

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

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**School Food Authority: Lake Geneva Jt. #1 School District**

**Agency Code: 64-2885**

**School(s) Reviewed: Lake Geneva Middle School**

**Review Date(s): January 22-24, 2018**

**Date of Exit Conference: January 24, 2018**

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

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- 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 Lake Geneva Jt. #1 School District for the courtesies extended to us during the on-site review and especially to the school nutrition director for being available to answer questions and provide additional information, even on a school closed snow day. 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.

The school nutrition director completes tasks in many facets of the federal and state programs as she oversees several local SFAs and also vends meals to more SFAs. The cooperation between different departments and the SFAs is crucial for her work. After observation of the scope of the school nutrition director's duties, it is noted that the SFA could entertain the idea of additional director help for the complex school nutrition programs.

The DPI review team appreciates the eagerness of the staff at Lake Geneva School District for their willingness to make changes to meet school nutrition program regulations. All were very receptive to recommendations and guidance. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, service and knowledge of the school nutrition staff. We were impressed during meal service at Lake Geneva Middle School that there are several serving lines to give the students food options and serve them quicker. There is great meal signage, especially at breakfast; it is placed directly behind the serving counter. Lunch signage includes a menu board with colorful markers. Fruits and vegetables are offered first in the meal lines; this is a wonderful Smarter Lunchroom practice. All cashiers are trained on the Power School system before assuming duties.

AS we observed breakfast and lunch at Lake Geneva Middle School and milk break service at Central-Denison Elementary School, we were welcomed with kindness and enthusiasm from a great staff. A friendly, caring attitude is evident as a direct reflection of their attentive director.

The DPI review team is confident that Lake Geneva Jt. #1 School District will continue to improve their knowledge and operation of child nutrition programs.

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Certification and Benefit Issuance**

##### **Comments/Technical Assistance (TA)**

- Three hundred eighty eligibility determinations were reviewed with seven identified errors with the reviewed students and seven other household members.
- The determining official single-handedly reviews many applications with accuracy. She could have some assistance to check the applications over for the main components (household number box and social security number area) before she works with the income amount computation.
- Applications are determined in an organized and timely manner after much time spent communicating with households to get all sections completed to determine benefits.
- (TA) The determining official determines applications by submitting income amounts into PowerSchool system and then writes the information on the front of the application. The SFA is

required to keep the entire submitted application from the household on file (both side of completed application) and fill in the spaces identified for determining, confirming and verifying officials.

- (TA) There is no temporary approval of applications or needed follow up with zero income reported. These applications may be subject to “verification for cause.”

### **Free and Reduced Price Meal Applications**

- Applications are reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved and students are receiving the benefits they have been determined eligible for.
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.
- (TA) Applications must be determined with the lowest frequency of payment. The determining official manually enters the new annual income eligibility guidelines.

### **Annual Income**

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

### **Household Size Box**

- (TA) 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.
- The determining official works with households to have this completed for application determination. Thank you!

### **Incomplete Applications**

- (TA) 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 documents the details of the conversation plus dates and initials. 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.

### **Application Forms**

- If an SFA wishes to change the look or format of the application for Free or Reduced-price school meals or other forms in the application packet, that document needs to be approved by the School Nutrition team at DPI.
- Thank you for using the DPI prototype letters with the current non-discrimination statement.

### **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.

### **Public Release**

- (TA) Thank you for distributing a [Public Release](#) before the start of the school year to the local news media. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs
  - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

### **Limited English Proficiency (LEP)**

- Application materials and other communications with households concerning eligibility determinations are 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.
- The SNT provides the Wisconsin 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.

### **Direct Certification**

- Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- Keep in mind that Medicaid is now matching some students through direct certification and those new codes extend benefits to other students in the household.
- The effective eligibility date for a DC eligible student is the date of the original output file.

### **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.
- 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. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

- Wisconsin DPI SNT requires that eligibility determination from another school is to be from source documentation, like a copy of the application or direct certification run.

### **Disclosure**

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- (TA) 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](#) 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](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

### **Findings and Corrective Action Needed: Certification and Benefit Issuance**

- ❑ **Finding #1:** Students approved on an application with a program case name of BadgerCare do not receive automatic categorically eligible for free meals. They must be changed to Paid unless you can determine the application with an appropriate program name or with household member number and income amounts.

**Corrective Action Needed:** Report corrections for the students with eligibility errors (YCV1, YCV2, UCV3, OC1, KL1 and IL2) on the **SFA-1 and SFA-2** forms with correction date. Please send the completed copy as proof. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). **Corrected onsite 1-24-18; no further action required.**

- ❑ **Finding #2:** Students approved on an application for free meals who should have been reduced or paid status must be changed to appropriate status in the Point of Service (POS) and on the Benefit Issuance (BI) list.

**Corrective Action Needed:** Report findings on the students to reduced (HS1, JT1, RT1) and the students to paid status (OC1, KL1, IL2) on the **SFA-1 and SFA-2** form with the date the Adverse Action letter is sent. Please send the completed copy as corrective action. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January).

