

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

School Food Authority: St. Mary's School (Greenwood) Agency Code: 10-7668

School(s) Reviewed: St, Mary's School

Review Date(s): April 10, 2019

Date of Exit Conference: April 10, 2019

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). Travel/meal expenses are allowable food service expenses.
- Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage (https://dpi.wi.gov/school-nutrition/training/webcasts).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the school nutrition director at St. Mary's School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. She was very receptive to our 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. We appreciate your flexibility in needing to reschedule the Administrative Review dates.

The DPI review team appreciates the eagerness of the director at St. Mary's School for her questions and willingness to make changes to meet regulations in the school nutrition program. The school staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu selections, and meal service. We were impressed during meal service that the foods offered varied in color. Students help serve the meal components and teachers check off students as they come through the line.

The DPI review team is confident that St. Mary's School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

CERTIFICATION AND BENEFIT ISSUANCE

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

- Thirteen eligibility determinations were reviewed with zero errors identified. Nice work!
- The SFA sends an application packet to every household each year before school starts.

Free and Reduced Price Meal Applications

- The determining official reviews the application and completes the determination process as received. Applications are kept secure and confidential. 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.
- Approval or denial letters are sent to households in a timely manner.
- Consider using the prepared DPI letter templates which include the required sections.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- All free/reduced applications and the direct certification runs were available for review.
- (TA) When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to monthly or annual, but using the [Income Eligibility Guidelines](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf) one would look at the amount of their income under the column indicating that stated frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines-1819.pdf>).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss. A business loss (negative dollar amount) would become \$0 for the income on the application.

Annual Income

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

Income Eligibility Guidelines

- The current [Income Eligibility Guidelines](#) (IEGs) are used to determine applications.
- The complete IEG grid may not be sent to the households applying for meal benefits as they include the specific income amounts for free or reduced benefits. Therefore, the Public Release may not be sent to households, either. The information letter must include the reduced price guidelines and an explanation that households with incomes at or below the reduced price income limit may be eligible for free or reduced price meals. Typically, the information letter is the USDA template entitled [Letter to Parents/Frequently Asked Questions](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/free-reduced-app-parent-letter-faq-1819.docx>).

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

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

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, runaway or Head Start, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Public Release

- (TA) All SFAs are required to distribute a correct [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1819.doc) before the start of the school year (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1819.doc). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Limited English Proficiency (LEP)

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

Direct Certification

- Thank you for running direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run and if a new student is enrolled.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- The [Direct Certification Parent Notification letter](#) may be useful as it contains all of the requirements.

Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

VERIFICATION

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

- Thank you for using the [Verification Tracker tool](#).
- Visit our [verification webpage](#) for current and useful forms; the main verification information is included in the [verification forms packet](#) and letter templates.

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

MEAL COUNTING AND CLAIMING

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

- The meal counting and claim for the Review Month was conducted perfectly. Thank you for using the Edit Check form.
- (TA) Any adult who is determining if a student’s selected meal is reimbursable must have the appropriate training in menu planning, meal service and Offer Vs. Serve.
- Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).
- Please note that SFAs may claim visiting students in the paid category or the individual’s category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

School Nutrition Accountability Software (SNACS)

If the district would like to pursue an automated benefit issuance/verification software system and have access to an online application module, DPI provides a free program called [SNACS](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snacs-brochure.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snacs-brochure.pdf). This system will not replace your current point of sale software, but can be set-up to load data from SNACS into PowerSchool.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations:

Thank you to the Food Service Director/Authorized Representative of St. Mary School for their flexibility, time, cooperation, and warm welcome during the Administrative Review. Thank you for providing documentation prior to the on-site review and answering all questions. The Food Service Director/Authorized Representative is very knowledgeable and organized. St. Mary School implements great farm to school practices that provide a variety of fresh vegetables to students. 5th grade students assisted with serving lunch. Students were excited to receive lunch from their friends and the students that were serving took pride in their work. Thank you for your hard work and dedication to your National School Lunch Program!

Technical Assistance:

Production Records

St. Mary School is using the DPI SNT production record template. However, the leftovers column is crossed out and temperatures are filled in instead. It is required that leftovers are recorded on production records. There is a production record template that includes a column for temperatures titled, Lunch- One Grade Group with Temperature, located on the [Production Records](https://dpi.wi.gov/school-) webpage (https://dpi.wi.gov/school-

nutrition/national-school-lunch-program/menu-planning/production-records). Please consider using this template in order to meet your needs as well as the requirements.

