

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Mellen School District

Agency Code: 23427

School(s) Reviewed: Mellen Public School

Review Date(s): November 15-17, 2017

Date of Exit Conference: 11/17/17

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [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 do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation:

Thank you to the staff at Mellen School District (23427) for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Thank you to the Determining Official (DO) for being available to answer questions, clarify information and follow-up with households when necessary.

139 of 185 eligibility determinations were reviewed. The following errors were identified:

- 1 student received carryover benefits past the carryover date.
- 3 students received carryover benefits when they had no carryover eligibility.

All 4 students have since submitted applications for SY17-18. While considered in error in the month of October 2017 (review period), the applications were no longer in error as of the on-site (November 2017).

Technical Assistance was provided on correct processing of the applications. The SFA is reminded of the [USDA Eligibility Manual for School Meals](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>) to assist in processing meal applications. The following Technical Assistance provided includes information discussed during the on-site visit.

Free and Reduced Price Meal Applications

- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official (DO), except when the SFA has been approved to use the *Effective Date of Eligibility Flexibility* noted below and described in SP 11-2014. In order to use the flexibility, the SFA must follow procedures noted in their application to use the flexibility.
- All free/reduced applications and the direct certification runs were available for review.

Effective Date of Eligibility

- SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. Mellen School District has applied and been approved for this flexibility but is not currently utilizing it. The DO notes applications can be processed in a timely fashion without it. As a reminder, with use of the flexibility, student eligibilities should be dated the date the application is received and not backdated to the beginning of the school year, even if the student(s) was in carryover status.

Annual Income

- There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP-19, 2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. These applications may now be processed at face value.

However, most households that receive regular pay checks, will report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly.

Household Size Box

- The total household member size box (Step 3G) includes all children and adults in the household and **must** match the number of names on the application for the application to be considered complete. The SFA should follow up with households immediately to complete this box or correct a discrepancy between the number and household members outlined on the application.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing/email. The Determining Official (DO) should document the details of the conversation plus date and initial the application. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Application Forms

- Thank you for using the DPI prototype letters with the current non-discrimination statement.
- The SFA is reminded that the full and current non-discrimination statement must be used on all communications regarding USDA Child Nutrition Programs, even non-required letters such as reminders to submit applications prior to the carryover date. As a reminder, the DPI SNT has created an [Expiring Benefits](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter-1718.doc) template letter for SFAs to utilize (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/expiring-benefits-template-letter-1718.doc>).

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Direct Certification

- The effective eligibility date for a DC eligible student is the date of the original output file.

Findings and Corrective Action Required: Certification and Benefit Issuance

❑ **Finding #1:** 4 certification and benefits issuance errors were identified that are to be included in fiscal action calculations. 1 student received carryover benefits past the carryover date and 3 students received carryover benefits when they had no carryover eligibility. These errors are outlined on the SFA-1 form. All 4 students have since submitted applications for SY17-18. While considered in error in the month of October 2017 (review period), the applications were no longer in error as of the on-site (November 2017).

Corrective Action Required: *No further action required.* As of the on-site, all students had returned applications for SY17-18.

VERIFICATION

- When applications are chosen for verification, the person designated as the Confirming Official (CO) must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the CO to sign and date on the back of the application. The CO only needs to review, confirm, and sign those applications selected for verification.
- Subsequently, the Verification Official (VO) only needs to sign those applications that have been reviewed and verified as part of the verification process.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current [Eligibility Manual](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 Required: Verification

❑ **Finding #2:** Only one application was verified by the SFA when the SFA should have verified two applications. This error is noted on the SFA-2

Corrective Action Required: Select another application for verification and re-submit the Verification Collection Report (VCR) with information for both applications verified.

❑ **Finding #3:** While the Confirming Official (CO) signed the back of the application selected for verification, the date was after verification documentation was received from the household. No confirmation review was truly completed. The CO should review applications selected for verification prior to contacting the family, confirming the original benefit determined was correct. If the original benefit is incorrect, the SFA should follow guidelines outlined in the Eligibility Manual for School Meals. If correct, the SFA should proceed with contacting the family for verification documentation.

