

Administrative Review Report

Carmen High School of Science and Tech

Review Schedule:

| Schedule Type | Start Date | End Date |
|--------------------------|------------|------------|
| Off-Site Review | 11/26/2024 | 01/16/2025 |
| On-Site Review | 01/16/2025 | 01/16/2025 |
| Site Selection Worksheet | 11/26/2024 | 11/26/2024 |
| Entrance Conference | 01/16/2025 | 01/16/2025 |
| Exit Conference | 01/16/2025 | 01/30/2025 |

Commendations:

From the Public Health Nutritionist:

Thank you to all staff at Carmen for the warm welcome and cooperation during this Administrative Review (AR). Your time and patience in working through this review is greatly appreciated. Thank you for serving your students.

From the Nutrition Program Consultant:

Nice work creating a communicative, safe and accepting environment for students to share school meals. Students had ample time to eat and socialize. Staff was friendly and cooperative with reviewers.

Recommendations:

Training Resources:

Webcasts and self-guided e-learning courses are available in the Online Learning Library (<https://dpi.wi.gov/school-nutrition/training/online-learning>). Check our Training webpage for additional training opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of DPI SNT staff can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

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Findings and Corrective Action:

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| Site Name | |
| Form Name | Maintenance of Non-Profit School Food Service Account (700 - 705, 777) |
| Question # | 701 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Based on the SY 2023-24 Annual Financial Report, the nonprofit school food service account has a net cash resource in excess of six months average expenditures. The SFA does not have an approved spend down plan from the State Agency (7 CFR 210.9(a)). Note that these funds can only be used within the program to better benefit students including: Increase marketing of the school meal program to increase participation, or purchase additional or updated kitchen equipment if needed, or increase the quality, freshness of the food served within the program, become self-operating, produce scratch cooking or meals made of local foods, train staff in self-operation.</p> <p>Corrective Action: Submit a plan and timeline for reducing the net cash resources to below six months operating expenditures. Please note, a formal notification and report may also be required outside of the AR process.</p> |
| Site Name | |
| Form Name | Civil Rights (800 - 806) |
| Question # | 801 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The Public Release was not distributed to the required locations including the media, local unemployment office, grassroots organizations and any major employers contemplating large layoffs in the area (7 CFR 245.5(a)(2)). Please note the public release is not intended to be published on a school's webpages, distributed to households, or posted in the school. The CEP public release should not be confused with the CEP letter to households which is required to be distributed each year.</p> <p>Corrective Action: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year including at least 1 media organization and at least 1 community organization that is not part of the school's organizational structure.</p> |
| Site Name | |
| Form Name | Civil Rights (800 - 806) |
| Question # | 803 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Findings: The FSD has created a complaint procedure for handling discrimination complaints specific to the school meals program using the DPI provided template (FNS Instruction 113-1). The complaint procedure needs to be shared with school frontline staff and school food service staff.</p> |

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| | <p>Corrective Action: Provide an explanation or plan for how/when and with whom you will share the complaint procedure with food service and frontline staff on an annual and ongoing basis.</p> |
| Site Name | |
| Form Name | Civil Rights (800 - 806) |
| Question # | 805 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA does not have written procedures in place to notify households how to request a meal modification for students with special dietary needs or how the SFA will respond when there is a special diet request. All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10)</p> <p>Corrective Action: Provide a timeline for when a Special Dietary Needs procedure will be put in place. Provide the name and title of the SFA representative that will ensure compliance. It is recommended that SFAs utilize the Special Dietary Needs policy template. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/special-dietary-accommodation-policy-template.docx) to ensure that the required procedures are documented.</p> |
| Site Name | |
| Form Name | Civil Rights (800 - 806) |
| Question # | 806 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Civil Rights training did not occur, or documentation was not available to support that this training was provided to all staff who interact with program participants or assist in operating the school meals program in the current school year (FNS Instruction 113-1). The DPI Civil Rights training is required annually.</p> <p>Corrective Action: Provide the civil rights training to all staff that assist in operating the school meals program. The training is located here: https://media.dpi.wi.gov/school-nutrition/civil-rights-training/story.html). Upload a sign-in sheet with the names and date(s) the training was provided and include the PowerPoint into SNACS.</p> |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1000 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA does not have a Local Wellness Policy (LWP) in place (7 CFR 210.31). FSD utilized the DPI LWP template to provide an example for the Administrative Review but did</p> |

