

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

School Food Authority: HOPE Christian Schools, Inc.: Fortis

Agency Code: 401439

Review Date(s): 12/4/18–12/5/18

School(s) Reviewed: HOPE Christian School Fortis (single site)

Date of Exit Conference: 12/5/18

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at HOPE Christian School Fortis for the courtesies extended during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. The DPI review team appreciates the eagerness of the staff and their willingness to make changes to meet school nutrition program regulations. Documentation was organized and thorough which allowed for a successful review.

The breakfast service set up is commendable in that it promotes high participation by offering students breakfast in two locations as they arrive for the school day. Staff members involved with breakfast service encourage students to take all of the available items in a friendly, fun, pressure-free manner. Procedures are in place to ensure students on late buses have the chance to get breakfast as well. It is clear that staff members care about the nutrition and well-being of the students.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Community Eligibility Provision (CEP)

Commendations:

- The SFA participates in CEP and met the program requirements for direct certification runs, public release, notifying households, report submission, and alternate income forms.

Technical Assistance:

Visiting Students

- While the SFA rarely (if ever) provides meals for visiting students, guidance for how to handle claiming for visiting students can be found in the [CEP Visiting Students Flow Chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf) and referenced as needed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-visiting-students-flow-chart.pdf>).

Meal Counting and Claiming

Commendations:

- The counting, claiming, and edit check procedures appear to be effective. The popsicle stick counting at lunch and check off counting at breakfast and appear to yield correct meal counts and constitute reliable points of service, with the one exception of the infrequent breakfast check off error described in the corrective action section below.
- The school provides reimbursable field trip meals to students, which is an excellent way to ensure that students are fed nutritious meals even when they are eating away from the school campus.

Technical Assistance:

- When utilizing a manual check off system for meal counting and claiming, each check mark represents a reimbursable meal served to an eligible student. Therefore, only check marks physically recorded at the point when a student was served a reimbursable meal can be used to count up meals for the reimbursement claim. See corrective action below.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding A:** During the validation of the breakfast claim, it was noted that some of the daily breakfast check-off sheets used at the point of service (POS) were not marked and totaled correctly. On several occasions, the check marks began on a number other than the first box, and thus several of the individual count boxes were left blank. The blank (unchecked) boxes were used

to determine the daily meal count total. In this check-off POS system, each individual check mark signifies a reimbursable meal served to an eligible student. Therefore, any unchecked boxes cannot be used to count reimbursable meals served. After reviewing all check off sheets for the review period, it was determined that this intermittent error resulted in an overclaim of 77 breakfasts during the review period. Fiscal action will be assessed for these meals. A brief review of other breakfast check off sheets indicated that this error was intermittent and not consistent. This error appears to be non-systemic.

Corrective Action: Submit a statement describing how this counting error will be prevented going forward. This may include providing additional training to breakfast servers and/or adding a step to the edit check process to ensure that only checked boxes are counted in the meal totals.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the staff at Hope Christian Schools: Fortis and Milwaukee Center for Independence (MFCI). The time and efforts spent preparing for and participating in the onsite review were much appreciated. Documentation was provided prior to the on-site review in an organized and timely manner. All staff were available to answer questions and showed great dedication to operating the best possible programs. Thank you for all that you do for your students!

Technical Assistance:

Training

- Regular trainings are offered on the Wisconsin Department of Public Instruction (DPI) webpage as webcasts, webinars, and on-site trainings. Check our [Training](https://dpi.wi.gov/school-nutrition/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](https://dpi.wi.gov/school-nutrition/directory) can be found on our website (<https://dpi.wi.gov/school-nutrition/directory>).

Offer versus Serve (OVS)

- Some lunches are pre-plated prior to service with the meat/meat alternate, grain, fruit, vegetable, and condiments due to the large number of meals served in a small space in a short time frame. Milk is available in a milk cooler at the beginning of the service line. Students are allowed to decline components by requesting a tray without particular menu items, which was observed during service on the day of review. Additionally, there is clear signage communicating to students what they may select as part of a reimbursable lunch. While students have the option to decline components, consider having staff offer and serve the components as students move through the line. This would take the burden off students to request a different tray and may reduce food waste. As a reminder, OVS is optional for K-8 students (and the co-mingled 4K students), but without using OVS, students must be served all components as part of a reimbursable meal.

