

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

School Food Authority: Janesville School District

Agency Code: 532695

School(s) Reviewed: Kennedy, Lincoln, Madison

Review Date(s): February 26-March 1, 2018

Date of Exit Conference: March 1, 2018

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.US Department of Agriculture.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.US Department of Agriculture.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>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Janesville for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- 560 eligibility determinations were reviewed, 18 errors were identified.

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value. However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Limited English Proficiency (LEP).

- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Other Source Categorical

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

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.

Disclosure.

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>). **Technical assistance was provided. It was noted that the food service department moving forward will not be responsible for sharing of information responsibilities per food service director.**
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

Finding #1: Documentation did not support free meal eligibility status for several students from the statistical sample. The extension of benefits capability within Infinite Campus software identified these students as residing at same address as students who were categorically eligible for free meals based on Direct Certification. The eligibility statuses were automatically updated in the system so these students receive free meal benefits. Per USDA regulations, free meal eligibility status may only extended students who reside in the same household. Per page 19 of USDA's *Eligibility Manual for School Meals*, household is defined as a “group of related or unrelated individuals who are living as one economic unit and whose members share housing significant income, and expenses.”

USDA memo SP 25 -2010; CACFP 11 -2010; SFSP 10 -2010, provides guidance when identifying students residing at same address.

Corrective Action Needed: Determine if the students with extended free meal eligibility status based on address are part of household with one or more students who are directly certified. A list of the students was shared with Megan Martin for follow-up. Change status of students in Infinite Campus who were not a member of household with students who were directly certified and send a 10-day notice of adverse action to these households. Turn off the extension of benefits capability within Infinite Campus to discontinue automatic extension of free meal benefits to students based on addresses. Extend benefits manually once information is obtained to determine if students reside in same household. If more than one household resides at an address, determining official must confirm through available records or contacts with school which students reside with children who are directly certified. The school secretaries or principals may assist the determining official with contacting households to determine their composition and establish eligibility.

Response Needed: Please describe in writing results of follow up activity for those students. Indicate if each student was correctly or incorrectly extended free meal benefits. Include the date the 10-day notice was sent to households with students that are ineligible and the date eligibility status was changed for the ineligible students. Also state in writing that district will discontinue automatically awarding free meal benefits based on address and moving forward how the district will address this issue. Please send copy of completed SFA 1 form that was left on-site. Please submit a copy of the SFA 1 form that was left on-site that lists the 19 students.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance.
- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission. **Technical assistance** was required on what report to use from the software for claiming.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Findings and Corrective Action Needed: Meal Counting and Claiming

- Finding #1:** The finding was that the wrong report (Transaction summary report) was being utilized as the edit check report for entering claims. This is incorrect.

Corrective Action Needed: Fiscal action will be required. A recalculation of meals will be occur for both breakfast and lunch going back to the start of the year. The correct edit checks for all months and the claims were requested from the current school. In addition, it is also requested that a statement of understanding be submitted of what report will be used in the future for claiming.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to the Food Service Director and school nutrition professionals at Janesville School District. We appreciate your time and efforts spent preparing for and participating in the onsite reviews. Thank you to the Food Service Director for sending documentation and promptly answering questions prior to the on-site review. Your commitment shows with all three review sites having perfect weeks of review for the breakfast and lunch meal patterns!

It is great to see that the review sites of Kennedy Elementary, Lincoln Elementary, and Madison Elementary are offering students two entree options daily at lunch, with a variety of fruits and vegetables to choose from. Furthermore, the cold fruits and vegetables are packed so that students are able to move quickly through the lunch line, leaving them more time to enjoy their meals. The school nutrition professionals at each site had positive, encouraging interactions with students and knew each student by name! Thank you for all that you do for the students of Janesville School District.

