

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Alma School District

Agency Code: 60084

School(s) Reviewed: Alma High School

Review Date(s): 5/8-9/17

Date of Exit Conference: 5/9/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to all the staff at Alma School District for the courtesies extended to us during the on-site review. Staff were available to answer questions and were 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. Alma has an overall great program with dedicated staff and high student meal participation rates.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

62 eligibility determinations were reviewed, 5 errors were identified. The determining official is doing a great job. Benefits are approved in a timely manner and direct certification is completed as required.

Applications

- When benefit's eligibility decreases, the change cannot take place before 10 *calendar days* and a notice of adverse action must be sent in writing with appeal rights procedures. Day 1 is the day the letter is sent to the household. A copy of the adverse action DPI template was provided to the SFA to correct errors on the SFA-1 form.
- If a household has only one source of income, or if all sources are received in the same frequency, the LEA takes the sum of all income sources and compares the household's total income to the IEGs. If a household has multiple income sources and the income sources are received with varying frequency, the LEA must annualize (calculate all income as for an entire year).
- The effective eligibility date for students directly certified is the run date of the output file.

Annual Income

USDA recently updated their stance on reporting annual income on applications.

Per SP 19-2017, when households complete Free and Reduced Priced Meal Applications, they may receive income from a variety of sources with different pay frequencies. Examples include households that rely on seasonal work, agricultural work, or are self-employed. In these cases, reporting current income as an annual figure may be easier and more accurate. **If only annual income is provided, SFAs are no longer required to follow up with the household prior to making an eligibility determination. These applications are taken at face value.** Additionally, during an AR, if a household reports annual income and the SFA does not have documentation showing they contacted the household, this will no longer result in an error and fiscal action will not be applied.

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.

Alma School District had an 8.06% certification error rate on the SFA-1 form and will be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual. DPI will send a future memo outlining the reporting requirements.

Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.

- 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. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- 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 form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

Verification

- The verifying official did a good job reaching out to households, requesting supporting income documentation, and communicating the outcome.
- Section 3 of the Verification Collection Report (VCR) was not reported accurately. In 3-2, S and O codes must be reported separately from the T, E, and other source categorically eligible students in 3-3. Skyward should provide you with this detailed data, or you will need to obtain it manually from the state DC output file.
- The agency is using the confirmation review signature line on the back of the application to document a second review of applications at the time of determination. DPI discourages a *voluntary* 2nd review of applications, unless required as part of a high error rate- this may slow the approval of applications.
- Do not confuse the initial application determination with the confirmation review. The confirmation review is conducted only on applications that are chosen for verification.
- When requesting supporting documentation from the household/s selected as part of the verification sample, ensure you are receiving documentation to support current income listed on the F/R application. Households can provide the month prior to application, the month they applied, or any month after they applied until the requested deadline.
- As a reminder, there are 3 sampling methods (Standard, Alternate 1, and Alternate 2). If the agency has a non-response rate of less than 20% in the previous school year they may use any method. If choosing Standard, first select from the *error prone* applications. Error prone means, those applications with reported income within \$100 monthly or \$1,200 yearly of the free and reduced-price income eligibility guidelines.

Meal Counting and Claiming

- When entering the monthly claim it is necessary to review and use the site-level edit check reports. Each site listed on your contract should have a separate edit check (Alma El and Alma HS).
- The milk component is located just past the point of service (POS). The School Foodservice Authority (SFA) is using milk bag dispensers rather than cartons due to a quality preference. Since the milk is being dispensed, there are limited electrical outlets and space to accommodate all of the dispensers on the line before the point of sale. Per SP 41-2015 USDA OVS Guidance Manual <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, all meal components must be available before the point of sale, or an alternate point of sale approved by the State Agency(SA). Prior to the review, this alternate POS had not been approved.

While observing meal service during the Administrative Review, it was noted that the SFA has a series of checks and balances that are already in place: small student population; close proximity of the milk dispenser to the point of sale; staff knowledge of the reimbursable meal; and the 10 oz. cups are obtained and placed on the tray prior to the point of sale. The SFA and SA staff discussed having students keep their tray at the POS table while obtaining their milk, unless they have chosen to turn down the milk component and already have a reimbursable meal.

The SA and SFA also discussed changing the point of sale to the beginning of the line, but realized that would make it difficult for students to balance full milk glasses while navigating the rest of the service line.

