

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

School Food Authority: Portage Community School

District

Agency Code: 11-4501

School(s) Reviewed: Muir El & Woodridge El

Review Date(s): 4/3/18-4/4/18

Date of Exit Conference: 4/4/18

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. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Portage Community School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. The food service department is well managed. Records are organized and easy to access. Staff stay current on Professional Standards training in job specific areas and are obtaining hours above what is required. Keep up the good work!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

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

380 eligibility determinations were reviewed, 0 errors were identified. Great job!

Disclosure

The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits. For anyone receiving access to eligibility information to manage the software system, the *Disclosure Agreement* form should be signed and on file at the district. A template [Disclosure of Free and Reduced Price Information](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Findings and Corrective Action Needed: Certification and Benefit Issuance

No findings. The agency is in full compliance.

Verification

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

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases (adverse action), the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures. Day one is the day the letter is sent.
- Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient.

Meal Counting and Claiming

No findings. The agency is in full compliance.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the staff of Muir Elementary and Woodridge Elementary for their warm welcome, cooperation, and time during the Administrative Review. A special thanks to the Food Service Director and the Administrative Assistant for providing very complete and thorough documentation prior to coming on-site, as this greatly expedited the review process. Portage Community School District is doing an excellent job providing a variety of menus and menu items to students at all grade levels and meeting meal pattern, while accounting for dietary specifications. All of the school nutrition

professionals are extremely knowledgeable and work well with the students. We enjoyed our time at Portage Community School District! Thank you for your hard work and dedication to your School Nutrition Programs!

Technical Assistance

Crediting Discrepancies

- The following items were incorrectly credited on the crediting tables attached to production records based on documentation provided. The correct crediting based on the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) or recipe provided on-site is listed (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).
 - Crispy TriTator, 2.00 ounces- credits as $\frac{1}{8}$ cup
 - Fresh cut pepper, 1.60 ounces- credits as $\frac{1}{4}$ cup
 - Romaine lettuce for daily salad option, 2.00 ounces- credits as $\frac{3}{8}$ cup
 - Cucumber slices for daily salad option at Muir Elementary, 0.30 ounces- does not credit, $<\frac{1}{8}$ cup
 - Cucumber slices for daily salad option at Woodridge Elementary, 0.16 ounces- does not credit, $<\frac{1}{8}$ cup
 - Taco meat recipe for Muir Elementary- credits as 1.00 ounce equivalent meat/meat alternate

Food Buying Guide Crediting

- Below is the crediting of red pepper strips, cucumber slices, and romaine lettuce based on the [USDA Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) (FBG) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).
- Red pepper strips, 1.60 ounces (oz.)
 - FBG entry: Peppers, Bell, fresh *Orange or Red, Medium or Large, Whole*
 - 1 pound or 16 oz. = 14.70- $\frac{1}{4}$ cup raw vegetable strips
 - 1.6 oz. = 0.3675 cups or $\frac{1}{4}$ cup
 - $\frac{1}{2}$ cup = 2.18 oz.
- Cucumber slices, $\frac{1}{4}$ cup
 - FBG entry: Cucumbers, fresh *Whole, Unpared*
 - 1 pound or 16 oz. = 12.40- $\frac{1}{4}$ cup unpared, sliced vegetable
 - $\frac{1}{4}$ cup = 1.29 oz.
- Romaine Lettuce, 2.00 oz.
 - FBG entry: Lettuce fresh *Romaine, Untrimmed*
 - 1 pound or 16 oz. = 31.30- $\frac{1}{4}$ cup raw vegetable pieces (credit as $\frac{1}{8}$ cup in NSLP/SBP)
 - 2.00 oz. = 0.4890625 cups or $\frac{3}{8}$ cup
 - $\frac{3}{4}$ cup = 3.07 oz.

Fruit Variety

- It was noted on the February and April monthly menus and on the day of on-site observation at Woodridge Elementary that the same type of fruit is served for breakfast and lunch on some days. For example, bananas were offered at breakfast and lunch during the day of meal observation at Woodridge Elementary.
- Consider offering a different fruit variety at breakfast and lunch in order increase the likelihood that students will select fruit at both meals and to provide a variety of different nutrients.

