

Administrative Review Report

Sturgeon Bay School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	03/05/2019	04/19/2019
On-Site Review	03/05/2019	05/09/2019
Site Selection Worksheet	03/05/2019	03/20/2019
Entrance Conference	05/07/2019	05/07/2019
Exit Conference	05/09/2019	05/09/2019

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- 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.

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Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Sturgeon Bay School District for the courtesies extended to us during the on-site review, for being available to answer questions and provide 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.

The DPI review team appreciates the eagerness of the staff at Sturgeon Bay for their willingness to make changes to meet school nutrition program regulations. The staff are concerned for the nutritional well-being of their students as evidenced through food safety, menu, service, local wellness. We were impressed during meal service at the variety of foods offered and staff interaction with the students. The FSD was working on several community initiatives like “the vegetable of the month” that would be featured at local grocery stores, hospital and the schools in the district, a greenhouse and working on farm to school initiatives.

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Findings and Corrective Action

Site Name	SFA Wide	
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)	
Question #	705	
Corrective Action History	Flagged 06/05/2019 10:34 AM	<p>Finding: On the Annual Financial Report, SFA was allocating all of the milk expenses under "SMP", when it should have been distributed between all programs.</p> <p>CA: Submit a statement of understanding that milk expenses will be properly allocated to the appropriate programs moving forward.</p>
Site Name	SFA Wide	
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	709	
Corrective Action History	Flagged 05/16/2019 05:11 PM	<p>Finding: The SFA did not accurately calculate the nonprogram food ratio. The SFA completed the Nonprogram Foods Revenue Tool, but did not include all required information into the tool (7 CFR 210.14).</p> <p>CA 1: Watch the Nonprogram Food Revenue webcast on the DPI website.</p> <p>CA 2: Update the Nonprogram Foods Revenue Tool, including all missing information and upload the updated tool into SNACS.</p>
Site Name	SFA Wide	
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
Corrective Action History	Flagged 05/30/2019 03:09 PM	<p>Finding: The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The following applications were not determined correctly due to missing/incorrect household information, including child or household name, case number, social security number, adult signature, miscategorized applications, or benefit issuance errors. See the SFA-1 form provided by the consultant for details.</p> <p>CA: Contact household(s) with incomplete application(s) and request the missing information. Upload a copy of the completed application into SNACS.</p>
Site Name	SFA Wide	

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Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	129	
Corrective Action History	<p>Flagged 06/05/2019 10:26 AM</p>	<p>Finding: SFA's "Sharing of Information" template did not have the appropriate non-discrimination statement on it. Additionally, all of the programs that are waiving fees need to be broken out. Households need to have an option to select which programs they would like fees waived for.</p> <p>CA: Update the SFA's "Sharing of Information" template for the 2018-2019 SY with the information above and upload a copy into SNACS.</p>
Site Name	SFA Wide	
Form Name	Verification (207 - 215)	
Question #	211	
Corrective Action History	<p>Flagged 05/08/2019 08:13 PM</p>	<p>Finding: The verification notification letter did not contain all required information.</p> <p>CA: Review the Household Notification of Selection section of the Eligibility Manual (pg 105-106) and submit a statement that the DPI template letter will be used moving forward, or upload an updated version of the SFAs verification notification letter into SNACS for approval.</p>
Site Name	SFA Wide	
Form Name	Civil Rights (809 - 810)	
Question #	810	
Corrective Action History	<p>Flagged 05/30/2019 03:22 PM</p>	<p>Finding: SFA did not have the full non-discrimination statement on the household notification letters.</p> <p>CA: Submit a draft of the household notification letter template that the SFA plans to use for the 2019-2020SY. Corrected on Site. No further action required.</p>
Site Name	SFA Wide	
Form Name	Local School Wellness (1007)	
Question #	1007	
Corrective Action History	<p>Flagged 06/05/2019 11:08 AM</p>	<p>Finding: Sturgeon Bay School District has an alternate agreement with St. John Bosco School. This agreement makes Sturgeon Bay solely responsible for St. John Bosco's food service program. Sturgeon Bay and St. Johns had two different wellness policies but since St. John Bosco is a site under Sturgeon Bay, it should have the same wellness policy. Within the overarching wellness policy, there can be subsections specifically for St. John Bosco.</p> <p>CA: Submit a timeline for when the wellness policy will be updated so the SFA has one wellness policy. Resources can</p>

