

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

School Food Authority: Lodi School District

Agency Code: 11-3150

School(s) Reviewed: Primary School, Lodi High School

Review Date(s): 3/19/18

Date of Exit Conference: 3/20/18

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state 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, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Lodi School District 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. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

- Of the 284 students eligible for free/reduced price meals in February, a sample of 170 was pulled and all benefits were determined correctly, and direct certification had been run in the appropriate timeframes. Kudos for a job well done

Applications

- All applications must have the frequency of income and total income for that frequency recorded on the back of the application if not included in their Software approval notification.

Public Release

- 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.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The applications did not have frequency of income or income total recorded on the application.

Corrective Action Needed: Please provide a statement of understanding that any required information that does not appear on the Skyward letter, will be recorded on the back of the application in the appropriate blanks.

- Finding #2:** The Public Release was not submitted to a local newspaper which was fine as the local paper charges, but it was also not distributed to local grassroots organizations (public libraries, food pantry, churches, etc.) and unemployment offices.

Corrective Action Needed: Please submit a statement of the process to use for school year 2018-19 to include the appropriate places/agencies when distributing the Public Release.

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

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

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

Thank you to the staff at Lodi School District for their warm welcome and cooperation throughout the administrative review. Reviewers took note of and greatly appreciated your conscientiousness with following the meal pattern. We also loved seeing your clean and organized kitchen and the beautiful variety of fresh produce available to students. Your dedication to serving healthy and appealing meals to students is evident; keep up the great work!

Crediting - Product Formulation Statements

- Proper crediting documentation is necessary to show how foods credit towards the meal pattern. This allows reviewers to verify that the daily and weekly minimums for the five food components were met.
- A few products did not have the appropriate crediting documentation. Jamwich sandwiches, Azteca 8" Ultra Grain Flour Tortilla and Rold Gold Heartzels Pretzels. The following is a reminder of what Product Formulation Statements (PFS) should include. A complete PFS must come directly from the manufacturer and must list:
 - product name and number
 - weights of raw and cooked ingredients
 - portion size
 - statement of contribution to meal pattern requirements
 - original signature signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
 - printed on company letterhead
- Information about crediting documentation can be found on the [Menu Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

Clementines on Daily Fruit pear/clementine/banana recipe

- It was noted that clementines (one each) were incorrectly listed on the daily fruit recipe as 1/2 cup fruit. After further discussion with the food service director, she was aware that one clementine only credits as 3/8 cup and that the recipe did not get updated. She has a portion control sheet of all foods served to students that staff use to verify portion amounts, and it correctly lists one clementine as only 3/8 cup and that 1/2 cup is the necessary minimum under Offer vs. Serve. The reviewer strongly encourages the food service director to add an additional note for clarity that at least two clementines are necessary to equal a 1/2 cup fruit. In addition, update production records and recipes to reflect the change so that there is no confusion over the serving size for clementines.

Vegetable Subgroups

- Review of recipes showed that snap peas were incorrectly crediting towards the starchy vegetable subgroup. This did not result in a shortage of starchy or any other vegetable subgroup, but it is important that the error be fixed. This was corrected on site and the snap peas are now being credited toward the Other vegetable subgroup.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

❑ Finding #1: Daily fruit pear/clementine/banana recipe and production records incorrectly state that one clementine is a 1/2 cup fruit.

CORRECTIVE ACTION REQUIRED: Remove the clementine from the Daily fruit recipe and or add a note for clarify that two clementines are needed to credit as a 1/2 cup fruit. Additionally, make sure production records reflect this change. Submit a copy of the new recipe and a new production record template. *Corrected onsite. Thank you!*

❑ **Finding #2:** A few products did not have the appropriate crediting documentation: Jamwich sandwiches, Azteca 8" Ultra Grain Flour Tortilla and Rold Gold Hartzels Pretzels.

CORRECTIVE ACTION REQUIRED: Contact the manufacturer and request Product Formulation Statements for the products mentioned. *Corrected onsite. Thank you!*

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

- Excellent job on new Annual Financial Report!
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- **Your lunch account refund policy states, "if you choose to donate your remaining balance, no further actions required," but they are required to give their permission for you to donate it.**

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

Nondiscrimination Statement

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

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 must have procedures 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 [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Medical statements must include
 - A description of the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet, and
 - An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Food Service should have copies of all medical statements for students within their school to provide correct meal substitutions.

Findings and Corrective Action Needed: Civil Rights

- Finding #1:** The Menu posted to the website does not have the current shortened USDA Nondiscrimination Statement “ This Institution is an Equal Opportunity Provider” printed on it.
Corrective Action Required: Please submit the April menu with the correct nondiscrimination statement printed on it.
- Finding #2:** The Civil Rights poster was not posted out in the cafeteria in public view.
Corrective Action Required: Please move the Civil Rights poster out into the cafeteria in public view and take a picture of its placement as corrective action.

