

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Kettle Moraine School District Agency Code: 671376

School(s) Reviewed: Magee Elementary and Wales Elementary

Review Date(s): 2/15/17-2/17/17

Date of Exit Conference: 2/17/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Kettle Moraine for the courtesies extended to us during the on-site review. Staff were available to answer questions and were receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Applications are reviewed in a timely manner. Determinations are made, the family notified of their status, and the status implemented well within 10 operating days of the receipt of the application.
- Direct Certification is ran as required and more frequently to increase student matches. Great job!

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

287 eligibility determinations were reviewed, 27 errors were identified. 10 on the SFA-1 will be included in fiscal and towards the error rate. 17 on the SFA-2 will be corrected, but not included in fiscal or the error rate. These students were not part of the review sample.

Applications

- The effective eligibility date for applications is the date the application is determined. For direct certification, the match date of the file is the effective eligibility date. These are the dates that should be reflected on the benefit issuance list.
- When benefits increase, the change must take place within 3 days. When benefits decrease, the change cannot take place before 10 calendar days; an adverse action must be sent in writing with appeal rights procedures.

Zero Income

Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household members and their incomes have been included on the application *before an eligibility determination is made*.
- If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Annual Income

If the household provided only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income or falls under a "special situation" outlined in the eligibility manual.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- Kettle Moraine School District had a 3.14% certification error rate and will *not* be required to conduct a second review of applications in the following school year.

Meal Counting and Claiming

- Kettle Moraine has 10 schools (4 of them charter) that are recognized by DPI and participate in the NSLP. Moving forward, the agency should report 10 sites on the monthly claim, not 6.
- No other errors consolidating the monthly meal counts from the site based edit check reports. Great job!

Findings and Corrective Action Needed

Certification and Benefit Issuance

- Finding #1:** Students on the SFA-1 and SFA-2 forms are incorrectly certified for free and reduced price meal benefits.
Corrective Action Needed: No further action necessary. Fixed onsite.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director at Kettle Moraine School District for his organization with sending needed documentation before the initiation of the Administrative Review. This allowed us to answer minor questions before coming on-site.

The food service employees at Magee and Wales Elementary were accommodating and passionate about feeding children. The staff had a great rapport with the students and appropriately served students fruit who were missing the ½ cup fruit or vegetable component by the time they reached her.

In addition, the meal service eating environment at the elementary schools is exceptionally pleasant. Magee Elementary in particular is colorful, inviting, and promotes positive nutritional messages on the walls.

Comments/Technical Assistance/Compliance Reminders

- On the production records for the Spaghetti and Meatballs entrée, the crediting is listed as 4 meatballs providing 1.75 oz. eq. Five of these JTM meatballs credit as 2.0 oz. eq, which means four meatballs credit only as 1.5 oz. eq. I recommend updating the production record to prevent an accidental meat/meat alternate weekly shortage if relying on this information to meet weekly requirements.

- When speaking with the food service employees at Magee Elementary there was some confusion over Offer versus Serve. The newest hire thought it meant the school had to offer choices within each component daily, while the seasoned employee understood the rule to mean students had to have a tray with $\frac{3}{4}$ cup fruit or vegetable instead of the minimum $\frac{1}{2}$ cup quantity. Technical assistance was provided before meal service began that only $\frac{1}{2}$ cup of fruit or vegetable or combination was required to be a reimbursable meal, along with 2 other full components. The seasoned employee did quickly grasp onto this concept and was happy to have a #8 scoop in the peaches instead of two different portion servers.

Findings and Corrective Action Needed

- ❑ **Finding #1:** It is required to post signage visible to the students that indicate the offered components in each meal and what they must select in order for their meal to count as reimbursable. The lunch signage should list the five components and inform the student that under Offer Versus Serve (OVS), a student must select at least three full components, one of which must be at least $\frac{1}{2}$ cup fruit, vegetable, or a combination of fruit and vegetable.

Corrective Action Needed: On the television monitor, it currently incorrectly states that students must select the fruit component *and* the vegetable component, without any mention of portion size. Please edit this television screen to include the phrase “You must select 3 out of 5 components, one of which must be $\frac{1}{2}$ cup of fruit or vegetable”. Send the final image to the public health nutritionist.

