

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

School Food Authority: Kaukauna Area School District

Agency Code: 442758

Review Date(s): 11/26/18–11/28/18

School(s) Reviewed: Riverview School, New Directions Learning Center

Date of Exit Conference: 11/28/18

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 Kaukauna Area School District for the courtesies extended 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.

The food service director and assistant food service director were welcoming, eager to make improvements, and quick to take corrective action steps. The staff at the review sites were accommodating and receptive to suggestions.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations:

- The determining official did an excellent job reviewing applications and following up with households when needed to ensure eligible families receive meal benefits.

Technical Assistance:

Benefit Issuance Review

- Of the 380 eligibility determinations reviewed, five errors were identified. These errors have been recorded on the SFA-1 form and are used to determine an error percentage. The error percentage was 1.3%, which is low enough to not require an independent review of applications or benefit issuance fiscal action. An additional three errors were identified outside of the benefits issuance sample. These errors have been recorded on the SFA-2 form and are not used to determine error percentages.

Public Release

- All SFAs are required to distribute a [Public Release](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps) before the start of the school year (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications#apps). The purpose is to inform the public that free and reduced price meals are available. SFAs must annually distribute the Public Release to:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need such as food banks, local libraries, WIC clinics, etc.)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.

Transferring Students

- When a child transfers to a new school within the same Local Educational Agency (LEA), the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination. Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA (if they participated in NSLP) when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. Wisconsin DPI requires source documentation of the student's previous eligibility. Source documentation means that the information originally used to determine the student's meal eligibility is shared with the school requesting the information for

the new or transfer student. Source documentation may include a copy of the original application or a copy of a DC run with the student's name listed. A phone call or copy of a benefit approval letter are examples of documentation that would not be sufficient to establish the new or transfer student's eligibility. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

Direct Certification Approval Letter

- As explained in the [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), the written direct certification approval letters sent to qualified households must:
 - Explain the child is eligible free without further application
 - Clarify that eligibility extends to all school aged children in household
 - Inform households of how to notify LEA of any additional school aged children in household not listed on notification
 - Explain how household can decline benefits
 - Include full non-discrimination statement
- Additionally, because students in Wisconsin may be eligible for reduced meal benefits via direct certification Medicaid match, it is important to inform these reduced-eligible families that they may qualify for free meals via an income application.

Disclosure

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, a disclosure agreement form should be signed and on file at the district. Template disclosure agreements for [outside agencies](#) and for [school staff](#) are available on the SNT website (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement-school-staff.docx).

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 that application to be considered complete.

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 with the household. 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 should document the details of the conversation plus date and initial. 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.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ✓ **Finding 1:** One income application did not have a number entered in the total household members box, which is a state requirement. There were five names listed on the application, however the family must be contacted to verify this is the correct number of household members used for eligibility determination.

Corrective Action: The determining official (DO) contacted the household and verified that there were five household members at the time the application was submitted. The DO adequately updated the application and documented the communications. No further action required.

- ✓ **Finding 2:** One household's income application was submitted as a duplicate paper application and online application. The paper application indicated the reported case number was for "health care." The online application lists the same case number as the paper application. The household must be

contacted to clarify if the case number is for an eligible program. "Health care" is not an eligible program for which a case number can be provided for a free meal benefit.

Corrective Action: Contact the household to determine if the case number is for a valid, eligible assistance program. If the case number is not for a valid program, send the household an adverse action letter indicating that benefits will be discontinued in 10 calendar days unless a new determination is made. If the case number is for a valid program, record the confirmed program name on the application and make a brief note documenting the communication. Corrected by determining official; no further action required.

- ✓ **Finding 3:** One income application was correctly approved as reduced based on income information, however one student listed was awarded free benefits based on the categorical Head Start box being checked. According to the [Eligibility Manual](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf) page 63, a child participating in Head Start cannot be determined eligible for free benefits until the local education agency (LEA) documents the child's status with Head Start program officials (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual.pdf>).