On-site Monitoring

Commendations/Comments/Technical Assistance/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo [SP 56-2016](http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf) (<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>).
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> and <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc>.)

Findings and Corrective Action Needed: On-site Monitoring.

- **Finding #1:** The SFA combined its On-site monitoring of NSLP and SBP onto the SBP monitoring form, and a separate form must be completed for each program.

Corrective Action Required: Please complete the current NSLP on-site monitoring form for all NSLP sites in the SFA

- [School food authority on-site review checklist for NSLP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc>)
- [School Food Authority On-Site Review Checklist for SBP](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc>)

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the *Wisconsin Wellness: Putting Policy into Practice* - [School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit). (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)

- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).
- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf). Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Wellness Policy

- **Finding #1: SFA LWP meets some but not all requirements as stipulated above.**
Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule. Please include:
 - The updated new language
 - The official responsible for oversight of the LWP to ensure school compliance with the wellness policy
 - A plan for measuring implementation.

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- All food and beverages sold to students during the school day must be compliant with both the Smart Snacks general and nutritional guidelines. The homemade parfaits made with GFS pudding are non-compliant. The pudding's first two ingredients are water and sugar and the pudding is the main ingredient in the parfait. To be Smart Snacks compliant the parfait must have the first ingredient be a dairy food. In addition, the parfait must meet the nutrient standards for calories, fat, sodium and sugar for the planned serving size.

- After further discussion with the Food Service Director (FSD), the prepared pudding will be discontinued and the parfait will instead be prepared with a pudding mix. By switching to a pudding mix, the FSD is able to determine the amount of milk that will be mixed into the powder and ensure that milk is the first ingredient, by weight, in the recipe's ingredient list.
- Refer to the [Smart Snacks in a Nutshell](#) resource for detailed information on general and nutrient standards. Additional [Smart Snacks](#) resources are on our webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed: Smart Snacks

❑ Finding #1: The homemade parfaits made with GFS pudding are non-compliant. The pudding's first two ingredients are water and sugar.

CORRECTIVE ACTION REQUIRED: Discontinue the sale of the parfaits made with the prepared pudding product, find another prepared pudding where the first ingredient is a dairy product or make your own recipe ensuring that a dairy product is it first ingredient by weight. Submit a copy of the new recipe, product label(s) used and weights of each individual ingredient.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Safety Inspections

- The most recent food safety inspection must be posted in a publically visible location.

Food Safety Plans

- 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 [SNT Food Safety](#) 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.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Heat-treated plant food, such as cooked rice, beans, and vegetables
Shell eggs	Tofu or other soy protein
Meat (beef, pork, and lamb)	Sprouts and seed sprouts
Poultry	Sliced melons
Fish	Cut tomatoes
Shellfish and crustaceans	Cut leafy greens
Baked potatoes	Untreated garlic-and-oil mixtures

Synthetic ingredients, such as textured soy protein in meat alternatives

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Sharing and No Thank You Tables

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

Sharing Table

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

No Thank You Table

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

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

Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or

local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.

6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

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

“Wholesome” must be defined by the SFA as part of the SOP.

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

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

Monitoring Log

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

Findings and Corrective Action: Food Safety

- Finding #1:** At Lodi High School, the most recent Food safety inspection was not posted out in cafeteria in public view.
Corrective Action Needed: Please post most recent inspection in public view and send picture of placement as corrective action.
- Finding #2:** Since the salad bar contains TCS foods which are held outside of mechanical refrigeration, and cheese sticks, are served to students at the register outside of mechanical refrigeration, Time as a Public Health Control must be used. Standard operating procedure (SOPs) for Time as a Public Health Control is not included in the food safety plan.
Corrective Action Needed: Add and adapt site-specific Time as a Public Health Control, SOP to the food safety plan and submit an updated SOP as attachment via email.
- Finding #3:** At both Lodi Primary School and Lodi High School the Food Safety Templates need to be updated with site-specific information, and the high school needs all Process 1, 2, and 3 items listed in plan.
Corrective Action Needed: Update Food Safety Plan to be site specific and submit electronic documents as corrective action.

Buy American

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

- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
 - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
 - If no country of origin identified on label, than SFA must get certification from 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 within an email.
 - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
 - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
 - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
 - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- 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) (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. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).
- **If the SFA receives any nondomestic products, these products must be recorded on a Noncompliant Product List. A [template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is located on the procurement webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).**

Findings and Corrective Action Needed: Buy American

- **Finding #1:** The SFA’s noncompliant list does not contain the country of origin.
 - Corrective Action Needed:** Please add the country of origin to the spreadsheet. Completed on site, no further action required.
 - **Label does not identify country of origin:**

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

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

Findings and Corrective Action: SFSP Outreach

- ❑ **Finding #1:** No summer food service outreach was provided to students.
Corrective Action Needed: Please provide a statement that Lodi SD will do summer food service outreach for the 17-18 school year.

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 your students' success.

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



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