

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

School Food Authority: Manawa School District

Agency Code: 68-3276

School(s) Reviewed: Manawa Elementary School

Review Date(s): 12/17/18 – 12/18/18

Date of Exit Conference: 12/18/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. 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).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the Food Service Supervisor for the courtesies extended to us during the on-site review. Thank you for taking time out of the week to be available to answer questions and provide additional information for the review. Thank you for staying late every day we were on-site to make sure everything was taken care of for the review. We are extremely appreciative of your organizational skills and attention to detail. The School Nutrition Programs are operating smoothly because of your work ethic.

It was noted during the review that the Food Service Supervisor is challenged to run the School Nutrition Programs with the time allowed to work on the programs. Manawa School District participates in the National School Lunch Program and the School Breakfast Program. The Food Service Supervisor handles all aspects of the programs including menu planning, ordering, meal application approval, notification of benefits to households, direct certification, verification, on-site monitoring, continuing education for food service staff, tracking continuing education for staff, continuously training staff on the program requirements, etc.

Administration was not aware of the many requirements necessary to running the School Nutrition Programs. For the amount of work the Food Service Supervisor has to do for the programs, it is common to have multiple people splitting the job duties in order to run the School Nutrition Programs efficiently. Many times, there is a Food Service Director overseeing the meal pattern, menu planning,

training the food service staff, and handling ordering. There is typically an Administrative Secretary, Bookkeeper or Business Manager who handles the Free and Reduced Meal Applications, running Direct Certification, and submitting the monthly claims all while doing their other job duties that do not pertain to the School Nutrition Programs.

There are many requirements regarding the School Nutrition Programs outlined in the following report that need attention. It is my recommendation that the Food Service Supervisor work solely on the School Nutrition Programs or split the duties among staff members.

The DPI review team appreciates the eagerness of the Food Service Supervisor and Food Service employees for their willingness to make changes to meet School Nutrition Program regulations. Many of the findings regarding corrective action were corrected on-site. This is a testament to the work ethic, passion, and dedication to school nutrition by the Food Service Supervisor and the Food Service staff.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- 175 eligibility determinations were reviewed, 1 error was identified.
- The Food Service Supervisor, who is the Determining Official, is doing a thorough job reviewing, documenting and approving the meal applications in a timely manner.

Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.

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.

Effective Date of Eligibility

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

Public Release

- All SFAs are required to distribute a [Public Release](#) before the start of the school year (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps>). The purpose is to inform the public that free and reduced price meals are available.

- SFAs must annually distribute the Public Release to three of the following places:
 - 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. You may request the public release to be published as a public service.

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.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the [Sharing Information with Other Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc) template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone in the district (IT, school secretaries, administration, staff) receiving eligibility information to approve students for non-food service program benefits or for other school related obligations, after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** One student was found receiving Free meal benefits, but there was only documentation to support a Reduced-price meal status through Direct Certification.

Corrective Action Needed: Notify the household, whose benefit will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **No further action required.**

- Finding #2:** The letters to households regarding the approval or denial of meal benefits as well as the direct certification notification letter did not have the USDA Non-discrimination Statement in the correct format.

Corrective Action Needed: Update the letters to have the USDA Non-discrimination Statement in the same format as what is shown on the [DPI Civil Rights website](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nondiscrimination-statement.doc>).

Corrected on-site. No further action required.

- Finding #3:** The Sharing of Information Form did not include the full USDA Non-discrimination statement.

Corrective Action Needed: Update the Sharing of Information Form to include the full USDA Non-discrimination statement. **Corrected on-site. No further action required.**

- ❑ **Finding #4:** The Public Release was not posted at three locations at the beginning of the school year.

Corrective Action Needed: Submit a statement of where you plan to post the Public Release for the 19-20 SY and who will be responsible for this task.

Verification

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- 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. The Confirming Official must sign and date on the back of the application upon confirming the application was determined correctly.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The lunch and breakfast claims for the Review Month were conducted perfectly.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Manawa School District for working to provide documentation as requested prior to the review. Staff was friendly, professional and willing to implement changes on-site. It is clear that they care about ensuring students in the district have access to nutritious meals. Thank you for all you do for the students at Manawa!

Comments/Technical Assistance (TA)/Compliance Reminders

Documentation

Overall, production records are being filled in fairly completely. However, there are a couple improvements that could be made. A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

- For breakfast, it appears that the planned number of each grab n’ go option is recorded in the “actual # of servings prepared/available” column and the actual number of servings prepared are recorded in the “actual quantity prepared” column. These columns should be re-named to accurately reflect the numbers being documented OR planned quantities should be recorded in the total planned quantity column.