Corrective Action: Contact appropriate Head Start program officials to obtain documentation that the student is enrolled in Head Start. If the enrollment is confirmed with the proper official, retain the documentation with the application. If enrollment cannot be confirmed with the proper official, send the household an adverse action letter indicating that the child's free benefit will be changed to the reduced benefit supported by the income information in 10 calendar days. Corrected by determining official; no further action required.

- ❑ **Finding 4:** One income application did not include all reported incomes in the benefit determination calculation. The skipped income was reported in two different frequencies and may also be reported in the Regardless of which frequency is used in the calculation, the addition of the skipped income results in determination of a paid status.

Corrective Action: Contact the household to clarify the reported income amounts and frequencies. Based on the information obtained from the household, recalculate the total household income for benefit determination. Update the benefit issuance system and notify the household accordingly based on the resulting determination. If the household cannot be reached, the household income must be recalculated to include the skipped income, which results in a paid/denied status regardless of which reported frequency is used. If the students will receive a benefit reduction, send the household an adverse action letter indicating that the children's benefits will be decreased or eliminated in 10 calendar days. Notify consultant of results and date of household communication.

- ❑ **Finding 5:** The staff members that are given individual students' free/reduced information for fee waivers and other non-program purposes do not have signed disclosure agreements on file.

Corrective Action: Submit signed disclosure agreements for staff members receiving meal benefit information for non-program purposes.

- ❑ **Finding 6:** The free and reduced direct certification notification letters did not adequately explain the extension of benefits for other children residing in the same household as other directly certified children. The reduced direct certification notification letter does not explain that households may be eligible for free benefits by submission of a household income application. The letters do not include information stating that FDPIR participation and foster child status may also be reasons that students qualify via direct certification. During the updating process, please ensure that the full non-discrimination statement is included and in the properly spaced format.

Correction Action: Please revise the free and reduced direct certification notification letters so that they contain the missing information stipulated above. Submit copies of the revised letters.

- ❑ **Finding 7:** The public release printed in the local newspaper did not contain the income eligibility guidelines. Per the Eligibility Manual page eight, the public release (i.e. public notice) must contain eligibility criteria for free and reduced price meals. Additionally, the public release was not sent to grassroots organizations as required.

Corrective Action: Submit a plan describing how the correct, full version of the public release will be sent to all of the required outlets going forward.

Verification

Technical Assistance:

- Different reports run in the software system to assist with verification contained some minor discrepancies in the total number of applications. The slightly different sample pools indicated in each report resulted in the same number of applications selected as the sample size to be verified. It is highly encouraged to contact the software vendor to explore the reason for these report discrepancies, and watch closely for similar discrepancies going forward.

Findings and Corrective Action Needed: Verification

- ✓ **Finding 8:** The verification collection report (VCR) contained an error in the results section 5-8. The number of students reported with each verified application should only include students enrolled in the SFA.

Correction Action: The determining/verifying official resubmitted the VCR via the online portal with the corrected student counts in the results section 5-8. No further action required.

- ✓ **Finding 9:** The online contract did not entirely reflect actual practices in the district. The hearing official and confirming official listed on the contract are not the staff members that actually hold the corresponding duties. Additionally, the number of food safety inspections completed in the prior school year for New Directions and Riverview were reported incorrectly—New Directions should indicate “meals not served” and Riverview should indicate “two inspections.”

Corrective Action: The food service director updated the contract to reflect these required changes. No further action required.

Meal Counting and Claiming

Technical Assistance:

Field Trip Meals

- The field trip meals check-off system should be reviewed to ensure that teachers check off students at the time they receive their meal.

Visiting Students

- Please note that SFAs may claim visiting students outside of the district in the paid category or the individual’s benefit category with documentation, unless they are from a CEP school.

Student Volunteers

- The free meal incentive for student volunteers should be re-evaluated. If all student volunteers get a free lunch, this is not necessarily fair to students that normally receive free meals since they are not really being compensated above what they normally receive at lunch. The paid eligible students receiving a free meal after working would essentially be earning something of a \$2.70 value to them, but the free eligible student would be earning something of \$0.00 value to them since they

normally receive free lunch regardless of their help in the kitchen. The same logic applies to students eligible for reduced priced meals.