Seconds

When seconds of entrée items are offered and students are not charged a la carte prices, the calories, saturated fat, and sodium of these portions must be included in the weekly averages for dietary specifications (calories, saturated fat, and sodium).

It is highly recommended that the school discontinue the practice of offering seconds of entrées free of charge to students. This practice complicates production planning, increases food costs, and increases the likelihood meals exceed the dietary specifications. If students are still hungry, seconds of entrees should not be given away free of charge, but should be sold a la carte.

Seconds of fruits and vegetables are a great option, as fruits and vegetables are not usually a high source of calories, saturated fat, or sodium. Encourage students to select what they intend to eat when they go through the service line the first time. This will ensure students select reimbursable meals and will also decrease the likelihood that students will want or need seconds.

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

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

- The consultant addressed financial topics, including the Child Nutrition Program report and the Annual Financial Report.
- The Aids Register shows the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](http://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

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. The new [Annual Financial Report instructions](#) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund or the general fund until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.
- (TA) 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, may not be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.

- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” report any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “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 an NSLP food expenditure for private schools and a 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.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the [Indirect Costs guidance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Unpaid Meal Charge Policy

- (TA) 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>).

REVENUE FROM NONPROGRAM FOODS

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

- Nonprogram foods include Adult Meals and Extra Milk sales.
- (TA) Since nonprogram foods include Adult Meals and extra milk, these expenses and revenues must be separated from Program foods.
- SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](#) from completing the USDA Nonprogram Food Revenue tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

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 follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. The teacher meals at St. Mary's School are funded by the teacher paying half of the cost and the school paying food service for half of the cost of the adult price.
- 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. The current reimbursement rates (2018-19 SY) should be used to determine adult prices.

Resources

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

INDIRECT COSTS

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

- Any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district. Examples of supporting documentation for costs assessed to food service fund could include:
 - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local reality broker who has knowledge of current rates for rent of similar facilities).
 - Utility charges - separately metered or current usage study by the local utility company.
 - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
 - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.

- Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from the district's total.

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 is completed by the school nutrition director on a yearly basis; please include the school secretary.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The [Civil Rights Self-Evaluation Compliance](#) form (PI-1441) is 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 to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. For more information on [fluid milk substitutes](#),

please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Processes for complaints

- All verbal or written civil rights complaints alleging discrimination within the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or the State Agency (DPI School Nutrition Team) within 5 days, per FNS Instruction 113-1 (Section XVII Section C, paragraph 2). You will want to make sure that this is included in the district procedures to ensure compliance.
- Additionally, per FNS Instruction 113-1, if an individual makes allegations of discrimination *orally* and “is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements” of the allegation for said individual. (Note: The items which should be included in the write up are listed in FNS Instruction 113-1.) Such complaints should then be forwarded to the State or Regional office, as appropriate, within the established timeframes.
- All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

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.
- 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](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<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>).

SMART SNACKS IN SCHOOLS

Compliance Reminders:

Final Rule

At the time of the Administrative Review, St. Mary School is not selling any food or beverages during the school day outside of the reimbursable meal. The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. The school day is defined as midnight until 30 minutes after the instructional day. More information can be found on the DPI SNT [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Fundraisers

While St. Mary School does not hold any fundraisers during the school day at this time, please note the following fundraisers guidelines if St. Mary School chooses to hold any in the future. The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods

and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers are required to be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

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.

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](#) 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.

WATER

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

- (TA) Water is required to be available at no charge to students during the lunch meal service. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, cups of water on the serving line, a water fountain, or a faucet that allows students to fill their own bottles or cups.
- For more information on the water requirement, see [SP 28-2011](#) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/gm_sp_28_2011_r.doc)

FOOD SAFETY AND STORAGE

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

- [A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service director at work that she is very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- Thank you for maintaining a food safety plan, which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>)

Food Employee Reporting Agreements

- All food service employees must have a signed [Food Employee Reporting Agreement](#) on file (<https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf>). The school nutrition director has one, but please include one for teachers who mark off student meals in the serving line.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).
- The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

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.

BUY AMERICAN

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. SFAs must monitor contractor performance, to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Technical Assistance:

Non-Compliant Products Found Onsite

The following products identified in St. Mary School's storage did not have proper labeling to identify the country of origin:

- Flour- distributed
- Ketchup- manufactured
- Salsa- NC
- Canned tomatoes- distributed
- Canned tomato paste- packed in
- Vegetable juice- distributed
- Frozen turkey ham- distributed by
- Buttermilk- distributed
- Sour cream- distributed

In USDA Memo SP 38 -2017, any product that does not identify the country of origin requires certification from the manufacturer or distributor. Work with your distributor to move toward compliance with these and similarly labeled products.

