

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

School Food Authority: Kickapoo Area School District

Agency Code: 625960

Review Date(s): 4/4/18–4/5/18

School(s) Reviewed: Kickapoo High School

Date of Exit Conference: 4/5/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Kickapoo Area School District for the courtesies extended during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations.

The SFA does a great job providing balanced, varied, and nutritious meals to students. The flow of the service lines are effective and present the menu items in appealing ways. The food service staff were friendly, knowledgeable, and appeared well-trained on food safety. Additionally, the SFA puts forth commendable efforts to provide affordable meals to students by offering universal free breakfast, elimination of reduced price lunch, and summer food service.

The SFA is involved with the Farm to School movement and has a school garden, vermiculture composting, and garden-based student fundraisers. The school garden is used as an integrated learning tool and some produce grown is served in the school meal programs. Keep up the good work with Farm to School initiatives!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The administrative assistant does an excellent job managing free/reduced benefit information and keeping up on the latest eligibility guidance. The preparation in advance of the review and eagerness to answer questions on-site were much appreciated.
- The procedures in place to provide meal benefits to homeless children appear to be effective and thorough, which ensures that homeless students are able to receive free meals.

Technical Assistance:

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 that application to be considered complete. Inconsistencies can be verbally clarified with the household and documented on the application including the updated information, initials, and date by the determining official.

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 with the household. 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.

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.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other [foreign language translations of the Application for Free and Reduced Price School Meals](https://www.fns.usda.gov/school-meals/translated-applications) (<https://www.fns.usda.gov/school-meals/translated-applications>).
- The nonprofit food service account may be used to pay for translation services if there is a need to translate materials in a language that is not currently available.

Disclosure.

- The only non-food service purpose that the SFA uses free/reduced information for is for AP test fee waivers. Sharing of information for AP tests is allowed without parental consent because it is a State Education Program. However, 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, school fees, 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>).
- 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>). See corrective action below.

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.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of

documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding A:** Of the 170 eligibility determinations reviewed, a total of eight errors were found on two separate applications. One application was missing a household member's name, therefore the household members box did not match the number of names listed deeming it incomplete. The other application contained six student names. One of the students was directly certified as free based on an S code. The other five students were given reduced benefits based on the income information provided. Available documentation indicated that these five students should have received free meal benefits based on the sixth child's extension of the S code direct certification match.

Corrective Action Needed for Finding A: The determining official followed up with the household about the missing household member's name and corrected the application on-site. To correct the error involving failure to extend free benefits to all children in the household, the determining official updated the benefit issuance document to change the affected students to free. Because the SFA has eliminated the reduced price lunch charge, the family did not need to be notified of the change because the students were already eating free of charge. The change of these students Corrected on-site; no further action required.

- ❑ **Finding B:** The staff members that are given individual students' free/reduced information for the purpose of AP test fee waivers do not have signed disclosure agreements on file.

Corrective Action Needed for Finding B: Submit signed disclosure agreements for staff members receiving meal benefit information for AP test waivers to the consultant.

Verification

Commendations:

- The verifying official maintained a very well organized system for completing the process thoroughly and on time. It is clear that the official understands the details of the verification process. Great job clarifying overtime pay reported on submitted pay stubs when completing verification!

Technical Assistance:

- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
 - The verification collection report contained one error in the results section. One verified application was incorrectly reported as an application approved as categorically eligible, when in fact it was an income application. The report can no longer be edited this year, but special attention should be paid to the results section on future reports. Discussions with the verifying official indicate that this error was a mistake and not a systemic error based on lack of understanding of the types of applications.
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Meal Counting and Claiming

Commendations:

- The claim preparer is well-versed on claim submission. The collaboration between the claim preparer and food service director has resulted in accurate timely claim submission for multiple programs.
- The claims submitted for the Special Milk and WI School Day Milk Programs looked great. The counting/claiming system utilized for the milk programs ensures that accurate claiming occurs for these programs.
- The documentation to support severe need breakfast eligibility was provided upon request and supported the information reported on the online contract.

Technical Assistance:

Online Claiming

- The breakfast claim contained the incorrect number of operating days. One school day when breakfast was not served was counted as an operating day. As a reminder, the number of operating days listed on claims for each program must reflect the actual number of days in the month that the meal was offered and served. This means that operating days may vary by program each month.
- The enrollment reported on the breakfast claim did not reflect the 4K students with access to breakfast. As a reminder, enrollment listed on monthly claims should reflect the number of students with access to the program each month. This means that AM 4K with access to breakfast should be included in the enrollment on the breakfast claims.