Two types of milk were offered daily at breakfast. However, for the week of review, there were two days where there were no 1% unflavored was left at the end of service. While this could have meant

that the last student going through the line selected the last 1% milk, it could also mean that there were students going through the line that did not have access to variety of milk. Each student going through the line should be presented with at least two different options without needing to request it.

While more information about breakfast offerings is available on the website, the printed menu should list all components included with the reimbursable meal. It is advised that the menu be updated to include that milk and fruit are offered as part of a reimbursable breakfast.

Meal Pattern Crediting

Students must be offered 1 cup of fruit daily at breakfast. This is currently be done with two ½ cup servings pre-packed into the breakfast bags. However, using offer vs. serve (OVS), students only need to select ½ cup of fruit in order to have a reimbursable meal. Therefore, only putting one ½ cup serving of fruit in the bag and offering an additional ½ cup on the side would both allow students more choice in their meal and help to decrease food costs for those students who would prefer not to have a full cup of fruit at breakfast.

Great job completing a menu planning worksheet and weekly nutrient calculator each week! However, be sure that you are including all entrée options (such as the deli sandwich) as well. The menu planning worksheet should not take OVS into consideration, rather, the minimum/maximum should be determined based on how the menu is planned. Alternatively, the weekly nutrient calculator *should* take OVS into consideration when determining the number of planned servings for each menu item. Be sure to use these tools to your advantage to catch daily and/or weekly shortages and make corrections as needed prior to service.

As a reminder, there is a difference between weight (ounces) and volume (fluid ounces). The fact that spoodles, which are used to measure volume, are often referred to as a “4 oz spoodle” for example, makes this somewhat confusing. A 4 oz or ½ cup spoodle is actually 4 fl oz rather than 4 oz by weight. This is an important distinction as the weight of the contents of the spoodle can vary significantly (think about the difference in weight between ½ cup of popped popcorn vs. ½ cup of peas).

- The portion size for the mashed potato recipe should be changed from 4 oz to ½ cup.
- Items that are portioned by volume, but credited based on weight should have weight clearly documented to ensure accurate crediting. For example, BBQ pork is portioned with a #16 scoop and it was determined that portion weighs 3.1 oz and therefore credits as 1.5 oz eq meat/meat alternate (m/ma).

During lunch observation on 12/17, some of the vegetables on the garden bar ran out prior to the final serving period. All students were still offered a sufficient amount of fruit and vegetable to meet daily minimum requirements. However, it is important to ensure that weekly subgroup requirements are still being met.

It can be difficult to determine if students using the self-serve garden bar have selected a full ½ cup serving of fruit and/or vegetable. Additional signage on a salad or garden bar can assist students and point of service staff in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a [Salad Bar Signage Template](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage_template.docx) with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage_template.docx).

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time

when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

- The herbed broccoli and cauliflower polonaise recipe should be standardized in order to verify the recipe yield.

Findings and Corrective Action Needed

❑ **Finding #1:** The applesauce cups used for breakfast during the on-site review were 4oz by weight. This quantity does not provide a full ½ cup serving of fruit. This was noted prior to meal service on 12/18 and students were offered an additional fruit selection to ensure the daily minimum fruit requirement was provided. *The USDA applesauce cups were used during the week of review, so there was no shortage during that week.*

Corrective Action Needed: Submit a written statement indicating your plans to either substitute with an alternative product (provide label), only serve applesauce when the USDA Foods product is available, or offer students an additional fruit on days that applesauce is offered.

Corrected on site: Will be contacting Reinhart for a new product (none were available on order guide). Until a larger product can be procured, an additional fruit offering will offered with breakfast packs containing a 4 oz applesauce. (An alternative option would be to pre-cup canned applesauce, a ½ cup serving typically fits well into 5 or 5.5oz cups) No further action needed.

❑ **Finding #2:** Recipes provided for the grab n’ go breakfast bags do not adequately reflect what is served each day. Currently the recipes show that each bag will have a 4oz applesauce and 4oz juice. However, some bags have two fruit cups instead. Additionally, it is necessary to have documentation of the actual products served each day. While basic recipes can be developed for each grab n’ go option (Cereal, yogurt, frudel/cinni mini), they should be updated to list the types of items that might be included. Additionally, the actual varieties served each day should be documented on the production record. This provide acceptable documentation that reimbursable meals were served. Additionally, from a food safety perspective, if there were to be a recall on one of the times, food service should be able to determine what day/s students may have been served those products.