Corrective Action Required: Please review the role and duties of the CO in the Eligibility Manual for School Meals. Please provide a statement detailing the CO duties and the SFA's intended compliance for verification in the future.

MEAL COUNTING AND CLAIMING

- All components must be made available before the Point of Service (POS) for both breakfast and lunch. An adult must be monitoring all meals for both breakfast and lunch to ensure all meals are reimbursable.
- Mellen School District is strongly encouraged to move the main entrée to the end of the meal service line for both breakfast and lunch, after the fruit and vegetable offerings. This would allow the person serving the main entrée to also ensure every meal is reimbursable.
- No errors were identified in the October 2017 breakfast or lunch claims for reimbursement.

Findings and Corrective Action Required: Meal Counting and Claiming

❑ **Finding #4:** While no non-reimbursable meals were observed at breakfast on 11/16/17, milk was available outside of the meal service line, specifically before the beginning of line Point of Service (POS) computer. If selecting milk, students should take milk in the meal service line rather coming back to take a milk after sitting down to eat as the person at the POS is not aware if the milk is part of their reimbursable meal or an extra milk to be charged out.

Corrective Action Required: Please submit a summary and/or photo detailing how the meal service line has been adjusted at breakfast.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Thank you to all staff at Mellen Public Schools for the cooperation during this Administrative Review. We appreciated the Food Service Director's willingness to ask questions and learn. We were also impressed that when we suggested she do an in-house yield study for the bananas, she organized her staff to complete the study right away.

Training

It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program. The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements. Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (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 [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts).

Child and Adult Care Food Program (CACFP)

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

The new Meal Pattern Charts for the CACFP meal pattern can be found on [USDA's CACFP](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf) webpage (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf).

Co-mingling flexibility Misuse - Breakfast in the Classroom (BIC) and Lunch

During on-site observation, preschool students were served the K-5 menu, but were not being served at the same time and in the same place as the K-5 students. Children who are not yet in kindergarten must be served the updated CACFP meal pattern if not co-mingled with other age/grade groups at meals. Training and additional resources can be found on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Sugar in cereal

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Honey Nut Cheerios, Total Raisin Bran, and Cinnamon Toasters cereal were above the sugar limit for the serving size and cannot be served to those not yet in kindergarten. To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. For more information, including the sugar limit charts, calculation examples, and cereals that meet the sugar requirements, please refer to the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

Grain-based desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Items with names such as “breakfast rounds” resemble grain-based desserts and are not a creditable grain under the CACFP meal pattern. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Offer Versus Serve (OVS) in CACFP

Offer Versus Serve (OVS) is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. According to guidance, when using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children.

Family style meal service allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component. Supervising adults should actively encourage (but not force) children to try components and accept full portions during the meal. If a child refuses to take one or more food components, he or she should be offered that food again before the meal is finished.

During onsite observation, food was not on the tables, and children did not serve themselves. Children, based on their abilities, should be given the option to serve themselves. A teacher may help, but the child should lead. If instead children are served pre-plated meals, children must be provided with the minimum serving of each component (e.g. take one of everything planned).

Training resources on family style meals may be found on SNT’s [Infant and Preschool in NSLP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Additional resources are available on the Community Nutrition Team’s [Nutrition and Wellness Training](https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice) webpage, under the Meal Service heading (<https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>).

Milk in CACFP

Milk is a required component to be offered to children when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers may serve the milk when using family style meal service, however, children must be served the full serving of milk when doing so. A variety of milk does *not* need to be offered under CACFP.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., grilled cheese). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. Instructions for standardizing recipes and recipe templates can be found on the [Meal Planning](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) web page (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>).