Field Trip Meals

- Teachers responsible for checking students off for their field trip meals must check off each student when they take the meal. It is not acceptable to check off every student that orders a meal and then uncheck any student that did not take a meal. Please ensure that teachers are aware of the correct way to count field trip meals served so that the claim for reimbursement is accurate. Updating the directions on the check off sheet given to teachers with the meals could be an effective way to provide instruction on proper point of sale (POS) for field trips.
- 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>).

Visiting Students

- Please note that SFAs may claim visiting students in the paid category or the individual's benefit category with documentation, unless they are from a CEP school.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to all staff at Kickapoo Area School District for the cooperation and time spent preparing for this Administrative Review (AR). Thank you to the Food Service Director for sending all documentation prior to the onsite visit in an organized manner as this greatly expedited the AR process. All school nutrition professionals in the kitchen were pleasant, hardworking, and did a great job preparing and serving meals to students.
- Commendable job offering multiple, appealing, cold and hot entree options daily for breakfast and lunch. The breakfast service line was set up exceptionally; with 1.0 oz. eq. grain or 1.0 oz. eq. meat/meat alternate (M/MA) options on the left (students can choose two from a variety) and 2.0 oz. eq. grain/M/MA options on the right (students can choose one from a variety) as well as

numerous fruit (fresh, canned, and dried) and milk options (four different types). There was also clear signage to help students select a reimbursable meal. The food service director did a nice job encouraging students to select milk. By offering Universal Free Breakfast to all students, many great options, and multiple breakfast service times, Kickapoo School District has over 75% of its students participating in the breakfast program. Great job!

- There is also a flavor station at lunch, with sodium-free and low-sodium herbs and spices to add flavor to meals. In the summertime, the agriculture department and food service work together to manage a school garden. Tomatoes, peppers, cucumbers, zucchini, onions, and herbs are planted and used in the lunch program, in spaghetti sauce, bread butter pickles, muffins, soups, and more! Thank you for also hosting Small Victories next week and helping with continuing education for other food service professionals. Thank you for serving healthy, nutritious meals to the students of Kickapoo Area School District!

Technical Assistance:

Training

- Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Check the [training webpage](https://dpi.wi.gov/school-nutrition/training) often for current and upcoming opportunities (dpi.wi.gov/school-nutrition/training). All members on the School Nutrition Team are available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (dpi.wi.gov/school-nutrition/directory).

Field Trip Meals

- Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

Muffins Made with Cake Mix

- Muffins are an allowable breakfast item, however cake is not. Because whole grain-rich cake mix is used in the muffins, and marketed to students as muffins, this is allowable. However, there are things to consider. There is not a specific amount of sugar, fat, etc. that qualifies a grain product as a dessert. Much is dependent on how the product is used in the meal and how children consume the product. There is a recognized need for some sugar in baking breads and other grain items that are not generally served as desserts (i.e. muffins). The menu planner should use typical perceptions of the product as a way to determine how to menu the item and should also be aware that even if a product is not labeled as a traditional dessert/sweet item, higher levels of sugar, fat, and sodium could cause challenges in staying within the weekly dietary specifications.

Production Records

- Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use has missing information, such as serving size, total number of purchase units prepared, and total number of portions prepared. While there is no required production record template, there are examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the

production record requirements (“Must Haves and Nice to Haves” list) can also be found at that link.

- Be specific on production records about the identity, brand, and description of the items served. Instead of “dried”, list both the Craisins and raisins separately. List the specific type of granola bar or cereal offered, and list both when two types are offered, rather than just listing “cereal bar” or “granola bar” as these do not indicate exactly what was served. There is a wide variation in formulation of the many products that fall into these categories. If you do not wish to list each product by type, consider making a recipe. For example, 5 different types of muffins are put out daily, 20 each, for 100 servings. Fruit sizes (e.g. case count) should also be recorded. It is helpful to include not just portion size, but also crediting, on the production records.
- Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. This includes the vegetables on the salad bar.