Corrective Action Needed: Submit updated recipes for the grab n’ go options as well as one week of breakfast production records showing the actual varieties offered are documented each day.

❑ **Finding #3:** The lunch menu, as served at Manawa Elementary resulted in a weekly grain shortage at lunch as the minimum offering was 7.5 oz eq, which is short of the weekly minimum grain requirement of 8 oz eq for K-8 students.

- Monday
 - Mini corn dogs – 2 oz eq grain
 - Deli sandwich – 1.5 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*
- Tuesday
 - Mac and cheese + dinner roll – 1.5 oz eq grain
 - Deli sandwich – 1.5 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*
- Wednesday
 - Burger bar – 1.5 oz eq grain
 - Deli sandwich – 1.5 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*
- Thursday
 - BYO salad, dinner roll, chex mix – 2.25 oz eq grain
 - Deli sandwich – 1.5 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*
- Friday
 - Ham/turkey wrap, nature valley bag– 1.5 oz eq grain
 - Deli sandwich – 1.5 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*

Corrective Action Needed: Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the day, item and portion size (ex. use a 2 oz bun for the deli sandwich daily). If a new product is added, submit any necessary crediting documentation.

Corrected on site: Buns for the deli sandwich and burger bar will be increased to a 2 oz bun. No further action needed.

□ Finding #4: The lunch menu, as served at Manawa Elementary resulted in a weekly meat/meat alternate shortage at lunch as the minimum offering was 7 oz eq, which is short of the weekly minimum meat/meat alternate requirement of 9 oz eq for K-8 students.

- Monday
 - Mini corn dogs – 2 oz eq m/ma
 - Deli sandwich – 1.5 oz eq m/ma
 - *Daily minimum – 1.5 oz eq m/ma*
- Tuesday
 - Mac and cheese – 1 oz eq m/ma
 - Deli sandwich – 1.5 oz eq m/ma
 - *Daily minimum – 1 oz eq m/ma*
- Wednesday
 - Burger bar – 2 oz eq m/ma
 - Deli sandwich – 1.5 oz eq m/ma
 - *Daily minimum – 1.5 oz eq m/ma*
- Thursday
 - BYO salad, dinner roll – 2 oz eq m/ma
 - Deli sandwich – 1.5 oz eq m/ma
 - *Daily minimum – 1.5 oz eq m/ma*

- Friday
 - Ham/turkey wrap, nature valley bar– 1.5 oz eq m/ma
 - Deli sandwich – 1.5 oz eq m/ma
 - *Daily minimum – 1.5 oz eq m/ma*

The recipe for the deli sandwich calls for 2 slices of cheese, meaning the sandwich would credit as 2 oz eq m/ma. However, the sandwich was being prepared with only 1 slice of cheese, decreasing the crediting to 1.5 oz eq of m/ma. Going forward, 2 slices of cheese will be used. This change will bring the weekly minimum up to 8.5 oz eq of grain, which is still just short of the requirement for the K-8 meal pattern.

Corrective Action Needed: Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the day, item and portion size (ex. add an extra slice of cheese to the wraps on Friday). If a new product is added, submit any necessary crediting documentation.

Corrected on site: Mac and cheese serving will be increased to a 6 oz serving, 2 oz eq m/ma, 1 oz eq grain. No further action needed.

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may also be subject to fiscal action. Thank you.

Please note that repeat violations involving missing vegetable subgroups and food quantity shortages on future Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The consultant addressed financial topics with the Business Manager and the Food Service Supervisor including how to locate the agency’s Child Nutrition Program report, which provides you with a compilation of meals claimed, your reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast. A copy of the 2017-18 SY Child Nutrition Report was left on-site including notes regarding the report.

Annual Financial Report (AFR)

- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The [Annual Financial Report manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) is located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The 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 “Purchased Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “nonprogram foods”, 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, a la carte, and caterings 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 NSLP purchased service for public schools.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- Currently, the SFA doesn't have a written policy. The SFA has a fund set up made up of donations that is used to pay for some student meals in the district. There isn't a clear policy of which students benefit from this. My recommendation is to discontinue this practice and implement a new Unpaid Meal Charge Policy which outlines exactly how the district plans to handle negative meal accounts.
- It is advised that the new policy includes more detailed information regarding when households will be notified of negative account balances, how often and the mode of how they will be notified. It may be important to include information about disallowing a la carte purchases when there is a negative account balance. If you choose to serve alternate meals to students that have reached a certain negative account balance, that should be included in the policy as well.
- Students that are free eligible may not be denied a meal even if they have a negative account balance. If a student brings money in hand to buy a meal that day, and they have a negative account balance, they must be allowed to purchase a meal that day.
- You may deny a reduced or paid student a meal if they have surpassed the negative amount set in the policy (for example, -\$20.00) and offer them an alternate meal.