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| | not localize the policy or complete all areas of the template. Corrective Action: Provide a detailed timeline for when the Local Wellness Policy will be implemented (include creation of committee, written policy, Board Approval if required, and publicly posting). Include the name(s) and title(s) of the SFA representative(s) that will ensure compliance. |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1001 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA does not make the Local Wellness Policy (LWP) publicly available in accordance with 7 CFR 210.31.</p> <p>Corrective Action: After completing CA #1000, notify the public (school community) of the LWP and upload documentation for how the public was notified.</p> |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1002 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA does not have documentation indicating when and how the Local Wellness Policy (LWP) is/will be reviewed and updated.</p> <p>Corrective Action: After completing Ca #1000, provide a plan on when and how the LWP will be reviewed and updated.</p> |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1003 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: SFA did not include a diverse group of stakeholders to participate in the committee update and review the LWP per 7 CFR 210.31.</p> <p>Corrective Action: Provide a statement of understanding that the LWP committee must include a diverse group of stakeholders in the review and update of the LWP.</p> |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1004 |
| TA Log # | No TA Log# found |
| Due Date | |

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| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA does not actively seek or inform potential stakeholders of their ability to participate in the LWP committee.</p> <p>Corrective Action: Prior to completing CA #1000 provide a plan on how potential stakeholders will be notified of their ability to participate.</p> |
| Site Name | |
| Form Name | Local School Wellness (1000 - 1006) |
| Question # | 1005 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: SFA has not completed the assessment of the Local Wellness Policy within the last three years because it has not met the program requirement to have a Local Wellness Policy.</p> <p>Corrective Action: Submit a statement of understanding that the SFA will be required to complete a Triennial Assessment of the Local Wellness Policy in school year 2027/28.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Dietary Specification Assessment Tool (Off Site Review) |
| Question # | 12 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Grain-based dessert limit exceeded during the week of review. Per 7 CFR 210.10(c)(2)(iii)(C) , for grades K-12, up to 2 oz eq of grain-based desserts per week are allowed in the NSLP.</p> <p>The following was offered during the week of review:</p> <p>Monday- Chocolate Bear Graham Crackers (1oz eq. grain)</p> <p>Tuesday- Vanilla Bear Graham Crackers (1oz eq. grain)</p> <p>Thursday- Maple Waffle Graham Crackers (1oz eq. grain)</p> <p>The menu for the week of review provided 3oz eq. of grain-based desserts. Corrective Action: Submit a statement describing how the menu served during the week of review would be changed to comply with the grain-based dessert limit. Be specific and include serving sizes, nutrition facts labels, ingredient lists, and/or crediting documentation for any items that would be planned in place of a grain-based dessert.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Dietary Specification Assessment Tool (On Site Observation) |
| Question # | 20 |
| TA Log # | No TA Log# found |
| Due Date | |

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| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding : Breakfast and Lunch meal pattern requirements not clearly understood: training required. Food service staff were unclear about the breakfast and lunch meal pattern requirements.</p> <p>Corrective Action: Upload certificates of completion for breakfast meal pattern and lunch meal pattern for each staff member in the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit a training roster signed by all attendees.</p> <p>WI DPI training resources on meal pattern may be used to fulfill this requirement: https://dpi.wi.gov/school-nutrition/training/online-learning#meal-patterns.</p> |
| Site Name | |
| Form Name | Meal Counting and Claiming (314 - 316) |
| Question # | 314 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: SFA is not following the current approved contract. Contract indicates the breakfast service model is "Breakfast in the classroom" at Carmen Middle School South but should be described as "Grab and Go". Meal Accountability System indicated as "Roster/Checklist at the end of the line" however breakfast is not being tallied this way in at least one serving line.</p> <p>Corrective Action: Correct the POS to ensure an accurate meal counting method. Then update the online contract to reflect the school's actual procedures and submit for approval.</p> |
| Site Name | |
| Form Name | Civil Rights (809 - 810) |
| Question # | 810 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The required USDA Child Nutrition Programs complete non-discrimination statement was not included on all required program materials. Note that the SFA does not offer many program materials to households; no related webpages, no direct mailings but does have a monthly newsletter which sometimes mentions school meals and the non-discrimination statement is not included. The monthly menu provided by meal vendor does include the required shortened statement but this section is cut off when the menu is inserted into the newsletter.</p> <p>Corrective Action: Add the complete non-discrimination statement to required program materials and upload updated materials into SNACS. Upload a copy of the January and February monthly newsletters into SNACS.</p> |
| Site Name | |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1214 |
| TA Log # | No TA Log# found |