Standardized recipes for lunch show three different grade groupings (e.g. grades 4K-6, 7-8, 9-12). Remember that each of these grade groups may require different serving sizes to meet their unique meal pattern requirements. Please note, 4k-6 and 7-8 are not recognized grade groupings. Also, 4k and those children not yet in kindergarten are now required to follow the updated CACFP meal pattern (more information on the CACFP meal pattern is listed above). USDA has three options to combine age/grade groups for lunch, which include K-5, 6-8, and 9-12. Review [meal pattern tables](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables) on our Menu Planning webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#meal-pattern-tables>).

Additionally, a few recipes used during the review week (scalloped potato and ham, fresh vegetables, turkey recipe, chicken Alfredo and cream base and meatballs and gravy) lacked pieces of information required for standardized recipes. Technical assistance was given on-site to analyze each serving and crediting of the recipe. This is needed for menu planning to ensure that the portions offered are actually what is intended. Please use our [recipe tools and resources](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) to aid in this process (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). There is a checklist of information necessary to standardize a recipe, calculators to assist with nutrient analyses, and a template to help organize the information. The recipe standardization process will take several times producing the menu item to make sure it comes out the same way. This requires organized record keeping throughout the process.

Production Records

Be specific on production records about the identity, brand, and description of the items served. Production records should indicate exactly what was offered as part of a reimbursable meal. Fruit sizes (e.g. case count) and by type (e.g. canned, frozen) should also be recorded. Instead of "Fresh Fruit", be specific with which type you are using.

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with all staff members to record planned usage, actual usage, and leftovers. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. Technical assistance was provided on using volume measures (such as cups) to record portion sizes of fruits and vegetables, and using weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>). A copy of the production record requirements (“Must haves and Nice to haves” list) can also be found at that link. There is also an [Instructions for How to Fill out Production Records](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-instructions.pdf>).

Dietary Specifications

Many menu items offered during the week of review were high in dietary specifications like sodium, fat, and saturated fat. At breakfast during the week of review, the biscuit served alone contained 770mg sodium, the ham patty contained 520 mg sodium per serving, and the American cheese contained 135 mg per slice. If a student selected and ate these three menu items, they consumed 1,425 mg sodium, not including other menu items from which they could select that day. Major contributors of sodium include condiments (e.g. Ranch), regular canned vegetables, deli meats, dairy products, cheese, and processed food items. It is recommended to purchase products that are labeled reduced-sodium, low-sodium, or no salt added. As a rule of thumb when reviewing nutrition facts labels, sodium with a percentage higher than 20% is an indicator of a high-sodium product.

Another way to ensure a low-sodium product is to prepare and serve more fresh fruits, vegetables, and minimally-processed items. As many of the menu items were canned or processed, consider incorporating more fresh fruits and vegetables into your menu to help decrease sodium and increase variety. There were also many full-fat condiments and menu items offered during the week of review. Consider purchasing low- or reduced-fat varieties of condiments, dairy products, and other processed items.

In-house Yield Study

During the Administrative review, the school was serving a specific fruit size not currently listed in the Food Buying Guide (FBG) (e.g. 72 count banana). The fruit being offered consistently has a higher yield compared to the fruit listed in the FBG. The Wisconsin Department of Public Instruction – School Nutrition Team (DPI-SNT) allows the use of in-house yield data for crediting food items contributing to meal pattern requirements. As part of the in-house yield study, the Food Service Director must maintain original documentation showing the method and procedures used to determine yield. Visit our website for [in-house yield study](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy) procedures and a documentation template (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>). *An in-house yield study was conducted onsite for the bananas. A template was filled out and emailed 11/21/17 with this information, showing that 1 banana = 1 cup fruit.*

Whole Grain-Rich Exemption

If the SFA can demonstrate a hardship in procuring, preparing or serving a compliant WGR product that is accepted by students, an exemption can be requested for that specific product. Review the August 23, 2017 memo, “[School Meal Flexibilities for School Year \(SY\) 2017-18](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf)” for more information on the exemption process (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/snt-mail-082317.pdf>). The Food Service Director completed an exemption request in a previous year, but currently do not have an exemption. Note that until an exemption approval has been received, WGR products must continue to be served.