- If students are not taking a reimbursable meal, they must be charged the a la carte (nonprogram food) price that covers the cost of those items as you are not getting federal reimbursement for anything but a reimbursable meal. You'll want to make sure whoever is working the point of sale that they know what a reimbursable meal is and to make sure to ask students if they want to take a half cup fruit or vegetable and/or a third component to make a reimbursable meal. The more reimbursable meals you serve, the more money you get in reimbursement for the program.
- If the policy states you will offer an alternate meal to students that surpass the negative amount set forth in the policy, you should state what the alternate meal will be and how the student will be notified they are receiving the alternate meal. You may also want to include where the student will receive the alternate meal. Some districts call the students to the office to discreetly tell the student they will be receiving the alternate meal that day on the lunch service line, or they will call the students to the office to hand them their alternate meal.
- The alternate meal is meant to encourage students to bring money or have their parent/guardian deposit money into their lunch account. You are still feeding the student by offering the alternate meal, but offering a less desirable meal option for them. You may refer to the [Unpaid Meal Charges "In a Nutshell"](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) to see your options regarding alternate meals. Depending on whether you claim, charge, or giveaway the alternate meals, there are rules for each option. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>)
- You may have a stricter policy for the older grades than the younger grades, such as cutting the older students off from getting an alternate meal. This is a district decision.
- If you decide to offer alternate meals free of charge and do not claim them, be sure to keep track of the number of alternate meals you serve throughout the year. Keep track of the food cost, labor, and other expenses as well. Make a transfer from Fund 10 or another non-federal fund (could be the donations) to Fund 50 to cover the costs of these alternate meals.
- 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
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The school has no written Unpaid Meal Charge Policy which was required to be in place and distributed to families by July 1, 2017.

Corrective Action Needed: Submit a copy of the Unpaid Meal Charge Policy. Implement the policy starting January 1. Submit a statement of how you will clearly communicate the policy to households throughout the school year and make sure it is enforced.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All 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.
- Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

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

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 the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals.

Resources

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** The [DPI Nonprogram Food Price Calculator Tool](#) (USDA Nonprogram Revenue Tool) has not been completed for the current school year.

Corrective Action Needed: Submit a copy of the completed DPI Nonprogram Food Price Calculator Tool using a 5-day reference period.

- ❑ **Finding #2:** The Adult Meal Price is not in compliance with the WI DPI Adult Meal Pricing Worksheet. For the 18-19 SY, the Adult Meal Price should be \$0.63 more than the highest paid student lunch price. The highest paid student lunch price at Manawa School District is \$2.90.

Corrective Action Needed: Increase the Adult Meal Price to \$3.53, at a minimum, otherwise round up to the nearest nickel. Update the Online Contract with the new price. Implement the new price starting after January 1. Submit a statement this has been completed and implemented.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 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.

Civil Rights Training

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

Civil Rights Self-Compliance Form

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

Special Dietary Needs

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

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The incorrect shortened USDA Non-discrimination statement was posted on the lunch and breakfast menus.

Corrective Action Required: Update the statement on the menus to say: “This institution is an equal opportunity provider.” **Corrected on-site. No further action required.**

- ❑ **Finding #2:** The Civil Rights PI 1441 Form was not completed for the 2018-19 SY. This is an annual report due October 31.

Corrective Action Required: Update the statement on the menus to say: “This institution is an equal opportunity provider.” **Corrected on-site. No further action required.**

On-site Monitoring

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; 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>).

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

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

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in

the creation of a LWP, SFAs are encouraged to utilize the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit*. This can be accessed electronically at <http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit> . At a minimum the wellness policy must include:

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

Resources:

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

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding #1:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above, specifically measurable goals regarding Nutrition Promotion, Nutrition Education, Physical Activity, and Other School Based Strategies for Wellness.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](#). **Provide a statement of when you plan to have the policy updated and compliant with the final rule.**

Smart Snacks in Schools

Comments/Technical Assistance/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 if they do not qualify for an exemption.

The Wisconsin Department of Public Instruction 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 this may not occur in the meal service area during meal service times.

There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.

