USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Mineral Point School District Agency Code: 253633

School(s) Reviewed: Mineral Point Elementary

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:

- 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 <u>School Nutrition Training</u> 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 <u>Healthier School Day: The School Day Just Got Healthier</u> 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 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.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Mineral Point School District for being available to answer questions and provide documents both offsite and onsite. Overall, the agency is running an excellent program. The director and staff are dedicated to the success of the program and put in additional effort to make menu items from scratch where possible. The meal prep and service areas are clean, tidy, and inviting. Thank you for all you do to serve the students in your community!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

149 eligibility determinations were reviewed, no errors were identified. Keep up the good work!

Receipt Date

Consider implementing a system to track when applications where received in the district office for processing. This makes it clear that the SFA has processed all applications within 10 operating days.

<u>Categorical Eligibility and Program Name</u>

Listing an eligible program name is now a *required* part of the case number eligibility determination for free meal benefits in Wisconsin. If the program name is missing, the application cannot be determined until received. The SFA must contact the household for clarification. Date and initial the application to track correspondence.

Direct Certification

Thank you for running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.

Notification Letters and Non-discrimination Statement

When sending approval and denial letters for meal benefits, the non-discrimination statement must be in the same size font as the text in the body of the letter. To ensure the required content is included within vital communications, consider using the DPI SNT templates, which are updated each year in June and posted to the <u>free and reduced price website</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#notification-letters). Do not distribute until after July 1.

<u>Disclosure Agreement Form</u>

A Disclosure Agreement form should be signed by any individual, or an organization, that is receiving individual student free and reduced price school meal eligibility information for purposes other than school meal benefits.

Any individual that is provided with individual student eligibility information for state reporting purposes or local program fee waivers should complete the <u>Disclosure Agreement for School Staff</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx) and retain a copy on file at the district.

Findings and Corrective Action Needed: Certification and Benefit Issuance

☐ Finding #1: A noncompliant free and reduced application form was sent to households at the beginning of the school year. The error was discovered after the start of the school year and corrected.

All Free and Reduced Price materials, including the application packet and public release are updated annually and posted in June on the <u>DPI SNT Free and Reduced Price website</u>

(https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps).

Corrective Action Needed: Submit a statement agreeing to use the Wisconsin form and acknowledging its location on the SNT website. If the agency wants to modify the template, it must be pre-approved by DPI to ensure all required components of the application are present.

Verification

No errors. Great job!

2. MEAL COUNTING AND CLAIMING

The agency is in compliance for the School Breakfast Program and the National School Lunch Program.

3. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the Food Service Director and all of the nutrition professionals in the Mineral Point School District. Thank you to the FSD for prompt communication and great organization. It was a pleasure to visit and review your school district. Staff is knowledgeable, kind, and efficient. Thank you all for the warm welcome to your school district. There were no meal pattern findings during breakfast or lunch during the week of review. All meals observed onsite were reimbursable. Excellent! Standardized recipes are thorough. Production records are completed correctly daily. Signage was informative and hung in appropriate locations. Menu offerings look appealing and taste good. It is very nice to provide students with two rotating entrée options. Keep up the great work, Mineral Point School District!

Comments/Technical Assistance/Compliance Reminders

CACFP: The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Salad bar signage: Additional signage on a salad or garden bar can assist students in recognizing appropriate portion sizes. The School Nutrition Team (SNT) has a <u>Salad Bar Signage Template</u> with pictures that can be posted on a salad or garden bar (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx). Students at breakfast were aware of how many carrots they needed to select to make ½ cup, but it would be a helpful reminder to use this signage at breakfast as well.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ Finding #1: Offer versus Serve

Food service staff were somewhat unclear about the Offer versus Serve (OVS) requirements for breakfast. Although all students observed at lunch and breakfast took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The Offer Versus Serve Guidance manual and the Offer Versus Serve Webcast 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).

Under Offer versus Serve (OVS) for the **breakfast meal pattern**, four food items must be offered from the three components:

- 1. Grain [and optional meat/meat alternate]
- 2. Fruit/vegetable
- 3. Milk

An item is defined as:

- 1. 1.0 ounce equivalent (oz eq) of grain (and optional meat/meat alternate)
- 2. ½ cup of fruit and/or vegetable
- 3. 8 fluid ounces of milk

Under Offer versus Serve (OVS), students must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. Visit the <u>Breakfast Menu Planning</u> webpage, under the OVS heading for additional guidance (https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning).

Corrective Action Needed for Finding #1: Conduct or view the <u>OVS webinar</u> for all food service staff (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html). Provide documentation of all food service staff (including teachers or students who assist with meal service) attendance at this OVS training.

√ Finding #2: Crediting Documentation

Acceptable crediting documentation was not available for

- Tony's Breakfast pizza- CN label found on site. No further action required.
- Otis Spunkmeyer Delicious Essential 2oz muffin- Credited as 1 oz eq grain using Exhibit A. No further action required.
- Keebler Graham Crackers 3ct- Provided on site. No further action required.
- Goldfish Giant Graham- Provided on site. No further action required.

