## USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. Patricks Catholic School Agency Code: 297784

School(s) Reviewed: St. Patricks Catholic School

Review Date(s): 12/18, 19, 20, 2018 Date of Exit Conference: 12/19/2018

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

• Determine whether the SFA meets program regulations,

- Provide technical assistance,
- Secure needed corrective action.
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture 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 do 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 (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

#### Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. Patricks Catholic Grade School for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

#### **REVIEW AREAS**

#### 1. MEAL ACCESS AND REIMBURSEMENT

## **Certification and Benefit Issuance**

5 applications were reviewed and 1 error was found.

## Commendations/Comments/Technical Assistance/Compliance Reminders

## Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the
  family notified of its status, and the status implemented within 10 operating days of the receipt of
  the application.
- 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. All
  applications have been approved and students are receiving the benefits they have been
  determined eligible for.
- 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 annual, but using the <a href="Income Eligibility Guidelines">Income Eligibility Guidelines</a> one would look at the amount of their income under the column indicating that 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-1718.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.

#### Effective Date of Eligibility

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

#### **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.

#### 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 the 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. 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.

## 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.
- SFAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- 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 <u>foreign language</u> <u>translations of the Application for Free and Reduced Price School Meals</u> (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.

## Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, 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.

## **Transferring Students**

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- A child that transfers within the same LEA from a CEP to a non-CEP school must be given free reimbursable meals for up to 30 operating days or until a new eligibility determination is made, whichever comes first.
- 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.

#### **Direct Certification**

- As a reminder, you are required to run 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.
- The effective eligibility date for a DC eligible student is the date of the original output file.
- 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 student.

## Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- 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 annual, but using the <a href="Income Eligibility Guidelines">Income Eligibility Guidelines</a> one would look at the amount of their income under the column indicating that
  frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually)
  (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/income-eligibility-guidelines1718.pdf).

In cases where the initial eligibility determination is incorrect, the change in eligibility status will not be voluntary. In these situations, LEA officials must make appropriate changes in eligibility, and send a notice of adverse action: • If the initial eligibility determination was found to be incorrect during a second review of applications or an Administrative Review; or • When verification of household eligibility, including verification for cause, does not support the level of benefits for which the household was approved. A letter of adverse action must be sent to the family, but changes to the status of the children's account may not be changed for 10 days to allow the family to deposit monies into their account.

☐ Finding #1: In reviewing all 5 applications, it was observed that all the applications income had been annualized. However, only 1 error was found in the determinations. The application was determined "Reduced", but should have been "Denied" due to income being too high.

**Corrective Action Required #1:** Technical Assistance was provided in explaining the error on the application to the person who determined it incorrectly.

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□ Finding #2: All of the applications were signed on the Confirming Officials line. The person who signed them is not the Confirming Official outlined in the contract. This person is also listed in the contract as the Determining Official but is not determining the applications. The contract will need to be changed to reflect accurately the persons doing the duties of the Officials as listed.

Corrective Action Required#2: Change the current contract on the Officials Information page to reflect the actual persons doing the duties of the four officials. Changes need to be made for the Determining, Confirming and Verifying Officials. Submit for approval to the consultant on this Administrative Review.

□ Finding #3: The applications reviewed had the incomes annualized that were listed. They should only be annualized when the income frequencies are different. If there are two incomes listed, and each are weekly, then they are to be added together and checked against the eligibility guidelines for determination. If there are two incomes listed and they are different frequency, such as monthly, and the other is bi-weekly, then they should be annualized and determined.

Corrective Action Required #3: Watch the webcast on the DPI website for Filling Out the Household Application (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\_html5.html). Submit a signed statement that you have watched and understand the process. The link is below. Submit a statement stating you have watched it, the date, and explain that you understand the process for correctly determining applications going forward.

## Verification

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.
- 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.

## Commendations/Comments/Technical Assistance/Compliance Reminders

Verification was done correctly. A total of one application was selected for Verification.