Production Records

- The production record template in use is missing the planned/actual number of servings for some menu items. Most menu items are served as individual units, such as one sandwich or one apple, so this information is captured within the amount sent. However, it is recommended to add the number of servings sent for items not served as an individual unit, such as the vegetables.

In-House Yield

- The 163 count apples offered during the week of review were credited as ½ cup of fruit, but may credit as more than ½ cup. An in-house yield study may be warranted if the food service operation consistently gets higher or lower yields from a product than what is specified in the Food Buying

Guide (FBG) or for food items or sizes that are not currently listed in the FBG (e.g., 163 count apples).

- An in-house yield study may also be completed to determine the appropriate serving size for items, such as baby carrots, that do not fit neatly into spoodles or measuring utensils. The baby carrots may be diced to fit into the desired measuring utensil without extra air. The number of baby carrots that filled the measuring utensil then becomes the number to serve. This number of baby carrots could then be included on the production record as the number to serve in order to credit as $\frac{1}{2}$ or $\frac{3}{4}$ cup of vegetables.
- [In-house Yield Study Procedures](#) are available on the [Menu Planning](#) website (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ihy>). Original documentation showing methods and procedures used to determine yield must be completed and maintained at the food service operation and will be reviewed during the School Food Authority's (SFAs) next regularly scheduled Administrative Review (AR).

Maintaining Extra Food on Site

- With a vendor, servers must assess the quantity of components halfway through meal service to ensure each student is offered the proper amount of each component. If staff assess a component shortage, immediate corrective action should be taken by either calling the vendor for more of the required component or by having a small stock in-house in case of emergencies.
- During onsite lunch observation, the quantity of whole pears delivered was not sufficient for all students in the last lunch sections. Staff offered applesauce cups that were on hand to meet the $\frac{1}{2}$ cup of fruit, so all students were offered a reimbursable meal. Consider maintaining a small stock of shelf-stable items from other components at the school for other such situations so students do not have to wait for more to be delivered.

School Breakfast Challenge

- Make this school year the best one yet and see how easy it is to provide a healthy breakfast and a great start for every student. The Wisconsin Department of Public Instruction (DPI) School Nutrition Team is partnering with Hunger Task Force (HTF) and Share Our Strength's No Kid Hungry (NKH) to promote breakfast in Wisconsin schools through the Wisconsin School Breakfast Challenge. The challenge begins December 1, 2018 and ends February 28, 2019.
- Schools across Wisconsin are invited to compete for prizes and recognition by increasing participation in their school breakfast program, or to start a new program if they do not already have one. As student participation grows, so do the chances for winning!
 - NKH will be providing the following amazing prizes:
 - Grand Prize: \$1,000 for Highest Breakfast Participation Increase (2 Schools)
 - \$750 Prizes for Most Improved Breakfast After the Bell (2 Schools)
 - \$750 Prizes for Implementing School Breakfast Program (2 Schools)
- Not only is there opportunity to win prizes, but *all participating schools* are eligible to apply for NKH's breakfast grants, totaling \$30,000. For these grants, there is no free and/or reduced price meal percentage requirement. Deadline to apply is December 14, 2018. Ready to get started? [Register your School](#) and visit the [Hunger Task Force](#) website to gather all the details (. Considering a new School Breakfast Program? Contact DPISBP@dpi.wi.gov.

Equipment Grant

- The United States Department of Agriculture (USDA) distributes funding annually to State Agencies (SAs) to award equipment assistance grants to eligible School Food Authority's (SFA's) participating in the National School Lunch Program (NSLP). Priority for this grant is given to schools that have not received similar USDA equipment grants in the past and have 50% or higher free and reduced-price eligibility. Requested equipment must cost more than the SFA's definition of capitalization threshold or \$5,000, whichever is less. For the fiscal year 2018 grant, the SFA's capitalization threshold can be no lower than \$1,000. More information can be found on the [NSLP](#)

[Equipment Grant Opportunities](https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant) webpage (<https://dpi.wi.gov/school-nutrition/grants-opportunities/equipment-grant>).

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding B:** Milk usage is being recorded by type on both the breakfast and lunch production records. However, on some days at least one milk type had zero recorded leftovers. This may reflect an opportunity for improved accuracy in recording actual milk usage or the need to offer more cartons of the most popular milk type. Accurate milk usage recording is necessary to show that milk is being offered to meet the meal pattern requirements. The number in the *amount started with* column should be the exact number of cartons put out for service, including any restock during service. The number of cartons in the *amount leftover* column should be the exact number of cartons remaining after all students have been offered a meal.

