

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

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**School Food Authority: Messmer Catholic Schools**

**Agency Code: 40-7186**

**School(s) Reviewed: Messmer High School**

**Review Date(s): 4/08-09/19**

**Date of Exit Conference: 4/09/19**

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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:

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

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](#) webpage.
- 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](#) webpage.

**Appreciation/Commendations/Noteworthy Initiatives:**

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

**REVIEW AREAS**

**1. MEAL ACCESS AND REIMBURSEMENT**

**Meal Counting and Claiming**

## **Commendations/Comments/Technical Assistance/Compliance Reminders**

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

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

### **Commendations**

Sincere thanks to the food service director and school nutrition professionals of Messmer High School. We appreciate your time and efforts spent preparing for and participating in the onsite review. School nutrition professionals were friendly and helpful. The food quality was very good. The food service director submitted a significant amount of information for off-site review, and prepared additional information for on-site review. She asked and answered clarifying questions. There were no meal pattern findings related to the School Breakfast Program during the week of review.

### **Technical Assistance and Program Requirement Reminders**

#### **Non-Reimbursable Meals**

Eleven students at Messmer High School selected non-reimbursable meals during lunch meal observation on Monday, April 8. Students left the point of service (POS) with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components.

**Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action.**

Adequate signage helps students accurately select reimbursable meals by indicating how many items at breakfast or components at lunch must be taken to constitute a reimbursable meal.

Standardized recipes submitted for Chicken Caesar, Caesar, Chef, and Buffalo Chicken Caesar Salads credited 1/2 cup to 3/4 cup of vegetable and 2 ounce equivalents (oz eq) to 3 oz eq of meat/meat alternate (m/ma) towards daily and weekly meal pattern requirements. A student who selected a salad and an orange did not select a reimbursable meal. Furthermore, the planned portion size for leaf lettuce was 1/2 cup, which credited 1/4 cup of vegetable towards daily and weekly meal pattern requirements. Unfortunately, there was no signage on the nutrition bar showing students how many leaves of lettuce to select based on the planned portion size.

#### **Signage**

Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The breakfast signage must list the three components and the four items offered, and must communicate to students that under Offer versus Serve (OVS), they must select at least three food items, one of which must be at least ½ cup of fruit and/or vegetable, or a combination. The lunch signage must list the five components, and must communicate to students that under OVS, they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination.

Consider adding signage to the nutrition bar, like the School Nutrition Team (SNT) [Salad Bar Signage](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx), showing students how many pieces of fruits and/or vegetables to select based on the planned portion size(s) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>).

## **Production Records**

Production records are intended to be useful tools to record information prior to, during, and following production. Thorough, accurate production records aid the menu planner with forecasting, ordering, menu planning, and reducing food waste. **Production records submitted before the onsite review were not filled in completely.** Continue working with all staff members to record planned/actual number of servings prepared, planned/actual quantity prepared in purchase units, and milk types available and actual usage by type.

Planned portion sizes are required for every meal component. Even in self-service, the menu planner must plan a specific portion size that he or she intends students to take. Use volume measures (such as cups) to record portion sizes of fruits, vegetables, and milk, and use weight measures (such as ounces or grams) to record portion sizes of meat/meat alternates and grains.

Planned portion sizes and crediting information recorded on the production records were not consistently in agreement with supporting documentation, such as Child Nutrition (CN) labels, product formulation statements (PFS), standardized recipes, the USDA *Food Buying Guide for Child Nutrition Programs*, or menu planning worksheets. Including meal pattern contributions for specified grade groups on production records is not required, though they must be documented and available for staff.

## **Portion Control**

Using tools correctly is an important aspect of portion control. The correct way to portion food is to use a level scoop, which means the item is served as planned. Heaping scoops provide excess calories and nutrients and increase food cost, as more food is required to serve the same number of students. Food shortages may result. Conversely, scant scoops provide component shortages per portion and inadequate calories and nutrients. Excessive leftovers or food waste may result.