#### **Meal Counting and Claiming**

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.
- Meals must be offered to all students each day school is in session a full day, so DPI has created <u>Field Trip meal resources</u> to help schools offer student meals (https://dpi.wi.gov/schoolnutrition/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.

#### Commendations/Comments/Technical Assistance/Compliance Reminders

While observing the lunch service, there was no overt identification. All meals observed were reimbursable.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

#### Commendations

Thank you to the staff at St. Patrick's Grade School for their warm welcome and cooperation throughout the administrative review. Reviewers loved to see the creative menu names, and colorful and festive decorations in the cafeteria. We are sure the students appreciate it too! Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It's been a pleasure working with your staff.

# <u>Comments/Technical Assistance/Compliance Reminders</u> Crediting Documentation

As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food, meat/meat alternate, or other processed food not found in the <u>USDA Food Buying Guide for School Meal Programs</u> (https://media.dpi.wi.gov/school-nutrition/processing-applications-direct-certification/story\_html5.html).

The USDA Food Buying Guide for Child Nutrition Programs contains yield and crediting information for foods with standards of identity (in large part, unprocessed foods). Foods that do not have standards of identity are not listed in the Food Buying Guide and require further documentation (a Child Nutrition [CN] label, product formulation statement [PFS], or USDA Foods Fact Sheet) clearly detailing the ingredients and their creditable quantities in order to be served in School Meal Programs.

A complete CN label includes the following: CN logo, product name, ingredient statement and inspection legend. It is important to save actual CN labels from product packaging that include these

four things. Simply cutting out the CN logo is not adequate documentation. You may either cut the label off the package, make a copy of the label directly from the package, or take a picture of the label.

When a CN label is not available for a processed product, that product must have a current, accurate PFS detailing product composition and crediting information in order to be served in School Meal Programs. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

Acceptable crediting documentation was not available for the hashbrown patty, Rich's 16" white wheat crust (the PFS was dated 2008), Hormel cooked old world style spicy italian sausage chunks, and the chicken breast with rib meat . 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). If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the NSLP Menu Planning webpage, under the Child Nutrition Labels and Product Formulation Statements heading (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs).

## **Production Records/Crediting**

Crediting for meat/meat alternate and grain products must always be rounded down to the nearest quarter (0.25) ounce equivalent (oz eq). For example, production records listed the crediting for the bread as 1.35 oz eq. However, this must be rounded down to the nearest quarter oz eq (1.25 oz eq).

## **In-House Yield Study**

While reviewing the Food Buying Guide (FBG) with the food service director, the question arose, "how do you credit 88 count oranges if they are not listed in the FBG?" If a food is not listed in the FBG the School Food Authority (SFA) may complete an in-house yield study to determine the yield of the product. The SFA must follow the <a href="In-house Yield Study Procedures">In-house Yield Study Procedures</a> that are available on DPI's <a href="Menu Planning">Menu Planning</a> website. The documentation must be maintained and kept with all food crediting documentation (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy).

#### **Standardized Recipes**

All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the <a href="Standardized Recipes">Standardized Recipes</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).

The following recipes must be updated to reflect how St. Patrick's School is making the recipes. Additionally, since pre-K students are comingled with K-8, it is not necessary to have different serving sizes for each age/grade group.

Some recipes were difficult to understand and some didn't appear to yield the amount that was listed. Review these recipes for accuracy:

• Chicken and gravy - update ingredients to reflect actual products used (diced chicken), correct serving sizes (is it ¾ cup or ½ cup serving size?), ensure number of portions/yield for the recipe is correct. Change age/grade groups to just K-8.