- The most preferred way to compensate student helpers is by providing a wage. If a wage is not desirable or possible, an alternative incentive could be implemented or helping could simply be offered as a volunteer opportunity.

Claiming Inconsistencies

- Claim validation indicated some inconsistencies between the software's monthly edit check report and the monthly claim. Acceptable explanations and supporting documentation were provided to clarify the reasoning for the inconsistencies, thus these are not considered errors.
 - Reimbursable free meals for student volunteers are charged to the students' accounts via a "volunteer meal" POS button. Use of this button allows for the meal to be claimed in the appropriate category, but the student does not pay for the meal. Monthly tallies of volunteer meals are charged to the district—not the student or Fund 50. These volunteer meals are manually added on the edit check and claim due to the POS button coding.
 - On one day during the review period, a cashier erroneously charged some students for only a milk instead of a full lunch. This error was corrected manually the next day, and thus was not reflected on the edit check report.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- ❑ **Finding 10:** The claims for reimbursement are prepared based on monthly transaction summary reports from the software system and the edit checks created by the FSMC. The edit checks generated from the software system should be the documents used to review monthly data and submit the claim for reimbursement. The software-generated edit checks should also be used when entering the students approved for free and reduced each month on the claim. While the current system the claim preparers use to double-check and cross-reference monthly data appears accurate in determining claimable meals in each category, it is most accurate and reliable to use the edit check reports generated directly from the POS software system.

Corrective Action: Submit a statement describing how the proper edit check reports from the software system will be used to submit claims going forward.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Menus, OVS, and Crediting

Commendations:

- Thank you to the food service staff at Kaukauna Area School District for working to provide documentation as requested during the review. Staff were friendly, professional and willing to implement changes on-site. Thank you for all you do for the students at Kaukauna!

Technical Assistance:

Documentation

- Any processed product that is not listed in the USDA *Food Buying Guide* for Child Nutrition Programs requires a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to credit toward the meal pattern. A complete PFS must be directly from the manufacturer and include the product name and number; weights of raw and cooked ingredients; portion size; statement of contribution to meal pattern requirements; and an original signature from the manufacturer certifying that the information is correct. Documentation should be printed on company letterhead and signed by an appropriate person (e.g., a quality assurance agent or registered dietitian, rather than a salesperson). If a processed item does not have a valid CN label or PFS and cannot be found in the USDA *Food Buying Guide* for Child Nutrition Programs, it may not be credited when served as part of the USDA School Meal Programs. Additionally, remember to

collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year as well. More information about crediting documentation can be found on the [NSLP Menu Planning](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

- Overall, production records are being filled in fairly completely. However, there are a couple improvements that could be made. A list of production record requirements (“[Must Haves and Nice to Haves](#)”) and sample production record templates can be found on our [Production Records](#) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).
 - The Quantity Prepared column is being filled in with the number of servings rather than the quantity prepared in purchase units (pounds, cases, loaves, #10 cans, etc.)
 - Actual fruit served must be recorded on the production records

Meal Pattern Crediting

- An alternative entrée option of a Wowbutter Sandwich, giant goldfish graham and string cheese was planned every day for lunch at River view during the week of review. The graham credits as 1 oz eq of grain and would be considered a grain based dessert. Therefore, offering it daily would exceed the weekly grain based dessert limit. However, after reviewing production records, this entrée option was not offered the week of 10/8, so corrective action is not required. Going forward, cheddar goldfish will be offered in place of the goldfish grahams (this change was implemented during the on-site review).
- Portion sizes served must be full, level scoops in standardized measuring utensils. During lunch observation at New Directions Learning Center, some portions of green beans were scant scoops. A full ½ cup must be provided to ensure meal pattern requirements are being met, and to fulfill the required ½ cup vegetable selected under Offer versus Serve (OVS) if they do not select any other fruits or vegetables.
- For breakfast observation at River View during the on-site review, canned fruit was pre-portioned into 4fl oz soufflé cups. This was corrected prior to service by serving bulk fruit with a 4fl oz spoodle rather than the pre-portioned cups. Going forward, it is recommended that canned fruit be served in bulk or pre-portioned into larger containers that can more easily accommodate a full ½ cup serving.