Comments/Technical Assistance/Compliance Reminders

Offer vs Serve (OVS) at Breakfast

An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve, at least four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal. All breakfasts served on the days of review were reimbursable; however, students were required to select an entrée as one of their food items. Depending on how the menu is planned, a student could take fruit and a milk and have a reimbursable meal. Consider the following examples of possible reimbursable meals:

- ½ cup apple slices (1 food item) + 4 oz. juice (1 food item) + 1 cup milk (1 food item) = 3 food items (1 of which is at least ½ cup fruit) = reimbursable meal
- 1 apple (1 cup fruit = 2 food items) + 1 cup milk (1 food item) = 3 food items (1 of which is at least ½ cup fruit) = reimbursable meal
- 1 Frudel (2 oz. eq. grain = 2 food items) + ½ cup apple slices (1 food item) = 3 food items (1 of which is at least ½ cup fruit) = reimbursable meal

However, if the menu planner plans the Frudel or apple as 1 food item, the second and third above scenarios would require an additional food item.

When giving instruction on OVS at breakfast, it may be of benefit to focus on what students must take to have a reimbursable meal, instead of what students may decline. Students must take at least three food items, with one being at least ½ cup fruit or vegetable. Phrasing instructions in terms of the number of food items a student may decline may eliminate possible reimbursable meal combinations.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The breakfast production records templates currently in use are missing information, such as the grade group, total number of purchase units prepared, actual milk usage by type, and the total number of student and adult meals served. The lunch production record template is missing the total number of purchase units prepared.

Technical assistance was given on site to record milk usage by type at breakfast or create a milk recipe. You can find instructions and a milk recipe template on our [Meal Pattern Components](#) webpage, under the milk heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern#milk>).

While there is no required production record template, there are some examples that may be used on our [Production Records](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

Updated CACFP Meal Pattern for P4J Students

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern at breakfast or lunch. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Additionally, items with names such as “breakfast rounds” resemble grain-based desserts and are not a creditable grain. For a complete list of foods considered grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Fruit and Vegetable Serving Sizes

According to the USDA [Food Buying Guide for School Meal Programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs), one standard 138-count orange credits as $\frac{1}{2}$ cup fruit (<http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). Therefore, if an orange is cut into quarters, two quarters only equals $\frac{1}{4}$ cup. A full orange needs to be selected in order to obtain a full $\frac{1}{2}$ -cup portion.

The fresh fruits and vegetables were packaged on site in $\frac{1}{4}$ cup and $\frac{1}{2}$ cup portions for students to select. While not each individual portion needs to be measured, it is recommended that a serving in the planned portion size be measured out for reference at the beginning of preparation. The portions of some of the offerings during observation appeared larger than the planned portion size. For example, the celery sticks offered at lunch were planned and credited as $\frac{1}{4}$ cup. However, many of the portions appeared to be more than $\frac{1}{4}$ cup.

The marinara sauce offered with the mozzarella sticks was located on the condiment table at Madison Elementary on the day of lunch observation. Consider moving this sauce to the service line so that it may be credited toward the vegetable component and the red/orange vegetable subgroup. Items located after trays have been checked for reimbursable meals are not creditable toward the meal pattern.

Standardized Recipes

A few recipes submitted for the review week could be improved for clarity. Technical assistance was given on-site to indicate clearly the serving size intended for each recipe and the specific weight or volume of each ingredient, including spices. These details will help to ensure a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Please refer to our [recipe tools and resources](#) for additional information, including a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analysis, and a template to help organize the information (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding: Milk is a required component as part of the School Breakfast Program. While total milk usage is being recorded daily at breakfast, daily usage must be recorded by milk type. Additionally, total reimbursable and non-reimbursable meals served must be documented on the production record. Based on documentation sent for the week of review, the number of meals served is not consistently being recorded for breakfast at Kennedy Elementary.

Corrective Action Needed: Submit completed breakfast production records for two days from both Kennedy Elementary and Madison Elementary showing total milk usage recorded by type and total meals recorded for each day.

❑ Finding: It is required to post signage visible to the students that indicates the offered components in each meal and tells students what they must select in order for their meal to count as reimbursable. Additionally, signage must include a statement that students must select at least $\frac{1}{2}$ cup fruit, vegetable, or combination as part of a reimbursable meal.

Corrective Action Needed: Please add this statement to the signage posted at both Lincoln Elementary and Madison Elementary and submit a photo.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.

- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf): <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Paid Lunch Equity (PLE)

Commendations/Comments/Technical Assistance/Compliance Reminders

Commendations:

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program->

food-price-calculator.xlsx).

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

- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

Adult Meals

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

Resources

- [Nonprogram Foods Revenue Rule SP-20-2016](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>)
- [Nonprogram Foods In a "Nutshell"](#) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>).

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

Finding: The Nonprogram Foods Revenue Tool had not been completed for the current school year at the start of review. **Technical assistance was provided to run the tool yearly.**

Corrective Action Needed: Please complete the tool and submit. The tool was completed and submitted prior to reviewer arriving on-site. **No further action is needed.**

Finding: The finding was that meals are being served to custodians. This is not an allowable cost to food service.

Corrective Action Needed:Please submit a statement on how this will be corrected.

Indirect Costs

Commendations/Comments/Technical Assistance/Compliance Reminders

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such

as utilities, rent, printing and mailing services, administrative oversight, etc.

- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
 - **Waste disposal services**, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

Findings and Corrective Action Needed: Indirect Costs

□ Finding: The finding was that trash removal was being charged to fund 50 at an indirect cost rate. This is not allowable. These cost have to measurable with supporting documentation in order for this to be an acceptable practice.

Corrective Action Needed: Please submit a statement on how this will be corrected in the future. Please submit a copy of the a funds transfer into the ledger paying back fund 50 for this year's current costs. **An e-mail was sent with a statement that stated the trash removal costs will not be charged to fund 50. A transfer was made back into fund 50 from another source. No further action needed.**

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, **"This institution is an equal opportunity provider."** Both statements should be in the same size font as the other text in the document.

And Justice for All Poster

- "And Justice for All" posters need to be posted in public view where the program is offered.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

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

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form is required to be completed by October 31 annually.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Overt Identification

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

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the

[USDA Program Discrimination Complain Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Corrective Action

❑ Finding: The finding was that on one of the notification letters the non-discrimination statement was not in the correct format size.

Corrective Action Required: Please correct this and submit a copy of the corrected letter. **Corrected on-site, no further action needed.**

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

Corrective Action

❑ Finding: The finding was that the breakfast on-site monitoring form was not completed by the February 1st required due date.

Corrective Action Required: Please submit a statement moving forward of how this issue will be corrected.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

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

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

Content of the Wellness Policy

At a minimum the wellness policy must include:

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

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

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

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform the public about the content, implementation of, and updates to the LWP annually. Your SFA did not notify the public regarding updates to the LWP. SFAs may use a variety of methods to notify the public about the LWP and its updates. This may include

mailing flyers, newsletters, emails, website postings, newspaper articles. The SFA must retain documentation regarding the notification.

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain documentation that notifies potential stakeholders of their ability to participate in the development, review, update, and implementation of the local school wellness policy (LWP). SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication. This may include a district-wide email, the posting of flyers at community locations, or a newspaper posting. For information on forming a wellness committee, review pages 5-6 of the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>).

❑ Finding: Local Wellness Policy is not made readily available to the public. Additional It was noted that there was no real process in place on how to notify the public about the opportunity to participate in the wellness committee.

❑ Corrective Action Required: Provide a plan for making the wellness policy available to the public and explain how you will notify the public of the policy. In addition please address how the public is invited to be part of the wellness committee.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review, a la carte milk and second entrees were the only foods or beverages sold to students for consumption during the school day at the three review sites. If additional food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

- It was noted at that if a student took a second meal, it was not claimed for reimbursement and the student was charged the adult meal price. Second meals are no longer permissible to be sold because a whole meal would not meet the Smart Snacks requirement. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements. **Technical assistance** was provided.

Professional Standards: New Food Service Director Hiring Requirements

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
 - Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
 - SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).
- **Annual Training Requirements for All Staff**
 Directors: 12 hours
 Managers: 10 hours
 Other Staff (20 hours or more per week): 6 hours
 Part Time Staff (under 20 hours per week): 4 hours
 If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Water

Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofsf/food-safety-flashes), Visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofsf/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety!

Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Temperatures

- All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Food Employee Reporting Agreements

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

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. (record any notable observations)

Findings and Corrective Action: Food Safety

❑ **Finding:** The finding was that the most recent food safety inspection report is not posted in the schools that were reviewed.

Corrective Action Needed: Please post the most recent food safety inspection report in location visible to public. Please submit a statement that moving forward this will be done.

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, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

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

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

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

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

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. “LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last

fiscal year of CEP.” Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

Commendations/Comments/Technical Assistance/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Summer Meals

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](#) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

Findings and Corrective Action: SBP and SFSP Outreach

❑ Finding: The finding was that the breakfast in the classroom at one of the reviewed schools did not have an accurate point of service. There were inconsistencies regarding the point of service in the various classrooms.

Corrective Action Needed: Please submit a detailed statement on how this will be corrected and what the process will be to ensure an accurate point of service.

5. OTHER FEDERAL PROGRAMS REVIEWS

Afterschool Snacks

Commendations/Comments/Technical Assistance/Compliance Reminders

- Each site participating in the Afterschool Snack Program needs to receive a review within the first four weeks of operation, and a second review within the school year. The review form may be found on our [Afterschool Snack Program](#) webpage (<http://dpi.wi.gov/school-nutrition/after-school>).
- Area Eligible Afterschool Snacks are all claimed at the free rate.

Fresh Fruit and Vegetable Program

Commendations/Comments/Technical Assistance/Compliance Reminders

On the day of observation, teachers did a fantastic job of educating students about papaya, which was the day's snack. Teachers showed a video about papayas, and then encouraged students to taste the fruit while also helping them identify the fruit's different qualities. Overall, students clearly enjoyed FFVP snack time and it was fun to watch.

Findings and Corrective Action: FFVP

q Finding: After reviewing the documentation provided during the AR to support claims submitted to FFVP the reviewer wasn't able to identify were the costs associated with the Unprocessed Fruits and Vegetables Pilot Program (Pilot) were deducted from FFVP claims. As a result you received payment for costs not incurred for some of the product costs claimed as part of your FFVP costs. Products paid for through the Pilot cannot be submitted as costs to the FFVP. This would result in duplicate payments for products by two different USDA FNS Programs; FFVP and Pilot. Details of any findings and fiscal action will be communicated to the food service director.

Corrective Action Needed: Continue to work with DPI to provide all necessary documentation that supports the December 2017 FFVP claim.

Wisconsin School Day Milk Program

Commendations/Comments/Technical Assistance/Compliance Reminders

- Wisconsin School Day Milk Program requires the distribution of free milk to free and reduced priced students in K-5.
- Point of Service Counts (POS) for the Wisconsin School Day Program and the Special Milk Program must be recorded by who "did" take milk not by marking who "did not" take one.
- Per the Agreement in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and you may want to include that stipulation in your milk bid.

Findings and Corrective Action: Wisconsin School Day Milk Program

□ Finding: The finding was that the staff involved with the WSDM had some inconsistent practices regarding how the point of service is handled. It was suggested to review additional training on best practices regarding the point of service.

Corrective Action Required: Please submit a statement on how this will be corrected.

6. COMMUNITY ELIGIBILITY PROVISION (CEP) AND PROVISION 2

Commendations/Comments/Technical Assistance/Compliance Reminders

- [USDA Community Eligibility Provision guidance](http://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) has been expanded in memo SP 54-2016 (www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1) to allow for the use of one form for both meal eligibility and as an alternative household form to be used in CEP schools. This may alleviate confusion among households and administrative staff at a mixed district. This memo clearly outlines the requirement to cost-allocate expenses back to the district for processing and distributing forms in CEP schools. CEP applications and labor hours involved with processing them cannot be paid for from the nonprofit school food service account.

- There must also be a method to accurately distinguish between forms from students in CEP vs. non-CEP households. CEP applications are not subject to verification, independent review of applications, and the certification and benefit issuance portion of the AR review; nor do these students carry individual meal eligibilities that can extend benefit to other students.

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

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

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!