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| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The Food Service Director did not complete the 12 hours of annual continuing education/training in school nutrition for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30).</p> <p>Corrective Action: Provide a training plan for how the 12 hours of continuing education/training in school nutrition will be met for the current school year.</p> |
| Site Name | |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1215 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The School Nutrition Program Manager did not complete the 10 hours of continuing education/training for the current school year and was unable to provide a training plan on how this will be met (7 CFR 210.30).</p> <p>Corrective Action: Provide a training plan for how the 10 hours of continuing education/training will be met for the current school year.</p> |
| Site Name | |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1216 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The school nutrition program staff did not complete the required training hours in school nutrition for the current school year and was unable to provide a training plan for the current school year (7 CFR 210.30).</p> <p>Corrective Action: Review the School Nutrition Team Professional Standards webpage for annual training requirements for school food service staff (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf). Provide a training plan for how each food service staff member that is not in compliance will meet the required training hours for the current school year.</p> |
| Site Name | |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1217 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30.</p> |

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| | Corrective Action: Include all training hours completed so far this school year for each school food service employee onto the DPI professional standards training tracking tool and upload into SNACS. |
| Site Name | |
| Form Name | Professional Standards (1210 - 1219) |
| Question # | 1219 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Non-school nutrition staff who have responsibilities for the school nutrition program(s) did not receive job specific training in the current school year (7 CFR 210.30). The staff person working at the POS at Carmen Middle School South needs annual training.</p> <p>Corrective Action: Provide a training plan for the current school year, for this non-school nutrition staff, with school nutrition program responsibilities. This must include a minimum of the DPI Civil Rights training (See CA # 806), and Counting, Claiming and Point Of Service training (See CA #320)</p> |
| Site Name | |
| Form Name | Reporting and Recordkeeping (1500 - 1501) |
| Question # | 1501 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA is not maintaining program records and documentation for three years plus the current school year to meet record retention requirements (7 CFR 210.23(c)). Note that the SFA agrees to compile data, maintain records, and submit records and reports as required, to permit effective enforcement of nondiscrimination laws and permit authorized USDA personnel during hours of program operation to review and copy such records, books, and accounts, access such facilities and interview such personnel as needed to ascertain compliance with the nondiscrimination laws. Specifically:</p> <p>1) All SFAs must maintain a separate revenue and expense ledger that reports all accrued food service revenues and incurred food service expenditures from July 1 through June 30 and upon request must make all accounts and records pertaining to its school food service available to the SA and to USDA FNS, for audit or review purposes, at a reasonable time and place. Such records should be retained for three years after the date of the final claim for reimbursement for the fiscal year to which they pertain, except if audit findings have not been resolved. In this case, the records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit. Nonprofit school food service ledger records for SY23/24 were not retained by the SFA authorities and were not made available upon request in a reasonable time, but required multiple requests and conversations and were only made available 8 weeks after the request and 4 weeks after the required due date.</p> <p>2) Original meal count documents are not retained for breakfast service at Carmen Middle School. Scratch paper and post-it notes that contain meal counts are the SFAs record of meal participation upon which the claim is made and must be retained when used.</p> <p>Corrective Action: Provide a statement of how the record retention requirements will be met moving forward. Ensure that the persons with fiduciary responsibility for the school nutrition</p> |

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| | programs (the contracted Food Service Director and Authorized Representative) have access to this documentation. |
| Site Name | Carmen Middle School South |
| Form Name | Meal Counting and Claiming - Day of Review (317-321) |
| Question # | 318 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). The point of service (POS) did not provide a reliable or accurate meal count due to no staff person consistently at the point of service, staff not recognizing what counts as a reimbursable meal, SFA using backout counts to identify meals taken (set out a number of trays and counting what remains) and POS staff counting meals in groups as students pass the service line.</p> <p>Corrective Action: Correct the POS to ensure accurate counts are tracked. Then submit 30 consecutive operating days of meal counts and corresponding edit check reports. Clean counts will be used to adjust monthly claims back to the beginning of the school year and may result in a fiscal reclaim. This is a recalculation of all meals served in SY4/25.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Meal Counting and Claiming - Day of Review (317-321) |
| Question # | 320 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Day of review meal counts are not recorded correctly. POS staff is unaware of what makes a reimbursable meal that should be counted and also unaware that a la carte items should not be recorded as reimbursable meals.</p> <p>Corrective Action: The FSD and all food service and POS staff at both school sites (6 people) will watch the Counting, Claiming and POS webcast on the SNT's Online Learning Library. Upload a certificate of completion email for each person into SNACS.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Meal Counting and Claiming - Review Period (322-325) |
| Question # | 322 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The claim for the review period cannot be verified. The SFA did not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. The SFA is not completing monthly edit checks for each school prior to claim submission. The SFA is not entering accurate enrollment and attendance numbers on claims. The SFA is not entering accurate number of serving days on claims.</p> |