Breakfast Participation and Alternative Service Models

- Breakfast participation in the Kaukauna Area School District is low. In 2017-2018, average daily participation in the School Breakfast Program was less than 28% that of the average daily participation in the National School Lunch Program. Looking specifically at students eligible for free and reduced price meals, only 46 out of every 100 kids eating lunch also ate breakfast.
- Consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation. Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways.
- Decreasing the a la carte offerings (such as chips, cookies, ice cream, etc.) available during breakfast service may encourage more students to select a reimbursable meal.
- Consider sending this [School Breakfast brochure](#) to families and caregivers to promote the benefits of breakfast
- The [breakfast resources webpage](https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources) (<https://dpi.wi.gov/school-nutrition/school-breakfast-program/resources>) contains a wealth of information about the different breakfast service and financial models. For questions on breakfast models or ideas to increase participation, contact the [School Breakfast Program Specialists](mailto:DPISBP@dpi.wi.gov) (DPISBP@dpi.wi.gov).

- 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. Contact DPISBP@dpi.wi.gov.

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding 11:** Several standardized recipes in use do not accurately reflect the actual products used. Any deviation from a standardized recipe requires that recipe to be re-standardized, to ensure yield and crediting information are accurate.

Corrective Action: Please submit updated standardized recipes for the following:

- Macaroni chicken casserole- recipe calls for elbow macaroni and diced chicken, but rotini and fajita chicken are used
 - Macaroni and cheese - recipe calls for elbow macaroni, but rotini is being used
 - Cheeseburger - recipe calls for 2.5 oz JTM burger patty, but CN label provided is for a 2.17 oz patty
 - Cheeseburger pizza - recipe calls for 2.5 oz advance pierre burger patties, CN label provided for 2.17 oz JTM patty
 - Sausage and cheese English muffin - provide a recipe or list out items separately on the production record
 - Crispy ranch chicken sandwich - recipe calls for 3.75 oz Tyson breaded chicken patty, documentation provided for WI State Processed 3.4oz Tyson chicken patty
 - Pasta salad with beans - submit updated recipe if using rotini instead of elbow macaroni
- ❑ **Finding 12:** Webtrition is used to prepare menus and production records and is also intended to verify that daily and weekly meal pattern requirements are being met. However, there are issues with the wrong recipes being pulled (not standardized based on actual products) and crediting not matching the portion size entered. This resulted in multiple shortages for the week of review. It is imperative that another method be used to verify meal pattern compliance and/or crediting shown on production records is double checked for accuracy.

Additionally, it is recommended that a folder of recipes used by this operation be created or other recipes be "turned off" so they are not inadvertently selected.

A few examples include:

River View

- 10/8 cheese pizza, production record says 2.5 oz eq grain
- 10/9 sliced bread, 1 slice, production record says 2 oz eq grain

- 10/11, production record says 2 pork sausage patties credit as 0.5 oz eq m/ma. CN label for Jimmy Dean pork sausage patties provided says each 2.0 oz patty provides 1 oz eq m/ma
- 10/27 pepperoni pizza, production record says 3.75 oz eq grain

New Directions/Quinney

- 10/8 sliced bread, 1 slice, production record says 2 oz eq grain
- 10/12 tortilla chips, serving size is 1 ounce, production record says 2.25 oz eq grain

Corrective Action: Please submit a written statement describing your plans for ensuring that planned menus are analyzed for compliance prior to service.

- **Finding 13:** A 1.3 oz Nutrigrain bar was served for breakfast on 10/8 at River View. This product only credits as 0.75 oz eq of grain and therefore resulted in both a daily and weekly grain shortage at breakfast.

Corrective Action: Submit documentation for the product what will be served in place of this item (or if a larger Nutrigrain bar will be procured) for future service.

- **Finding 14:** The planned lunch menu on 10/11 at New Directions Learning Center included a hash brown patty (1/4c vegetable), ½ cup broccoli salad with raisins (1/4 c. vegetable 1/4 c. fruit) and celery. However, celery was not included or documented on the production record, meaning only ½ cup of vegetable was offered. This is short of the ¾ cup requirement for K-5 and therefore resulted in a daily vegetable shortage for lunch.