Standardized Recipes

- The chicken and gravy recipe was provided for the week of review. This recipe was lacking pieces of information necessary for standardized recipes, such as total volume or measure (gallons, pieces) of the recipe, pan sizes, weight or volume in each pan, and the number of pans. Recipe standardization is very important to ensure that each meal is consistently planned to meet the daily and weekly requirements. Continue to work towards recipe standardization, and use all resources available to you. Visit our [Recipe Resources and Tools](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage for additional information (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes).
- For an overview of essential information needed in standardized recipes, please view the [Standardized Recipe Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf).

Resources:

CACFP Meal Pattern

While Portage Community School District does not serve Pre-K students outside of the Special Milk Program at this time, if the school district chooses to serve Pre-K students NSLP or SBP, please review the following:

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

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

- Finding #1:** During the day of on-site lunch observation at Muir Elementary, it was noted that the recipe submitted for taco meat was different than the recipe used on-site. The taco meat recipe provided was also a quantity recipe with edits made on the quantity recipe. The recipe standardization process must be completed in order to standardize any quantity recipes.

During the week of review and on the day of on-site lunch observation at Woodridge Elementary, mashed potatoes were offered at both elementary schools. The recipe on the mashed potato bag is followed. A standardized recipe is required for all menu items that have more than one ingredient, even if there is a recipe that is utilized from the packaging.

Corrective Action Needed: Submit an updated standardized recipe for taco meat for Muir Elementary. Submit standardized recipes for mashed potatoes for Muir Elementary and Woodridge Elementary.

- Finding #2:** Offer Versus Serve (OVS) is implemented but not being implemented to the full extent at Muir Elementary and Woodridge Elementary for lunch.

Prior to lunch service observation at Muir Elementary, the school nutrition professionals were asked how the service line works. From the explanation, it was discovered that the cooked vegetable for the

day is served on each tray prior to providing each student with a lunch tray. This practice is in place because the school nutrition professionals would like to encourage students to try the vegetable. Technical assistance was provided prior to meal service that students must be offered, or asked, if they would like the cooked vegetable and have the ability to deny this option. During lunch service, the $\frac{1}{2}$ cup of cooked carrots were being served on each tray before providing each student with a lunch tray. The students were not offered, or asked, if they would like the cooked carrots. Instead, they were served. OVS was implemented properly for all other menu items.

Prior to lunch service observation at Woodridge Elementary, it was noted that mashed potatoes and chicken nuggets were being pre-portioned into boats. The mashed potatoes and chicken nuggets were pre-portioned into the same boat. Technical assistance was provided on-site prior to lunch service that there should be boats with just mashed potatoes or just chicken nuggets because students should have the ability to deny either the mashed potato or chicken nugget options. The school nutrition professional made a few boats of just mashed potatoes and just chicken nuggets in order to accommodate students who would like to deny either one of these options. During lunch service, students were served the boats with both chicken nuggets and mashed potatoes. Students were not offered, or asked, if they would like mashed potatoes or chicken nuggets or both. OVS was implemented properly for all other menu items.

Technical assistance was provided to the Food Service Director and Administrative Assistant on different ways to approach OVS in these situations.

Corrective Action Needed: Submit a written statement for Muir Elementary and Woodridge Elementary detailing the plan for how these practices will be changed in order to implement Offer Versus Serve to the full extent. Complete a training with the school nutrition professionals of Muir Elementary and Woodridge Elementary on the new procedures and submit a signed training roster as part of corrective action.

- ❑ **Finding #3:** Documentation provided for the week of review indicated that $\frac{1}{4}$ cup of sliced cucumbers are offered with the daily salad option. During on-site observation of lunch preparation at Muir Elementary and Woodridge Elementary, it was noted that about 0.16-0.30 ounces of sliced cucumbers are offered on the daily salad option. 1.29 ounces of sliced cucumbers credit as $\frac{1}{4}$ cup of other vegetable. 0.16-0.30 ounces of sliced cucumbers is not a creditable amount of cucumbers and, therefore, cannot credit towards the *other* vegetable subgroup requirements for the week of review.

This led to an *other* vegetable subgroup shortage for the week of review. This is not a missing vegetable subgroup because it is evident that efforts to serve the *other* vegetable subgroup were made.

Corrective Action Needed: Submit a written statement detailing your plan for communicating to school nutrition professionals at all schools that 1.29 ounces of sliced cucumbers must be offered in order to credit as $\frac{1}{4}$ cup of other vegetable.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

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

Annual Financial Report (AFR)

The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

Meal Account Refunds

Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ✓ **Finding #1:** The Annual Financial Report (AFR) for the 16-17 SY is not correct. Total revenues and the ending fund balance need to be updated to match the district's 1505 Financial Report.

Corrective Action Needed: Submit Total Revenue and Ending Fund Balance corrections via email to the DPI Accountant.

Corrected onsite. No further action required.

- ❑ **Finding #2:** A trailer was purchased in the 16-17 SY and 50% of the expense was allocated to the foodservice account without a basis/time study to support the allocation. **If any equipment use is shared outside of school food service, the amount funded by the nonprofit school food service account must be prorated and supported by a time or usage study as a direct expense.**

Corrective Action Needed: Conduct a usage study for one week. Submit the results of the study to the consultant. The study will be reviewed and the consultant will determine if any financial adjustments should be made.

Paid Lunch Equity (PLE)

Comments/Technical Assistance (TA)/Compliance Reminders

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Minor technical assistance was provided on-site to correct errors in the 16-17 SY prices recorded in the tool. The tool was re-uploaded to the online contract. The school is in compliance with the 17-18 SY weighted average requirement.

Revenue from Nonprogram Foods

No findings. The agency is in full compliance.

Indirect Costs

Comments/Compliance Reminders

DPI does not allow annual assigned indirect cost rates 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 an indirect cost rate. This may include utilities, rent, printing and mailing services, administrative oversight, etc.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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

Civil Rights Training

Civil rights training had been attended by all staff in the schools and documentation was available for review. There is a newer version of the [Civil Rights Training Power Point](#) that the SFA should begin using.

Public Release

The agency is doing a great job publicizing the SFAs participation in the USDA School Meal Programs. The public release was sent to multiple community organizations and the local media as required.

Special Dietary Needs

The agency is doing a great job communicating and documenting special dietary requests. The food service department works closely with the nurse and the households to serve safe meals. Medical statements are on file for each student requesting a meal accommodation. Medical statements do not need to be updated annually, but this is a best practice as students' needs may change.

Reviewer noted that Muir EI and Woodridge EI operate a peanut "free" table. Consider reviewing the CDCs [Guidelines for Managing Food Allergies in Schools Manual](#), which recommend schools be allergen "aware" by implementing Standard Operating Procedure (SOPs) that decrease the risk of cross contact and help maintain safe school environments. Using the statement peanut "free" may give parents a false sense of security when the agency is not restricting/checking each food item others bring from home. The agency is doing a great job overall, by keeping the focus on allergen awareness, standard operating procedures, and having emergency action plans in place.

As a reminder,

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended

that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

On-site Monitoring

Technical Assistance (TA)/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. This form must be completed by February 1.

Local Wellness Policy

Comments/Technical Assistance (TA)

Beginning in 2020, the agency must conduct an assessment of the LWP. Policy assessment is required every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and progress made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Smart Snacks in Schools

Commendations

Thank you to the Food Service Director for answering Smart Snacks questions prior to coming on-site. A special thanks to the Food Service Director for providing Muir Elementary and Woodridge Elementary with DPI's fundraiser tracking tools at the beginning of the school year. Through discussions with the Food Service Director and Administrative Assistant, it is evident that Portage Community School District is very knowledgeable about the Smart Snacks rules and regulations. While milk is the only item sold a la carte at Muir Elementary and Woodridge Elementary, it sounds like all Smart Snacks at the other schools of Portage Community School District are being checked with the Alliance for a Healthier Generation Product Calculator and all accompaniments are being accounted for.