Please provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If proper documentation cannot be obtained, you should discontinue using these product for school meals.

Corrective Action Needed for Finding #2: Submit crediting documentation (PFS) for the items. *Corrected on site. No further action required.*

4. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance (TA)/Compliance Reminders

Expenses

The food service fund accounting system records only *direct* costs. Direct costs are those expenditures relating to the food service operation. Such costs are readily identified; food, labor, equipment, purchased services, and other supplies. An accurate break down of expenditures for labor/benefits, food, equipment, purchased service, and other costs by program (breakfast, lunch, and nonprogram foods) is necessary for good management.

The food service management company will need to code vendor invoices by program and category so that the district can code and record expenses in for Fund 50. A list of <u>Standard WUFAR codes for Fund 50</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/wufar_codes_sy1718.xlsx) and a chart of <u>expenditure categories</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expenditure-categories-for-food-service-annual-financial-report.doc) is posted on the SNT Financial Website.

Free Non-reimbursable alternate meals

The cost of free alternate meals cannot be absorbed by the food service account. Consider an a la carte charge to the households, or ensure items are tracked and record a transfer (monthly or annually) from outside funds.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Ц	Finding #1: The food service management company fees (profit) are not recorded under purchased
	services on the 17-18 SY Annual Financial Report (AFR).
pr	orrective Action Needed: Update the 17-18 SY AFR to pull out the food service management company ofit under purchased services. You should also record the NSLP food safety inspections under rchased services.
	Finding #2 : Direct expenses are not recorded by program and expenditure category within Fund 50. This complicates the district's ability to accurately complete the Annual Financial Report (AFR).
Co	prrective Action Needed: Submit a statement agreeing to track direct expenses by program and
	penditure category. In order to do this, the district must reconcile all vendor invoices with the monthly
FS we ex	MC invoice. The FSMC should code vendor invoices so the district bookkeeper knows which items ere purchased for the NSLP, SBP, Nonprogram foods, or milk programs. The AFR report requires five penditure categories (Labor, Food, Equipment, Purchased Services, and Other). For expenses that are
sh	ared among programs (e.g., oven repair cost), SFAs may use the <u>expenses allocation tool</u>
•	tps://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx) posted on the SNT ebsite.

Paid Lunch Equity (PLE)

The agency is in full compliance.

Revenue from Nonprogram Foods

Great job tracking and documenting compliance with non-program foods. Technical assistance was provided onsite to include the Special Milk Program and extra lunch entrees. Once included, results still reflect compliance.

5. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Public Release

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

- Local news media
- Grassroots organizations (local organizations providing services to populations in need)
- Major employers contemplating or experiencing large layoffs
- Local Unemployment Office (as applicable)

SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Civil Rights Training

Ensure you are using the School Nutrition Civil Rights PowerPoint

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) and <u>Attendance Record</u> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/civil-rights-training-attendance-record.doc), which is posted on our <u>Civil Rights website</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

Special Dietary Needs

Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Processes for complaints

All verbal or written civil rights complaints regarding the school nutrition programs that are filed with
the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within
5 days. You will want to make sure that this is included in the district procedures to ensure
compliance.

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the <u>USDA Program Discrimination Complaint Form</u> for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our <u>Administrative Review</u> webpage under the SFA onsite monitoring section (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).

Findings and Corrective Action Needed: Onsite Monitoring

☐ Finding: The SFA did not complete onsite monitoring reviews as required in the 17-18 SY.

Corrective Action Required: Submit the 18-19 SY onsite monitoring reviews (NSLP and SBP) for Mineral Point Elementary.

Local Wellness Policy

Mineral Point SD has a great LWP and has conducted outreach to involve the public, parents, and students. The food service director also plans to conduct a local chef in the classroom event and other nutrition education classroom demos. As a reminder, the first assessment will be due in SY 20-21. The assessment needs to measure how you are meeting the goals and objectives and how the policy compares to a model policy.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Mineral Point Elementary School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Professional Standards

Professional Standards: Training Requirements

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 <u>Professional Standards</u> webpage (http://dpi.wi.gov/school-nutrition/training/professional-standards).

Food Service Management Company (FSMC)

The following duties may not be delegated to the FSMC:

- Onsite monitoring the annual requirement for the district to evaluate each "site" of the School Food Authority (SFA) for meal compliance, proper Point of Service (POS) and meal claiming, plus other categories. This must be completed for Lunch and Breakfast (at half of the sites) each year. It is due February 1 annually and the documents are kept onsite.
- Signature Authority -a representative of the SFA must sign off on the contracts for the SFA
- Edit Checks- an SFA person must sign off on the monthly edit checks of meals served before the information is submitted for a claim, even if the edit check is done by the POS software.
- One representative from the SFA must complete 12 hours of Food Service Director Professional Standards Training hours.

Water

The agency is in compliance.

Food Safety and Storage

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

Food Safety Inspections

Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Safety Plans

The Food Safety Plan was available for review. It was obvious in observing the food service manager/director at work that they are very knowledgeable about food safety practices and safe food handling. Temperature logs and sanitizing solution logs were up-to-date.