- ❑ **Finding #2:** Based on the menu and production records provided from the January 9-13, 2017 Week of Review, the Kettle Moraine Elementary Schools had a weekly grain shortage. This is due to multiple entrees crediting as 1.0 oz. eq grain and when the daily minimums are tallied, it does not total the weekly grain requirement of 8 oz. eq. *Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

Corrective Action Needed:

- a) Part of the reason there was a weekly grain shortage is because an alternate entrée of yogurt parfait is menued daily. The standardized recipe for this yogurt parfait calls for 1 oz. eq in the form of granola. Updating the recipes to include 1.75 or 2.0 oz. eq per yogurt parfait will alleviate this systemic problem. The grain component does not have to come solely from the granola; if you wish to include an additional grain item that would be acceptable. Please send updated yogurt parfait recipe to the public health nutritionist.
- b) Even when the yogurt parfait recipe is updated to provide more than 1.0 oz. eq of grain daily, the planned menu for the week of review still shows a weekly grain shortage.

Monday, Jan 9: Popcorn Chicken (1 oz. eq grain)

Tuesday, Jan 10: Two hard shell tacos with churro (1.75 oz. eq)

Wednesday, Jan 11: USDA Baked Chicken pieces with dinner roll (1 oz. eq grain)

Thursday, Jan 12: $\frac{1}{2}$ cup spaghetti with garlic toast (2 oz. eq grain)

Friday, Jan 13: Tyson Chicken Tenders (1 oz. eq grain)

This makes the weekly grain a total of 6.75 oz. eq. There are accompanying entrees on each of these days that do credit as more than 1.0 oz. eq, but it is the minimum daily crediting that is tallied together to produce the weekly requirement, thereby guaranteeing each student received access to enough grains during the week regardless of which entrée they chose.

The Food Service Director did state that dinner rolls are sent to elementary schools on a weekly basis to bolster the grain requirement, but it is up to the school food service staff to serve these rolls on days that they deem appropriate. As the Food Service Director, there needs to be a plan in place as to how the weekly grain requirement of 8 oz. eq is met. The addition of dinner rolls needs to be placed on the menu and/or production record. Please send one future week of menu and production records to the public health nutritionist showing that the weekly grain requirement is met.

Consider rearranging menu entrees throughout the week so entrees crediting as 1.0 oz. eq grain are paired with other 1.0 oz. eq grain entrees. This will result in different days where both entrees are crediting as 2.0 oz. eq grain or both and could resolve the weekly grain shortage without adding more menu items to the menu. As the Food Service Director has stated, the weekly calorie limit is already near the maximum 650 calories.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

Annual Financial Report:

All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at:

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

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.

Paid Lunch Equity

Completed as required. No errors!

Revenue from Nonprogram Foods

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

- Agencies must clearly track and separate nonprogram food costs and revenues from program food costs and revenues.
- The *USDA Nonprogram Revenue Tool* must be completed annually: https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls. An alternative is to use the *DPI Nonprogram Food Revenue Tool/Calculator*, which feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the regulation. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>

To complete the tool:

- Select a reference period of *at least 5* consecutive operating days (4 consecutive days for schools which only operate 4 days) of a regular school week. Annual data is recommended.
- Separate non-program food costs from program food costs for the selected period.
- Compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance

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

Adult Meals

Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until July 1 of each year.

Resources:

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

Findings and Corrective Action Needed:

Comprehensive Review- Revenue form Nonprogram Foods

Finding #1: The USDA nonprogram food tool was not completed.

Corrective Action Needed: Submit the completed tool for a minimum of 5 operating days. Include all program and nonprogram food sales from this timeframe. It may be easier to complete this tool using annual data.

- ❑ **Finding #2:** The foodservice account is sharing a percentage of vending profits with student organizations. Per memo SP 13-2014 (<http://www.fns.usda.gov/sites/default/files/SP13-2014os.pdf>), profit sharing is unallowable. There is no mechanism in Fund 50 to account for transfers out to other funds. If foodservice is purchasing the items for the group to sell, the group must reimburse the foodservice account for all costs related to this purchase (food costs as well as any labor costs involved). If the student groups are purchasing and selling food items then the revenues and costs related to those food sales should be accounted for in a student organization fund (Fund 60 and/or Fund 21).

Corrective Action Needed: Submit a statement agreeing to discontinue profit sharing for food service vending. Explain how the transactions will be handled moving forward.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- Great job with Summer Foodservice outreach. E-messages go out to families weekly starting in May until the end of the school year.
- Water is freely available to students during service.
- All staff attend comprehensive in-service training, industry training (SNA meetings), and annual civil rights training. Thank you for making sure your staff are receiving job specific trainings so Kettle Moraine can run a stellar food service program.

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

Nondiscrimination Statement

When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. When space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.

Special Dietary Needs

Fluid Milk Substitute

If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a licensed medical practitioner. Water is available to all students, a lactose free milk could be offered, or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, http://www.fns.usda.gov/sites/default/files/SP_07_CACFP_04_SFSP_05-2010_os.pdf

Medical Statement

- All food substitutions for children with disabilities must be documented by a licensed medical practitioner. We have a prototype Medical Form posted on our website that is also available in

Spanish and Hmong that you can use <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>. When the form is completed and signed by a licensed medical practitioner, the school is required to provide a meal that meets the child's needs as documented. The meal would *not* have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child.

