

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Stanley-Boyd School District Agency Code: 95593

School(s) Reviewed: Stanley-Boyd High School

Review Date(s): 4/24-26/17

Date of Exit Conference: 4/26/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to all the staff at Stanley-Boyd School District for the courtesies extended to the consultant 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, these efforts expedited the onsite review. Stanley-Boyd has great staff dedicated to serving the students within the community.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

275 eligibility determinations were reviewed, only 7 errors were identified which require documentation clarification. The determining official is doing an exceptional job. She stays current on regulatory changes by attending summer SNSDC training course. Benefits are approved in a timely manner and direct certification is ran often.

Applications

- Children are eligible for free or reduced price mal benefits on the date their eligibility is determined complete by the Determining Official. If you wish to use a receipt date stamp, this requires pre-approval from the SNT. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.
- When benefit's eligibility decreases, the change cannot take place before 10 *calendar days* and a notice of adverse action must be sent in writing with appeal rights procedures. Day 1 is the day the letter is sent to the household. A copy of the adverse action DPI template was provided to the SFA via email to correct errors on the SFA-1 form should the clarifications result a decrease in benefits.

Annual Income

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

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

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- Stanley-Boyd School District had a 2.55% certification error rate on the SFA-1 form and will not be required to conduct a second review of applications in the following school year. More information on this requirement is found in the Eligibility Manual.

Disclosure

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

- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

Verification

- The verifying official did an excellent job reaching out to households and requesting supporting income documentation. As a reminder when sending the follow-up letter to the household, include the full non-discrimination statement.
- Section 4 of the Verification Collection Report (VCR) was not accurate. The numbers reported should match the pool taken from the electronic system on file as of October 1. Staff did not know how to access a detailed report and thus completed this section manually, likely resulting in the discrepancy. Moving forward, work with your software company to export a detailed report, which will tell you all applications and type in the pool expediting the process. The correct sample size was calculated and resulted in the right number of applications being verified.

Meal Counting and Claiming

- When entering the monthly claim it is necessary to use the edit check report to calculate your reimbursable meals *by site* for consolidation. Each site listed on your contract including Open Doors should have a separate edit check.
- When reporting the number of free and reduced eligibles, enrollment, and Average Daily Attendance on the monthly claim form include Open Doors students in all of these calculations.
- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance. An accurate point of sale was discussed with staff for the Open Doors Academy and Boyd-Elementary.

This requirement also applies to offsite meals provided during a field trip. When the meals are distributed to students there must be a student roster list that is completed and later returned to food service for entry into the electronic system. Counts may not be based on forecast or number of meals ordered. DPI has a Field Trip resources on our website to help schools with the point of service and menu planning: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc> <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>

Findings and Corrective Action Needed

Certification and Benefit Issuance

- ❑ **Finding #1:** Students 1-7 listed on the SFA-1 form are incorrectly certified for meal benefits. Fiscal Action will be assessed for all student errors on the SFA-1 form.

Corrective Action Needed: Clarify that the application for students 5 and 6 is for an eligible program. For all others errors, follow-up with the outside districts to obtain true source documents (e.g., copy of the state direct certification output file or a copy of the free and reduced application if applicable). If these documents cannot be obtained to support the current status, send a letter of

adverse action to the households and encourage them to apply for meal benefits. Record the date that corrective action is taken on the SFA-1 form and send the completed copy back to the NPC via email. Also send a copy of the updated benefit issuance list (screen shot, or file) once the benefit changes are input in the software system after the 10th day.

Meal Counting and Claiming

- **Finding #1:** Open Doors Academy and Boyd- Elementary meal counts do not have an accurate point of service. Counts may not be based on forecast or classroom counts, they must be taken as the student receives the meal in the service area to ensure accurate benefit issuance.

Corrective Action Needed: Submit a statement via email outlining how the district will improve/change the point of service systems at both sites. Options to improve these systems were discussed with the food service director and admin staff.

- **Finding #2:** Open Doors Academy must have/complete its own monthly edit check. This can be completed manually or by adding a site location within the Skyward system.