Juice Limit

No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. When students are able to take their daily requirement of 1 cup of fruit solely in the form of juice, this means that 100% of the fruit offered over the course of the week can be taken in the form of juice, which is not allowable. If ½ cup of juice and ½ cup of fruit and offered daily at breakfast, a student is *not* allowed to take two juices. They must be limited to one.

Condensing Meal Patterns

Currently, the meal patterns being used at breakfast at Mellen Public Schools is K-5, 6-8, and 9-12. It was discussed onsite to condense these to K-8 and 9-12 to reduce paperwork and production record recording.

Noodles

On production records, the serving size is written as 2 ounce for each grade group K-12 at lunch. According to Exhibit A, 1 ounce *dry* pasta by weight credit as 1 ounce equivalent (oz. eq.) grain and ½ cup cooked pasta credits as 1 oz. eq. Grain. Because pasta will be cooked when serving on the line, it may be more appropriate to write the serving size in cups (e.g. 1 cup) for serving staff to recognize and understand.

Whole Grain-Rich vs. Enriched Grains

Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The following products were found in dry storage, which are *enriched*, but not whole grain-rich: Spaghetti Noodles, Penne Noodles, and Macaroni Noodles. Please note that if serving these ingredients alone, they will not meet the whole grain-rich requirement of 50% or more of the product being whole grain. If making a pasta recipe, consider a 50/50 blend of whole grain and enriched pasta for student acceptability and to meet requirements.

Crediting

Many of the menu items were credited incorrectly. Please note there is a difference between serving size and crediting (or meal pattern contribution). Most fruits and vegetables credit by volume served (e.g. ½ cup peaches credit as ½ cup fruit). Refer to the [Food Buying Guide](https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) (FBG) for more details on how specific ingredients credit toward the meal pattern (<https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>). Processed products which cannot be credited using the FBG require additional documentation like a Child Nutrition (CN) label or Product Formulation Statement (PFS). These typically will not credit ounce for ounce, meaning one ounce by weight will not credit as 1 oz. eq. M/MA. These will have the crediting directly on them (e.g. a Chicken patty may be 2.5 ounces by weight, but will credit 2 oz. eq. M/MA). When recording on production records, pay careful attention to the serving sizes versus the crediting of the menu item.

Findings and Corrective Action Required: Meal Pattern and Nutritional Quality

Finding #5: Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning 50% or more of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. Although Mellen Public Schools had a whole grain-rich exemption in SY 13-14, there is no record on file for SY 17-18, therefore the whole grain-rich requirement is in effect. The Jumbo Bread with the Turkey Sandwich, Biscuit, Bread Slices, and Fettuccini Noodles served during the week of review were not whole grain-rich.

Corrective Action Required: Find new, whole grain-rich versions of the following products and submit nutrition facts labels, ingredient lists and recipes, if applicable:

- Jumbo Bread with the Turkey Sandwich (served 10/10/17 at lunch)
- Biscuit (served 10/11/17 at breakfast)
- Fettuccini Noodles (served 10/11/17 at lunch)
- Bread Slices (served 10/9/17 and 10/12/17 at lunch)

Finding #6: Processed products that are not listed in the Food Buying Guide (FBG) require a current Child Nutrition (CN) label or a detailed Product Formulation Statement (PFS) to be credited toward the meal pattern. The Egg Patty and Pork Sausage Patty each did not have a valid PFS to be credited towards the meal pattern. There was also no crediting information provided for the Jennie-O Frozen Fully Cooked Sliced Deli-Style Turkey Breast served 10/10/17. The USDA Foods Product Information Sheet for Turkey, Deli Breast, Sliced did not match the Jennie-O product label sent.