During lunch meal observation on Monday, April 8, heaping 5 fluid ounce spoodles of penne pasta were served. According to production records, the planned portion size was 1 cup, but according to the food service director, the planned portion size was 1/2 cup. These inconsistencies make it difficult for school nutrition professionals and for students to determine which menu items and components to select as part of reimbursable meals. Consider serving 1 cup of pasta with an 8 fluid ounce spoodle.

Consider placing a “last chance” bowl at the POS with pre-packaged or whole fruits and/or vegetables in at least 1/2 cup servings for students to select. Options may include pre-packaged dried cranberries or raisins, whole oranges or bananas, applesauce or mixed fruit cups, and pre-packaged carrots or celery sticks.

## **Condiments**

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium target remains in effect. Condiment portion sizes must be communicated to students.

Promote correct serving sizes by adding signage at the condiment station with a photo of what one tablespoon looks like, or using signage on self-serve pumps. More information on sodium targets is found on the [Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Sodium heading.

According to the [Smarter Lunchrooms Movement](https://www.smarterlunchrooms.org/) a flavor station with herbs and spices allows students to personalize their meals and offers a way to experiment with different flavors (https://www.smarterlunchrooms.org/). Calorie free and sodium free spices and flavors are

recommended. Consider lemon juice, parsley flakes, garlic powder, cinnamon, pumpkin pie spice, chives, vinegar, or hot sauces.

### **Standardized Recipes**

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time, when the exact procedures, equipment, and ingredients are used. **Recipes must be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen.**

Use the resources on the [Standardized Recipes webpage](#), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](#) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The PHN also encourages viewing the webcast, [What's the Yield with Standardized Recipes?](#), which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

### **Vegetable Subgroups**

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes. During the review period, the beans/peas vegetable subgroup minimum weekly requirement of 1/2 cup was not met. Consider serving baked beans or refried beans from the steamtable or garbanzo beans or black beans from the nutrition bar.

A standardized recipe for Black Bean & Corn Salad incorrectly credits each 1/2 cup serving as 1/2 cup of beans and peas (legumes). The recipe ingredients include black beans, corn, tomatoes, jalapeno peppers, cilantro, and lime juice. As corn, tomatoes, jalapeno peppers, and cilantro do not belong to the beans and peas (legumes) vegetable subgroup, 1/2 cup serving cannot credit as 1/2 cup of beans and peas (legumes). Without total yield for the recipe, vegetables cannot be credited towards weekly vegetable subgroup requirements based on their proportions.

### **Offer versus Serve (OVS)**

School nutrition professionals and students will benefit from additional OVS training in the context of the Messmer High School's breakfast and lunch menus. During lunch meal observation on Monday, April 8, students were inappropriately sent back for additional fruits and vegetables. The [Offer Versus Serve Guidance manual](#) and the [Offer Versus Serve webcast](#) may be used as training resources (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>, <https://dpi.wi.gov/school-nutrition/training/webcasts>). Additionally, [Meal or No Meal](#), a training resource inspired by a game show, may be used for staff determining reimbursable meals (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx>).

### **Corrective Action**

- Meal Pattern Finding #1:** Eleven students at Messmer High School selected non-reimbursable meals during lunch meal observation on Monday, April 8. Students left the point of service (POS)

with insufficient fruits and/or vegetables to meet the 1/2 cup requirement, while others selected only two full components. **Incomplete meals claimed for reimbursement on the day of onsite review will be subject to fiscal action**

**Required Corrective Action:** Submit two to three sentences describing how selection of non-reimbursable meals will be corrected and avoided in the future.