**Corrected onsite 1-24-18; no further action required.**

- ❑ **Finding #3:** Students approved on an application with reduced status who should have been paid or free status must be changed to appropriate status in the POS and on the BI list.

**Corrective Action Needed:** Please notify the household of the increase in benefits for MRT, LRT2 and AZ2; increases can be immediately changed in the POS or at least within 3 calendar days. Please give Adverse Action for the decrease of benefits (NP1, NP2). Record these dates of correction on the **SFA-1 or SFA-2** form and send completed copy as corrective action. Fiscal action will be figured for these errors for the review period (December) and month of on-site review (January). **Corrected onsite 1-24-18; no further action required.**

- ❑ **Finding #4:** The Public Release is submitted to a local newspaper for both the Lake Geneva-Genoa and the Lake Geneva Joint #1 SFAs, but it is not distributed to local grassroot organizations (public libraries, food pantry, churches, etc.) and unemployment offices. Please share with major employers contemplating layoffs, as applicable.

**Corrective Action Needed:** Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

## Verification

### **Comments/Technical Assistance (TA)**

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- The verification process selected six applications which were done correctly. The SFA may benefit from using Alternate Two verification process with the sample pool size to verify less applications.
- The verifying official uses the verification tracker form which identifies the steps and outcome. Nice work!
- (TA) When the proof of income returns from the household and compared to the application, do not convert the income amount to monthly to enter in the software, PowerSchool. Income must be kept as the lowest frequency of income receipt.
- 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.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

## Meal Counting and Claiming

### **Comments/Technical Assistance (TA)**

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

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #5:** Students are charged for their field trip meals via a checklist that is obtained from the teachers, and if the student does not take the meal, the charge is removed. This is an unacceptable point of service as meals may only be charged to a student at the time the student receives the meal. Milk choice must also be offered to all students with their field trip meals.

**Corrective Action Needed:** Please train all teachers and staff on the correct point of service for field trip meals and submit the sign-in roster as corrective action. Visit our [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage for more information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations:

Thank you to all staff of Lake Geneva Joint #1 for their time, warm welcome, and cooperation during this Administrative Review. We appreciated the Food Service Director providing documentation and answering questions prior to coming on-site as this greatly expedited the review process. We appreciated all of the nutrition professionals' willingness to ask questions, answer our questions, and help us better understand their food service operation. We were impressed by the all of the nutrition professionals' knowledge and admired their dedication to the Child Nutrition Programs and their students. Thank you for all of your hard work!

### Technical Assistance:

#### Printed Menu

- The printed menu should list all components included with the reimbursable meal. Currently, the third reimbursable meal service line at Lake Geneva Middle School is not listed on the monthly menu. Please include all components included with the reimbursable meals on the third service line on your printed menu.

#### Crediting Documentation

- Acceptable crediting documentation was not available for the following products:
  - Grecian Delight Roasted Red Pepper Hummus
  - Coleslaw
  - Jamwich
  - Crunchmania French Toast Graham Sticks
  - Benefit Banana Chocolate Chunk Bar
  - Bosco's Pizza Co Cheddar Cheese-Stuffed Pretzel Breadsticks
  - Cheez-It Crackers
  - Cinnamon Rolls
- Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by product formulation statements (PFS) or Child Nutrition (CN) labels to sufficiently document meal component crediting. 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. It is highly preferred that this documentation is printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for School Meal Programs, it may not be credited when served as part of the USDA School Meal Programs. Please discontinue the use of these items.
- Product formulations change frequently, so it is important that nutrition facts labels, Child Nutrition (CN) labels, USDA Foods Product Information Sheets, and Product Formulation Statements (PFS) on file are kept up-to-date. State-Processed Product Information is updated annually. [USDA Foods Product Information Sheets](#) are organized by component and updated

annually (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

### **Standardized Recipes**

- Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.
- Currently, recipes in the kitchen are missing essential information needed in a standardized recipe. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. The missing information includes:
  - Steps for how to prepare the recipe
  - Cook time(s)
  - Temperature(s)
  - Recipe yield
  - Pan size(s)
  - Number of pans
  - Weight or volume in each pan
  - Equipment used
  - Serving utensils to use
  - Different serving sizes used for different age/grade groups
- Quantity recipes are being used as standardized recipes for the toasted cheese sandwich and tuna sandwich. These recipes will only be standardized once they have been tried, tested, and adapted to your food service operation and products. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.
- For the turkey and gravy recipe specifically, there are different variations of meat/meat alternate (M/MA) written on the recipe. For example, one variation shows 90 pounds of turkey roast and another shows 45 pounds of turkey roast and 45 pounds of diced chicken. While both of the above variations credit the same (2 M/MA for 700 servings), please be sure to create a different standardized recipe for each variation of the recipe used.
- There are resources on the DPI School Nutrition Team (SNT) website for recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found on the [Meal Planning](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>). The [Institute of Child Nutrition](http://www.ics.nyu.edu/) has resources with recipe abbreviations, measurement conversions, portioning tools, and steam table pan capacities. Print-outs and posters can be found on their website (<http://nfsmi.org/ResourceOverview.aspx?ID=250>).