The SA determined that this is an allowable *alternate* point of sale.

Findings and Corrective Action Needed

Certification and Benefit Issuance

- Finding #1:** Students listed on the SFA-1 form are incorrectly certified for meal benefits. Fiscal Action will be assessed for all student errors.

Corrective Action Needed: Send a letter of adverse action (decrease in meal benefits) to the households and encourage them to apply for F/R meal benefits. Provide copies of the letters to the NPC along with a screen shot of the updated BI list when the new status take effect.

- Finding #2:** The SY 2014-15 free and reduced application materials are posted on the districts food service website.

Corrective Action Needed: Update the website with the SY 2016-17 free and reduced application materials. Take a screen shot of the site when updated and forward this as an email attachment.

Meal Counting and Claiming

- Finding #1:** The agency is not reviewing/using the *site-level* edit checks to consolidate the monthly claim.

Corrective Action Needed: By signing this report, you agree to pull your monthly meal counts from the site-level edit check reports. **No further action required.**

Verification

- Finding #1:** The agency over verified applications (2 vs.1) as part of the Standard Sampling method.

Corrective Action Needed: By signing this report, you agree not to over verify applications in future years and correctly calculate the sample size based on the pool on October 1. If you choose to conduct 'verification for cause', this is a separate process.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service director for sending meal pattern documentation prior to the on-site review and for answering many questions before and during the review. The food service staff are doing a wonderful job of serving healthy meals to students every day. The salad bar offers a nice variety of fresh vegetables daily which helps expose children to new healthy foods.

Comments/Technical Assistance/Compliance Reminders

- **Fruit Portion Sizes:** On the day of review, bananas offered at breakfast were cut in half and students were able to take two halves. On the production record for the week of review, the same menu day was offered and the production records indicated that the portion size of a banana was ½ banana. Per the Food Buying Guide, a banana provides ½ cup of fruit. Students must be offered two halves of a banana at breakfast in addition to the ½ cup juice to meet their daily required offering of 1 cup fruit. It is recommended to change the planned portion size for bananas to one whole or two halves on your production records to make it clear that the meal pattern requirements are met.
- **Salad Bar Signage:** It may be beneficial to add signage on the salad bar to show students exactly what must be taken to have the required ½ cup fruit or vegetable for a reimbursable meal. For example, signage could include the number of baby carrots that equal ½ cup of vegetable. Since the salad bar is self-serve, it is helpful for students to know what they are expected to take.
- **Peanut Butter:** On the day of review, peanut butter was offered as an extra at breakfast. Peanut butter credits as a meat/meat alternate (two tablespoons of peanut butter = 1 oz eq meat/meat alternate) which can be offered at breakfast and credited towards the grain component. By crediting the peanut butter as a meat/meat alternate, students would have more options for how to build a reimbursable meal. Offering extra items increases food cost and potentially food waste.

Findings and Corrective Action Needed

☐ **Finding #1:** There was a daily grain shortage on Tuesday, April 4, 2017. The only grain offered to grades 9-12 was a 1 ounce equivalent (oz eq) dinner roll. Students in grades 9-12 must be offered 2 oz eq of grain per day. Options discussed included offering a second dinner roll, using a larger dinner roll that credits as 2 oz eq, or adding another menu item that provides 1 oz eq grain.

Corrective Action Needed: Please provide a written statement explaining what you will fix about this menu day to provide 2 oz eq of grain to grades 9-12. If you choose to add a new product to the menu, please submit the nutrition facts label and ingredient list.

☐ **Finding #2:** The bread served at breakfast during the week of review was not whole grain-rich. All grain products for both breakfast and lunch are required to be whole grain-rich. A whole grain-rich food is not necessarily 100% whole grain, but at least 50% of its grain ingredients must be whole grain. In order to be whole grain-rich, a grain food must list a whole grain as its first ingredient. Look for first ingredients such as “whole wheat flour,” “whole corn,” or “whole oats.” USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products: <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Corrective Action Needed: Please provide a nutrition facts label and ingredient list for the new whole grain-rich bread that will be used.

- **Corrective action completed on-site; no further action needed. Thank you!**

☐ **Finding #3:** Any menu item with two or more ingredients must have a standardized recipe. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates were left onsite and can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

Corrective Action Needed: Please provide a standardized recipe for the broccoli and cauliflower with cheese sauce.