- ❑ **Meal Pattern Finding #2:** The daily and weekly minimum requirements for grain were not met for age/grade group 9-12 at Messmer High School for lunch during the review period. The following represent the portion sizes planned, offered, and served during the review period:
  - Monday through Thursday: Chicken Caesar Salad, Caesar Salad, Buffalo Chicken Caesar Salad, and Chef Salads with a slice of bread or a breadstick (1 oz eq)
  - Tuesday: Crispy Chicken Bowl (1 oz eq)
    - This entrée was listed on the March 2019 menu as Crispy Chicken Bowl with Breadstick; however, breadsticks were not recorded on Tuesday's production record.
  - Friday: Caesar Salad with a slice of bread or a breadstick (1 oz eq)

The daily and weekly minimum requirements for age/grade group 9-12 are 2 oz eq and 10 oz eq, respectively. **Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.**

**Required Corrective Action:** Describe **specifically** how the daily and weekly minimum requirements for grain will be met for age/grade group 9-12 at Messmer High School for lunch during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Please address assorted salads and Crispy Chicken Bowl in your reply. If signage will be added to the meal service line, or if production record organization will be improved, such that it becomes clear that 2 oz eq of grain is available with assorted salads, please describe these changes in your reply.

- ❑ **Meal Pattern Finding #3:** The required 1/2 cup fruit and/or vegetable, or a combination, statement is missing from signage.

**Required Corrective Action:** Add a statement to your current signage which explains a student must select at least 1/2 cup fruit and/or vegetable, or a combination, as part of his or her reimbursable meal. **Submit a photo of updated signage.**

- ❑ **Meal Pattern Finding #4:** Production records submitted for breakfast and for lunch the review period were not filled in completely. All required information on the template must be documented for all menu items.

**Required Corrective Action:** **Submit one week of completed production records for breakfast and for lunch.** Select production records you are confident are filled in accurately and completely.

- ❑ **Meal Pattern Finding #5:** School nutrition professionals will benefit from additional training on OVS.

**Required Corrective Action:** Watch the [Offer Versus Serve webcast](https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) (https://dpi.wi.gov/schoolnutrition/training/webcasts#ovs) on the SNT [Training webpage](https://dpi.wi.gov/school-nutrition/training) (https://dpi.wi.gov/school-nutrition/training) or comparable training with prior approval from the Public Health Nutritionist. **Submit certificates of completion for the food service director and for school nutrition professionals who determine reimbursable meals at the point of service (POS).**

### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Annual Financial Report (AFR):

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on our website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).

##### Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, the revenues and expenses were not broken out by category and were mostly reported into Purchased Services.  
**Corrective Action Needed:** Please submit a plan to break out all expenses by category, and provide a statement that going forward all expenses and revenues will be reported in their correct category.

#### Revenue from Nonprogram Foods

##### Commendations/Comments/Technical Assistance/Compliance Reminders

- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.
- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus, nonprogram foods may never run in the negative and non-federal funds must be transferred into the food service fund to cover the deficit.
- For fixed price per meal contracts, awarded on a per meal basis and with revenues from nonprogram foods sales converted into meal equivalents to which the fixed price cost is applied, the FSMC will annually provide information on food costs and revenues. The information must include food cost for reimbursable meals, food cost for non-program foods, revenue from non-program foods, and total revenue. Nonprogram foods include: a la carte; catering; vending; and student stores operated, or any other sales generated through the nonprofit school food service account not already described. This information is used to determine compliance with revenue from nonprogram foods at 7 CFR 201.14(f).
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

## Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** The nonprogram food revenue tool submitted showed that the SFA is not meeting the required revenue ratio for nonprogram foods.  
**Corrective Action Needed:** Please submit a plan as to how the SFA will become compliant with the required nonprogram food revenue ratio.
- ❑ **Finding #2:** Catering revenues and expenses are not entered into the food service account and all funds and expenses must run through the nonprofit school food service account.  
**Corrective Action Needed:** Please submit a statement that all expenses and revenues from nonprogram foods will run through the school food service account.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations/Comments/Technical Assistance/Compliance Reminders

##### Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “This institution is an equal opportunity provider.” Both statements should be in the same size font as the other text in the document.

