

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

School Food Authority: St. Andrew & Thomas School

Agency Code: 22-7361

School(s) Reviewed: St. Andrew & Thomas School

Review Date(s): 11/13/18

Date of Exit Conference: 11/13/18

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](https://dpi.wi.gov/school-nutrition/training) webpage (<https://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](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (<https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>).

Appreciation/Commendations/Noteworthy Initiatives:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance/Compliance Reminders

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- The effective eligibility date for a DC eligible student is the date of the original output file, and should be uploaded directly into your software upon run date.

Applications

- Applications must be signed and dated by the determining official at the time of approval.
- The application determination and income amount should be recorded on the back of the application with the determining official signature.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** The application determination and income amount was not recorded on the back of the application with the determining official's signatures.

Corrective Action Needed: Please provide a statement that going forward all applications will have the determination and income amount recorded on the back of the application with the determining official signature.

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 to sign and date on the back of the application.
- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable, but these verifications are not considered part of the Verification sample. For more information, refer to the current [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

- Finding #1:** The Direct Certification run was not uploaded into the SNACS software system to override any applications submitted. This caused DC students to be subject to the Verification sample, and not recorded correctly on the Verification Collection Report.

Corrective Action Needed: Please resubmit Verification Collection Report with correct DC numbers recorded. Completed on site no further action required.

- Finding #2:** The application chosen for verification did not have the confirming official signature recorded on the back of the application.

Corrective Action Needed: Please provide a statement that going forward all applications chosen for verification will be confirmed and have recorded on the back of the application the confirming official signature.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- The edit check must be reviewed monthly before claim submission to assure school is not claiming more meals than are eligible in any eligibility category.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** 29 paid meals were claimed in the month of October and only 28 students are paid eligible. Fiscal action will be assessed for one ineligible meal.
Corrective Action Needed: Please provide a statement that all edit checks will be reviewed before claim submission and submit the reviewed November edit check before you submit the November claim.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director and school nutrition professionals at St. Andrew & Thomas School. We appreciate your time and efforts spent preparing for and participating in the onsite review. Everyone involved with the program at St. Andrew & Thomas was very open and receptive to all feedback during the onsite review. It is great to hear that the Food Service Director takes initiative to use the online webcasts for training – continue this great practice! Thank you as well for your interest in joining the School Breakfast Program. Offering a nutritious and reimbursable meal will benefit both your program and your students. Thank you for all that you do for the students of your school!

Comments/Technical Assistance/Compliance Reminders

Training

Regular trainings are offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](#) webpage often for current and upcoming opportunities (<https://dpi.wi.gov/school-nutrition/training>). Members of the School Nutrition Team (SNT) are also available for technical assistance any time throughout the year. A complete list of [DPI SNT staff](#) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Production records submitted for the week of review were missing information, such as menu type (lunch) and number of servings prepared. You may also consider adding condiments to your daily production records instead of maintaining a separate condiment production record.

While there is no required production record template, there are some examples that may be used 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>).

Crediting

SFAs are required to document how foods offered credit towards weekly meal pattern requirements. Sources of this information include the USDA *Food Buying Guide*, Child Nutrition (CN) labels, and product formulation statements (PFS).

- The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates, and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different options may appear. Find the one that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.
- Most fruits and vegetables credit by volume served (e.g., ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g., one medium banana credits ½ cup fruit). Most meat/meat alternates and grains credit by weight (i.e., 2 ounces of cooked, plain chicken breast credit 2.0 oz eq meat/meat alternate; 1 ounce brown rice credits 1.0 oz eq grain). If the product is not listed in the FBG, additional crediting documentation is required.
- Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson).
- If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs.
- Remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well.
- When purchasing foods at a grocery store, CN labels and PFS are not always available for these products. Only foods with standards of identity listed in the *Food Buying Guide* can be purchased and used for School Meal Program meals, when shopping at a grocery store.
- More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).
- Additional training on crediting is available in our webcasts for each meal component. Visit our [webcast](https://dpi.wi.gov/school-nutrition/training/webcasts) webpage and look for the Fruits, Vegetable, Grains, Meat/Meat Alternate, and Milk training webcast links. (<https://dpi.wi.gov/school-nutrition/training/webcasts>).