Corrective Action Needed: Submit a statement explaining how the district will fix/improve the current claim consolidation practice to include Open Doors as a site for Food Service purposes.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service staff at Stanley-Boyd School District for providing documentation prior to the review. Documentation was thorough and well organized. All of the PHNs questions were answered very quickly which helped to expedite the process of reviewing meal pattern compliance. The willingness to learn and make changes where necessary was appreciated. Students are offered a menu with nice variety as well as an extensive garden bar daily.

Furthermore, food service staff are well trained on implementing Offer vs. Serve and the students know what items to take to make up a reimbursable meal. Meal signage at the beginning of the line is clear and students are politely encouraged to return for missing items. The meal service area is full of nutrition education posters and a lovely “flavor station”.

Comments/Technical Assistance/Compliance Reminders

Production records:

- Currently, all required information is not being documented on the production record. The list of production record requirements is available on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/production-records>.
 - The planned number of servings for each menu item should be documented as well as the actual number of servings prepared.
- It is essential that all items offered as part of the reimbursable meal are documented on the production record. The bread that is offered with the salad bar was not documented, so it appears that meal option was missing a component. Onsite reviewer noted bread was offered on the salad bar for the day of review.

Weight vs. volume:

- Unless an item is physically weighed, the serving size should most likely be recorded on the production records and/or standardized recipe as a volume. Spoodles measure volume, so while it may be labeled a 4 oz spoodle, this actually indicates that it holds 4 *fluid* ounces or ½ cup. It doesn't mean that the serving provided will necessarily weigh 4 oz.
- As the meal pattern requirements for fruits and vegetables are provided in cups, it is best for the planned serving sizes to also be a volume. This will assist staff in determining if a student has selected a reimbursable meal.
 - To determine the number of serving sizes needed for salad bar items (ex. How many baby carrots = ¼ cup), you can either:
 1. Use the Food Buying Guide to calculate the weight for the desired serving and then weight out that serving and count the number of pieces.
 2. Dice up the item and determine how many fit in a spoodle/measure cup of the desired serving.

Meal Pattern/Crediting:

- Product formulation statements (PFS) should be reviewed and verified to ensure that they are complete and accurate. A PFS was submitted for the Jennie-O turkey combo pack, but the documentation listed all three meat varieties on the same form. Since they are separate products, each variety must have its own PFS. Additionally, the “description of creditable ingredients column” should list an ingredient found in the Food Buying Guide. For the saltine crackers, the creditable ingredient was listed as “savory crackers” rather than the grain ingredient being credited. More information on reviewing PFS can be found on USDA's website <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.

Findings and Corrective Action Needed

√ **Finding #1:** 1 non-reimbursable lunch was noted during service (hamburger patty and ½ cup Broccoli), this will be included in fiscal action for the review.

Corrective Action Needed: *no further action needed- reviewer will include this meal in the overall NSLP fiscal action calculation for the agency. There is a \$600 disregard per program before any funds must be repaid.

□ **Finding #2:** The menu for the week of March 13-17, 2017 had a weekly starchy vegetable shortage. A ½ cup serving of a 60/40 pea/carrot mix was the only starchy vegetable offered during this week. This provided ¼ cup of starchy vegetable, which is short of the ½ cup weekly requirement. *** Please note that on future Administrative Reviews, repeat violations of minimum quantity shortages will result in fiscal action*

Corrective Action Needed: Please submit a written statement outlining your plan to correct this shortage the next time this menu is served and to ensure that all vegetable subgroup requirements are met on future menus.

□ **Finding #3:** Determining an accurate yield is an essential part of the recipe standardization process. Without an exact yield it is not possible to accurately credit a recipe and determine how it contributes to meal pattern requirements.

Corrective Action Needed: Please re-standardize and submit updated recipes for the rice pilaf and coleslaw.

3. RESOURCE MANAGEMENT

Commendations

The food service director did an excellent job determining the food cost per serving of program meals, and nonprogram items which is an essential component to understanding how to operate a fiscally responsible program and accurately completing the nonprogram food revenue tool.

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

Annual Financial Report (AFR):

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

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

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs.