##### Processes for complaints

- All SFAs should have procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if individuals state that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual’s right to file. Please refer to the [USDA Program Discrimination Complaint Form](#) for assistance in filing these complaints [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to DPI Food and Nutrition Service within 5 days. You will want to make sure that this is included in the district procedures to ensure compliance.

##### Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

## Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding #1:** The incorrect USDA Nondiscrimination full Statement is on the school website.  
**Corrective Action Required:** Please the website with the correct USDA long statement.  
**Completed onsite, no further action required.**
- ❑ **Finding #2:** The process for receiving discrimination complaints does not reference the USDA requirements for submission. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#) (AD-3027), found online on the [USDA Complaint Resolution](#) webpage and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form ([http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html)).  
**Corrective Action Required:** Please submit a revised complaint procedure to include the above USDA requirement.

## Local Wellness Policy

### Commendations/Comments/Technical Assistance/Compliance Reminders

- The local wellness policy contains all of the required elements.

## Smart Snacks in Schools

### Comments/Technical Assistance/Compliance Reminders

#### Fundraisers

The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](#) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way to make sure schools are meeting Smart Snacks regulations.

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

#### Documentation

Stapling a complete nutrition facts label with ingredient statement to the Alliance for a Healthier Generation [Smart Snacks Product Calculator](#) printout is a best practice (<https://foodplanner.healthiergeneration.org/calculator>).

## Professional Standards

### Commendations/Comments/Technical Assistance/Compliance Reminders

- All training is tracked on a tracking tool and the SFA is on track to meet the yearly requirements.

## Food Safety and Storage

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Food Safety Inspections

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

#### Food Safety

- SFAs are required to update food safety plans 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 (FFVP), or other locations outside the cafeteria.

#### 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

#### 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 the holding period for cold time/temperature control for safety (TCS) food.
  - 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.
  - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 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 or heat during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

#### Findings and Corrective Action: Food Safety

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

- Corrective Action Needed:** Please post the most recent food safety inspection in a publically visible location outside of the kitchen and submit a picture as to its placement.
- ❑ **Finding #2:** The SFA’s plan has incomplete lists of process 1, 2, 3 items.  
**Corrective Action Needed:** Update the food safety plan to include all required elements and submit updated page.
  - ❑ **Finding#3:** No annual food safety plan review completed.  
**Corrective Action Needed:** Review entire food safety plan and update as needed. Document date and name of reviewer on the Food Safety Plan Review page. Submit completed Food Safety Plan Review page.
  - ❑ **Finding #4:** Because cold items are held outside of mechanical refrigeration on the salad bar, Time as a Public Health Control must be used.  
**Corrective Action Needed:** Please develop a Time as a Public Health Control SOP and submit updated SOP.

## Buy American

### Commendations/Comments/Technical Assistance/Compliance Reminders

- 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 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 noncompliance 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

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

- Chunk Tropical Fruit - Thailand
- Frozen diced green peppers - Canada
- Fresh Cucumbers - Mexico

**Corrective Action:** The identified noncompliant food item(s) may qualify to be on the non-compliant product list, but the SFA does not have them listed on their noncompliant list. Provide a copy of the any noncompliant products currently in the SFAs food storage areas. A [Non-Compliant Product Form](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) is available on the Procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

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

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at the SFA, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
  - Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
  - Promotion of calling 211 to locate meals in the area
  - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
  - Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

### Findings and Corrective Action: SBP and SFSP Outreach

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

## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Fresh Fruit and Vegetable Program

#### Commendations/Comments/Technical Assistance/Compliance Reminders

- Thank you to Messmer Catholic Schools for participating in the Fresh Fruit and Vegetable Program (FFVP)! A special thanks to the Food Service Director for providing documentation for the claim validation. The claim validation did not result in any findings. Excellent work!
- Fresh vegetables that are not normally eaten raw may be served cooked once per week. If a cooked vegetable is served, a nutrition education lesson related to the vegetable is required.

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

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

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