- Pizza Portion size should be amount served to students (1 slice), not the crediting of the product. Change age/grade groupings to just K-8. Review and update the crediting based on the updated crediting documentation for the pizza crust and sausage topping.
- Baked Ziti -review weight and measure for each ingredient and ensure it reflects the amounts that are used in the recipe. It is not necessary to have both weight and measure, though helpful to have both. If both are provided ensure they equal the same amount.
- Grandma's Crispy Chicken- review and update portion size and crediting. Rice krispies not creditable (not enough on each piece to credit and not whole grain-rich). Re-write procedures for clarity. Combine to one K-8 age/grade grouping.
- Marinara sauce S-1 Review the statement in the procedures that says, "add 12-15 lbs beef crumbles, if you wish." This statement is not standardized.
- Cinnamon apple slices review weight and measure amounts for each ingredient as the amounts do not equal one another. Update the number of portions for the recipe (it appeared to be too high for how much product is in the recipe). Re-write procedures for clarity.

#### Whole Grain-Rich

Crisp Rice cereal used as a coating for Grandma's Crispy Chicken is not whole grain-rich. All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. Replace all enriched grain products with whole grain-rich versions. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products

(https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

#### **Trans Fat**

The aged cheddar cheese sauce contains 2 g trans-fat per serving. Food products and ingredients used to prepare school meals must contain zero grams of trans fat per serving (less than 0.5 grams per serving) according to each product's nutrition facts label or manufacturer's specifications. If it is likely that a product's trans fat is naturally occurring (for example, in some meat and dairy products), the school food authority (SFA) must request documentation from the manufacturer that reports the source of the trans fat prior to using the product. If a label does not specify the trans fat content of a product, the SFA must request additional information prior to serving the product. All products containing synthetic trans fats and list a partially hydrogenated oil in the ingredient list must be discontinued immediately.

#### Offer vs. Serve (OVS)

St. Patrick's School uses OVS. This means that for students to select a reimbursable meal, they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. There was some confusion about milk and whether or it students had to take it. Under OVS, students do not have to take a milk to create a reimbursable meal. Please communicate this with students and staff. The Offer Versus Serve Guidance manual (this is the most up-to-date version) 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).

#### Veggie Bar

There must be standardized measuring utensils for salad bar offerings. This ensures proper portioning. For food items that do not fit into cups neatly, proper serving sizes must be communicated to service staff. For example, if the planned serving size for celery is ¼ cup, then serving staff must know to serve

three, 4x1/2 inch strips to equal ¼ cup vegetable. Please review this resource that the School Nutrition Team created this year for <u>veggie bar signage</u> (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

#### **Veggie Bar Production Records**

Produce on a garden bar can credit toward the meal pattern each day that it is offered to students. Even with garden bars, the menu planner must plan a specific portion size that he or she intends students to take. If the fruits or vegetables on the garden bar are used to meet the weekly requirements, portion sizes of at least 1/8 cup each should be communicated to students with signage. This encourages students to take the planned amount, and ensures the amount needed for a reimbursable meal is selected. Keep in mind that raw, leafy green vegetables (spinach, romaine, lettuce, etc.) credit as ½ of the volume served.

Additional signage on the veggie 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 the main line to help students identify correct serving sizes (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx).

Production records must be kept for a garden or salad bar. Production record templates for garden bars and salad bars are available on the <a href="Production Records">Production Records</a> webpage, under the Other Resources heading. Remember to include the date of service and age/grade groups served. A <a href="Vegetable\_Subgroups">Vegetable</a> Subgroups handout is also available and identifies common vegetables with their respective subgroups (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

#### Signage

Adequate signage helps ensure that students accurately select reimbursable meals. Signage was available at the end of the serving line; however, it is recommended to reposition this closer to the beginning of the line. Thank you for doing this while reviewers were onsite! Signage must also state the students must take at least three full components, one of which is ½ cup fruit and/or vegetable, or a combination. Visit our <a href="Signage">Signage</a> page for additional signage resources (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

#### **Printed Menu**

There was a statement at the bottom of the printed menu that said, "Milk is served with each meal." Because St. Patrick's Grade School uses Offer vs. Serve (each student is able to select at least 3 full components that they want to eat, one of which is at least a ½ cup fruit or vegetable for their reimbursable meal) students do not have to select milk. Milk is one of the required components to offer to students, but it is possible for students to build a reimbursable meal without selecting a milk.