Achieving Buy American Compliance

- If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51 percent of its agricultural food component, by weight or volume, from the U.S." This can be accepted in an email.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.

- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the Contract Management chapter of the [SNT Procurement Manual](https://dpi.wi.gov/school-nutrition/procurement/procurement-manual) (https://dpi.wi.gov/school-nutrition/procurement/procurement-manual). Additional Buy American monitoring procedures can be found on the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

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.
- This is a link to the current [Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf) for general type schools (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-general.pdf).
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

SCHOOL BREAKFAST PROGRAM (SBP) AND SUMMER FOOD SERVICE PROGRAM (SFSP) OUTREACH

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

Summer Meals

- (TA) 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 St. Mary's School, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

No Findings or Corrective Actions required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed for Meal Pattern and Nutritional Quality:

❑ **Finding #1:** Recipes provided for the week of review are quantity recipes that are adjusted to fit the food service operation's needs. These recipes are not fully standardized due to changes in the amount of ingredients, the type of ingredients used, and portion sizes.

Use of standardized recipes is an important part of USDA programs. Any menu item that has more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used.

The recipe standardization process will be a continuous work in progress as you modify older recipes and update with current ingredients and practices. There are resources on the [Standardized Recipes](https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) webpage regarding recipe standardization, including a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, and templates to organize all information once obtained (<https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>). We encourage viewing the webcast, [What's the Yield with Standardized Recipes?](https://dpi.wi.gov/schoolnutrition/training/webcasts#sr), which guides the viewer through the recipe standardization process (<https://dpi.wi.gov/schoolnutrition/training/webcasts#sr>).

Corrective Action Needed: Submit standardized recipes for the beef tacos, breakfast burrito, baked beans, and coleslaw. Please continue to update and standardize recipes for all menu items with more than one ingredient.

❑ **Finding #2:** Documentation provided for the week of review demonstrated a weekly meat/meat alternate (M/MA) shortage at lunch. The K-8 weekly M/MA requirement is 9.00 oz eq. On Monday, the USDA beef tacos recipe was not scaled down appropriately for the shredded cheese. This resulted in the recipe crediting as 1.75 oz eq M/MA, instead of 2.00 oz eq as the recipe and menu planner intended, which lead to the weekly M/MA shortage. 8.75 oz eq M/MA were offered over the course of the week.

Corrective Action Needed: Submit a statement indicating how the weekly M/MA requirement will be met for the week of review and your plan for ensuring the requirement is met for future service weeks when this menu is offered. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable.

Please note, repeat violations of a weekly meat/meat alternate shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding #3:** Documentation provided for the week of review demonstrated daily vegetable shortages on Wednesday and Friday, which also led to a weekly vegetable shortage. The K-8 daily vegetable requirement is $\frac{3}{4}$ cup and the weekly vegetable requirement is 3 $\frac{3}{4}$ cups.

On Wednesday, only $\frac{5}{8}$ cup of vegetable was planned. The breakfast burrito quantity recipe was scaled down for 25 instead of 29 servings, as the menu planner intended. This led to the recipe crediting as $\frac{1}{8}$ cup vegetable, instead of $\frac{3}{4}$ cup as the recipe and menu planner intended. In addition to this $\frac{1}{8}$ cup vegetable, only $\frac{3}{8}$ cup of vegetable was offered for a total of $\frac{1}{2}$ cup vegetable offered. On Friday, only $\frac{1}{2}$ cup of vegetable was planned and offered. Over the course of the week, 3 $\frac{1}{2}$ cups of vegetable were offered.

Corrective Action Needed: Submit a statement explaining how the daily $\frac{3}{4}$ cup vegetable requirement will be met during the week of review on Wednesday and Friday and your plan for ensuring the daily requirement is met for future service weeks when this menu is offered. Please include respective portion sizes, labels, recipes, and crediting documentation, if applicable. By fixing the daily vegetable shortages, the weekly vegetable requirement will be met.

Please note, repeat violations of a daily and/or weekly vegetable shortage during subsequent Administrative Reviews may result in fiscal action.

❑ **Finding #4:** Seven non-reimbursable meals were observed during lunch. Six of the meals had less than $\frac{1}{2}$ cup fruit, vegetable, or combination. One meal only contained one full component. Under Offer versus Serve (OVS), students are required to select three full components, one of which must be $\frac{1}{2}$ cup fruit, vegetable, or combination. A full component is considered the full daily requirement (1.00 oz eq grain, 1.00 oz eq M/MA, $\frac{1}{2}$ cup fruit, $\frac{3}{4}$ cup vegetable, 1 cup milk).