### **Production Records**

- Production records are missing information:
  - Planned number of portions



- Total number of portions prepared
- Planned portion size for condiments on the condiment production record
- In addition to the general missing information listed above, there are some more specific items missing from production records:
  - Detention lunches should have all of the current columns on the production record filled out, such as serving size, quantity prepared, and leftovers. The detention lunches should also include the general missing information listed above.
  - Serving size should reflect the portion size. For example, if something is not pre-packaged, has a standardized recipe, or is an individual component such as a hamburger or bun, “1 each” is not an appropriate serving size. Specifically, serving sizes need to be added or adjusted for diced chicken, diced ham, and cheese cup. The serving size of strawberry cups and applesauce cups is listed as 4 ounces (oz), which is inaccurate. These pre-packaged items are 4.5 oz each but can be listed as “1 each.”
  - Planned portion sizes for M/MA should be portion sizes by weight and not volume, since M/MA is measured by weight. For example, the cheese cup is in a 4 oz container. This a volume measurement and does not describe how it credits toward the meal pattern since M/MA is credited by weight.
  - The case count for fruit, such as apples and oranges, should be included in the menu item description on the production record.
  - Marinara served with Bosco sticks, on service line 3 on Wednesday during the week of review, was not on the production record. Please include this information on the production record in the future.
  - If bananas are offered daily, along with apples and oranges at breakfast and lunch, please include them on the production record.
  - Currently, cereal at breakfast, yogurt at breakfast, and juice at both breakfast and lunch are listed as assorted on the menu. When items are listed on the menu as assorted or variety, all items need to be listed on the production record or a recipe needs to be developed, like the milk recipes that were created for Lake Geneva Middle School.
- While there is no required production record template, there are some examples, including transport sheets, 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. There is also [Instructions for How to Fill out Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

## Signage

- Service line 3 does not have signage. Signage must indicate what is offered as part of the reimbursable lunch as well as OVS requirements. Signage must also indicate any extra items so students know what is and is not included as part of a reimbursable meal. The goal is to help students select reimbursable meals and reduce unintended purchases of a la carte items.
- Signage is encouraged for detention lunches. SP41-2015; July 21, 2015: Updated Offer versus Serve Guidance for the National School Lunch Program and School Breakfast Program Effective Beginning School Year 2015-2016 states: *Signage is not required for field trips, breakfast in the classroom and other venues where signage may be problematic. However, other methods should be used to inform students what choices they have.*
  - An example of signage that could be used for detention lunches is signage on the cart that delivers the meals to the rooms. For these detention lunches specifically, the signage

would say that students are being served all five components and that they have a choice of milk type.

- Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage Resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage). If you are interested in ordering signage from SNT, please visit the [Team Nutrition](https://dpi.wi.gov/team-nutrition) webpage and complete the Resource Order Form located at the bottom of the webpage. (https://dpi.wi.gov/team-nutrition).

### **Incorrect Crediting on Production Records**

- The following items were incorrectly credited on production records based on the documentation provided. The correct crediting based on documentation provided is listed in parentheses.\*
  - 113 ct orange (5/8 cup)
  - Turkey sub (2.5 oz equivalent (eq) M/MA, 2 oz eq grain)
  - Ham sub (3.5 oz eq M/MA, 2 oz eq grain)
  - Diced chicken (1 oz eq M/MA)
  - Diced ham (1.5 oz eq M/MA)
  - Cheese cup (1 oz eq M/MA)
  - Buns for hamburger and grilled chicken sandwich (2 oz eq grain)
  - Sloppy Joe (2.25 oz eq M/MA, 1/8 cup red/orange vegetable)
  - Breaded pork patty (2 oz eq M/MA, 0.75 oz eq grain)
  - Spicy chicken sandwich with bun (2 oz eq M/MA, 3 oz eq grain)
  - Spudsters, 5 each (1/4 cup starchy vegetable)

\*The above crediting may change as recipes are updated and standardized for corrective action and as products change.

### **Multiple Entree Options Meeting Minimum Meal Pattern Requirements**

- The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one “line” and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.
  - [DPI’s Lunch in a Nutshell](#)  
Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf).
  - [Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule. “Nutrition Standards in the National School Lunch and School Breakfast Programs”](#)
    1. For menu planning purposes, when multiple choice menus are served, how are minimums calculated?  
Weekly minimum - example 2: If a grade K-5 school offers a 1 oz. eq. grain item (salad) and a 3 oz. eq. grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz. eq. grain (1 oz. eq. x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz. eq. (pg. 37)
    2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?  
Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to

ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

### **Using Vegetable Subgroups to Meet “Other” Vegetable Subgroup**

- For lunch, the “other” vegetable subgroup requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups, once those individual subgroup requirements have been met. The “other” vegetable subgroup was met for all service lines by reviewer while using this method.
  - Service line 1 and 2: The vegetables in the “other” vegetable subgroup that were offered were  $\frac{1}{4}$  cup cucumbers and  $\frac{1}{4}$  cup coleslaw. Because coleslaw was not able to be credited without a PFS, the  $\frac{1}{2}$  cup other vegetable subgroup requirement was not met through “other” vegetables. Instead, extra red/orange was used to meet the requirement. The  $\frac{1}{2}$  cup tomato soup served on Friday was credited as “other” vegetable in order to meet the “other” vegetable subgroup requirement.
  - Service line 3: Because carrots are served daily, extra red/orange was used to meet the “other” vegetable subgroup requirement. The  $\frac{1}{2}$  cup carrots on Wednesday were credited as “other” vegetable to meet the “other” vegetable subgroup requirement.
  - Detention lunches: Because carrots are served daily, extra red/orange was used to meet the “other” vegetable subgroup requirement. The  $\frac{1}{2}$  cup carrots on Wednesday were credited as “other” vegetable to meet the other vegetable subgroup requirement.

### **Detention Lunches**

- Detention lunches must meet daily and weekly meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of potentially hazardous 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, for detention lunches as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, M/MA, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and offer at least two milk types. A variety of milk, at least two allowable milk types, is required to be offered daily at lunch.

### **Salads**

- Because salad on service line 1 and 2 is self-served using tongs, it would be beneficial to post signage with a picture to communicate to students what the intended portion size looks like.
- The reimbursable meal for the entree salad on service line 3 is planned as the packaged salad with packaged cheese and packaged diced ham with a roll or packaged cheese and packaged diced chicken with a roll. The packaged cheese, packaged diced ham, and packaged diced chicken are also available a la carte. During meal observation, it was noted that packaged cheese and packaged diced chicken was running low. While additional packaged items were ready to be stocked on the line, it may be helpful to put out more at the beginning of meal service and replenish the supply between meal service times in order to ensure that salad entrees can still be used as a reimbursable meal.

### **Juice**

- A variety of juices are offered during breakfast and lunch at Lake Geneva Middle School. It was observed during lunch that two juices were allowed to be selected under OVS. No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice at breakfast and lunch. It is possible to offer juice daily and meet the 50 percent juice limit if it is offered along with fruit (fresh, frozen, dried, or canned).

- If a student were to select two juices for lunch at Lake Geneva Middle School, this would not exceed the juice limit. If a student were to select two juices at breakfast at Lake Geneva Middle School, this would exceed the juice limit.
- After speaking to the menu planner about what the planned menu for juice is, it was explained that only one juice is intended to be selected under OVS for breakfast and lunch.
  - Please use signage to communicate to students that only one juice may be selected.

### **Condiment Usage**

- Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium targets remain in effect and condiments should be included in weekly dietary specifications. While condiment usage is recorded, it is not monitored nor are planned portion sizes recorded or communicated to students. Please plan, record, and communicate appropriate condiment portion sizes to students.
- Planned portion sizes can be recorded on the condiment production sheet that is filled out daily at Lake Geneva Middle School. Correct portion sizes can be promoted to students by adding signage at the condiment station with a photo of what one tablespoon of dressing looks like, purchasing single-use 1 oz cups to aid in portion control, or using signage such as “One squeeze, please!” on self-serve squirt bottles.
- Butter should have a planned portion size and be recorded on the condiment production record. Signage should be used to communicate butter portion sizes to students. During lunch observation, students were taking anywhere from 1-5 butter packets.
- For dietary specifications for age/grade group 6-8, please refer to the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf). The optional “Weekly Nutrient Calculator” tool to help monitor compliance with dietary specifications is also found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage under the Menu Planning Tools heading (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

### **Findings and Corrective Action Needed (from PHN):**

**Finding #P 1:** Recipes in the kitchen are missing essential information needed in a standardized recipe. Standardized recipes are needed for all menu items that have more than one ingredient.

#### **Corrective Action Needed:**

- Submit updated recipes that are standardized for the following recipes:
  - Sloppy Joe (Tuesday)
  - Turkey and Gravy (Wednesday)
  - Hot Ham and Cheese (Thursday)
  - Toasted Cheese Sandwich (Friday)
  - Tuna Sandwich (Friday)
  - Parfait (daily)
  - Turkey sub (daily)
  - Ham sub (daily)
- Submit standardized recipe for the following menu items:
  - Ravioli and spaghetti sauce (Monday)
  - Fresh garden salad for service lines 1 and 2 (Monday and Wednesday)
  - Mashed potatoes (Wednesday)
  - Tomato soup (Friday)
  - Salad for service line 3 (daily)

**Finding #P 2:** Acceptable crediting documentation was not available for the Jamwich, Crunchmania French Toast Graham Sticks, Benefit Banana Chocolate Chunk Bar, Bosco's Pizza Co Cheddar Cheese-Stuffed Pretzel Breadsticks, Cheez-It Crackers, or Cinnamon Rolls.

**Corrective Action Needed:** Submit appropriate PFS for the above products. **Completed on-site. No further action needed.**

**Finding #P 3:** During the week of review, hummus and coleslaw were unable to be credited toward the meal pattern due to the manufacturers not having a PFS available for the specific products used. Hummus was unable to be credited on Tuesday and Friday in service lines 1 and 2 and on Tuesday in service line 3. Coleslaw was unable to be credited on Thursday in service line 1 and 2.