#### **School Breakfast Challenge**

Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.

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

NKH will be providing the following amazing prizes:

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

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

Ready to get started? <u>Register your School</u> and visit the <u>Hunger Task Force</u> website to gather all the details. Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

You may also use this <u>School Breakfast brochure</u> to share the benefits of breakfast with parents (https://dpi.wi.gov/sites/default/files/imce/wisconsin-school-meals-rock/\_files/brochure-get-school-breakfast.pdf).

## Child and Adult Care Food Program (CACFP) for Pre-K Students

Pre-K students are comingled with other age/grade groups. St. Patrick's Grade School using the USDA flexibility to serve the K-8 meal pattern to all students.

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

☐ **Finding #1:** Insufficient crediting documentation

**Corrective Action Needed:** Provide crediting documentation for the following:

- Sysco hashbrown patty completed onsite, thank you!
- Rich's 16" white wheat crust completed onsite, thank you!
- Hormel Sausage chunks
- Chicken breast with rib meat

Submit to public health nutritionist for review.

□ Finding #2: Daily vegetable shortage at lunch for week of review. Only 1 hashbrown patty served, and the crediting documentation provided indicated that 1 patty is equal to  $\frac{1}{2}$  cup vegetable. This means students only had access to  $\frac{1}{2}$  cup vegetable ( $\frac{1}{2}$  cup beans and  $\frac{1}{2}$  cup hashbrown patty).

**Corrective Action Needed:** Submit a statement that explains what will be done to fix this daily vegetable shortage. If you choose to use a different hashbrown product, submit the crediting documentation as well.

☐ Finding #3: Not all grains WGR. The rice cereal coating for Grandma's Crispy Chicken recipe was being credited towards the grain component. However, the cereal was not whole grain-rich. Non whole grain-rich grains are not credible towards the meal pattern.

**Corrective Action Needed:** If you wish to credit the cereal towards the grain component a whole grainrich product must be used. Submit a statement that explains what you will do and submit the nutrition facts label and ingredient list of the new product.

☐ Finding #4: Aged cheddar cheese sauce contains trans fat. All foods served in the school meals program must contain 0g trans fat per serving.
<b>Corrective Action Needed:</b> Submit a statement that says you will discontinue the use of this product. If you wish to continue to serve a cheese sauce, submit the product nutrition label and ingredient list of the new product. If you wish to credit the cheese sauce, proper crediting documentation must be provided, as well.
☐ Finding #5: Standardized recipes not accurate and must be reviewed and updated.
<b>Corrective Action Needed:</b> Correct and submit the following standardized recipes (review the technical assistance section above for more detailed information about what is needed):
<ul> <li>Chicken and gravy</li> <li>Pizza</li> <li>Baked Ziti</li> <li>Grandma's Crispy Chicken</li> <li>Marinara sauce S-1</li> <li>Cinnamon apple slices</li> </ul>
☐ <b>Finding #6:</b> Veggie bar production records did not list a planned serving size for each vegetable served.
Corrective Action Needed: Include a planned serving size on the veggie bar production records. Submit one week of completed production records to the public health nutritionist for review.
☐ Finding #7: Reimbursable meal signage not at the front of the service line.

**Corrective Action Needed:** Please move to the beginning of the meal service line. *Completed onsite*, *thank you!* 

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

#### 3. SMART SNACKS

## **Comments/Technical Assistance/Compliance Reminders**

At the time of the on-site review there were no competitive foods or beverages sold at St. Patrick's Grade 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 <a href="Smart Snacks">Smart Snacks</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

#### 4. BUY AMERICAN PROVISION

### **Comments/Technical Assistance/Compliance Reminders**

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product. A "Domestic Commodity or Product" is defined as an agricultural commodity or product that is produced or processed in the United States using substantial agricultural commodities that are produced in the United States (products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowable under this provision as territories of the United States).

"Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

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% 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.

For products that are non-compliant with this provision, the following information must be recorded on a Buy American Non-Compliant Product List. *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 <u>Buy American Non-Compliant Product list</u> 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.
    - i) 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.)
    - i) Ex. Blueberries are not available domestically during the months of December June.
  - c) **Availability** Product(s) is not available to purchase domestically.
    - i) 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.)
    - i) 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.
  - i) Ex. The SFA received a donation of non-domestic oranges
  - ii) Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic 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).

## Findings and Corrective Action Needed: Buy American Provision

☐ **Finding #1:** The following products are non-domestic and a non-compliant product sheet\_must be filled out for each one:

- Fresh melons Mexico
- Fresh cucumbers Mexico

Corrective Action Needed: Complete a non-compliant product list for each of the aforementioned

#### 5. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

#### Commendations/Comments/Technical Assistance/Compliance Reminders

- How to locate the agency's Child Nutrition program Report, which provides you with a compilation
  of meals claimed, your reported revenues and expenditures, amount of federal reimbursement
  received and per meal costs for lunch and breakfast. The Aids Register shows the amount
  deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods.
  Both resources are accessible from our Online Services webpage (dpi.wi.gov/nutrition/onlineservices).
- SFAs must limit the net cash resources in order to not exceed three months average expenditures.

#### Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new 16-17 Annual Financial Report instructions are located on our 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 (Fund 50) or the general fund (Fund 10) 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.
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance".
- 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".
  - o "Equipment" should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under "Other".
  - Under "Purchases Services" you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under "Ala Carte", you should be reporting 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 would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

#### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the <u>Indirect Costs guidance</u> (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. <u>SP23-2017 Unpaid Meal Charges guidance</u> <u>Q & A</u> may be found our Financial Management webpage (https://dpi.wi.gov/schoolnutrition/national-school-lunch-program/financial).

#### **Unpaid Meal Charge Policy**

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the <a href="Unpaid Meal Charges In a "Nutshell"">Unpaid Meal Charges In a "Nutshell"</a> (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: <a href="Unpaid Meal Charges Guidance">Unpaid Meal Charges Guidance</a> (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 <u>Wisconsin Department of Revenue</u> (DOR) as unclaimed property (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf). The DOR has rules concerning unclaimed property that must be followed.

## Nonprofit School Food Service Account Adult Meals

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

☐ Finding #1: The Annual Financial Report does not show the transfer from a Non-Food Service account into Fund 50 for adult meals for the school year 18-19.

Corrective Action Required #1: Watch the webcast on the DPI website for the Annual Financial Report. This will explain how items are to be broken out on the annual report. Submit a statement stating you will show a transfer from Non-Food Service account into Fund 50 Food Service for these meals on the Annual Financial Report going forward. Keep daily documentation of counts of adult meals. If the current process you are using for paying for these adult meals changes, please indicate that in your statement of corrective action.

#### **Paid Lunch Equity**

## Commendations/Comments/Technical Assistance/Compliance Reminders

The PLE tool did not need to be completed due to a positive fund balance in Food Service. The PLE Survey was completed.

## **Indirect Costs**

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice
  account within WUFAR). For both public and private schools in Wisconsin, 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 on the indirect cost rate. This could include items such
  as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. 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 <u>current</u> 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 district's total.

There are no indirect costs being charged to Food Service.

#### 6. GENERAL PROGRAM COMPLIANCE

## **Civil Rights**

#### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Nondiscrimination Statement

When including the <u>non-discrimination statement</u> on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in October 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).

However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, "**This institution is an equal opportunity provider**." Both statements should be in the same size font as the other text in the document.

#### And Justice for All Poster

"And Justice for All" posters need to be posted in public view where the program is offered.

## **Civil Rights Training**

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

#### Civil Rights Self-Compliance Form

• The <u>Civil Rights Self-Evaluation Compliance</u> form is required to be completed by October 31 annually (https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc).