Findings and Corrective Action: Food Safety

✓ **Finding**: Most recent food safety inspection report is not posted in a publicly visible location at Mineral Point Elementary School.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public. *Corrected onsite. No further action required.*

BUY AMERICAN

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures

(https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and Buy American monitoring procedures.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the <u>SNT Procurement</u> webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American

☐ Finding #1: Non-compliant items

The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Garlic powder- China
- Bountiful Harvest frozen vegetable blend- USA, Mexico, Canada
- Green bell pepper- Mexico
- Roma tomatoes- Mexico

Corrective Action Needed for Finding #1: The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

Note: In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the Buy American Non-Compliant Product list there are 4 pieces of information that must be recorded:

- 1. Date
- 2. Name of product
- 3. Country of origin
- 4. Reason
 - a) **Cost analysis** SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.
 - b) **Seasonality** Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - Ex. Blueberries are not available domestically during the months of December June.
 - c) **Availability** Product(s) is not available to purchase domestically.
 - Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.
 - d) **Substitution** In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.

- e) **Distribution** the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.
- f) Other- Please provide a written explanation.
 - Ex. The SFA received a donation of non-domestic oranges
 - Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the nondomestic products.

You may record additional information if you find it beneficial. A suggested <u>Buy American - Non Compliant Product List template</u> can be found on the <u>Buy American webpage</u>

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx; https://dpi.wi.gov/school-nutrition/procurement/buy-american). For more information on Buy American exceptions, visit the Buy American Provision Memos webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos).

Reporting and Recordkeeping

Program records must be kept on file for a minimum of three years plus the current school year. Temperature and calibration logs must be kept for six months.

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

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

Breakfast Promotion

The breakfast participation in the Mineral Point School District is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered.

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 <u>Resources for the School Breakfast Program</u> webpage, in the Marketing Breakfast section (https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources).

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Mineral Point School District 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 <u>summer meals locator</u> 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 <u>Summer Food</u> website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the <u>interactive map</u> 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

Findings and Corrective Action: SBP and SFSP Outreach

☐ Finding #1: The SFA did not conduct SFSP outreach in the 17-18 SY.

Corrective Action Needed: Submit a plan outlining the method(s) the SFA will use to inform households of the location of summer meals in the 18-19 SY. This is an annual requirement.

6. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Technical Assistance (TA)/Compliance Reminders

Point of sale counts must be taken <u>as the student receives the milk</u>. Milks claimed cannot be based on a forecast, or by subtracting out who did not take a milk from the forecast. It is allowable to obtain a daily forecast which helps project how many milks to order or deliver to the classroom. However, the SFA must then obtain a separate daily participation count <u>at the point of sale</u>. Participation counts must be used to consolidate the annual claim.

Findings and Corrective Action: Wisconsin School Day Milk Program

☐ **Finding #1:** Inaccurate point of sale. Milks counts are claimed off of a daily forecast rather than participation as the student receives the milk.

Corrective Action Required: Discontinue this practice. Correct the point of sale system and re-train staff responsible for the point of sale. Submit an explanation of the new system, who received training, and when the new system was implemented.

Special Milk Program (SMP)

<u>Technical Assistance/Compliance Reminders</u>

- Only unflavored milk is allowable under the updated CACFP meal pattern. Children 2-5 years old and not yet in kindergarten must be served unflavored low-fat (1%) or unflavored fat-free (skim) milk.
 Discontinue serving chocolate milk. The Smarter Lunchrooms Movement has strategies to encourage the consumption of unflavored milk (https://www.smarterlunchrooms.org/scorecard-tools/smarterlunchrooms-strategies#Milk).
- Point of sale counts must be taken <u>as the student receives the milk</u>. Milks claimed cannot be based on a forecast, or by subtracting out who did not take a milk from the forecast. It is allowable to obtain a daily forecast which helps project how many milks to order or deliver to the classroom. However, the

SFA must then obtain a separate daily participation count <u>at the point of sale</u>. Participation counts must be used to consolidate the annual claim.

Findings and Corrective Action Needed: SMP

☐ **Finding #1:** Inaccurate point of sale. Milks counts are claimed off of a daily forecast rather than participation as the student receives the milk.

Corrective Action Required: Discontinue this practice. Correct the point of sale system and re-train staff responsible for the point of sale. Submit an explanation of the new system, who received training, and when the new system was implemented.

- ☐ Finding #2: Systemic and non-systemic claim consolidation errors.
 - The SFA is claiming reduced eligible students in the free category. The SMP does not have a reduced claiming category, thus reduced eligible students must be claimed in the paid category.
 - A one-time clerical error in addition to the systemic error noted above was found when reviewing the claims back to the beginning of the school year. This resulted in a substantial over-claim in the free category.

Corrective Action Needed: Submit the December milk count report which list 4K milks by category to support the claim consolidation process has been corrected and matches milks claimed in online services. Fiscal action will be taken back to the beginning of the school year to disallow ineligible milks in October and to correct over-claiming milks in the free category.

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

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

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



With School Nutrition Programs!