Revenue from Nonprogram Foods

- Examples of nonprogram foods may include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), WSDMP paid status milks, meals sold to other agencies (Head Start and Daycare), Snacks not part of the USDA meal programs, 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. **Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.**
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food

regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.

Resources:

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

Nonprogram Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

Findings and Corrective Action Needed:

Comprehensive Review- Revenue form Nonprogram Foods

- **Finding #1:** The agency is not separating the cost and revenue of nonprogram foods from program foods.

Corrective Action Needed: Submit a statement agreeing to begin separating these expenses and revenues and how this will be done.

- **Finding #2:** The Food *Cost* Ratio is greater than the *Revenue* Ratio indicating that the district has priced nonprogram food items too low and will likely end with a loss in nonprogram foods.

Corrective Action Needed: Submit a statement, including a timeline indicating how the agency will assess and raise nonprogram food prices to ensure student program funds are not used to subsidize nonprogram food sales. Reviewer made suggestions to look more closely at the cost per serving of an extra milk, adult meals, caterings, and extra entrees to determine where charges can be raised.

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

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The agency is sending the Public Release to various outlets ensuring the community is aware that the district participates in the USDA meal programs and can choose to apply for meal benefits at any point during the school year. The agency also conducts outreach for the School Breakfast and Summer Food Service Program as required. Thank you for promoting the programs!
- The Food Safety Plan is well done. Reviewer can tell that staff are implementing the Standard Operating Procedures, taking temperatures and maintaining other cooler/freezer logs. Storage areas are clean and tidy.
- Staff are purchasing domestic products to the maximum extent practicable and/or maintaining a limited exemption log to document why a non-domestic product may have been procured.

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>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.

Special Dietary Needs

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

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

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

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

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

Local Wellness Policy (LWP)

The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017. The agency is encouraged to create a diverse committee which also includes students and parents. Consider incorporating the LWP and Smart Snacks maintenance into the school curriculum for a health or business class. Students can learn about the basis for the USDA School Meal patterns, be shown to read/analyze food labels and may be more invested in activities connected to the wellness goals and objectives outlined within the policy.

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

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

- a wellness policy builder (google form with canned language)
- a wellness policy checklist
- comprehensive toolkit
- report card for the triannual assessment that can easily be shared with the public

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

All foods (vending machines, a la carte, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the Smart Snacks rule that went into effect on 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>.

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. *Exempt* fundraisers cannot exceed two consecutive weeks in length and cannot occur in the meal service area during meal time.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund must be used to pay the salary of a new director who is actively pursuing the minimum education requirements.
- The intention of annual training hours is that it is job-specific and helps employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program. For student volunteers, they may only need 4 hours of job specific training (hand washing, maintaining logs, civil rights trainings etc.). The determining official, and other office staff with duties related to claiming/reporting, or program operation will need 4 hours. The determining official has attended SNSDC classes each year and is exceeding the training hours required for her position. Other office staff should consider reviewing the claiming and annual financial report manual -at a minimum the confirming official must have civil rights training and review the eligibility manual, which outlines their role.

Food Safety, Storage and Buy American

No concerns.

Reporting and Recordkeeping

Records must be kept on file for a minimum of three years plus the current year.

Alternative Breakfast Models

Despite promotion efforts, the breakfast participation rate is low district-wide (49%-F, 34%-R, 21%-P) compared to an excellent participation rate at lunch in all categories (74%-F, 69%-R, 63%-P). Therefore, consider ideas for increasing SB participation, like offering breakfast in the classroom at

the younger grade levels, asking for student input through an anonymous survey, or conducting taste testings. You may also consider eliminating the reduced price charge or offering free breakfast to all at the elementary level. More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>.

A Breakfast in the Classroom Toolkit is also available if that option is considered: http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website:

<https://www.youtube.com/watch?v=aHR7eECbKaE>

Findings and Corrective Action Needed

Civil Rights

- **Finding#1:** The menu calendar overview posted and sent to households does not contain the current non-discrimination statement.

Corrective Action Needed: Update the templates with the correct non-discrimination statement. Send a copy to the consultant.