Corrective Action: Submit a written statement regarding how staff will be trained/instructed that all menu changes must be confirmed with the Food Service Director or other supervisor who is knowledgeable about meal pattern requirements. Additionally, indicate how this shortage would be corrected if this menu was to be re-served.

- **Finding 15:** The lunch menu, as served at New Directions Learning Center resulted in a weekly grain shortage at lunch as the minimum offering was 6.5 oz eq, which is short of the weekly minimum grain requirement of 8 oz eq for K-5 students.

- Monday
 - Chicken Nuggets – 1 oz eq grain
 - Pork/bread slice – 1 oz eq grain
 - *Daily minimum – 1 oz eq grain*
- Tuesday
 - Mini corn dogs – 2 oz eq grain
 - Pepperoni pizza pasta bake – 1 oz eq grain
 - *Daily minimum – 1 oz eq grain*
- Wednesday
 - Cheese pizza – 2 oz eq grain
 - Turkey and cheese on a bun – 2 oz eq grain
 - *Daily minimum – 2 oz eq grain*
- Thursday
 - French toast sticks – 1.5 oz eq grain
 - Egg and cheese bagel sandwich – 2 oz eq grain
 - *Daily minimum – 1.5 oz eq grain*
- Friday
 - Pork nachos – 1 oz eq grain
 - Beef, bean and cheese burrito – 2 oz eq grain
 - *Daily minimum – 1 oz eq grain*

Corrective Action: Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the day, item and portion size (ex. offer a 1 oz dinner roll

with the pepperoni pizza bake on Tuesday). If a new product is added, submit any necessary crediting documentation.

❑ **Finding 16:** The lunch menu, as served at River View resulted in a weekly grain shortage at lunch as the minimum offering was 6.75 oz eq*, which is short of the weekly minimum grain requirement of 8 oz eq for K-8 students. Below I have listed the entrée/s each day that contributed to the weekly minimum:

- Monday
 - Macaroni and cheese – 1 oz eq grain
- Tuesday
 - Roasted turkey with gravy, 1 slice bread (1 oz eq), ½ cup garden pasta salad with beans (0.5 oz eq) – 1.5 oz eq
- Wednesday
 - Spaghetti with meat sauce (1/2 cup rotini) – 1 oz eq grain
- Thursday
 - French toast sticks – 1.5 oz eq grain
- Friday
 - Pork tacos (8" tortilla = 51g) – 1.75 oz eq grain*

*Note: This is estimated based on labels provided, however, clarification on actual tortilla used is needed.

Corrective Action: Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the day, item and portion size (ex. replace the peas on Friday with ½). If a new product is added, submit any necessary crediting documentation.

❑ **Finding 17:** Baked beans were listed on one page (salads) of the production records for lunch at River View on 10/9, however service of this item was not documented. No other vegetable from the bean/pea subgroup was offered during the week of review, meaning this was a missing vegetable subgroup.

Corrective Action: Submit a written statement outlining the changes that will be made to the menu to correct this shortage. Be specific and indicate the day, item and portion size (ex. replace the peas on Friday with ½ cup of refried beans). If a new product is added, submit any necessary recipes and/or crediting documentation.

❑ **Finding 18:** Additional documentation is needed to complete the analysis of the week of review.

Corrective Action: Please submit the following:

- Complete PFS for the stuffed cinnamon pretzel
- Additional APP documentation for the Advance Pierre Rib Patty (44-531)
- Wowbutter sandwich – updated PFS with accurate grain crediting
- Beef crumbles used in the Italian Meat Spaghetti Sauce – are they WI State Processed (CP5876)? Recipe calls for CP5868 – these two products credit differently. Either submit updated recipe or crediting documentation for CP5868
- CN label or PFS for pork sausage crumbles and turkey ham (unless using commodity) on the Meat Lover's Pizza

❑ **Finding 19:** Quantity of dark green vegetables offered for lunch at River View the week of 10/8 could not be determined.