Standardized Recipes

- Any menu item that is made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- A few recipes used during the review week lacked pieces of information necessary for standardized recipes like the planned number of portions (yield) and serving size. Technical assistance was given on-site to analyze servings of recipes. This is needed for menu planning to ensure that the portions offered are actually what is intended. Please use our [recipe tools and resources](#) to aid in this process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is also a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analysis, and a template to help organize the information. Continue to work towards recipe standardization by viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>), or [contact a Public Health Nutritionist](#) for assistance (<https://dpi.wi.gov/school-nutrition/directory>).

Meal Pattern, 6-12 Overlap

- There is no overlap in calorie requirements for students in grades 6-8 and those in grades 9-12. This means grades 6-8 cannot follow the same meal pattern as grades 9-12. Currently, 6-12 are all in one building and are following a similar, although not exact, meal pattern. Grades 7-8 can follow the 6-8 meal pattern, or they can be included with the grades K-5 under the K-8 meal pattern.
- If grades cannot be separated, consider posting signage instructing students what serving sizes are needed for their grade level, making different size spoodles available when needed, and using different cafeteria lines or colored trays for varying grade groupings.

Crediting Overview

- There is a difference between serving size and crediting (or meal pattern contribution). Most fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit) and meat/meat alternates and grains credit by weight (referred to in ounce equivalents (oz. eq.)). Refer to the [Food Buying Guide](#) (FBG) for more details on how specific ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>).
- Processed products which cannot be credited using the FBG require additional documentation like a Child Nutrition (CN) label or Product Formulation Statement (PFS). These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 oz. eq. M/MA. These will have the crediting directly on them (e.g. a Chicken patty may be 2.5 ounces by weight, but will credit 2 oz. eq. M/MA per the CN label).

- The following recipes for the week of review contained incorrect crediting information. Column one shows the recipe title, column two shows the crediting on the recipe, and column three shows what the crediting should be on the recipe, per serving.

Recipe	Crediting of Serving Size on Recipe	Actual Crediting of Serving Size (based on ingredient amounts and recipe yield)
BLT Chicken Pasta Salad	2 oz. M/MA ½ c G/B ½ cup vegetable	2.25 oz. eq. M/MA 2.25 oz. eq. Grain 1/8 cup vegetable
Potato Soup	½ cup vegetable	5/8 cup vegetable
Bean Salad	¼ cup vegetable	½ cup (which is bigger than planned serving size. Yield of recipe could be off.)
Beef Vegetable	½ cup vegetable	¼ cup vegetable 0.25 oz. eq. M/MA
Cream of Broccoli	¼ cup vegetable	⅛ cup vegetable
Chicken Tortellini Soup	⅛ oz M/MA ½ cup vegetable	1 oz. eq. M/MA (could even credit cheese tortellini with proper documentation to contribute to M/MA) ¾ cup vegetable
Chili	¼ oz M/MA ½ cup vegetable	0.5 oz. eq. M/MA 1 ¾ cup vegetable (which is bigger than planned serving size. Yield of recipe could be off.)
BLT Chicken Pasta Salad	2 oz M/MA ½ cup grain ½ cup vegetable	2.25 oz. eq. M/MA 2.25 oz. eq. Grain Vegetable amount too little to credit (less than ⅛ cup per serving)
Chicken Sandwich	(K-5): 3.5 oz M/MA, 57g grain (6-12): 2 oz M/MA, 2 grain	(K-12): 2 oz. eq. M/MA, 3 oz. eq. grain
Walking Taco	2 oz M/MA 1.5 grain	In practice: #12 scoop (1.75 oz. eq. M/MA) + cheese (0.25 oz. eq. M/MA) = 2 oz. eq. M/MA

- For assistance with crediting recipes, use the USDA FBG (or other applicable crediting documentation) along with the [Recipe Crediting Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls) to calculate the oz. eq. Of M/MA or grain, and the cups of fruits or vegetables per serving size (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/recipe-crediting-tool.xls>).

Extras

- Make sure to choose if items will be extras or if they are being credited toward the meal pattern. On the day of observation, the chicken tortellini soup was considered an extra, yet the vegetable

was in fact being credited as students went through the line. Make sure this is clearly communicated to the point of service staff so they understand what constitutes a reimbursable meal. Please also note the soup as is credited as 3/8 cup vegetable, which is less than the ½ cup fruit and/or vegetable requirement under offer versus serve. Therefore, if a student came through with soup, a milk, and a grain this would not be a reimbursable meal as it is missing the ½ cup f/v requirement.

Crediting Documentation

- Any processed product that is not listed in the FBG requires a current CN label or a detailed PFS to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct.
- If a processed item does not have a valid CN label or PFS and cannot be found in the FBG, it may not be credited when served as part of the USDA School Meal Programs. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Product formulations change frequently, so it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets, and PFS's on file are kept up-to-date. State-Processed and USDA Product Information are updated annually and can be found:
 - [SY 2017-2018 State-Processed Product Nutrition Information](https://dpi.wi.gov/school-nutrition/usda/product-information) - WI-processed (<https://dpi.wi.gov/school-nutrition/usda/product-information>)
 - [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets) - Commodities are organized by component and updated annually. CN labels can be verified and collected from boxes as products are delivered (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>). Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

Crediting Grains

- Grains can be credited based on weight using Exhibit of the FBG. If a product is not on Exhibit A, you must obtain a PFS from the manufacturer that lists the *grams of creditable grain* in the product.
- [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf) is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1 oz. eq. for each specific group (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf). Exhibit A groups all grains products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:
 - Group A: these products are hard and crunchy and dry and lightweight. Per ounce, they contain a good deal of grain.
 - Group B: whether serving bagels, pizza crusts or tortillas, 1 ounce of these products all credit the same towards the meal pattern (1 ounce = 1 oz. eq. grain).
 - Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1 ounce of pancake does not credit as 1 oz. eq. like a slice of bread does. More of the product by weight will need to be served to credit as 1 oz. eq. grain.
- Exhibit A can be used to credit any of the products that appear in this table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

Whole Grain-Rich

- All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50

percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. Replace all enriched grain products with whole grain-rich versions. Additional information on what qualifies as whole grain-rich can be found in the [USDA Whole Grain Rich Resource](https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf) (https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding C:** All grain products offered and served as part of a reimbursable meal must be whole-grain rich. The Frito Corn Chips served during the week of review and day of onsite were not whole grain-rich as the first ingredient was corn and not whole corn.

Corrective Action Needed for Finding C: Find a whole grain-rich version of the Frito Corn Chips and submit a product label including the nutrition facts label and ingredient list.

- ✓ **Finding D:** The Walking Taco recipe served during the week of review and the day of review was not standardized for the 6-8 and 9-12 grade students. The recipe did not reflect what was actually being done in the kitchen.

Corrective Action Needed for Finding D: Submit a standardized recipe for the Walking Taco Recipe with all required items (e.g. yield, detailed instructions). A [Recipe Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc) may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc). **Corrected on-site; no further action required.**

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations:

- The SFA has elected to use the fund balance in the non-profit food service account to offer universal free breakfast and elimination of reduced priced lunch. These options are excellent ways to spend a fund balance while providing more students affordable, nutritious meals and reducing financial burdens on households.

Technical Assistance:

Unpaid Meal Charge Policy

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).
- 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).

Catering

- Labor costs associated with catering should be charged to the organization receiving catering services—not to the non-profit food service account. While the SFA has procedures in place for

designating labor hours spent on catering, Fund 50 has still been charged for these expenses. Discussions with the business managers indicate that going forward, labor associated with catering will be charged to Fund 10 or the organization purchasing catered items.

Annual Financial Report

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; 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 the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- 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” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, report 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, 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.

Findings and Corrective Action Needed: Non-Profit Food Service Account

- **Finding E:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category. Equipment, purchased services, and other expenditures were allocated entirely to NSLP instead of proportionally to each program. Additionally, no expenses were reported for the Wisconsin School Day Milk Program. Conducting a time/usage study can help determine how to break out these expenses by program.

Corrective Action Needed for Finding E: Please resubmit your 16-17 Annual Financial Report with revenues and expenses correctly broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134, and fax or email her an updated report to complete a manual update.

Revenue from Non-Program Foods

Technical Assistance:

- Non-program 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 costs associated with non-program foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Since non-program foods include adult meals and extra milk, these expenses and revenues must be separated from Program foods.
- 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: Revenue from Non-Program Foods

- ❑ **Finding F:** The Non-program Foods Revenue Tool had not been completed for the current school year.

Corrective Action Needed for Finding F: Complete the non-program foods revenue tool using the five day reference period to assess compliance with the revenue requirements. Submit completed tool to consultant.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

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. See corrective action below.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. The SFA’s existing procedures for complaint processing could be used in the context of school meal program complaints, should they arise. However, the proceeding points must be considered.
- 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. Be 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 Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](#) resource.

Special Dietary Needs

- The SFA is currently accommodating for one student with special dietary needs. The statement on file was faxed directly from the physician's office. Due to the faxing process, the physician's signature was not visible. Technical assistance was provided and the importance of a medical practitioner's signature on the filed form was discussed with the food service director.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- 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, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. 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>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding G:** The elementary and high school secretaries receive monthly lists from the determining official that shows individual students' free/reduced eligibility. The secretaries also have access to this information electronically in Skyward. For these reasons, both must complete [civil rights training](#) and sign a [disclosure agreement](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>; <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Corrective Action Needed for Finding G: Submit sign off sheet to consultant confirming training completion along with copies of the signed disclosure agreements.

- ❑ **Finding H:** Two food service staff members have not completed the required annual civil rights training for the current school year.

Corrective Action Needed for Finding H: Both food service staff members must complete civil rights training, as it is a USDA requirement that this training is completed annually for all persons involved in school nutrition program administration.

Local Wellness Policy (LWP)

Commendations:

- The local wellness policy contains all required content and includes links to external wellness-related resources. Great job developing a comprehensive, detailed policy!

Technical Assistance:

Wellness Policy Final Rule

- 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 2016-17 with full compliance of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which

the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- 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>). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Smart Snacks in Schools

Technical Assistance:

Overview

- All foods and beverages sold to students on the school campus during the school day outside of a reimbursable meal must meet both the general standards and nutrient standards, unless the sales qualify for an exemption (i.e. exempt fundraiser). More information can be found on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) or in the [Smart Snacks "In a Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).
- To determine if a product meets the general and nutrient standards, use the Alliance for a Healthier Generation [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org) to assess compliance (<https://foodplanner.healthiergeneration.org>). Simply answer a series of questions, then save and print the results for your records.

Beverages

- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz.; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.

Fundraisers

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

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Finding I:** The following products are not compliant with the smart snacks standards.

- Beverages
 - Kemps Low-fat (1%) Chocolate Milk (16 fl. oz.) and Strawberry Milk (16 fl. oz.)
 - All flavored milk must be fat-free (skim) and 12 fl. oz. or less.
- Food
 - All American Ice Cream Cup
 - Saturated fat exceeds 10% of calories
 - Kemps Chocolate & Strawberry Sundae Ice Cream
 - Total fat exceeds 35% of calories
 - Saturated fat exceeds 10% of calories
 - Kemps Chocolate Ice Cream Ins. Cup
 - Total fat exceeds 35% of calories
 - Saturated fat exceeds 10% of calories
 - Kemps Mini Ice Cream Sandwiches - Vanilla
 - Saturated fat exceeds 10% of calories
 - Van Holten's Dill Pickle
 - Sodium exceeds 200 mg per serving
 - Cheesewich
 - Total fat exceeds 35% of calories
 - Saturated fat exceeds 10% of calories
 - Sodium exceeds 200 mg per serving

Corrective Action Needed for Finding I: Please submit plan of action regarding how these non-compliant products will be discontinued as well as a timeframe for when this will go into effect.

Professional Standards

Technical Assistance:

Training Requirements

- While the current tracking tool used by the SFA is very detailed, it is suggested to not provide separate lines for each key area/training subject. The current tool is somewhat misleading because single training sessions are listed multiple times for each attendee in order to represent the topics covered in the session. This organization makes it appear that employees earned double or triple the training hours for a single training session. Consider utilizing the DPI tracking tool posted to the [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>). The template tool provides a separate Excel tab for each employee and a line for each training session completed.
- 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.).
- Annual civil rights training can contribute to annual professional standards training hours. Additionally, time spent completing tasks for the administrative review, including face-to-face discussions with DPI staff during the on-site review, can contribute to professional standards training hours.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full,

part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged.

Annual Training Requirements for All Staff by Position

- 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.

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding J:** The business manager responsible for claim submission and the administrative assistant responsible for free/reduced benefit management are considered “part-time non-nutrition staff with duties related to nutrition programs,” thus they are subject to the 4 hour annual professional standards training requirement. Based on discussions, these two staff members have completed adequate amounts of training this year but have not tracked completed training hours.

Corrective Action Required for Finding J: Submit training trackers for each non-nutrition staff member to reflect training hours completed during the current school year.

Food Safety

Technical Assistance:

Employee Health Reporting Agreements

- All food handlers must have a signed [Food Employee Reporting Agreement](https://datcp.wi.gov/Documents/foodemployee-reporting-agreement-supplement.pdf) on file (<https://datcp.wi.gov/Documents/foodemployee-reporting-agreement-supplement.pdf>).
- Although student workers that assist in the dishroom do not regularly handle food, their presence in the food preparation area and handling of clean dishes warrant signed agreements.
- Food handlers 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.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding K:** The second food safety inspection from the prior school year was posted in the kitchen area only. The most recent food safety inspection is required to be posted in a publicly visible location, meaning that it is readable by anyone at any time the school is open—not just during meal service when the kitchen is open.

Corrective Action Needed for Finding K: Please print and post the most recent food safety inspection report in a publicly visible location described above. Send a picture of the posted report to the consultant when completed.

- ❑ **Finding L:** Signed employee health reporting agreements were not on file for one full-time food service employee and for the student workers with various duties in the kitchen.

Corrective Action Needed for Finding L: Submit copies of signed employee health reporting agreements for the people listed.

On-site Monitoring

Technical Assistance:

- While the SFA operates two school sites according to the online contract, both school sites are located in the same building. Meals for both schools are produced in one kitchen but served in two separate cafeterias. The food service director has direct daily oversight for both sites and therefore on-site monitoring is not required.
-

Buy American

Technical Assistance:

- The USDA requires that a School Food Authority (SFA) purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, farmers, and provides healthy choices for children in the USDA School Meal Programs. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory.
- If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification. More information on this new requirement, including a tool to assist with tracking non-compliant 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>).
- There are 4 pieces of information per non-compliant item that must be recorded on the Buy American Non-Compliant Product list of your choosing:
 1. Date
 2. Name of product
 3. Country of origin
 4. Reason
 - a. Cost analysis
 - b. Seasonality- record the months that the domestic product is not available
 - c. Availability
 - d. Substitution- record the reason the distributor substituted the product
 - e. Distribution- record the reason the distributor carries the non-domestic product
 - f. Other- explain
 - You may record additional information if you find it beneficial. A suggested template is found on the [Buy American](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage under Buy American Non-complaint Product list (word doc) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American

- ❑ **Finding M:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List, or SFA equivalent form:
 - Canned Mandarin oranges (China)
 - Canned Pineapple Tidbits (Indonesia)
 - Frozen Chopped Spinach (Mexico)
 - Frozen Broccoli Cuts (Mexico)

Corrective Action Needed for Finding M: Complete and submit [Non-Compliant Product Forms](#) for the products listed above (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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

Commendations:

School Breakfast Program

- The SFA promotes the SBP in a variety of ways which has promoted excellent breakfast participation. The SFA offers three serving times for breakfast to maximize participation and meet student needs. The program is promoted all over the school with signs and on employee name tags. It is clear that the staff find great value in the breakfast program and that it is well received by students.

Technical Assistance:

Summer Meals

- Kickapoo Area School District offers summer meals to children in the community and meets the requirements for Summer Food Service Program outreach. The information below is intended to assist the SFA with outreach efforts for the upcoming summer.
- USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in the area, see the [interactive map](#) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
 - For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov
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5. OTHER PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP) and Special Milk Program (SMP)

Commendations:

- The counting/claiming system used for both milk programs appears to be effective and results in accurate claims. The SFA is continuing to think of ways to improve the administration of both milk programs to ensure point of service requirements are met in the most efficient and least burdensome ways possible.

Technical Assistance:

CACFP Allowable Milk Types for SMP

- The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. If pre-kindergarten (pre-K) students are not comingled with

other grade groups, then they must follow the new CACFP meal pattern. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans and include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

- Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served, which includes both chocolate and strawberry milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Because the SMP is offered only to 4K students without access to breakfast or lunch, the CACFP meal pattern requirement for milk types must be followed. Please work towards phasing out flavored milk in the SMP to become compliant with this regulation.

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

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

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



With School Nutrition Programs!