Professional Standards

- **Finding#2:** The district does not have a clear food service director established.

Corrective Action Needed: Submit a written statement outlining who will fill the director role. The current food service manager/head cook would be grandfathered into the hiring standards, has food safety training, has completed the annual hours of job specific training, and fits the main regulatory definition of the food service director.

Smart Snacks

- ☐ **Finding #3:** Second meals are being sold as a unit and do not meet the Smart Snacks nutritional standards.

Corrective Action Needed: Discontinue selling second meals as a unit. All parts of the meal must be analyzed for compliance and priced separately as ala carte. Submit an email statement agreeing to this with a timeline for implementation towards compliance.

- ☐ **Finding #4:** The special education department has a coffee sale every Friday. Since this is an ongoing fundraiser, it must be compliant with the Smart Snack regulations.

Coffee and espresso drinks are allowable beverages at the high school level. However, whoever is in charge of the sales must ensure that the products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards. Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; you may either assess this by determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below. I would highly recommend that they utilize the Alliance for a Healthier Generation's Smart Snacks Product Calculator (<https://foodplanner.healthiergeneration.org/calculator/>) to determine whether

their coffee drinks are compliant. If they are, they will be able to print a reference sheet directly from the website as recordkeeping documentation.

Here are the beverage guidelines that would apply:

- Calorie-free beverages (for black coffee only): <5 calories per 8 fl. oz; ≤10 calories per 20 fl. oz; Maximum serving size: 20 fl. oz.
- Lower-calorie beverages (for coffee with cream and/or sugar): ≤40 calories per 8 fl. oz; ≤60 calories per 12 fl. oz; Maximum serving size: 12 fl. oz.

Sugar-free syrups are allowable.

Hot chocolate has the potential to meet the Smart Snacks guidelines. There are two scenarios in which hot chocolate would be allowable:

- A fat-free hot chocolate mix can be added to fat-free milk and sold in the appropriate serving sizes to all grades. Because flavoring is not limited in fat-free milks, we would consider this the same as heating fat-free flavored milk.
- Because many hot chocolate mixes contain non-fat milk solids, there are two acceptable scenarios where these mixes will be allowable when prepared with water.
 - A school could get a product formulation statement from the manufacturer indicating that the product will reconstitute in a manner that is nutritionally equivalent to milk. With the PFS, the product could continue to be sold to all grades in the appropriate serving sizes (equivalently to fat-free flavored milk).
 - If there is no PFS available, the product could not be assumed to be equivalent to milk. This product would then need to meet the low-calorie beverage requirements to be allowable for sale at the high school only. The serving size limit on low-calorie beverages is 12 fluid ounces and this type of beverage cannot contain more than 5 calories per fluid ounce (or 60 calories per 12 ounces).

Schools may prepare hot chocolate from scratch with fat-free milk as well. However, it is important to note that many recipes use enough cocoa powder to add fat to the product (1 Tbsp of unsweetened cocoa powder has about 0.74 g of fat). The serving should be nutritionally analyzed in the size it is sold and must contain less than 0.5 g of fat to be considered fat-free. A recipe with milk would never meet the low-calorie beverage requirements due to the calories from the milk. Therefore, the product must remain fat-free to be an allowable flavored milk beverage.

Please review the Smart Snacks in a Nutshell Handout, for more information on beverages calorie limits and serving sizes: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>

Corrective Action Needed: Please submit a written statement indicating your understanding of the regulations pertaining to coffee and hot chocolate sales as well as plans for ensuring that the sale occurring each Friday is in compliance with these regulations.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

- As a reminder, retain the original source documents (student check-off sheets) after entry into the computer. Reviewer discussed alternative options for conducting the point of service.

Findings and Corrective Action Needed

- Update Request:** The state agency is requesting an update the WSDMP contract to reflect more current milk counting and claiming practices.

Corrective Action Needed: Submit two signed copies of the WSDMP contract:

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/contract-manual.pdf> to the nutrition program consultant. I will review/approve and return a copy for the agency with the director's signature.

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.