Corrective Action: Please submit the following:

- Recipe and labels for Caesar salad
- Documentation for "romaine blend" used in mixed green salad

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may also be subject to fiscal action. Thank you.

Please note that repeat violations involving missing vegetable subgroups and food quantity shortages on future Administrative Reviews may result in fiscal action.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Technical Assistance:

Annual Financial Report (AFR)

- As a reminder, the AFR is due by August 31st annually. Failure to submit the AFR will result in blocking October claim submission.
- All revenues (reimbursements and student payments) and expenses (including food, labor, equipment, purchased services, and the other category) need to be separated into each program; this will aid the school in calculating its “yearly” reference period for nonprogram food compliance, which is highly recommended. The [Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>).
- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other.” Only expenses for edible food items and beverages should be reported under “Food.”
 - “Equipment” should reflect major purchases of equipment costing over \$5000 per unit. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other.”
 - Under “Purchased Services,” report any time someone is paid for services provided such as equipment repair and health inspections.
 - Under “nonprogram foods,” report the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals, a la carte, and caterings would also be included here.
- For assistance allocating expenses on the AFR, please reference the resources provided in the Annual Food Service Financial Report section of the [Financial Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>). An expenditures reference sheet and an expense allocation tool are available.

Food Service Management Companies (FSMC)

- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all placed into Purchased Services, as was previously done for SFAs with FSMC contracts. The only expenses that can be classified as “purchased services” are the FSMC management fees and actual purchased services such as equipment repair, health inspections, training costs, etc.
- SFAs must annually be provided information on food costs and revenues from FSMCs. The information must include food cost for reimbursable meals, food cost for non-program food,

revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

Unpaid Meal Charge Policy

- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges. For a snapshot 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>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>)
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

Account Balance Refunds

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

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding 20:** The annual financial report (AFR) contained several errors. The Summer Food Service Program (SFSP) was operated from June through August 2018, and therefore June revenues and expenditures must be allocated on the AFR. Labor expenditures are not properly allocated, as they are included in the purchased services category. Labor expenses must be broken out from purchased services and then further allocated by program.

Corrective Action: Correct and resubmit the annual financial report. This can be completed online until December 31. Notify the consultant when the report has been resubmitted.

- ❑ **Finding 21:** The unpaid meal charge policy was not distributed in writing (letter, email, handbook, registration materials, etc.) to all households at the start of the school year and to households transferring into the district during the school year. Please note that posting the policy on the district website is encouraged, but does not meet the policy distribution requirement.

Corrective Action: Submit a detailed plan describing how the policy will be distributed to all households in writing going forward.

Revenue from Non-Program Foods

Technical Assistance:

- 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) 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>).

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} > \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods.
- Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.

Adult Meals

- Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5.
- A [Wisconsin Adult Meal Pricing Worksheet](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc) has been developed to assist the SFA in pricing adult meals (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>).
- Districts need to assess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2017-18 SY) should be used to determine adult prices.

Findings and Corrective Action Needed: Nonprogram Foods

- ✓ **Finding 22:** Adult breakfast prices were not high enough to meet USDA minimum pricing requirements.

Correction Action: The online contract, POS price, and corresponding pricing notifications were corrected prior to the onsite review to reflect the new, increased adult breakfast price that meets the pricing requirements. No further action required.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations:

- The food service director and assistant food service director have taken steps towards improving the special dietary needs accommodations within the SFA. Both staff members have attended related trainings and are working with SFA administrators to improve and streamline meal accommodations to ensure all students are able to participate in the meal programs.

Technical Assistance:

And Justice For All Poster

- Only the most current poster should be displayed. During the on-site review, an outdated poster was observed and it was promptly removed. The correct poster was also appropriately displayed nearby, thus meeting the poster requirements.

Processes for Complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service

or the state agency within 5 days. This should be 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. An 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

- 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](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/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](#) 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](#) 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 or water may not be substituted for fluid milk unless juice or water is specified as a substitution on a medical statement signed by a licensed medical practitioner. An SFA may choose to offer lactose-free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA without a medical statement. 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](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).

