
- Implement a food safety program based on Hazardous Analysis Critical Control Point (HACCP) principles, per USDA guidance.
- Report annually the number of food safety inspections conducted at each site to the Department of Public Instruction (DPI).
- Food Safety Plan needs to be site specific and updated as changes occur. Standard Operating Procedures (SOP)s that are not being utilized by a site should be removed

from the plan and safety procedures in place but not recorded should be added as an SOP to the binder

- Process 1, 2, 3 for all foods served need to be recorded somewhere within the system. During the MPS review, it was determined that the processes are part of each recipe and included on production records. Based on USDA guidance it is necessary to include processes for all food used in the system but there is not a standard system for documenting them. Since MPS documentation verified the processes were visible and available in menus, recipes and production records there is no requirement to record them elsewhere.
- When/if using time as a Public Health Control for items held outside of mechanical refrigeration or heat it is critical to practice good food safety rules including tossing all leftover food, maintaining safe temperatures, and monitoring time in service. Additional information on food safety is available on the [DPI Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpages (<https://dpi.wi.gov/school-nutrition/food-safety>).

### **Afterschool Snack Program**

- Two onsite monitoring visits for the afterschool snack program must be completed. The first to take place within the first week of the program and the second within the first 4 weeks.

### **Fresh Fruit and Vegetable Program**

#### Food Safety

- During FFVP observation at Obama SCTE and Siefert Elementary, it was noted by reviewers and explained by teachers that the FFVP snack is not served when it is delivered. Instead, the snack is served at a convenient time that works for each classroom. It was reported that sometimes, the snack is delivered to the classroom and not served for about an hour. As explained in the **Food Safety** section of this AR report, a TCS food, cut melon, was offered during FFVP observations. By allowing the cut melon to sit out, unrefrigerated for an hour, proper food safety and HACCP principles are not being followed, which is required in order to ensure students have access to a safe to consume FFVP snack. For corrective action needed, please refer to the finding indicated.
- For additional assistance with food safety in the FFVP, there are resources on the [FFVP Food Safety](https://dpi.wi.gov/school-nutrition/ffvp/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/ffvp/food-safety>).

#### Promotion

- Promotion of the FFVP is required at each school. The accompanying dietitians explained that at the beginning of the school year, a newsletter is sent out with information about the FFVP. It is unknown if any other kind of promotion is done after this point. Additional ways to promote the FFVP during the school year include posting a monthly menu, announcing the FFVP snack for the day on morning announcements, or promoting consumption of fruits and vegetables through nutrition education, such as lessons, handouts, activities, etc. For more FFVP promotion ideas, the [FFVP Promotion](https://dpi.wi.gov/school-nutrition/ffvp/promotion) webpage has many resources (<https://dpi.wi.gov/school-nutrition/ffvp/promotion>).

#### Nutrition Education

- Nutrition education was observed in some classrooms at Obama SCTE and Siefert Elementary. USDA FNS strongly encourages schools to provide nutrition education as a component of the FFVP. Providing nutrition education is part of helping schools create a healthier school environment. Nutrition education is a required component of several important programs and initiatives for schools such as creating a Wellness Policy, becoming a Team Nutrition School and, meeting the goals of the Healthier US School Challenge.

## **Community Eligibility Provision (CEP) and Provision 2**

### Public Release

SFAs participating in the CEP are required to submit a public release at the beginning of the year to notify households that school breakfasts and lunches will be served at no charge to all students. The CEP-specific public release for free meals must be submitted to local media and grassroots organizations that reach minority or under-represented groups. SFAs are required to send the public release to local media and community grassroots organizations but are not required to pay to have it published. The prototype CEP Public Release can be found on [DPI's CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>). At the SFA, maintain a copy of the materials sent and a list of to whom the materials were sent.

### Informing Households

Before the beginning of each school year, SFAs must provide letters to inform households that students enrolled in a CEP school with access to breakfast and/or lunch will receive free meals for the current school year. A template CEP Letter to Households can be found on [DPI's CEP webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

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>).”