Corrective Action Required: Please provide a correct PFS (or CN label if applicable) for the following processed products:

- Egg Patty
- Pork Sausage Patty
- Jennie-O Frozen Fully Cooked Sliced Deli-Style Turkey Breast

Finding #7: Production Records were not filled out completely during the week of review. The Total Planned Quantity Prepared and Total Leftovers were blank on all days at lunch during the week of review. The Actual Number of Servings Prepared and Actual Quantity Prepared (in purchase units) were blank for most days at breakfast during the week of review.

Corrective Action Required: Please send a week of completed production records for both breakfast and lunch showing all required information is filled out, including the Total Planned Quantity Prepared and Total Leftovers. *Please refer to the suggested, updated production record templates emailed 10/21/17.*

Finding #8: Standardized recipes are required for all menu items that have more than one ingredient. There was no recipe for the Hamburger Wrap served onsite.

Corrective Action Required: Please submit a standardized recipe for the Hamburger Wrap. You may do a recipe for a single hamburger wrap, or a quantity recipe with multiple servings of the Hamburger Wrap. Be sure to include all requirements of a standardized recipe, including serving size and yield.

Finding #9: There was a daily Meat/Meat Alternate shortage for the following age/grade groups and days during the week of review:

For all age/grade groups on 10/9/17 at lunch when the ham was served

- K-5: 0.75 oz. eq. M/MA (minimum of 1 oz. eq. M/MA required daily)
- 6-8: 0.75 oz. eq. M/MA (minimum of 1 oz. eq. M/MA required daily)
- 9-12: 1.5 oz. eq. M/MA (minimum of 2 oz. eq. M/MA required daily)

For K-5 and 9-12 on 10/10/17 at lunch when the Turkey Sandwich w/ Cheese was served (*no crediting documentation provided for deli turkey, therefore meal pattern contribution could not be determined*)

- K-5: ½ oz cheese = 0.5 oz. eq. M/MA (minimum of 1 oz. eq. M/MA required daily)
- 9-12: 1 oz cheese = 1 oz. eq. M/MA (minimum of 2 oz. eq. M/MA required daily)

For 9-12 on 10/12/17 at lunch when the meatballs were served

- 2 oz of meatballs = 1.5 oz. eq. M/MA (minimum of 2 oz. eq. M/MA required daily)

For 9-12 on 10/13/17 at lunch when hotdog was served

- 1.5 oz. eq. M/MA (minimum of 2 oz. eq. M/MA required daily)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #10: There was a weekly Meat/Meat Alternate shortage for the following age/grade groups during the week of review:

- K-5: A total of 5.25 oz. eq. M/MA was offered (minimum of 8 oz. eq. M/MA required weekly)
- 6-8: A total of 5.75 oz. eq. M/MA was offered (minimum of 9 oz. eq. M/MA required weekly)
- 9-12: A total of 7.5 oz. eq. M/MA was offered (minimum of 10 oz. eq. M/MA required weekly)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #11: There was a daily grain shortage for 9-12 on the following days during the week of review:

On 10/9/17 at lunch when the bread slice was served

- 1 oz. eq. grain (minimum of 2 oz. eq. grain required daily)

On 10/12/17 at lunch when the bread slice was served

- 1 oz. eq. Grain (minimum of 2 oz. eq. grain required daily)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #12: There was a weekly grain shortage for 9-12 during the week of review: A total of 9 oz. eq. grain was offered (minimum of 10 oz. eq. grain required weekly)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #13: There was a daily vegetable shortage for the following age/grade groups and days during the week of review:

For K-5 and 6-8 on 10/10/17 at lunch when the Fresh Veggies were served

- K-5: ½ cup (minimum of ¾ cup vegetable required daily)

- 6-8: ½ cup (minimum of ¾ cup vegetable required daily)

For all age/grade groups on 10/11/17 at lunch when the broccoli was served

- K-5: ½ cup (minimum of ¾ cup vegetable required daily)

- 6-8: ½ cup (minimum of ¾ cup vegetable required daily)