Overt Identification

- The meal counting system must prevent overt identification of students receiving free and reduced price benefits. It was noted that meal prices for student meals were visible on the cashier screen which can be seen by students; this constitutes overt identification.

Civil Rights Training

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

Findings and Corrective Action Needed: Civil Rights

- ❑ **Finding 23:** At Riverview, the cashier screens at the point of service (POS) displayed different prices per meal based on eligibility (e.g. \$0.00, \$0.40, \$2.95) at breakfast and lunch. This constitutes overt identification of student meal benefit statuses.

Corrective Action: Modify the software settings to prevent this form of overt identification at the POS. If the software settings cannot be modified or cashiers have a legitimate “need to know” for students’ benefit statuses, then screen protectors must be obtained and utilized to prevent students from viewing the screen. Submit a statement describing how this issue will be resolved. It is strongly recommended to review the POS screens at the other schools in the district to ensure overt identification is prevented as well.

- ✓ **Finding 24:** The PI-1441 civil rights compliance form was not completed. An error with the software system prevented the required racial/ethnic data report from being compiled, thus the form could not be completed.

Correction Action: A help ticket was submitted to the software vendor regarding this issue prior to the onsite review. The SFA will continue working with the vendor to resolve the issue and subsequently complete the PI-1441 form. No further action required.

- **Finding 25:** Four staff members have not completed the required civil rights training. Additionally, two staff members hired during the week of review will need to complete civil rights training.

Corrective Action: Submit a signed training roster after the staff members have completed civil rights training. Please be sure to record the civil rights training as professional standards training hours for the staff members.

Local Wellness Policy (LWP)

Technical Assistance:

Content of the Wellness Policy

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. At a minimum the wellness policy must include:
 - Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
 - Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
 - Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
 - Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
 - Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
 - Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
 - Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)

- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Triennial Assessment

- The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place.
- To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources).
- Additionally, the SFA is required to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP, the progress made toward attaining the goals of the LWP, and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy). The policy builder provides sample language that can be used in the SFA's policy when the updates are made.

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding 26:** The local wellness policy (LWP) does not contain required language pertaining to food/beverage marketing and the triennial assessment. It is recommended to strengthen the language pertaining to school meals, foods sold outside of meal programs, nutrition promotion, and physical activity. As a reminder, diverse stakeholders (including parents, students, and community members) should be recruited to participate in wellness policy development and review.

Correction Action: Submit a timeline for updating the policy to become compliant with the final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule.

Smart Snacks in Schools

Commendations:

- Great job using the Alliance for a Healthier Generation product calculator to determine if a la carte items meet Smart Snack standards.

Technical Assistance:

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards if they do not qualify for an exemption.

- The Wisconsin Department of Public Instruction 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 this may not occur in the meal service area during meal service times.
- There is no required template that must be used to track fundraisers or products sold that are subject to Smart Snacks standards. However, tracking tool templates are available on the [Smart Snacks page](#) of our website and may be helpful in tracking this information (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>). Locations where exempt fundraisers occur, must be documented to ensure compliance with the regulation.
- The [Smart Snacks in a Nutshell](#) document provides a great overview and summary of the general standards, nutrient standards and allowable beverages for your reference (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>).

Findings and Corrective Action Needed: Smart Snacks

✓ **Finding 27:** A soft pretzel and cheese sauce are offered as an a la carte option at River View. The combination of these items exceeds the sodium limit outlined under the Smart Snacks regulations.

Corrective Action Needed: The cheese sauce will no longer be offered. This was implemented during the on-site review. The pretzel alone is in compliance. **No further action needed.**

❑ **Finding 28:** A variety of flavors of frozen yogurt are offered a la carte, which are prepared using a base with added syrup. A recipe was not provided, so this product could not be analyzed.

Corrective Action Needed: Submit a recipe for one flavor of frozen yogurt along with nutritional information for the base and syrup.

Professional Standards

Technical Assistance:

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.

Training Tracking

- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to the [Professional Standards](#) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).