#### Overt Identification

• The meal counting system must prevent overt identification of students receiving free and reduced price benefits. There was not any overt identification noticed.

## Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed
  with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service
  within 3 days. You will want to make sure that this is included in the district procedures to ensure
  compliance.

All SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the <a href="USDA Program Discrimination Complain Form">USDA Program Discrimination Complain Form</a> for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\_combined\_6\_8\_12.pdf).

## Commendations/Comments/Technical Assistance/Compliance Reminders

## Findings and Corrective Action Needed: Civil Rights

**Finding #1:** The Non- Discrimination shortened statement was not on the menu's. **Corrective Action #1:** Add the statement "This institution is an equal opportunity provider" to the lunch menu.

#### **Local Wellness Policy**

#### Commendations/Comments/Technical Assistance/Compliance Reminders

St. Patricks School has a Wellness Policy in place, however, some updates are needed. A Wellness Policy checklist has been provided to aid in this process.

#### Findings and Corrective Action Needed: Local Wellness Policy

☐ Finding #1: The wellness policy did not show anywhere that there are stakeholders involved in creating and/or implementing the policy.

Corrective Action Required: Use the Wellness Policy Checklist to help you with language to involve stakeholders in your wellness committee meetings and note this in your policy. Indicate a timeline in your corrective action as to when you plan to meet and take care of this. When the additions are made, send a copy to the DPI consultant.

#### **Professional Standards**

#### **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, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our <a href="Professional Standards">Professional Standards</a> 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.

## <u>Commendations/Comments/Technical Assistance/Compliance Reminders</u>

Professional Standards training is being done on an ongoing basis and documented. Continue to do trainings, webcasts, etc. The DPI website is a great source for training.

## <u>Water</u>

## Commendations/Comments/Technical Assistance/Compliance Reminders

Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups.

Water is readily available to all students during meals.

## **Food Safety and Buy American**

<u>A Flash of Food Safety</u> is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). While you're at it, visit the <u>Office of Food Safety</u> website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators. Let's grow food safety! **Food Safety Inspections** 

- Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year: one in the fall, which is an actual food safety inspection; and one in the spring, which is a review of the site's Food Safety Plan.
- 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.

#### **Temperatures**

 All cooling equipment must have internal temperatures taken and recorded daily on temperature logs. Posting them directly on the equipment makes recording convenient and a regular part of daily routines.

#### **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. All temperature logs, calibration logs, and sanitizing solution logs were upto-date.
- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the <a href="SNT Food Safety">SNT Food Safety</a> webpage. (https://dpi.wi.gov/school-nutrition/food-safety)
- Only SOPs relevant to the programs and procedures for which the site-specific food safety plan is written should be included in the plan.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.

- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- 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 food service staff.

## **Food Employee Reporting Agreements**

- All food handlers must have a signed <u>Food Employee Reporting Agreement</u> on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).
- All food handlers must sign a new Food Employee Reporting Agreement form if changes are
  made to the document. While there are no requirements as to how frequently food service
  employees must sign a Food Employee Reporting Agreement form, it is the best practice for
  each food service employee to annually review and sign an agreement to reinforce the
  information contained in the document.

#### **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 and/or off-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas.

## Reporting and Recordkeeping

#### Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the
  development of the ISP (e.g., records for the initial approval year and all records from the year any
  updates are made to the ISP) during the entire period CEP is in effect. In addition documentation
  must be retained for five years after the submission of the final claim for reimbursement for the last
  fiscal year of CEP." Documents would also need to be maintained longer if there were an open
  audit issue needing to be resolved.
- 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.

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

#### Commendations/Comments/Technical Assistance/Compliance Reminders

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

- Promotion of the <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)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. 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: 608.266.7

Carolyn Stanford Taylo, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her 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 <u>Every Child a Graduate</u> webpage (https://dpi.wi.gov/statesupt/every-child-graduate).