Crediting Grains and Exhibit A

Grains can be credited based on weight using [Exhibit A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exhibit-a.pdf>). Exhibit A is a table that separates commonly used grains into groups (A-I), which provides information regarding the grams or ounces per 1.0 oz eq for each specific group (<https://dpi.wi.gov/sites/default/files/imce/school->

nutrition/pdf/exhibit-a.pdf). Exhibit A groups all grain products based on how much grain they contain per serving, on average. Below are explanations for the first three groups:

- Group A: these products are hard and crunchy, dry and lightweight. Per ounce, they contain a good deal of grain.
- Group B: whether serving bagels, pizza crusts or tortillas, 1.0 ounce of these products all credit the same towards the meal pattern (1.0 ounce by weight = 1.0 oz eq grain).
- Group C: cookies, cornbread, and pancakes all have something in common. Other ingredients have been added besides flour to bake these products. Therefore, 1.0 ounce of pancake does not credit as 1.0 oz eq like a slice of bread does. More of the product by weight will need to be served to credit as 1.0 oz eq grain.

Exhibit A can be used to credit any of the products that appear in the table when the baked weight is known. However, there may be circumstances when it is more beneficial to get exact information about the grams of creditable grain from the manufacturer in the form of a CN label or PFS.

If a product is not listed in Exhibit A, you must obtain a signed Product Formulation Statement (PFS) from the manufacturer that lists the *grams of creditable grain* in the product. Divide this number by 16 grams per ounce equivalent to calculate the grain contribution for that product.

Crediting Raw Leafy Greens

Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, $\frac{1}{2}$ cup of fresh, baby spinach credits as $\frac{1}{4}$ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served.

Misleading Whole Grain Labels

The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole), which qualifies the product as whole grain-rich. Alternatively, crediting documentation in the form of a product formulation statement (PFS) may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients, making the product whole grain-rich. Note: a recipe that includes 50 percent whole grain and 50 percent enriched grain by weight is considered whole grain-rich. USDA has a very thorough [Whole Grain Resource](https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

Offer Versus Serve at Lunch

Offer versus Serve (OVS) is not required for grade K-8 students, although it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, grade K-8 students must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup fruit, vegetable, or combination to create a reimbursable meal.

Milk on Printed Menu

The printed menu should list all components included with the reimbursable meal. Currently, milk is not listed on the menu. It may either be listed daily or may be listed in one place on the menu and include a statement that says that a variety of milk is offered daily as part of the reimbursable meal.

Sodium in the School Meals Programs

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined sodium limits using three targets, allowing for a gradual implementation. The first target was implemented on July 1, 2014 and remains in effect. Products that can be major contributors of sodium include condiments, regular canned vegetables, deli meats, dairy products, olives, and processed food items. Use of these products should be closely monitored and limited to meet sodium requirements in this and upcoming school years.

Foods Offered after the Point of Service

Any foods offered after the Point of Service (POS) must be taken into account when determining the dietary specifications for the meal (calories, saturated fat, trans fat, and sodium), but do not contribute towards the meal pattern quantity requirements. It was discussed that creditable items, such as tomatoes and lettuce, are sometimes offered on a table after the POS. Consider locating these items before the POS in order to credit them toward the meal pattern. Additionally, keep in mind that leftover Time/Temperature Control for Safety (TCS) foods (see the food safety section of this report) must be discarded after service when held without mechanical refrigeration.

Offering Second Portions

Discontinue the practice of offering second servings free of charge to students. Offering second servings complicates production planning, burdens food cost, and increases dietary specifications. When students are not charged an a la carte price for second servings, the calories, saturated fat, and sodium of these portions must be included in the weekly averages. If students are still hungry, second servings may be sold a la carte. Side dishes can also be sold a la carte if they meet Smart Snacks standards.

Field Trip Meals

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way for collecting meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

School Breakfast Program

Your interest in participating in the School Breakfast Program (SBP) is commendable. Participation in SBP will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the [School Breakfast Program](https://dpi.wi.gov/school-nutrition/school-breakfast-program) webpage (<https://dpi.wi.gov/school-nutrition/school-breakfast-program>).