Director Role in FSMC Contracts

- In SFAs with FSMCs, the role of food service director is technically shared between the authorized representative and the FSMC food service director because the SFA retains ultimate responsibility for the school meal programs. For this reason, authorized representatives of SFAs under FSMC contracts are required to complete 12 hours of annual professional standards training. The authorized representative should begin seeking out opportunities for professional standards training and begin tracking trainings as they are completed.

Two Year Flexibility

- SFAs may utilize the two year flexibility offered by the state agency for professional standards training. The SFA may define a two year period and allow staff members to complete twice their annual training hour requirements over two years. For example, a full time staff member could complete 12 hours of training over the defined two year period as opposed to completing six hours every year. This option does not require additional approval from the state agency.

Findings and Corrective Action Needed: Professional Standards

- ✓ **Finding 29:** The professional standards tracking tool was missing information regarding staff positions and required training hours for some employees.

Correction Action: The tracking tool was updated prior to the onsite review to correct the staff positions to reflect the appropriate number of required training hours. No further action required.

Food Safety

Commendations:

- The food safety plans are reviewed frequently by the food service director and staff members at each school. It was especially apparent that the staff members at New Directions/Quinney modify aspects of their plan to ensure it is up-to-date and site-specific. The temperature logs and other food safety monitoring logs at Riverview were thorough, organized, and clearly completed with great care on a daily basis. All kitchens observed were very clean and organized. It was apparent that food safety is a priority in the food service department.

Technical Assistance:

Food Safety Inspections

- The most recent food safety inspection reports must be posted in publicly visible location that is visible throughout the day, including when meals are not being served.

Food Safety Plans

- Food safety plans must be 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/plan 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 including on field trips.

Findings and Corrective Action Needed: Food Safety

- ❑ **Finding 30:** 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>). The SOP should be added to food safety plan at any schools where field trip meals are offered.

- ✓ **Finding 31:** The most recent food safety inspection reports were not posted in publicly visible locations at the review sites. At New Directions (Quinney cafeteria), the posted report was not the most recent one. At Riverview, the report was posted in the serving area which is closed off when meals are not being served, thus it was not in a publicly visible location.

Corrective Action: Report postings were corrected on site. No further action required.

Summer Food Service Program (SFSP) Outreach

Technical Assistance:

- The SFA offered SFSP during the summer of 2018 and met the SFSP outreach requirements. However, it is important to remember that all SFAs must notify all households of where their students can receive a free meal in the summer months regardless of the SFA's participation in SFSP.
- 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>)

Buy American

Technical Assistance:

- 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.
 - Labels should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, the SFA must get certification from distributor or supplier stating: "We certify that (green beans) were processed in the U.S. and contain over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted within an email.
 - 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.
 - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>) and Buy American monitoring procedures (<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 noncompliant products, can be found on the [SNT Procurement webpage](http://dpi.wi.gov/school-nutrition/procurement/buy-american) (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

- The following products were found without a clear country of origin indicated on the product or product packaging. This will be treated as technical assistance for the 2018-19 school year, but work with your distributor/supplier to move toward compliance.
 - Kraft light ranch
 - Minor's sweet and sour
 - Del monte diced peaches
 - Golden grahams bowl pack
 - Cheddar goldfish
 - Fritos
 - Sunny fresh egg patties
 - Sunkist frozen cranberry juice
 - Sliced frozen carrots
 - Dannon yogurt
 - Mission hearty grains 8" tortilla
 - Apple juice
 - Wholesome farms cottage cheese
 - Sysco curry powder
 - Heinz red wine vinegar
 - Lays baked chips
 - Bush's black beans
 - Campbell's tomato soup
 - Sysco vanilla
 - Diced tomatoes, Kraft extra heavy mayo
 - English muffins

Findings and Corrective Action Needed: Buy American

- **Finding 32:** Documentation was on file for a number of non-domestic products, however, the following non-domestic products were found without a non-compliant product form on file:
 - Canola oil – product contains oil from the USA or Canada
 - Tomatoes from Mexico
 - Bananas from Honduras

Corrective Action: Complete and submit a [non-compliant product form](#) for each of these items or submit documentation for a domestic product that will be purchased in their place (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>).

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



With School Nutrition Programs!