Corrective Action Needed: Submit a written statement acknowledging the requirement to offer at least two milk types to all students for the duration of meal service at both breakfast and lunch. Additionally, submit three days of completed breakfast and lunch production records showing that actual milk usage is being accurately recorded by type.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

- The Aids Register shows the amounts deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods and to track all program deposits made to the agency's account. Both resources are accessible from our [Online Services](https://dpi.wi.gov/nutrition/online-services) webpage (dpi.wi.gov/nutrition/online-services).
- The Commodity Allocation Receipt Summary (CARS) report shows the monthly USDA Foods commodity distributions the SFA received during the specified program year. The CARS report can be accessed by logging into the [USDA Food Ordering System](https://www3.dpi.wi.gov/FDP/Login.aspx) (<https://www3.dpi.wi.gov/FDP/Login.aspx>).

Annual Financial Report (AFR)

- The cash/entitlement value of USDA donated foods should be reported as a National School Lunch revenue on the AFR and also as a National School Lunch food expenditure on the AFR. The entitlement value of USDA gets reported in two places—as a revenue and as an expenditure. This entitlement value is found on the CARS report which can be accessed by logging into the [USDA Food Ordering System](https://www3.dpi.wi.gov/FDP/Login.aspx) (<https://www3.dpi.wi.gov/FDP/Login.aspx>). Please reference the [AFR instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) for additional details (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- When revenues are recorded from the federal reimbursement payments, make sure that the full reimbursement based on the printed claim form is recorded, and not what is actually deposited into the account. As noted on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. This amount deducted from revenue should be reported as an NSLP purchased service.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding C:** The annual financial report (AFR) contained several errors. The total revenues and expenditures did not match the general ledger. The expenses associated with food safety inspections should be included as a Purchased Service for NSLP, because inspections are an NSLP requirement. Further, the USDA Foods entitlement value was not included in the School Food

Revenue Excluding Transfers column of the revenues section. In the expenditures section, the USDA Foods handling and processing fees were included in the Food column but should be categorized as Purchased Services.

Corrective Action: Please resubmit your 17-18 AFR with the corrections described above. Edits to the AFR can be completed online until December 31. After December 31, resubmission must be done manually by DPI. To submit edits manually after December 31, contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

- During the process of editing the report, please verify with the appropriate individuals that the USDA Foods Entitlement value is accounted for as an expense by inclusion as a food cost on MCFI invoices. USDA Foods Entitlement values must be recorded as both a revenue and expenditure so that they cancel out, but are still accounted for.

❑ **Finding D:** Non-reimbursable meals are occasionally selected by students and are given to students free of charge, but are not being tracked. The school does not want to charge the students for the items because it is a CEP school. Therefore, when students take a non-reimbursable meal, each item the student takes must be tracked and recorded throughout the year. These items are outside of the reimbursable meal and thus are considered non-program foods. The SFA must generate adequate revenue from other non-program foods so that the total revenue meets the requirements in 7 CFR 210.14 (f). However because there are no other non-program foods generating revenue, the cost of these items must be covered by a non-federal funding source. Reimbursement money from USDA cannot be used to cover the costs of providing these non-reimbursable items to students free of charge because they are considered non-program foods.

Corrective Action: Develop a process to track non-reimbursable meals taken at breakfast and lunch. Submit a statement describing how non-program foods given free to students will be tracked and accounted for.

- It is recommended to separately note when non-reimbursable meals (such as one missing a fruit or vegetable) and only milks are taken. These items have different food costs and thus it would be beneficial to track them separately. An Excel spreadsheet could be utilized to record the non-program foods students take along with the approximate cost of each item. At the end of the school year, a transfer must be made from the school account to the food service account to cover the cost of these items.
 - When food service is running in the negative and the school's fund is already absorbing these losses, there is no "transfer" that needs to be made since the school fund is already covering program losses that exceed the cost of the non-program foods served. On the Annual Financial Report, a portion of the amount listed under Revenues as an Operating Transfer from Non-Food Service Account should be broken out and classified as a Non-Program Food Revenue Transfer from the Non-Food Service Account. Please note that a "transfer" or journal entry would not actually be made since this amount would already be covered by the school fund.
 - When the food service account is running in the positive (if this ever occurs in the future), a "transfer" or journal entry would need to be made because food service dollars (reimbursements) would be covering the total cost of serving these non-program food free of charge. In this case, the total reimbursements in the year would be greater than the total program expenses and thus the reimbursement money would be covering the cost of these non-program foods. This means that money from the school fund would need to be entered as a revenue through a journal entry to food service to cover the costs of serving these non-program foods for free to students.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Technical Assistance:

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. The SFA's existing procedures for complaint processing could be used in the context of school meal program complaints, should they arise. However, the proceeding points must be considered.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the the state agency or the Civil Rights Division of USDA Food and Nutrition Service within 5 days. Be sure that this is included in the district procedures to ensure compliance.
- 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 Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- Additional information can be found in the [FNS 113-1 USDA Civil Rights Compliance and Enforcement for Nutrition Programs and Activities](https://fns-prod.azureedge.net/sites/default/files/113-1.pdf) resource (<https://fns-prod.azureedge.net/sites/default/files/113-1.pdf>).

Special Dietary Needs

- Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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>). This [flow chart](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>).
- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Local Wellness Policy (LWP)

Commendations:

- The wellness policy met all requirements and is very thorough. The SFA has completed an assessment of the policy and posted the results in the form of a Local Wellness Policy Report Card on the school website.
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Professional Standards

Commendations:

- All staff involved in the program completed and tracked the required training hours, including civil rights training. It was clear that staff training is valued and continued development is emphasized. The tracking tools utilized were organized and current.
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Food Safety

Technical Assistance:

Milk at Breakfast

- During breakfast service, cartons of milk were served out of coolers without temperature control, as no ice packs are used in the coolers. Milk, cheese, and other dairy products are considered time/temperature control for safety (TCS) foods, and thus must be held under temperature control or be handled using time as a public health control procedures. Saving and re-servicing TCS foods held outside of temperature control is not allowable per the Wisconsin Food Code, although local enforcement by the sanitarian conducting food safety inspections may vary. Regardless of which option for serving TCS foods at breakfast is used, a corresponding standard operating procedure must be included in the site-specific food safety plan.
 - Consider the following options to modify the current procedures:
 1. Utilize time as a public health control (TPHC) procedures.
 2. Utilize ice-lined milk bags, barrels, or containers so that temperature control is used, along with monitoring of temperatures.
 3. Work with local regulatory authority/sanitarian to develop an alternative, approved method for serving milk outside of temperature control.

Food Safety Plan

- All schools must have a comprehensive, site-specific food safety plan on-site which includes all process 1, 2, and 3 menu 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](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).
- SFAs are required to update food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria.
- The procedures detailed in the SOPs included in the site-specific food safety plan should be followed by all food service staff, student workers, volunteers, and any other people involved in the implementation of Child Nutrition Programs at all times.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding E:** Reimbursable field trip meals are offered, however there was not a corresponding standard operating procedure (SOP) in any schools' food safety plan.

Correction Action: Submit an SOP for field trip meals to reflect site-specific procedures including food handling, storing, transporting, and the leftover food procedure. A [template field trip SOP](#) which can be modified to be site-specific is available on the [food safety webpage](https://dpi.wi.gov/school-nutrition/food-safety#templates) (<https://dpi.wi.gov/school-nutrition/food-safety#templates>). Be sure the finished SOP gets added to the school's food safety plan binder and that staff are familiar with the content of the SOP.

Smart Snacks

Technical Assistance:

- At the time of the on-site review there were no competitive foods or beverages sold to students during the school day. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. Fundraiser tracking tools can be found on the [Smart Snacks](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
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Buy American

Technical Assistance:

- 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 is identified on the label, than SFA must get certification from the distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can 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 the 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 the 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 and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed: Buy American Provision

- ❑ **Finding F:** The following products were identified within product documentation for the week of review as non-domestic and not listed on the Buy American – Noncompliant List:
- Basil leaves – Egypt
 - Oregano leaves – Turkey

Additionally, the current non-compliant product list gives distribution as the reason for the non-compliant product, but the reason for the distributor carrying the item is not completed.

Corrective Action Needed: Submit a copy of your updated non-compliant product list showing that the two items listed above have been added and the reason for the distributor carrying the non-domestic items has been filled in.

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

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

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



With School Nutrition Programs!