- 9-12: ½ cup (minimum of 1 cup vegetable required daily)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #14: There was vegetable subgroup shortage for the following age/grade groups during the week of review:

Weekly red/orange vegetable subgroup shortage for all grade groups (*Fresh Veggie recipe lacked a yield and serving size, therefore meal pattern contribution could not be determined*):

- K-5: ½ cup red/orange was offered over the course of the week (minimum of ¾ cup red/orange vegetable required over the course of the week)
- 6-8: ½ cup red/orange was offered over the course of the week (minimum of ¾ cup red/orange vegetable required over the course of the week)
- 9-12: 1 cup red/orange was offered over the course of the week (minimum of 1 ¼ cup red/orange vegetable required over the course of the week)

Corrective Action Required: Please refer to the corrective action under Finding #16

Finding #15: There was no “Other” vegetable subgroup offered to 9-12 during the week of review.

No vegetables from the “Other” vegetable subgroup were offered over the course of the week (minimum of ¾ cup “Other” vegetable required over the course of the week).

Corrective Action Required: Please refer to the corrective action under Finding #16. *Additionally, fiscal action is required for any repeat violations from the previous Administrative Review. As a missing subgroup was found during the last AR (legumes) as well as the current AR (“Other”), fiscal action will be applied. Per page 82 of the Administrative Review Manual, there will be a re-claim for meals for one weekday with the lowest participation at each AR site with a missing subgroup. The following repeat finding was documented from the School Year (SY) 2013-14 Administrative Review: Vegetable subgroups: The week of review was missing vegetables from the legume subgroup.*

Finding #16: There was a daily fruit shortage for 9-12, which also led to a weekly fruit shortage during the week of review:

On 10/11/17 when the mixed fruit was served at lunch

- ½ cup fruit (minimum of 1 cup fruit required daily for 9-12)

A total of 4 ½ cups fruit offered over the course of the week (minimum of 5 cups fruit required weekly for 9-12)

Corrective Action Required for Findings #5-12: Please submit a menu planning worksheet for Lunch for each age/grade group listed below for the week of review (October 9-13, 2017), showing that all quantities will be met. Condensing the grade groups to K-8 and 9-12 for lunch was discussed on-site. Please fill out menu planning worksheets to reflect this change. Please refer to the [Lunch Meal Pattern Table](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) for daily and weekly requirements (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>).

- Please fill out a Menu Planning Worksheet for K-8 Lunch for the week of review (October 9-13, 2017): [K-8 Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-k-8.doc>)
- Please fill out a Menu Planning Worksheet for 9-12 Lunch for the week of review (October 9-13, 2017): [9-12 Lunch Menu Planning Worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/menu-planning-worksheet-lunch-9-12.doc>).

3. RESOURCE MANAGEMENT

Annual Financial Report (AFR) and Child Nutrition Program Report:

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. This will aid the school in calculating annual nonprogram foods compliance. The new SY16-17 [Annual Financial Report \(AFR\) instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the [DPI SNT Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>; <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).

Expenses and reviews associated with paid Wisconsin School Day Milk Program (WSDMP) students must be reported in the nonprogram foods category, as these students are not claimed in the WSDMP. Any food purchases that are ordered through food service must be paid back to food service as a nonprogram food revenue with an appropriate mark-up. If organizations outside of food service would like to order food without a mark-up from food service, the organization should order through their own account. These purchases would not need to be run through the food service fund, Fund 50, as food service has not been involved with the ordering or receiving of the product.

As a reminder, the [Child Nutrition Program Report](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/instructions-accessing-child-nutrition-program-report.pdf) provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/instructions-accessing-child-nutrition-program-report.pdf>). The Child Nutrition Program Report is accessible from the DPI SNT [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).

Revenue from Nonprogram Foods

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 these foods. Nonprogram foods may not be supported by reimbursable meals or have a loss absorbed by the food service account. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit. Nonprogram food costs and revenues must be separated from program food costs and revenues on the AFR to demonstrate compliance.