As discussed during the onsite review, when using Offer versus Serve (OVS) for the breakfast meal pattern, four food items must be offered from the three components (grain [and optional meat/meat alternate], fruit/vegetable, and milk). An item is defined as 8 fluid ounces of milk; ½ cup of fruit and/or vegetable; and 1.0 ounce equivalent (oz eq) of grain (and optional meat/meat alternate). The breakfast meal pattern requires at least 1 cup of fruit to be offered daily at breakfast. As a reminder, no more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Meal Pattern Finding #1:** The grade groups used (4K-4th grade and 5th-8th grade) are not allowable groupings under the lunch meal pattern. Allowable grade groupings for your site would be 4K-5th grade and 6th-8th grade or 4K-8th grade. 4K students are allowed to be served the K-5 or K-8 meal pattern if they are served at the same time and in the same place as the other grade groups, under the co-mingling flexibility from the USDA.

If you choose to offer the 4K-8th grade meal pattern, all students should be offered the same menu and serving sizes. If you choose to split students into the 4K-5th grade and 6th-8th grade meal patterns, the 6th-8th grade students will have a slightly different requirements. Please refer to our [lunch meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf) table, as well as the [breakfast meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) table (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-meal-pattern-table.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf).

Corrective Action Needed: Submit a written statement of which meal pattern(s) you intend to offer to students going forward.

- ❑ **Meal Pattern Finding #2:** There was a daily and weekly fruit shortage at lunch during the week of review. Servings sizes for fruit differed by grade groups being used. Students in 4K-4th grade were served amounts short of the daily and weekly lunch requirements. 4K-4th grade students were served $\frac{1}{4}$ cup of fruit at lunch each day during the week of review. 5th-8th grade students were served $\frac{1}{2}$ cup of fruit at lunch each day during the week of review.

Additionally, the reviewer provided technical assistance and requested corrective action for the planned fruit serving size to be changed to at least $\frac{1}{2}$ cup for all students for the day of review prior to the onsite review. This had not been adjusted as of the morning of the onsite review. However, the serving size adjustment was made prior to lunch and all students were served $\frac{1}{2}$ cup of peaches on the day of review.

Corrective Action Needed: Submit a statement indicating that you understand that K-8 students and co-mingled 4K students must be offered at least $\frac{1}{2}$ cup of fruit daily at lunch.

- ❑ **Meal Pattern Finding #3:** There was a daily vegetable shortage at lunch on four days during the week of review. This also resulted in a weekly vegetable shortage. Vegetables quantities served during the week of review were as follows:
 - Monday: All students were served $\frac{3}{8}$ cup vegetable from the Tator Tot Casserole. 4K-4th grade students were served an additional $\frac{1}{4}$ cup of cauliflower. 5th-8th grade students were served $\frac{1}{2}$ cup of cauliflower in addition to the Tator Tot Casserole. Since 4K-4th grade students were only served $\frac{5}{8}$ cup vegetables, this resulted in a daily vegetable shortage.
 - Tuesday: 4K-8th grade students were served $\frac{1}{2}$ cup of Lettuce and Spinach Salad. Since raw leafy greens credit as half the volume served, this resulted in a creditable amount of $\frac{1}{4}$ cup vegetable and a daily vegetable shortage for all students.
 - Wednesday: 4K-4th grade students were served $\frac{1}{4}$ cup of corn and 5th-8th grade students were served $\frac{1}{2}$ cup of corn. This resulted in a daily vegetable shortage for all students.
 - Thursday: 4K-4th grade students were served $\frac{1}{4}$ cup of baked beans and 5th-8th grade students were served $\frac{1}{2}$ cup of baked beans. This resulted in a daily vegetable shortage for all students. There was not a creditable volume per serving from the tomato soup used in the BBQ recipe.
 - Friday: $\frac{1}{8}$ cup of red/orange vegetables was included with the pizza slice entree. Additionally, 4K-8th grade students were offered five baby carrots and five cucumber slices. No volume or

weight measurements were recorded for this serving size of vegetables. The reviewer requested this information during the onsite review in order to credit this serving size of vegetables. The SFA measured five baby carrots to equal 1/3 cup and five cucumber slices to equal 1/3 cup. All students were offered 3/4 cup vegetables this day when rounded down to the nearest quarter cup.