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		be found at https://dpi.wi.gov/school-nutrition/wellness-policy .
Site Name	TJ Walker Middle School	
Form Name	SFA On-Site Monitoring (901 - 904)	
Question #	901	
Corrective Action History	Flagged 05/30/2019 03:53 PM	<p>Finding: SFA completed onsite monitoring for all of the schools except the Middle/HS. There was confusion on whether it was required since the FSD worked there everyday. Guidance was provided on site. Onsite monitoring for breakfast was completed correctly.</p> <p>CA: Provide a statement of understanding that on-site monitoring of NSLP is required to be completed at all of the schools in the SFA prior to February 1.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
Corrective Action History	Flagged 05/14/2019 09:31 AM	<p>Finding: Weekly grain shortage at lunch for the week of review with the alternate salad entree options at St. John Bosco and TJ Walker Middle School. Salads are only menued with 1 oz eq grain, and therefore over the course of the week the students only have access to 5 oz eq grains (if there is not a grain they can select on the main line).</p> <p>CA: Submit a statement that explains what you will do to fix this weekly grain shortage in the alternate salad entrees.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	400	
Corrective Action History	Flagged 05/14/2019 09:31 AM	<p>Finding: Breakfast burrito recipe in use is not standardized. Please update the recipe to reflect current kitchen practices.</p> <p>CA: Submit a standardized recipe for the breakfast burrito to reflect current kitchen practices.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Not all grains offered at lunch were whole grain-rich during the week of review. Non whole grain-rich chow mein noodles were offered and credited as a grain for the oriental salad alternate entree option at lunch.</p> <p>CA: Submit a statement that explains your plan to fix this. If you choose offer a different product, submit clear and legible pictures of the product label, nutrition facts panel and ingredient list.</p>

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Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	401	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Weekly grains exceeded the recommended weekly max at breakfast.</p> <p>CA: Submit your plan to reduce the number of grains offered at breakfast.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	404	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Reimbursable breakfast signage needed that indicates the requirement for students to take at least a 1/2 cup fruit and/or vegetable.</p> <p>CA: Submit a picture of the added breakfast signage.</p>
Form Name	Meal Components and Quantities - Day of Review (400-408)	
Question #	407	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Monthly menu did not indicate that a milk variety is offered.</p> <p>CA: Update the language on the monthly menu to indicate that a milk variety is offered. Submit a copy as corrective action.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Standardized recipes needed for breakfast bin options at TJ Walker Middle School.</p> <p>CA: Create and submit recipe(s) for the breakfast bins.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
Corrective Action History	Flagged 05/14/2019 09:34 AM	<p>Finding: Condiment production record missing planned serving sizes for each item offered.</p> <p>CA: Update the condiment production record to include a column for planned serving sizes or begin using the DPI condiment usage record template. Submit a copy of the updated template or submit a statement that explains that the DPI condiment template will be used and that planned serving sizes for each menu item will be documented.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	411	

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Corrective Action History	Flagged 05/14/2019 09:34 AM	Finding: Planned number of milk, by type, was not consistently documented on breakfast production records. CA: Submit a statement that explains your plan to ensure that planned and actual quantity used for each milk type will be included on production records.
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Technical Assistance Entries: Food Safety

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 pre-packaged and unopened. 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).

Technical Assistance Entries: Unpaid Meal Charges

SFA had a large amount of negative balances that were showing up at the Point of Service. Advice was given to reevaluate the Unpaid Meal Charge Policy.

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see

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the [Unpaid Meal Charges In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

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

Technical Assistance Entries: Meal Pattern and Nutritional Quality

Week of Review (April 8-12, 2019)

Documentation from the week of review, April 8-12, 2019, was reviewed for meal pattern compliance and the following meal pattern violations were found:

St. John Bosco

- Not all grains whole grain-rich (chow mein noodles in oriental salad)
- Weekly grain shortage (alternate salad entree options)

TJ Walker Middle School Breakfast

- Grains offered exceed the weekly recommended max of 10 oz eq grains when students are allowed to select two 2 oz eq grains every day.

TJ Walker Middle School Lunch

- Weekly grain shortage (alternate salad entree options)

Whole grain-rich

Non whole grain-rich chow mein noodles were offered and credited as a grain in the oriental salad alternate entree option at lunch. All grains offered and credited in school meal programs are required to be whole grain-rich. A whole grain-rich version must be acquired in order to credit this product, otherwise they may not be credited towards the grain component. Possible alternatives include breadsticks, dinner rolls, tortillas, whole grain-rich croutons or a cooked grain.

Another option is to apply for a [whole grain-rich exemption request](#) if the SFA can demonstrate a hardship in procuring, preparing or serving a compliant whole grain-rich product that is accepted by students, an exemption can be requested for that specific product. Review the August 28, 2018 memo, “[School Meal Flexibilities for School Year \(SY\) 2018-19](#)” for more information on the exemption process. Note that until an exemption approval has been received, whole grain-rich products must continue to be served. More information regarding the grains component and a link to the exemption request form is on our [Meal Pattern Components](#) webpage.