Mellen School District does not offer additional foods outside of the reimbursable meal aside from milk. The SFA is reminded that if students wish to take additional items from the reimbursable meal, the items should be priced and charged accordingly.

The [USDA Nonprogram Foods Revenue Tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) must be, at a minimum, completed yearly (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls). However, SFAs that sell only nonprogram milk and adult meals as nonprogram foods are [exempt](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) from completing the USDA Nonprogram Food Revenue Tool (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

The [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) provides a helpful overview of the nonprogram foods regulations (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [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>). Mellen School District currently allows each student to charge \$30.00 before a payment plan must be set up.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

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. SFAs may use the [prototype Medical Statement](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs) for Special Dietary Needs (<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 SNT Special Dietary Needs webpage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

School food service staff may make food substitutions, at their discretion, for children that do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

Juice may not be substituted for fluid milk in the NSLP or SBP unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, SFAs must first notify the DPI SNT in writing and provide the nutrition information from the product to be served. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Processes for complaints

As a reminder, all SFAs should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. Please refer to the [USDA Program Discrimination Complain Form](#) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Local 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. LWPs should include specific goals related to:

- 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](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Mellen School District is currently in the process of updating its LWP with Neola. The suggested edits to the LWP were reviewed.

Smart Snacks

Smart Snack regulations govern all foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that is effective July 1, 2014. Information on Smart Snacks, along with a product calculator to help determine compliance of various food items, can be found on the DPI SNT [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage at (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Additionally, Smart Snacks govern food fundraisers held on the school campus during the school day, with the intent for the food sold to be consumed during the school day. The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our [Smart Snacks](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

At the time of the on-site review, Mellen School District does not have any food fundraisers nor additional food items outside of the reimbursable meal for review.

Professional Standards

Annual training must be job-specific and intended to help employees perform their duties well. The required annual continuing education training hours for Professional Standards 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 a 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 the DPI SNT [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

If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action Needed: Professional Standards

❑ Finding #18: The Food Service Director (FSD) has completed 7 hours between SY16-17 and SY17-18. The Food Service Manager, while training has been completed in the past, has no documented hours for SY16-17 or SY17-18.

Corrective Action Required: Submit a summary detailing how continuing education training hours will be completed for both of these positions. Include specific trainings and times. Please note, time spent learning from DPI School Nutrition Staff during the on-site AR can credit as continuing education training hours.

Food Safety and Buy American

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). Additionally, visit the [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) and explore all of the great food safety resources available to USDA's nutrition assistance program operators.

Food Safety Inspections

Food safety inspection reports must be posted in public view. Posting the food safety inspection report in the same location as the "And Justice For All" poster can be a convenient way to have both items publicly visible.

Food Safety Plans

All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](#) webpage. (<https://dpi.wi.gov/school-nutrition/food-safety>).

Storage

Mellen School District is strongly encouraged to review its receiving and storage rotation procedures, as items were noted past quality dates. 'Best By' and 'Use By' dates have different definitions but both are important to take note of. The SFA is encouraged to review the [USDA Food Product Dating webpage](#) for additional information on product dating (<https://www.fsis.usda.gov/wps/portal/fsis/topics/food-safety-education/get-answers/food-safety-fact-sheets/food-labeling/food-product-dating/food-product-dating>).

Time as Public Health Control

When using “Time as a Public Health Control”, the internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of this holding period for cold time/temperature control for safety (TCS) foods. TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.

There can be no leftovers and no reuse of the items covered under this plan. Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products

Shell eggs

Meat (beef, pork, and lamb)

Poultry

Fish

Shellfish and crustaceans

Baked potatoes

Heat-treated plant food, such as cooked rice, beans, and vegetables

Tofu or other soy protein

Sprouts and seed sprouts

Sliced melons

Cut tomatoes

Cut leafy greens

Untreated garlic-and-oil mixtures

Synthetic ingredients, such as textured soy protein in meat alternatives

Finding #19: Menu items were not categorized into Process 1, 2, and 3.