Additionally, the reviewer provided technical assistance and requested corrective action for the planned vegetable serving size to be changed to at least 3/4 cup for all students for the day of review prior to the onsite review. This had not been adjusted as of the morning of the onsite review. However, the serving size adjustment was made prior to lunch and all students were served 3/4 cup of corn on the day of review.

Fiscal action is required for select repeat violations found during an Administrative Review (AR). Because a daily vegetable shortage at lunch was found during the last AR as well as the current AR, fiscal action will be applied. There will be a re-claim for meals on all days with a daily vegetable shortage at lunch during the week of review. The following finding was documented from the School Year (SY) 2014-2015 Administrative Review, which is a repeat finding during the current AR:

- *The menu planned for 5-8th grade will be used for the 4K-8 grade as a whole. Still there are vegetable shortages that will need to be corrected for when the menu is reserved in March. These changes will be included in the nutrient analysis. The shortages include: Vegetable: 1/2 c. of the 3/4 c. required on Friday, January 16*

Corrective Action Needed: Submit a statement indicating that you understand that K-8 students and co-mingled 4K students must be offered at least 3/4 cup of vegetables daily and at least 3 3/4 cup vegetables weekly at lunch.

- ❑ **Meal Pattern Finding #3:** There were vegetable subgroup quantity shortages during the week of review at lunch. The shortages include:
- Dark green: An insufficient volume of spinach was included with the Lettuce and Spinach Salad served on Tuesday.
 - Red/Orange: 1/8 cup of red/orange vegetables was included with the pizza entree served on Friday. The five baby carrots measured as 1/3 cup red/orange vegetable. This resulted in 3/8 cup red/orange vegetables over the week, when rounded down to the nearest quarter cup. This was short of the weekly requirement of 3/4 cup red/orange vegetables for K-8 students.
 - Beans and peas (legumes): 4K-4th grade students were only served 1/4 cup of baked beans on Thursday during the week of review. The 1/2 cup serving size for the 5th-8th grade students did meet the weekly subgroup quantity requirement.

Corrective Action Needed: The planned menu for the week of review must be modified to meet all vegetable subgroup requirements. Submit a list of all vegetables to be offered over this week with the corresponding planned servings sizes to show that all vegetable subgroup requirements will be met. This will also be checked to ensure daily and weekly total vegetable quantity requirements are being met for this week (Meal Pattern Finding #2).

- ❑ **Meal Pattern Finding #4:** There was a daily grain shortage on Monday and Tuesday of the week of review at lunch. This resulted in a weekly grain shortage as well. The grains served during the week of review were as follows:
- Monday: Five saltine crackers credit as 0.5 oz eq grain (daily shortage)
 - Tuesday: One taco shell credits as 0.5 oz eq grain (daily shortage)

- Wednesday: The egg noodles in the Chicken Alfredo credit as 0.25 oz eq grain for the 4K-4th grade serving and 0.75 oz eq grain for the 5th-8th grade serving. The garlic toast credits as 1.25 oz eq grain.
 - Thursday: One bun credits as 1.75 oz eq grain
 - Friday: One pizza slice credits as 2 oz eq grain. The Goldfish crackers credit as 1.0 oz eq grain.
- A total of 7.25 oz eq grains were offered during the week of review, which was short of the requirement to offer 8 oz eq weekly to K-8 students.

Corrective Action Needed: Submit a statement explaining specifically how the menu for this week will be changed to ensure at least the minimum requirement to offer 1.0 oz eq grain daily and 8 oz eq weekly will be met. Submit nutrition facts and ingredient labels for any grain products added to the menu.

- ❑ **Meal Pattern Finding #5:** Many of the grain products served during the week of review, offered as part of the a la carte breakfast, or observed while on site are not whole grain-rich. These include:
- Saltine crackers
 - Crescent rolls
 - Garlic toast slices
 - Egg noodles
 - Long grain rice
 - Cortona Brand Macaroni
 - Mini Corn Dogs
 - Lasagna Noodles
 - Hot Dog Buns
 - Food Club waffles
 - Farm Rich French toast
 - Pancake and waffle mix

All grains offered and credited in school meal programs are required to be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component.

Corrective Action Needed: Replace all enriched grain products with whole grain-rich versions or substitute other whole grain-rich items and submit your plan to do so. Please also submit nutrition facts and ingredient labels for all grain items added to your menus.