**Corrective Action Needed:** Discontinue the use of the non-creditable hummus and/or coleslaw or count them as an extra while taking dietary specifications into account. Submit a written statement for each menu item detailing your plan, and submit a PFS if a new hummus and/or coleslaw product is planned to be offered.

**Finding #P 4:** There were daily fruit shortages at breakfast during the week of review due to 2 oz, bagged apple slices served on Thursday (substitution for 113 ct apple) and Friday crediting as  $\frac{3}{8}$  cup. On these two days,  $\frac{7}{8}$  cup fruit ( $\frac{3}{8}$  cup apple slices and  $\frac{1}{2}$  cup fruit juice) were offered. The daily requirement for fruit at breakfast is 1 cup. Because  $\frac{1}{2}$  cup fruit juice is offered daily with  $\frac{1}{2}$  cup (fresh, frozen, dried, or canned), the weekly juice limit of 50 percent was exceeded because the full  $\frac{1}{2}$  cup of fruit (fresh, frozen, dried, or canned) was not offered on Thursday and Friday.

**Corrective Action Needed:** Submit a written statement describing your plan for correcting these daily fruit shortages at breakfast.

**Please note that repeat violations of daily fruit shortage during subsequent Administrative Reviews may result in fiscal action.**

**Finding #P 5:** There were weekly grain shortages at lunch during the week of review because the minimum weekly grain requirement ( $\geq 8$  oz eq) was not met.

- Service line 3: If a student were to choose the daily salad entree each day of the week, this would only provide 5 oz eq grain over the week.
- Detention lunches: The daily Jamwich provides 1 oz eq grain and provides 5 oz eq grain over the week.

**Corrective Action Needed:** Please refer to the corrective action under **finding #9**.

**Please note that repeat violations of weekly grain shortage during subsequent Administrative Reviews may result in fiscal action.**

**Finding #P 6:** There were daily vegetable shortages at lunch during the week of review. The daily vegetable requirement is  $\frac{3}{4}$  cup.

- Service line 1 and 2:
  - Monday: Ravioli was served in spaghetti sauce. When served using a spoon, this was not a  $\frac{1}{4}$  cup portion. The only other vegetable offered with this entree was  $\frac{1}{2}$  cup salad. On-site, it was discussed that a  $\frac{1}{4}$  cup spoodle could be used to serve a creditable amount of spaghetti sauce on top of the three ravioli if students choose spaghetti sauce under OVS.

- Thursday: Because a PFS was not available to credit the coleslaw, this product was not able to be credited toward the meal pattern. The only other vegetable offered was ½ cup sweet potato fries.

- Detention lunches: Detention lunches only offered ½ cup carrots daily.

**Corrective Action Needed:** Please refer to the corrective action under *finding #9*.

**Please note that repeat violations of daily vegetable shortage during subsequent Administrative Reviews may result in fiscal action.**

**Finding #P 7:** There were missing vegetable subgroups during the week of review.

- Service line 3: Dark green vegetables were not offered. The entree salad does not credit as a dark green vegetable subgroup for all service line 3 entrée options. Please see finding #8 for more detail.
- Detention lunches: Because carrots are the only vegetable offered, dark green, beans/peas, and starchy subgroups are missing.

**Corrective Action Needed:** Please refer to the corrective action under *finding #9*.

**Please note that repeat violations of missing vegetable subgroups during subsequent Administrative Reviews may result in fiscal action.**

**Finding #P 8:** There were vegetable subgroup shortages during the week of review.

- Service lines 1 and 2:
  - Dark green: A 80/20 iceberg/romaine lettuce mix with red cabbage and carrots was offered on Monday and Wednesday's salad. The Food Buying Guide credits this product as other, not dark green. A PFS would be needed to credit each vegetable in the mix in order to determine the dark green amount. In addition to this mix, spinach, tomato, and cucumber are added. There is not a standardized recipe for this salad so the crediting is unknown. This was considered a vegetable subgroup shortage instead of a missing vegetable subgroup because the intention to serve the subgroup was evident.
  - Beans/peas: Because a PFS was not available to credit the hummus on Tuesday and Friday, this product was not able to be credited toward the meal pattern. No other bean/pea was offered. This was considered a vegetable subgroup shortage instead of a missing vegetable subgroup because the intention to serve the subgroup was evident.
- Service Line 3:
  - Beans/peas: Because a PFS was not available to credit the hummus on Tuesday, this product was not able to be credited toward the meal pattern. No other bean/pea was offered. This was considered a vegetable subgroup shortage instead of a missing vegetable subgroup because the intention to serve the subgroup was evident.
  - Starchy: Spudsters are served on Friday. Because this product has two different types of potato without a known quantity, it cannot simply be credited using the Food Buying Guide. Five Spudsters were served. After mashing up five spudsters and putting them in a ½ cup, the ½ cup was not filled. It took eight Spudsters to fill the ½ cup. Please consider dietary specifications when increasing the number of Spudsters to meet the half cup requirement.

**Corrective Action Needed:** Please refer to the corrective action under *finding #9*.

**Finding #P 9:** Only one type of milk, low-fat unflavored, was offered with detention lunches during the week of review. A variety of milk, at least two allowable milk types, is required to be offered daily at lunch. *Please note that repeat violations of milk variety not being offered during subsequent Administrative Reviews may result in fiscal action.*

**Corrective Action Needed for Findings #5-9:** Please submit a [Menu Planning Worksheet](#) for each of the following lunch service lines for the week of review, December 11-15, 2017 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-6-8.doc>).

- Service lines 1 and 2
- Service line 3
- Detention lunches

Menu planning worksheets should be filled out to show how all quantities from findings #5-9 will be met in order to meet meal pattern. Please refer to the [Lunch Meal Pattern Table](#) for daily and weekly requirements for age/grade group 6-8 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

On-site, the Food Service Director and Head Cook discussed potentially discontinuing detention lunches. If discontinuing detention lunches, submit a written statement explaining that detention lunches will be discontinued and what process will be in place to ensure students receive a reimbursable meal. This written statement will then be submitted in place of the detention lunch menu planning worksheet.

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Comments/Technical Assistance (TA)

- (TA) The consultant addressed financial topics with the Business Manager including the annual financial report and child nutrition report, plus the correct way to report numbers on the annual financial report to break down expenses.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](#) webpage ([dpi.wi.gov/nutrition/online-services](http://dpi.wi.gov/nutrition/online-services)).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The business

##### Annual Financial Report (AFR)

- (TA) 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. New [16-17 Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the

deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”. While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.
- 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.

### **Allowable Costs**

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

### **Unpaid Meal Charge Policy**

- (TA) The procedures for Lake Geneva District state that a courtesy meal is given to students when there is a negative balance; that meal is not claimed nor is the household charged. The cost of providing the courtesy meal is not to be absorbed by the food service fund.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter



- Sample robo-call script

### **Findings and Corrective Action Needed: Nonprofit School Food Service Account**

- ❑ **Finding #6:** On the Annual Financial Report, all of the revenues and expenses were not broken out by program and expense category.  
**Corrective Action Needed:** Please resubmit your 16-17 Annual Financial Report with revenues and expenses broken out by program and category. To do this, you will need to contact Jacquie Jordee at [Jacqueline.jordee@dpi.wi.gov](mailto:Jacqueline.jordee@dpi.wi.gov) or 608-267-9134 and fax or email her an updated report to complete a manual update.
- ❑ **Finding #7:** According to a more comprehensive review of the resource management sections, the SFA must submit a **Summary Report of Revenues and Expenditures** for the School Year 2016-17. This is report PI-1505 Fund 50 Annual Report.  
**Corrective Action Needed:** Please submit this report for review after reallocations are made.
- ❑ **Finding #8:** According to a more comprehensive review of the resource management sections, the SFA must submit a **list of equipment purchased** in the School Year 2016-17.  
**Corrective Action Needed:** Please submit this list for review.
- ❑ **Finding #9:** According to a more comprehensive review of the resource management sections, the SFA must submit a **detailed expense report for one month** including several categories (e.g. labor, food, equipment, supplies, and purchased services) from the School Year 2016-17.  
**Corrective Action Needed:** Please submit this report for review.
- ❑ **Finding #10:** According to a more comprehensive review of the resource management sections, the SFA must submit an **invoice** for the joint meals sold to another school or from a catering event in the School Year 2016-17.  
**Corrective Action Needed:** Please submit this invoice for review.

### **Paid Lunch Equity (PLE)**

#### **Comments/Technical Assistance (TA)**

- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements.
- Great job running this tool! The SFA's current weighted average for 2017-18 SY tool is \$2.15.
- The Paid Lunch Equity tool must be completed annually and prices raised accordingly with a maximum annual increase of \$0.10 (of the weighted average price) as required by regulation.

### **Revenue from Nonprogram Foods**

#### **Comments/Technical Assistance (TA)**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the

food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

### **Adult Meals**

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals.
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

### **Resources**

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

### **Findings and Corrective Action Needed: Revenue from Nonprogram Foods**

❑ **Finding #11:** The Nonprogram Foods Revenue Tool has not been completed for the current school year, nor would the USDA tool represent the correct food cost allocation from the previous 2016-17 school year until the Annual Financial Report is revised. This is an annual requirement.

**Corrective Action Needed:** Watch the [Nonprogram Foods Revenue Tool webinar](#) and provide a copy of the completed quiz questions and a completed tool for Lake Geneva Joint #1 using a 5-day reference period ([https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html)).

## **4. GENERAL PROGRAM COMPLIANCE**

### **Civil Rights**

#### **Comments/Technical Assistance (TA)**

#### **Nondiscrimination Statement**

- (TA) 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 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 or low balance notices, the abbreviated statement may be used, "**This institution is an equal opportunity provider.**" Either of these statements must be in the same size font as the other text in the document.

### **And Justice for All Poster**

- “And Justice for All” posters are posted in public view where the program is offered.

### **Civil Rights Training**

- Civil rights training is conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by many school nutrition staff in the schools and documentation was available for review. Please include the verifying and confirming official, translators and substitute employees.

### **Civil Rights Self-Compliance Form**

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

### **Special Dietary Needs**

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. 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.
- 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.

### **Processes for complaints**

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints ([https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)).

### Findings and Corrective Action Needed: Civil Rights

- **Finding #12:** The USDA Nondiscrimination Statement on the school direct certification letter is not the current long USDA statement, and the statement on the lunch and breakfast menus is not the current shortened statement.

**Corrective Action Required:** Please submit a copy of the direct certification letter with the correct USDA long statement. Please submit a copy of the February lunch and breakfast menus with the correct shortened statement. **Completed on site no further action required.**

- **Finding #13:** A few staff have not completed the required civil rights training hours for the current school year. This includes the verifying and confirming official, translators, substitute workers, and other school nutrition staff.

**Corrective Action Needed:** Provide a statement of the plan to complete this task and the method to document the training.

### On-site Monitoring

#### Comments/Technical Assistance (TA)

- Every school year, each SFA with more than one school must perform at least one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).
- A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on our [Community Eligibility Provision \(CEP\)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage, under the resources for currently participating sites section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>).

### Findings and Corrective Action Needed: Onsite Monitoring

- **Finding #14:** The SFA did not use the current On-site monitoring forms to complete its monitoring of the NSLP and on-site monitoring was not completed for 50% of the breakfast sites in the SBP.

**Corrective Action Required:** Please complete the current on-site monitoring forms for all NSLP sites in the SFA and 50% of the breakfast sites in the district

[NSLP Onsite Monitoring](#)

[SBP Onsite Monitoring](#)

### Local Wellness Policy

#### Comments/Technical Assistance (TA)

- 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.

### **Content of the Wellness Policy**

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Permission for participation in the committee 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.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Plan for measuring policy implementation.
- Designation of one or more officials as being 'in charge' of the policy.
- An assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.
- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to review and update the local school wellness policy on a periodic basis. The frequency of updates is based on the content and structure of the plan. It is recommended that this review occur annually. This SFA has not reviewed nor updated their policy within the past three years. Additionally, this SFA does not have documentation indicating when and how the plan is/will be reviewed and updated.
- (TA) The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA 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](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>).

### **Findings and Corrective Action Needed: Local Wellness Policy (LWP)**

- **Finding #15:** The SFA's LWP has not been updated since it was created in 2006. It needs to specify the required components of the LWP to include: policy leadership, public involvement, school meals meeting regulations, foods sold outside of the school meal programs, foods provided but not sold, food and beverage marketing, goals for nutrition education, nutrition promotion and physical activity, other school-based strategies for wellness, triennial assessment and to inform the public of wellness policy updates and implementation. The [wellness policy resources](#) from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy checklist.

**Corrective Action Required:** Please provide a timeline for updating your policy to become compliant with the final rule.

### **Smart Snacks in Schools**

#### **Technical Assistance (TA)/Compliance Reminders:**

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. You can find more information on our [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks regulation that became effective July 1, 2014.
- (TA) Second meals are no longer permissible to be sold to students because an entire meal will not meet the Smart Snacks requirement. This also refers to another meal sold to students, such as when a student receives a detention lunch and then comes to the regular lunch line. Meal items can be sold separately as non-program foods, if they comply with the Smart Snacks requirements.
- 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](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
  - Documentation is required for all school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.
- We recommend using the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#), found on the Smart Snacks webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

### **Findings and Corrective Action Needed:**

**Finding #P 10:** Records of which Smart Snacks are sold at Lake Geneva Middle School were unavailable as well as documentation to show product compliance.

**Corrective Action Needed:** Submit a written statement indicating who will be in charge of Smart Snacks at Lake Geneva Middle School and how Smart Snacks will be tracked.

**Finding #P 11:** Non-compliant products are being sold a la carte and in vending machines at Lake Geneva Middle School during the school day. Products found that are not Smart Snacks compliant include:

- 14 fluid ounce whole, chocolate milk
- 14 fluid ounce 1%, chocolate milk
- Harvest Cheddar SunChips (1 oz)
- Garden Salsa SunChips (1 oz)
- Crunchmania Bite-Size French Toast (1.76 oz)
- Whole Grain Goldfish Crackers (0.75 oz)

**Corrective Action Needed:** Non-compliant products were taken out of vending machines and stopped being sold a la carte immediately after finding they were non-compliant. Reviewers observed non-compliant milks being returned to distributor and bagged items being taken off of racks and put back into boxes. **No further action required.**

## **Professional Standards**

### **Professional Standards: New Food Service Director Hiring Requirements**

#### **Comments/Technical Assistance (TA)**

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the 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>).

#### **Professional Standards: Training Requirements**

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. Resources are available on our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- This SFA is tracking staff training on a spreadsheet. Thank you!

#### **Annual Training Requirements for All Staff**

Directors: 12 hours

Managers: 10 hours

Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

## Water

### Comments/Technical Assistance (TA)

- Water is required to be available at no charge to students during the lunch and breakfast meal services.

## Food Safety, Storage and Buy American

### Comments/Technical Assistance (TA)

- [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices ([www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes)). The [Office of Food Safety](#) website ([www.fns.usda.gov/ofs/food-safety](http://www.fns.usda.gov/ofs/food-safety)) includes food safety resources.
- Once foods have been served to students, they may not be collected and shared with students or staff unless proper procedures are followed. Be mindful of food safety and student health safety, including food allergies.

## Food Safety Inspections

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year, including food safety inspection and a review of the site's Food Safety Plan.
- Food safety inspection reports must be posted in public view.

## Temperatures

- All cooling equipment have internal temperatures taken and recorded daily on temperature logs.

## Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling.
- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 process, all applicable standard operating procedures (SOP), all equipment, and food service staff.

## Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>).
- 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.

## Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

## Time as Public Health Control

- When using "Time as a Public Health Control:"



- The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
- TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
- Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

### Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. (All products that are opened and/or out of the original packaging must be dated. Some sliced turkey, sliced ham and sliced American cheese were not date marked; though other products in walk-in cooler were marked.)

### **Findings and Corrective Action: Food Safety**

- ❑ **Finding #16:** The most recent food safety inspection report is not posted in a publicly visible location.

**Corrective Action Needed:** Post most recent food safety inspection report in location visible to public. Not completed on-site. Submit photo of most recent inspection report, posted in a visible location, as an attachment, to assigned DPI Nutrition Program Consultant via email.

### Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- It is expected that the following products will require an exception to Buy American provisions: pineapple, mandarin oranges, olives, tuna, bananas and coffee.
- If no country of origin is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
- What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If the label indicates

that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure the product received and the inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>) are found on the procurement webpage under Buy American.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).
- **(TA) Label does not identify country of origin:**
  - In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance. The items without an identified country of origin were SunCup juice cups, Gordon condiment packs, spices, and Ardmore Juice.

### **Findings and Corrective Action Needed: Buy American**

- ❑ **Finding #17:** The following products were identified in the SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:
  - Canned Mandarin oranges – China
  - Canned pineapple – Indonesia
  - Canned Tuna – Thailand
  - Bananas – Honduras
  - Cucumbers – Mexico

**Corrective Action:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a [Noncompliant Product List](#) for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A template form is located on the procurement webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

## **Reporting and Recordkeeping**

### **Comments/Technical Assistance (TA)**

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

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

### **Comments/Technical Assistance (TA)**

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

### **Breakfast Promotion**

- The School Breakfast Program seems to be well-attended, but there is a reduction in reduced meal status eligible students participating in the meal. It would be advantageous for the SFA to offer reduced eligible students the meal for free (loss of 30 cents reimbursement) since the SFA receives the extra severe need breakfast reimbursement (this year it is 34 cents for free and reduced breakfast meals). The elimination of reduced price meal price may increase breakfast participation in the reduced price category.
- A [Breakfast in the Classroom Toolkit](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) is also available if that option is considered (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our [Resources for the School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) webpage, in the Marketing Breakfast section (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>).
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.
- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletters.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Lake Geneva Jt. #1, 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) 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 'Summer Meals' to 877-877 to find Summer sites
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) 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

### **Wisconsin School Day Milk Program (WSDMP)**

#### **Comments/Technical Assistance (TA)**

- Wisconsin School Day Milk Program requires the distribution of free milk to students eligible for free and reduced priced meals, but only for students in K-5<sup>th</sup> grade.
- (TA) Point of Service Counts (POS) for the Wisconsin School Day Program must be recorded by who “did” take milk not by marking who “did not” take one. A best practice is that teachers bring the check off sheet when the student selects the milk or as soon as the student returns to the classroom. We do not allow a sheet to be pre-marked with students or to mark them during attendance for milk to be consumed later.
- Per the Agreement for the WSDMP in the points the SFA agrees to, number 3 states that schools will serve Wisconsin-produced milk. Please check with your distributor to see if they can verify that and perhaps include that stipulation in the SFA’s milk bid.
- (TA) Students who can’t drink milk are eligible in this program to have juice provided and either pay for that as a paid student or be reimbursed as a free or reduced student.
- (TA) The cost of the milk and/or juice is reported in the annual claim by recording the average cost over the school year.

#### **Findings and Corrective Action: Wisconsin School Day Milk Program**

**Finding #18:** The student check off sheets are not being completed accurately. Many appear to have all students checked to take milk and then “back out” the ones who do not select milk that day or are absent. Some sheets appear to have been marked by students; all POS must be marked by a responsible adult.

**Corrective Action Required:** Please provide a timeline for training the classroom teachers on the correct POS procedures and submit a revised [WSDMP contract/agreement](https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc) (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>).

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](http://dpi.wi.gov/statesupt/agenda-2017)).



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