- Schools are not required to accommodate requests that are not supported by a signed statement from a licensed medical practitioner. Schools may accommodate non-disability requests if they choose to *as long as accommodations are made within the meal pattern requirements*. SFAs must ensure that accommodations are provided to all students equally. For more information on this topic, see the recently posted Wisconsin Q&A: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

Processes for complaints

- 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. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

Local Wellness Policy

The local wellness policy requirement was further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum 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.
- 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.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process 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.

- In response to this, Kettle Moraine assembled a diverse committee of parents, teachers, the food service director, nurse, and CFO. They will review the policy for updates throughout the year and have it in place for the start of the 2017-18 SY.
- The current policy is missing language specific to Food and Beverage Marketing, Nutrition Promotion (e.g., Smarter Lunchroom Techniques), language specific to Smart Snacks in Schools, and how the district will inform the Public about the content and any updates to the policy.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Smart Snacks in Schools

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 is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Smart Snacks was reviewed for Magee and Wales Elementary. The only food items available for students to purchase are extra milks, which are compliant. The schools do not hold food fundraisers.

Professional Standards

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

Food Safety, Storage and Buy American

Food Safety

Service areas and storage area are clean and tidy. Staff are taking temperatures and maintaining records as required. Equipment is well kept and staff are encouraged to batch cook, which helps maintain internal temperatures and food quality.

Food Safety inspections are posted in public view. All staff receive food safety training and the Food Safety plans with equipment, food processes 1-2-3 and Standard Operating Procedures (SOP) are maintained.

Buy American

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. 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. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

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.

- Of the inventory reviewed at Magee and Wales Elementary, the only item out of compliance with was California Blend frozen vegetables. This item should be replaced with a domestic equivalent.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Reporting and Recordkeeping

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

SFSP Outreach

USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>.

To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** Documentation was not retained to support that the Public Release was submitted to the media, a grassroots organization; and if applicable a local employee contemplating layoffs.

The form provided to the reviewer is from 2011 and contains the wrong non-discrimination statement and income guidelines.

Corrective Action Needed: By signing this report, the agency agrees to submit the updated release to the proper outlets in the 2017-18 SY and retain supporting emails or fax transmittals. A template is updated on the DPI website each year and can be found here:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1617.doc>

- ❑ **Finding #2:** It was noted that student reimbursable meal charges (\$2.50, \$0.40, and \$0.00) are visible on the computer screen that can be seen by service staff. This information can easily be deduced and staff do not need to know this information in order to conduct their duties. This is considered overt ID.

Corrective Action Needed: Work with infinite campus to hide the “Current Tx”. It is allowable for the account balance to show.

- ❑ **Finding #3:** Program letters and communications about the NSLP contain the wrong nondiscrimination statement.

Corrective Action Needed: Update all program materials with the correct statement. Send a copy via email attachment of just the: updated menu calendar report (which may contain the shortened statement), the free and reduced application approval letter, direct certification letter, and verification letters.

- ❑ **Finding #4:** The agency is not using a central tracking tool to document annual staff training hours.

Corrective Action Needed: Submit a tracking tool, which includes the required information. The agency already has a comprehensive list of all staff for tracking labor hours. You may want to simply modify this template to also track professional standards hours.

Maintain a file that includes: the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

- ❑ **Finding #5a:** The district is offering juice as a cow’s milk substitute for children who have a lactose intolerance. These statements are not supported by a medical statement signed by a licensed medical practitioner.

Corrective Action Needed: Submit a statement outlining how the district will address this. As noted above, these cases can be handled through offer vs. serve (water as an option if milk is declined), by providing a lactose free milk (does not require preapproval), or with DPI approval of another dairy alternative. If the agency decides to pursue a dairy alternative, contact claire.koenig@dpi.wi.gov to have the product reviewed insuring nutritional equivalence to cow’s milk.

Finding #5b: The medical statement the agency uses does not capture the minimum information required to make a dietary substitution. Signed medical statements must include:

- A description of the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet
- An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).

Corrective Action Needed: Submit the updated form the district will use to capture these food service requests. Consider using the DPI form, which contains all required fields and a place for a licensed medical practitioner to sign off.

Note: If the Individualized Education Plan (IEP) includes information on the physical or mental impairment, an explanation of what must be done to accommodate the disability, and specific information on what dietary modifications or substitutions must be made, the SFA can accommodate the request without further documentation from the household or licensed medical authority for food service purposes.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