- ❑ **Meal Pattern Finding #6:** Production records verbiage indicated that lunch was being served using Offer versus Serve (OVS). However, during the onsite review, it was determined that OVS is not being utilized since students do not have the opportunity to decline components. Staff indicated that they wish to begin utilizing OVS at lunch and breakfast, if they do join the School Breakfast Program.

Any staff member, including teachers, involved with the school meals programs or acting as the Point of Service (POS) must be trained on OVS. If teachers continue to mark rosters when a student takes a meal, then they must be trained to be able to identify a reimbursable meal. It is allowable for the last staff member in the serving line to check trays for reimbursable meals, but all creditable foods must be offered before that point and that person should not leave the serving line during meal service.

Corrective Action Needed: Submit a written statement explaining who will check trays to ensure they are reimbursable. Submit a copy of completed OVS training (certificates of completion or signed rosters) for all staff involved with the school meals programs or those who will act as the Point of Service (POS). Possible training materials include:

- [Offer versus Serve webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html) (https://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story_html5.html)
- Offer versus Serve - [Meal or No Meal PowerPoint presentation](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx) or [webcast](https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx; https://media.dpi.wi.gov/school-nutrition/offer-versus-serve-meal-or-no-meal/story_html5.html)
- [Breakfast OVS handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/ovs-handout-breakfast.pdf).

- ❑ **Meal Pattern Finding #7:** Recipes should be updated to clearly reflect current practices and products in use in your kitchen. Furthermore, recipes are missing essential information, such as the serving size and total yield. For more information on what essential information must be on a standardized recipe, review 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).

Corrective Action Needed: Submit a revised standardized recipe for the Tator Tot Casserole, Tacos, Chicken Alfredo, and BBQ.

- ❑ **Meal Pattern Finding #8:** The National School Lunch Program (NSLP) requires that schools identify, near or at the beginning of serving lines, what constitutes the unit priced reimbursable meals at breakfast and lunch. Samples of signage that can be printed or updated and implemented in your school can be found on our [Signage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage).

Corrective Action Needed: Submit a photo of posted lunch signage.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf).
- When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served at

which point the deposit account is converted to revenue. This amount should not be recorded as revenue, or part of the fund balance on your Annual Financial Report.

- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
 - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- 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](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) may be found our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Alternate meals for students without funds to pay, that are provided free of charge, must have the entire meal cost funded from a non-federal source and are subject to nonprogram foods revenue regulation as food service may not absorb the meal cost.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, only food cost expense was allocated to nonprogram foods and a portion of labor, purchased services, and other expenses must also be allocated to every program.

Corrective Action Needed: Please resubmit your 17-18 Annual Financial Report with all expenses broken out by program and category. Completed on site no further action required.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- 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.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>). The [Menu Raw Food Costing tool](#) may be used to help you cost out your reimbursable meals (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/menu-raw-food-costing-tool.xls>.)
- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist you in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates should be used to determine prices.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** Adult meals are provided free of charge to the teachers requiring a transfer from the general fund to cover the full adult price of these meals.
Corrective Action Needed: Please submit a tracking tool and ledger entry to show that adult meals are paid back to food service via nonfederal funds.
- ❑ **Finding #2:** The nonprogram food revenue tool was not completed for the 18-19 school year. The SFA sells vended meals to the daycare, and a la carte breakfast items, thus, this tool is required.
Corrective Action Needed: Please watch the [Nonprogram Foods Revenue Tool webinar](#) and complete the nonprogram foods revenue tool using a minimum 5-day reference period (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html).

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 (<https://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.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Processes for complaints

- All SFAs should 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](#) for assistance in filing these complaints https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

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>).
- 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>).