The Food Service Director reported that official OVS training has not been completed by the teachers who are the point of service. OVS training is required for all point of service staff in order to ensure all meals being counted and claimed for reimbursement are, in fact, reimbursable. The [Offer Versus Serve Guidance Manual](#) and [Offer Versus Serve webcasts](#) (Offer versus Serve and Offer versus Serve - Meal or No Meal Lesson and Game) can be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

Corrective Action Needed: Submit a statement indicating how these seven meal errors will be corrected and avoided in the future. Submit a statement indicating how OVS training plans to be completed. Submit a signed training roster for the point of service staff that completed the OVS training.

3. RESOURCE MANAGEMENT

NONPROFIT SCHOOL FOOD SERVICE ACCOUNT

Findings and Corrective Action Needed: Nonprofit School Food Service Account

❑ **Finding #5:** Annual Financial Report (AFR) does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk. The AFR was modified for the past School Year 2017-18 to break out Non-program Foods.

Corrective Action Required: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a [nonprogram food resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) on our website to aid you in this calculation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

- ❑ **Finding #6:** The school has no written unpaid meal charge policy which was required to be in place and distributed to families by July 1, 2017. Please see the resources listed above in this report.

Corrective Action Required: Develop a timeline for a written unpaid meal charge policy to be completed and how it will be distributed to all households.

4. GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #7:** Meal benefit notification letters sent to parents did not include the correct non-discrimination statement.

Corrective Action Required: Provide a statement that St. Mary's School will use the DPI letter templates or create their own letter, which includes the correct non-discrimination statement.

- ❑ **Finding #8:** All SFAs are required to distribute a correct [Public Release](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1819.doc) before the start of the school year (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1819.doc>). They

Corrective Action Required: Provide a statement that St. Mary's School will distribute the correct version of the Public Release form to appropriate locations before school begins.

LOCAL WELLNESS POLICY

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding #9:** St. Mary's School created a Local Wellness Policy (LWP); it meets some but not all requirements as stipulated above. The sections missing that need to be addressed at next revision are:
 - Policy leadership- SFAs are required to identify the official responsible for the LWP oversight.
 - Public Involvement- SFAs are required to include language related to permitting the public to participate in LWP development, implementation and review.
 - Food and Beverage Marketing – SFAs may only market products that adhere to Smart Snacks guidelines during the school day.
 - Nutrition Education – SFAs must include at least one goal for Nutrition Education in the LWP, using evidence based strategies when identifying goals.
 - Other School-based Strategies for Wellness – SFAs must include at least one goal for Other School-based Strategies for Wellness in the LWP, using evidence based strategies when identifying goals.
 - Triennial Assessment – LWPs must include language regarding completion of a triennial assessment as how the policy compares to a model policy.

- Update/Inform the Public – the SFA is required to inform and update the public about the content and implementation of the policy.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule, including these sections, above.

SMART SNACKS IN SCHOOLS

No findings for Smart Snacks and no corrective action is required.

PROFESSIONAL STANDARDS

Findings and Corrective Action: Professional Standards

- ❑ **Finding #10:** Not all nutrition program staff have completed the required training hours for the current school year and were unable to provide a training plan for the current school year. The school secretary is also the confirming official, so must complete 4 hours of training each school year. If the three teachers continue to determine if a meal is reimbursable at the end of the line, they must complete 4 hours of school nutrition training, including the [Offer Vs. Serve webcast](#). All trainings must be tracked for review on an Administrative Review.

Corrective Action Required: Provide a training plan for meeting the required training hours for the confirming official and teachers, as applicable.

WATER

Findings and Corrective Action: Water

- ❑ **Finding #11:** Water is not available to students during meal service without requesting it.

Corrective Action Required: Provide a statement of how water will be provided to all students during meal services moving forward.

BUY AMERICAN

Findings and Corrective Action Needed for Buy American:

- ❑ **Finding #12:** Canned pineapple was found in St. Mary School's storage area as non-domestic from Thailand. St. Mary School did not have a Buy American – Non-compliant List or SFA equivalent form for this product but did have forms for peppers, bananas, and cantaloupe.

Corrective Action Needed: Provide a copy of the completed form for the non-compliant canned pineapple as corrective action. Please continue using Non-compliant Product List forms or SFA equivalent for tracking non-domestic products.

“The Wisconsin Department of Public Instruction has a vision that every student will graduate prepared for college and career. 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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).”



With School Nutrition Programs!