Technical Assistance

Fundraisers

The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers are required to be documented. While copies of fundraising tracking tools are provided to the schools of Portage Community School District by the Food Service Director, electronic versions of the fundraiser tracking tools can also be found on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Findings and Corrective Action Needed for Smart Snacks

- ❑ **Finding #1:** Muir Elementary held a non-compliant bake sale fundraiser this school year. This fundraiser is an exempt fundraiser, however, this fundraiser and others are not being tracked. It is required that all food fundraisers are tracked.

Corrective Action Needed: Submit a written statement detailing who will be responsible for tracking and determining compliance of food fundraiser at Muir Elementary and how documentation will be kept and maintained.

Professional Standards

Staff are completing their annual training hours in job-specific areas and obtaining more than is required. Staff are well trained and knowledgeable.

Findings and Corrective Action: Professional Standards

No findings. The agency is in full compliance.

Food Safety and Storage

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

Food Safety Plan

The site specific Food Safety Plan was reviewed at both sites. It was obvious in observing the food service staff at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs are up-to-date. Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Findings and Corrective Action: Food Safety

- ✓ **Finding:** The most recent food safety inspection report at Woodridge El is not posted in a publicly visible location.

Corrective Action Needed: Post most recent food safety inspection report in location visible to public. **Completed on-site. No further action required.**

Buy American

Compliance Reminders

The USDA requires that a School Food Authority (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 the Buy American provision: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
- 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.
- What is acceptable to determine compliance on a label? Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
- Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the school.
- Any non-domestic product delivered to the school, without prior, written approval of the food service director, should be rejected. If non-domestic substitutes that were not pre-approved in writing by the food service director are delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.
- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from the manufacturer that poor market conditions exist (weather, and/or supply availability of market). This requirement applies to private labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American Provision procedures. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy](#)

[American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).

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 noncompliant 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>).

Findings and Corrective Action Needed for Buy American

- ❑ **Finding #1:** The following products were identified in Portage Community School District’s storage areas as non-domestic. Portage Community School District does not have a Buy American – Noncompliant List or SFA equivalent form.
 - Muir Elementary
 - Poultry gravy- product of Canada
 - Tropical fruit cup- product of the Philippines
 - Bananas- product of Guatemala
 - Cucumbers- product of Mexico
 - Woodridge Elementary
 - Tropical fruit cup- product of the Philippines

Corrective Action Needed: Begin using a Noncompliant Product List for tracking non-domestic products. Provide copies of completed forms for non-compliant products currently in Portage Community School District’s food storage areas. Provide the completed list as corrective action. The [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>).

Technical Assistance, No Corrective Action Needed:

The following products identified in Portage Community School District’s storage did not have proper labeling to identify the country of origin:

- Muir Elementary
 - Ranch dressing- distributed GA
 - Ketchup- manufactured PA
 - Dehydrated onion- MD
 - Marjoram- distributed IL
 - Diced peach cup- packed in Thailand
 - Sun Cups- NJ
 - Sidekicks- OH
 - Frozen potatoes- distributed TX
 - Cheddar cheese- distributed TX

- Woodridge Elementary
 - Frudels- distributed MN
 - Raisins- CA
 - Croutons- NY
 - Lemon juice- distributed TX
 - Apple juice- distributed NY
 - Turkey slices- manufactured USA

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 above section for sample certification language. This will be treated as technical assistance for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

Reporting and Recordkeeping

Commendations/Comments

Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.

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

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

- Continue to promote participation in the School Breakfast Program with fun menus or promotions.
- Continue to do your part to promote the SFSP by working with nearby districts who operate the program.

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Technical Assistance (TA)/Compliance Reminders

Milk types

Only unflavored milk is allowable under the updated CACFP meal pattern. Because this meal pattern also applies to SMP, flavored milk may no longer be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk.

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

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

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



With School Nutrition Programs!