Public Release

- SFAs must annually distribute the [Public Release](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-public-release-1819.doc>) 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: Civil Rights

- ❑ **Finding #1:** The USDA Nondiscrimination full Statement that the school places in their bulletin is not the correct USDA statement. The shortened statement is not on the menus.
Corrective Action Required: Please submit a copy of the correct USDA long statement. Please submit a copy of the December lunch menu with the correct shortened statement.
- ❑ **Finding #2:** Teachers stand at the end of the lunch line and check off students on the check-off sheet. Since they are involved in the distribution of child nutrition programs, they must receive annual Civil Rights Training.
Corrective Action Required: Please submit a copy of sign-in sheet that the teachers have received civil rights training.
- ❑ **Finding #3:** The process for receiving discrimination complaints does not reference the USDA requirements for submission. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form (http://www.ascr.usda.gov/complaint_filing_cust.html).
Corrective Action Required: Please submit a revised complaint procedure to include the above USDA requirement.
- ❑ **Finding #4:** The Public Release was not submitted to a local newspaper and it is not distributed to local grassroots organizations other than the church bulletin.
Corrective Action Needed: Please submit a statement of the process for the 19-20 school year to submit the public release to a local paper unless charged and other grassroots places than church bulletin.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

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>). 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:** The SFA's LWP does not contain all items on the checklist. The [wellness policy resources](#) from DPI have valuable items such as the Wellness Policy Builder and the Wellness Policy checklist (<http://dpi.wi.gov/school-nutrition/wellness-policy>).
Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks in Schools

Comments/Technical Assistance/Compliance Reminders

- All foods and beverages sold anywhere on the school campus (vending machines, school stores, etc.), between midnight the night before and 30 minutes after the last bell, must be in compliance with the Smart Snacks standards. To be in compliance, items must meet both the general standards and nutrient standards. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our [Smart Snacks](#) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- 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](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- 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.

Findings and Corrective Action Needed: Smart Snacks

- ❑ **Smart Snacks Finding #1:** The school sells a non-reimbursable bundled breakfast, which is not allowed under the Smart Snacks Regulation. Each item must meet the Smart Snacks requirement individually and must be sold individually. Many of the products being sold as part of the bundled breakfast would not individually meet the Smart Snacks general standards, including the non whole grain-rich waffles, non-whole grain-rich French toast, and the non-whole grain-rich pancake mix.

As discussed, joining the School Breakfast Program would allow you to sell a full breakfast meal, receive reimbursement, and provide your students with the nutrition they need to start their school day. Offering a reimbursable breakfast may be accomplished by making small modifications to the foods you already offer.

Corrective Action Needed: Submit your plan for breakfast going forward. You may choose to:

1. Join the School Breakfast Program and begin offering a reimbursable breakfast. Submit a planned breakfast menu with planned serving sizes for evaluation of compliance with the breakfast meal pattern.
2. Continue to provide a non-reimbursable a la carte breakfast, ensuring all items meet the Smart Snacks standards. All items must be priced and sold individually. Submit nutrition facts and ingredient labels for all items to be sold a la carte.

Professional Standards

Commendations/Comments/Technical Assistance/Compliance Reminders

Professional Standards: Training Requirements

- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Managers: 10 hours
Other Staff (20 hours or more per week): 6 hours

Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- ❑ **Finding #1:** Training is not being monitored on a tracking tool.

Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

Food Storage

- All food must be stored in NSF food grade storage containers. Reuse of plastic packaging containers which contained purchased food may not be used per Wisconsin food code. "Single-use articles" means UTENSILS and bulk FOOD containers designed and constructed to be used once and discarded.

Food Safety Inspections

- Most recent Food Safety Inspections must be posted in publically visible location

Food Employee Reporting Agreements

- Signed employee reporting agreements must be on file for all staff and volunteers operating the food service program. Employees must sign a new Food Employee Reporting Agreement form if changes are made to the document.

Findings and Corrective Action: Food Safety

- ❑ **Finding #1:** Most recent food safety inspection not posted in a publically visible location

Corrective Action Needed: Please post the most recent food safety inspection in a publically visible location outside of the kitchen.

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 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).

Findings and Corrective Action Needed: Buy American

□ **Finding #1:** The following products were identified in the SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Mandarin oranges from China
- Pineapple from Indonesia
- Frozen Strawberries from Mexico
- Fozen Broccoli from Mexico
- Garlic Powder China

Corrective Action: The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking. Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. 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 at (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

- **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 2018-19 school year, but work with your distributor/supplier to move toward compliance.

School Breakfast Program (SBP) and 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 St Andrew & Thomas, 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: SBP and SFSP Outreach

- ❑ **Finding #1:** Summer food service outreach was not provided to students.
Corrective Action Needed: Please provide a statement that you will notify students of the ability to receive free summer meals.

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).