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| | <p>Corrective Action 1: Upload monthly edit checks for lunch and breakfast at each school site (Carmen MS and Stellar) for September through January into SNACS. Fiscal action will be calculated if meal counting and claiming errors are identified either through edit checks OR recalculation required in CA #318.</p> <p>Corrective Action 2: The FSD will watch the Submitting Site-based Reimbursement Claims webcast: https://media.dpi.wi.gov/school-nutrition/site-based-claiming/story.html and upload a certificate of completion email into SNACS.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Meal Components and Quantities - Day of Review (400-408) |
| Question # | 401 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Non-reimbursable meals served during breakfast and lunch meal service. Under the straight serve meal participation model at breakfast, students must select all items for a reimbursable meal. 28 non-reimbursable meals were observed during breakfast service. The meals did not contain all breakfast items.</p> <p>Under the straight serve meal participation model at lunch, students must select all components for a reimbursable meal. 37 non-reimbursable meals were observed during lunch service. The meals did not contain all lunch components.</p> <p>Corrective Action 1: Submit a statement which indicates understanding that under the straight serve breakfast model, students must select all breakfast items. Additionally, in this statement explain in detail how this error will be corrected and avoided in the future.</p> <p>Corrective Action 2: Submit a statement which indicates understanding that under the straight serve lunch model, students must select all lunch components. Additionally, in this statement explain in detail how this error will be corrected and avoided in the future.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Meal Components and Quantities - Review Period (409-412, 430-437) |
| Question # | 431 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Incomplete breakfast and lunch production records during the week of review. Per 7 CFR 210.10(a)(3), records must show how the meals offered contribute to the required meal components and food quantities for each age/grade group every day. The following were not consistently filled in daily on production records:</p> <ul style="list-style-type: none"> Milk types available and actual usage by type Specific food items not filled in consistently Leftover amounts not consistently filled in <p>Corrective Action 1: Upload one full week of completed breakfast and lunch production records, including all requirements recorded daily into SNACS. Choose a week (Monday-Friday) that occurs after the completion of this Administrative Review (AR), but before the corrective action due date.</p> <p>Corrective Action 2: Have staff and the FSD complete the Production Records webcast available in the Online Learning Library (https://media.dpi.wi.gov/school-nutrition/final-production-records/story.html). Upload certificates of completion for each staff member in</p> |

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| | <p>the Documents tab of SNACS. If the training is completed as a group, provide information on where and when the training was conducted and submit a training roster signed by all attendees.</p> <p>Corrective Action 3 : Submit a statement of understanding that milk usage must be documented by type on the production record.</p> |
| Site Name | Carmen Middle School South |
| Form Name | SFA On-Site Monitoring (901 - 904) |
| Question # | 901 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8 in this school year or the previous school year.</p> <p>Corrective Action 1: Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p>Corrective Action 2: Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible for completing this.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Water (1300) |
| Question # | 1300 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: Free, potable water was not accessible to students during breakfast and/or lunch meal service (7 CFR 220.8 and 7 CFR 210.10).</p> <p>Corrective Action: Submit a statement explaining how free potable water will be made available to all students during breakfast and lunch meal service. Note that water is not meant to be a substitute for milk and should not be placed in the serving line.</p> |
| Site Name | Carmen Middle School South |
| Form Name | Food Safety, Storage and Buy American (1404-1411) |
| Question # | 1406 |
| TA Log # | No TA Log# found |
| Due Date | |
| Corrective Action Status | Flagged |
| Corrective Action History | <p>Finding: The most recent food safety inspection report was not posted in a publicly visible location.</p> <p>Corrective Action: Provide a photo of where the most recent food safety inspection report will be posted and visible to the public.</p> |
| Technical Assistance Entries: | |

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| TA Date | TA Log # | Question # | TA Area | Site | SFA Contact | Email | Phone | User Name |
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| 01/16/2025 | 5626 | 411 | Administrative Review | Carmen Middle School South | FSD | | | |
| Comments | | | | | | | | |
| <p>Offering fruit smoothies once per week is a great addition to the breakfast menu. The pureed fruit used in the breakfast smoothie is considered a juice. Please make sure a fresh, canned, frozen or dried fruit is served alongside the breakfast smoothie and that no other juice products are served when offering the fruit smoothie since no more than 50% of fruit offerings can be in the form of juice.</p> | | | | | | | | |