Crediting Documentation

Be sure to keep the product formulation statements for all grain items offered at breakfast. Without the product formulation statement, [Exhibit A](#) must be used to determine the crediting and many of the grains offered at breakfast do not credit as 1 oz eq grain using Exhibit A alone. In order to be able to credit these products as 1 oz eq grain the product formulation statement must be maintained. This was discussed with the food service director and the product formulation statements for the breakfast grain options were provided onsite.

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Multiple Entree Options/Alternate salad entree options

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entrée option, each entrée option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.

DPI's [Lunch in a Nutshell](#)

Each serving line must meet the daily and weekly requirements, including vegetable subgroups, independently.

[Memo SP 10-2012 \(v.9\)](#) (pg. 37) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"

1. For menu planning purposes, when multiple choice menus are served, how are minimums calculated?

Weekly minimum - example 2: If a grade K-5 school offers a 1 oz eq grain item (salad) and a 3 oz eq grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz eq grain (1 oz eq x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz eq (pg. 37).

2. When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?

Yes, in most cafeteria set-ups. As required in [Section 210.10\(k\)\(2\)](#), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. (pg. 37)

The alternate salad entree options for grades K-8 are offered 1 oz eq grain. The recipe states that students may select a grain off of the main line, in addition to selecting the salad, however during the week of review only one day during the week offered a grain on the main line (rice = 1 oz eq grain) that students would be able to select. Therefore students selecting the alternate salad entree option only had access to 6 oz eq grain over the course of the week, not the required 8 oz eq grain.

As discussed onsite, it is recommended to offer a 2 oz eq grain with the alternate salad entrees. In this way all students will have access to the weekly minimum requirements for grains.

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Therefore, all foods offered as part of the reimbursable meal, must be documented. Due to the many menu choices at breakfast, actual usage is documented for groups of products of similar crediting, rather than individually. While it is acceptable to continue counting products as a group to decrease staff labor hours counting each individual menu option, a corresponding recipe must be made so that it can be determined what products were placed on the line and in what quantities.

A standardized recipe can be created for each breakfast bin, grouping products of the same crediting together (e.g., bin with 1oz eq grain options, bin with 2 oz eq grain options etc). Complete all required fields that any other recipe would have. Refer to this [standardized recipe checklist](#) for what should be included.

Since the standardized recipe will list all the items that are offered, you may consider condensing the breakfast production records. Instead of listing every item, the recipe name and/or number only needs to be recorded on production records. Staff would then refer to the standardized recipes in order to know what to include in each bin for breakfast service.

Documentation of Milk

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As mentioned above, production records are required to document that food meeting the meal pattern was served. Planned number of milk, by type, was not consistently documented on breakfast production records.

Condiment Usage Record

All foods offered as part of the school meal programs must have planned serving sizes, even condiments. A column for condiment usage must be added to the production record template in use. While there is no required production record template, you may choose to use DPI [condiment usage record](#). This is found on our [Production Records](#) webpage. A copy of the production record requirements (“[Must Haves and Nice to Haves](#)”) list can also be found at that link (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Monthly Menu

Sturgeon Bay School District offers a variety of milk to students however the printed menu says, “white milk is the promoted milk in the school meals.” This statement makes it sound as though only while milk is the milk choice which is not the case at any of the schools visited. Please update the printed menu to say that a milk variety is available to students. You may keep the current statement to reinforce that white milk is the preferred selection, if you desire.

Standardized Recipes

Anytime two or more ingredients or food products are combined together a standardized recipe must be made. Recipe standardization ensures that each meal is consistently planned to meet the daily and weekly requirements. As discussed onsite, recipes that may say that they are standardized, such as the USDA breakfast burrito recipe, is not technically standardized until the recipe has been standardized to your kitchen operation. The breakfast burrito recipe calls for an 8” tortilla and frozen whole eggs, however, the schools use a 10” tortilla and sometimes substitutes whole eggs for the frozen. For recipe clarity, this recipe must be re-written on your school's recipe template to indicate how your kitchen makes the burrito.

Visit our [Standardized Recipes](#) and [Menu Planning](#) webpage for additional tools and resources, including a [standardized recipe checklist](#).

Recipes must also list the age/grade grouping served and planned serving sizes. These pieces of information were lacking from the alternate salad entree options. Salads are offered at the elementary, middle and high school level, therefore these age/grade groups should be listed on the recipe.

Breakfast Meal Pattern

It is recommended that the menu planner limit the amount of grains the students have access to at breakfast. Currently students may select two grain items that are 2 oz eq grains each, every day. This means that students have access to up to 4 oz eq grains daily, and over the course of the week this will exceed the recommended weekly maximum for grains at breakfast which is 10 oz eq.