☐ **Finding #4:** The production records being used do not contain all the requirements as listed in DPI's Production Record Requirement List (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Specifically, Alma's production records must be updated to include the number of servings prepared, number of adult meals planned, condiment usage, and milk usage. Technical assistance was given on using DPI's template production records (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>) which contain all required information. Milk usage must be recorded by type for each grade group every day, either on the main production records or on a separate milk production record. Salad dressing is currently being recorded on the garden bar production record, but other condiments such as ketchup are not recorded. Condiments contribute to the dietary specifications (calories, saturated fat, and sodium) of school meals and therefore must be recorded on production records.

Corrective Action Needed: Please submit one week of completed lunch (including garden bar and milk production record, if separate) and breakfast production records for grades 9-12.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

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. The new 16-17 Annual Financial Report instructions are located on our website at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>

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> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script
- 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.

Revenue from Nonprogram Foods

- The agencies nonprogram foods include: Adult Meals, A la Carte, Extra Milk, Pre-K snacks not part of the USDA meal programs, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, purchased services, and other 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 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>.

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:

Comprehensive Review- Nonprofit School Food Service Account

- ❑ **Finding #1:** The district is providing 1-3% meal incentives to household accounts that make lump sum deposits. These incentives have not been accounted for within the Paid Lunch Equity weighted average requirement.

Corrective Action Needed: Submit a statement outlining how the district will move forward (discontinuing this practice or estimating the value of the credits to be included within PLE). Consider discontinuing this practice as it is also no longer financially sustainable for the district, Fund 50 required a significant operating loss transfer in the 2015-16 SY.

Comprehensive Review- Revenue form Nonprogram Foods

- ❑ **Finding #1:** The nonprogram food revenue tool was not completed and nonprogram foods are priced very low covering only the food cost. Pricing of nonprogram food items must also cover any labor/supplies that go into preparing these items. The tool must be completed annually to assess if nonprogram foods are priced high enough to cover all costs. The topic of nonprogram foods and how to run the DPI or USDA tool was discussed onsite.

Corrective Action Needed: Submit a completed nonprogram food revenue tool for a minimum of 5 consecutive operating days. It is allowable to complete the tool for a longer period of time if that is easier (monthly or annually). Also, submit a statement and timeline which outlines how the agency will assess and raise nonprogram food prices to ensure student program funds are not used to subsidize nonprogram food sales.

Per SP 20-2016...“the SFA must compare the revenue ratio to the food cost ratio and determine if the revenue ratio is equal to or greater than the food cost ratio. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is properly pricing nonprogram foods and no further action is required. If the revenue ratio is less than the food cost ratio, the SFA has priced nonprogram foods too low, and must increase nonprogram food prices until the revenue ratio is equal to or greater than the food cost ratio **or contribute non-federal funds to the nonprofit school service account to address the revenue shortfall.**”

- ❑ **Finding #2:** The agency is not tracking the number of extra entrées sold. This could be done through Skyward or a manual system. The cash received is deposited to Fund 50.

Corrective Action Needed: Submit a statement via email outlining how the district will track extra entrée sales moving forward. Extra entrees are part of overall nonprogram food sales that must be included in the revenue ratio calculation.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The agency sends the Public Release to various outlets ensuring the community is aware that the district participates in the USDA meal programs and can choose to apply for meal benefits at any point during the school year. They also conduct outreach for the School Breakfast and Summer Food Service Program as required. Thank you for promoting the programs!
- The Food Safety Plan was recently reviewed and is site specific.

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

The student reimbursable meal charges (e.g., \$1.35, \$0.30, and \$0.00) are visible on the computer screen seen by point of service staff. This information can be deduced by F/R/P status, however the screen is only visible to staff operating the computer. These staff have also been trained on civil rights and have access to student level data for application approval within the district. Because this information is not needed by POS staff, consider working with Skyward to hide the current purchase charge. It is allowable for the account balance to show.

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,**” so that it can be printed in the same size font as the other printing in the document.

Special Dietary Needs

DPI has updated the Medical Statement Form posted on our website that you may use <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>.

When the form is completed and signed by a licensed medical practitioner, the school is required to provide a meal that meets the child’s needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child.

Schools are not required to accommodate requests that are not supported by a signed statement from a licensed medical practitioner. Schools may accommodate non-disability requests if they choose to as long as accommodations are made within the meal pattern requirements. SFAs must ensure that accommodations are provided to all students equally.

For more information on this topic, see the recently posted Wisconsin Q&A:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

Local Wellness Policy (LWP)

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. Alma School District recently reviewed their LWP, which included a nice outline of Smart Snacks guidelines and nutrition education goals using evidence based strategies like nutrition label reading and the MyPlate concept. As you conduct your next update, review the Wellness Policy checklist posted on our website to ensure all components are met. The agency will need to identify the official/position title responsible for the oversight LWP and clarify how foods provided, but not sold (e.g., class parties, rewards) are handled. Also consider incorporating more direct language related to food and beverage marketing.

Wisconsin Team Nutrition has several resources available on the wellness website:

<https://dpi.wi.gov/school-nutrition/wellness-policy>

- a wellness policy builder
- a wellness policy checklist
- comprehensive toolkit
- report card for the triannual assessment that can easily be shared with the public

Professional Standards

- 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 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 must be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- The intention of annual training hours is that it is job-specific and helps 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. The determining official (DO) should have a minimum of 4 hours. Other staff with duties related to financial reporting, the confirmation role, and point of sale should ensure they are receiving job specific training, but do not necessarily need to meet the full 4 hours. Civil Rights training was completed by the determining official and the confirming official, but there is no other log of training for SY 2015-16 or 2016-17. Consider reviewing the claiming, annual financial report, and the eligibility manuals annually along with other job specific webcasts. The eligibility manual outlines the confirming official’s role and the latest guidance on approving Free and Reduced meal applications and conducting verification.

Reporting and Recordkeeping

Records are retained as required. Thank you.

Findings and Corrective Action Needed

Food Safety

Finding #1: Chemicals are stored in close proximity to food items in the dry storage area. Please reference the agencies Standard Operating Procedure (SOP) #11(4) within the food safety plan.

Corrective Action Needed: Relocate chemicals to a designated area away from food and food contact surfaces using spacing, separate shelves or partitioning. ***Completed onsite, no further action needed.**

Civil Rights

Finding #1: The low balance letter template sent to households does not contain the current non-discrimination statement.

Corrective Action Needed: Update the template with the correct non-discrimination statement. Send a copy to the consultant. ***Completed onsite, no further action required.**

Professional Standards

Finding#1: The district does not have a clear food service director established.

Corrective Action Needed: Submit a written statement outlining who will fill the director role. The current head cook would be grandfathered into the hiring standards, has food safety training, has

completed the annual hours of job specific training, and fits the main regulatory definition of the food service director.

❑ **Finding#2:** The determining official and confirming official have not recorded annual job-specific training hours.

Corrective Action Needed: Submit a plan of training topics to reach the minimum training hours or a log with training hours completed thus far during the 2016-17 SY. Consider using the excel tool found on our website to document annual hours: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>

Smart Snacks

❑ **Finding #1:** The Smart Snacks beverage guidelines must meet the requirements of the lowest grade that has access to them. Since grades 7-8 have access to the machine, any other low-calorie or no-calorie beverages technically should not be in the machine. Take a look at the second page of our Smart Snacks in a Nutshell handout (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>) to see the guidelines for each grade group. If elementary school has access, then the beverages must meet their guidelines.

There are a few different options to remedy this problem:

- Turn off the entire machine during the school day, with the timer set so that the machine turns on at 4:00 p.m.
- Change what is in the machine so that all beverages meet the middle or elementary school guidelines. This would mean that only plain water, 100% juice, and milk (in the correct varieties) could be in the machine, in either 8 fl. oz (elementary school) or 12 fl. oz (middle school).
- Set up a system to ensure that only grades 9-12 may access the machine during the school day. This might involve posting a sign on the vending machine, having staff ensure that no middle schoolers use the machine, etc. If you choose this option, your plan must be very specific and must ensure that the younger grades do not access the machine.

Corrective Action Needed: Please provide a written statement explaining specifically what you will do to ensure that the beverage vending machines meet the Smart Snacks guidelines for all grades that have access to it.

❑ **Finding #2:** The beverage vending machine contains a 15.2 fl. oz 100% juice that is available during the school day. The size limit on 100% juice for grades 9-12 is 12 fl. oz.

Corrective Action Needed: Please provide a written statement confirming that this juice will no longer be available for sale during the school day.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. 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 webpage dpi.wi.gov/statesupt/agenda-2017.