Corrective Action Required: Categorize all menu items on chart for [Menu Items Categorized by Process 1, 2, or 3 form](#) from the template food safety plan (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc) Submit the updated chart.

Buy American Provision

The USDA requires that a 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? Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If a label indicates a 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 (FSD), 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 FSD, should be rejected. Should non-domestic substitutes that were not pre-approved in writing by the FSD 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 provision. 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](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).

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 DPI SNT [Procurement Buy American](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Finding #20: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or did not have proper labeling to identify the country of origin:

Frozen Broccoli – Mexico
Frozen Winter Vegetable Blend – Mexico
Canned Pineapple – Thailand

The SFA should have procedures for checking in inventory received from distributors or vendors. The personnel approving received products and supplies, should note any noncompliant product(s) and contact the distributor or vendor to inform them the product isn't compliant with the Buy American Provision. The SFA and distributor or vendor should discuss the availability of compliant options, if any exist. If no options are available then the SFA should complete the [noncompliant product template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) noting reasons for the exception. It is a best practice to retain all documentation (i.e. email, phone notes, etc.) related to the exception.

Corrective Action Required: The SFA should review its inventory check in procedures and provide a summary detailing the changes in procedures to ensure future products meet the Buy American Provision. If no procedures currently exist, the SFA should develop procedures for monitoring and receiving inventory, with guidance from the [DPI SNT Contract Management webpage](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management).

The SFA should also begin using a [noncompliant product template form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for tracking non-domestic products (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx). Complete and submit forms for each noncompliant product currently in the SFA's food storage areas.

Summer Food Service Program (SFSP) Outreach

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 Mellen School District USDA requires 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)

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). For more information on the Summer Food Service Program contact:

Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Afterschool Snack Program (ASP)

Review of the October 2017 indicated an under-claim of 33 snacks. Snack counts from 10/30/17 were omitted from the October 2017 claim for reimbursement. Operators of the ASP are reminded of the following:

- Crediting documentation for all products served should be maintained by the ASP operators. A binder or folder with crediting documentation is encouraged.
- If the ASP serves PreK students, the Child and Adult Care Food Program (CACFP) meal pattern must be followed for the PreK students. Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Items with names such as “breakfast rounds” resemble grain-based desserts and are not a creditable grain under the CACFP meal pattern. Therefore, the Poptarts currently served in the ASP would not be creditable for PreK students. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs \(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf\)](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf).

Findings and Corrective Action Required: Afterschool Snack Program

❑ Finding #21: An under-claim of 33 snacks was noted in the October 2017 ASP claim for reimbursement.
Corrective Action Required Please submit a statement detailing how the SFA will ensure correct ASP claims in the future.

Wisconsin School Day Milk Program (WSDMP)

Wisconsin School Day Milk Program (WSDMP) requires the distribution of free milk to free and reduced priced students in grades K-5. Point of Service (POS) milk counts for the WSDMP must be recorded by who ‘did’ take milk as opposed to those who ‘did not’ take milk.

As a reminder, expenses and reviews associated with paid Wisconsin School Day Milk Program (WSDMP) students must be reported in the nonprogram foods category, as these students are not claimed in the WSDMP.

Wisconsin-produced milk must be served in the WSDMP. The current milk distributor reports milk comes from within 200 miles of Mellen School District. Moving forward, include a Wisconsin-produced clause in the SFA’s milk bid.

Regulations for the WSDMP can be found in the [Wisconsin School Day Milk Program State Statute \(https://docs.legis.wisconsin.gov/statutes/statutes/115.pdf\)](https://docs.legis.wisconsin.gov/statutes/statutes/115.pdf). Interpretation and guidance for the WSDMP can be found on the DPI SNT [WSDMP webpage](https://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk) and in the [WSDMP Frequently Asked Questions \(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf\)](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf).

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](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