The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The [hiring standards for SFA directors](#) 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>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: New Food Service Director Hiring Requirements

Professional Standards: Training Requirements

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

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action: Professional Standards

- ❑ **Finding:** A director of the programs has not been designated. The director needs 12 hours of continuing education each school year. See the definition of director as stated above.

Corrective Action Needed: Submit a statement of who will be the director of the programs. Update the contract to have the correct Authorized Representative and Food Service Director.

Food Safety and Storage

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.

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

No Thank You Table

A no thank you table is a designated table placed after the point of service for items students do not intend to consume. Students may not pick up items from this table during the meal period. At the end of meal service, a designated worker or trained individual must inspect the items for wholesomeness.

Sharing or no thank you tables are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.

8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted. “Wholesome” must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Findings and Corrective Action: Food Safety

- Finding #1:** No sanitarian-approved SOP for sharing tables.

Corrective Action Needed: Obtain sanitarian approval for the Sharing Table SOP. Submit copy of approved SOP with proof of sanitarian approval as an attachment to assigned DPI Nutrition Program Consultant via email.

Buy American

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

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

- Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: “We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.

- 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.
- The SFA should maintain written procedures to ensure product received and 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/contract-procedures/buy-america>).
- 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 webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.

- Hellman’s creamy Caesar dressing
- Mustard packets
- Mrs. Dash
- Dehydrated onions
- Del Monte mixed fruit
- Side kicks

Findings and Corrective Action: Buy American

❑ Finding #1: Documentation was on file for a number of non-domestic products, however, the following non-domestic products were found without a non-compliant product form on file:

- Frozen California blend (mexico)
- Frozen broccoli (mexico)
- Frozen cauliflower (mexico)
- Fresh pepper variety (Canada/mexico)
- Dole pineapple cups (Philippines)

Corrective Action Needed: Complete and submit a [non-compliant product form](#) for each of these items or submit documentation for a domestic product that will be purchased in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>).

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

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

- All documents pertaining to the School Nutrition Programs must be kept for 3 years plus the current school year.

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

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Breakfast participation in the Manawa School District is low. In 2017-2018, average daily participation in the School Breakfast Program was less than 18% that of the average daily participation in the National School Lunch Program. Looking specifically at students eligible for free and reduced price meals, only about 29 out of every 100 kids eating lunch also ate breakfast.

Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and can be organized in a variety of different ways. Students could come to the cafeteria first thing in the morning, get a breakfast and take it to their classroom, food service staff could go around to classrooms with a mobile cart or point of service could be done by teachers in the classroom. With the breakfasts already pre-bagged, this would be an easy transition and would ensure that more students are starting the day with a full belly and ready to learn.

Manawa Elementary qualifies for Severe Need Breakfast. Financial models such as Elimination of Reduced Price Breakfast or Universal Free Breakfast can lead to significant increases in breakfast participation and therefore reimbursement. Often this is enough to offset the loss in revenue from the reduced and/or paid students. We encourage the district to evaluate if either of these financial models would be feasible options. The [Universal Free Breakfast Cost Analysis Calculator](https://dpi.wi.gov/school-nutrition/school-breakfast-program) can aid in this evaluation (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

Our [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) contains a wealth of information about the different breakfast service and financial models. Under Marketing Breakfast and Get Parents and Staff on Board you will also find some promotional videos. [Wisconsin School Breakfast Promotional Video](#) is a great resource to share with parents and the [Breakfast in the Classroom Success Video](#) is aimed at teachers and administrators (<https://www.youtube.com/watch?v=aHR7eECbKaE>, https://www.youtube.com/watch?v=a_5uLz6pDo0).

The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!

NKH will be providing the following amazing prizes:

- Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
- \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
- \$750 Prizes for Implementing School Breakfast Program (2 Schools)

Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement.

Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details.

Lastly, consider sending this [School Breakfast brochure](#) to families and caregivers to promote the benefits of breakfast. For questions on breakfast models or ideas to increase participation, contact the [School Breakfast Program Specialists](#) (DPISBP@dpi.wi.gov).

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 (insert SFA) USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](#) website (<http://www.fns.usda.gov/summerfoodrocks>)

Resources:

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

Wisconsin School Day Milk Program (WSDMP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- 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-5th grade.
- 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.

Findings and Corrective Action: Wisconsin School Day Milk Program

Finding: Milk is not being checked off at the point of service. It is being checked off later, after service.

Corrective Action Required: Change the procedure for checking milk off so that milk is checked off as the student receives it. Submit a statement this has been corrected for all teachers that administer the WSDMP.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the

knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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



With School Nutrition Programs!