It is strongly recommended that breakfast items that credit as 2 oz eq grains be separated from grains that credit as 1 oz eq grains. Additionally, only allow students to select one 2 oz eq grain item. Signage should be created to denote that students may select up to two of the 1 oz eq grain items and only one of the 2 oz eq grain items.

Breakfast Signage

Signage must be posted to communicate to students what they must select in order to make a reimbursable meal. The breakfast signage should list the day's menu options for each of the three components and inform students that under Offer versus Serve (OVS), they must select at least 3 items, including ½ cup of fruit, vegetable, or fruit/vegetable combination.

There was some signage posted, however, to clarify they should be updated. Suggested re-wording below:

- 1 item (1 oz eq grain) bins: Choose 1 or 2 items, plus fruit and a milk (if you want)
- 2 item (2 oz eq grain) bins: Choose 1 item, plus fruit and a milk (if you want)
- Complete breakfast offerings (Smoothie and Parfaits): These options are a complete breakfast, choose 1 in this area. You may also select a grain (1 item), fruit and a milk (if you want).

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- Fruit section: may take two

Reimbursable meal signage examples can be found on our [Signage](#) web page. You may also order signage from [Team Nutrition's resource order form](#).

School Breakfast Program

St. John Bosco does not currently participate in the School Breakfast Program. Participation in the program is encouraged, as ensuring students have access to breakfast is beneficial for their health and academic success. Specifically, students who eat breakfast at school, closer to class and test taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. Furthermore, providing students with breakfast in the classroom is associated with lower tardy rates and fewer disciplinary referrals. Refer to this school [breakfast comparison chart](#) for more information on the different service models. DPI's [breakfast resources webpage](#) also contains a wealth of information, including this [School Breakfast brochure](#), about the different breakfast service and financial models. For questions on breakfast models or starting a program, contact the School Breakfast Program Specialists (DPISBP@dpi.wi.gov).

Training

Anyone involved with the USDA School Meal Programs is encouraged to attend Wisconsin Department of Public Instruction (DPI) training classes. These are offered in the summer and select other times throughout the year. The classes provide an overview of all areas of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements including verification, free/reduced meal applications, meal pattern, crediting, smart snacks and record keeping requirements. Travel/meal expenses are allowable food service expenses.

The 2019 School Nutrition Skills Development Courses (SNSDC) dates and locations have been released:

- Appleton (Fox Valley Technical College): July 16-18, 2019
- Milwaukee (Alverno College): July 23-25, 2019
- Rice Lake (Wisconsin Indianhead Technical College): July 30-August 1, 2019
- Middleton (Kromrey Middle School): August 6-8, 2019
- Wausau (Northcentral Technical College): August 13-15, 2019

Registration and class schedules will be posted to the website in early May. Please visit the [Training](#) webpage for more information (<https://dpi.wi.gov/school-nutrition/training#up>).

Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [SNT Webcasts](#) webpage (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Buy American

Thank you to the food service director for maintaining documentation for non-domestic products purchased. Continue to review products before purchasing and as received. Maintain all correspondence with the vendor regarding the availability of domestic vs. non-domestic products throughout the year.

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.

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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 [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product
3. Country of origin
4. Reason
 1. **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.
 1. *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.*
 2. **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.*)
 1. *Ex. Blueberries are not available domestically during the months of December – June.*
 3. **Availability** – Product(s) is not available to purchase domestically
 1. *Ex. Pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 4. **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.)
 1. *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.*
 5. **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.)
 1. *Ex. Due to supply, chain constraints, recalls of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
 6. **Other** – Please provide a written explanation.
 1. *Ex. The SFA received a donation of non-domestic oranges*
 2. *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 [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<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>).

Smart Snacks

A la carte sales

St. John Bosco - a la carte sales are limited to second entrees.

Administrative Review Report

Sturgeon Bay School District

TJ Walker Middle School - A la carte sales are limited to water and second entrees. These sales are compliant.

School Store

TJ Walker Middle School - There is a school store that is open during the school day that offers different snack foods. Students are awarded a ticket (Clipper Dollars) for good behavior and no money is exchanged in order to acquire the ticket. This exchange of tickets for food, because no money is exchanged, is not considered a sale to the student and therefore is not required to be evaluated for Smart Snacks compliance. That said, reviewers were greatly impressed that the food service director maintained documentation for the products available for students and that they did in fact meet Smart Snacks standards. Reviewers encourage that the snacks offered continue to meet Smart Snacks standards. Reviewers were also encouraged to hear that students have the option to choose from non-food rewards, as well.

Fundraisers

There are no fundraisers currently held at the St. John Bosco or TJ Walker Middle School. As a reminder, all foods or beverages sold to students during the school day must meet Smart Snack standards. If they do not, even if an infrequent occurrence, they must follow the regulations as stated below:

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times.

All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading may be used (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

As a reminder the Smart Snacks Standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements.