

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

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**School Food Authority:** South Shore School District

**Agency Code:** 04-4522

**School(s) Reviewed:** South Shore Elementary School

**Review Date(s):** February 27-28, 2018

**Date of Exit Conference:** February 28, 2018

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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:

- 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 South Shore School District for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All staff were incredibly 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.

The DPI review team appreciates the eagerness of the staff at South Shore School District for their willingness to make changes to meet child nutrition program regulations. It is very apparent that all staff members are dedicated to the health and well-being of the students they serve every day. We were also very impressed by the efforts made during meal service to encourage the students to try new foods. The DPI review team is confident that South Shore School District will continue to improve their knowledge and operation of child nutrition programs. Keep up the great work!

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### Certification and Benefit Issuance

##### **Commendations:**

The SFA completed the certification and benefit issuance processes correctly and in a timely manner. Files are well maintained and organized. Great job!

#### Findings and Corrective Action Needed: Certification and Benefit Issuance

**Finding #1:** One student's status was determined as reduced via the application process when it should have been denied.

**Corrective Action Needed:** Please change the eligibility status accordingly within ten operating days of the exit conference.

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#### Verification

##### **Commendations:**

Thank you for your willingness to learn more about the verification process and adopting the DPI verification resources!

##### **Technical Assistance:**

- For the 17-18 school year, the Standard Sampling Method was used for the Verification process. However, the Alternate 1 or 2 method would have been sufficient. Standard Sampling is only necessary if the non-response rate for applications verified in the previous school year was 20% or more. This discrepancy did not affect the number of applications to verify this school year.

**Compliance Reminders:**

- The SFA has a regulatory obligation to verify “for cause” all approved applications that appear questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action is sent in writing with appeal rights procedures.

Findings and Corrective Action Needed: Verification

**Finding #2:** Due to staff turnover, the verification process was not completed in the correct timeframe nor was it completed in the correct format.

**Corrective Action Needed:** Please watch DPI’s [Verification](#) webcast and complete the quiz. Please forward the quiz completion email to the consultant assigned to your review ([https://media.dpi.wi.gov/school-nutrition/verification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html)).

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Meal Counting and Claiming

**Commendations:**

No meal counting and claiming errors were observed onsite. Great job!

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## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to all of the staff at South Shore School District for their warm welcome and cooperation during this Administrative Review (AR). Thank you to the school nutrition professionals for providing information prior to coming on-site. The efforts to provide nutritious meals was very much recognized. The staff was positive, open to discussion, and worked well with the students. We enjoyed our time at your school.

Training

It is recommended that anyone involved with the School Meals Program attend DPI training classes. The classes are offered in the summer and select other times throughout the year. Travel/meal expenses are allowable food service expenses for your program.

The classes provide an overview of all areas of the NSLP and SBP requirements including verification, free/reduced meal applications, meal pattern, and record keeping requirements.

Information on upcoming trainings can be found on DPI's [Training Page](https://dpi.wi.gov/school-nutrition/training#up) (https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics. These can be found on DPI's [Webcast Page](https://dpi.wi.gov/school-nutrition/training/webcasts) (https://dpi.wi.gov/school-nutrition/training/webcasts

### Dietary Specifications

Major contributors of sodium include condiments (e.g. Ranch), regular canned vegetables, deli meats, dairy products, cheese, and processed food items. It is recommended to purchase products that are labeled reduced-sodium, low-sodium, or no salt added. As a rule of thumb when reviewing nutrition facts labels, sodium with a percentage higher than 20% is an indicator of a high-sodium product.

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

### Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. Separating the grade groups, K-8 and 9-12 will help ensure meal pattern compliance. The production record template currently in use is out of date and uses columns that are not currently applicable (e.g. Process 1, 2, 3 and temp logs). While there is no required production record template, there are some examples that may be used on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link. Please note the FSD and the State Agency Representative walked through the how's and why's of the updated DPI production record on site.

Be specific on production records about the identity, brand, and description of the items served. The production records should reflect actual planned number of servings, which should be forecasted based on historical data.

Technical Assistance was given onsite regarding the benefits of using an updated production record.

### Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

#### Standardized Recipes

Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock.

Standardized recipe are needed for menu planning to ensure that the portions offered are actually what is intended. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA's *What's Cooking?* quantity recipes, especially when substitutions are made.

Continue to use the resources on our website regarding [recipe standardization](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). These include 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.

Findings and Corrective Action Needed: Standardized Recipes

Finding #3: Standardized Recipes are required for all menu items that contain more than one ingredient, and need to be standardized to the kitchen the item is being cooked in with the ingredients used on site.

Corrective Action Needed: Please submit a standardized recipe for each of the following:

1. Taco meat served on 01.22.2018
2. Refried Beans served on 01.22.2018
3. Stromboli served on 01.26.2018

Meal Pattern Requirements

The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select.

[Meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) requirements can be found at (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf>). The menu must meet the daily and weekly, including vegetable subgroups, independently, the "[In A Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf)" document is provided as well. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-in-a-nutshell.pdf>).

Finding and Corrective Action Needed: Meat/Meat Alternate

Finding #4: Due to the alternate Entrée (peanut butter and jelly sandwich) offered daily, the weekly meat/meat alternate minimum is not being met. Weekly minimums for K- 5 are  $\geq 8$  oz eq. Each prepackaged 2.7 oz peanut butter and jelly sandwich credits as a 1 oz eq meat/meat alternate.

Corrective Action: Please send the PHN a statement on what you will do going forward to correct this shortage.

### Whole Grain Rich

Foods that meet the whole grain-rich criteria for the school meal programs contain 100 percent whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50 percent is whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Please see this [Whole Grain Resource](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wgr_nslp_sbp.pdf) for more information. ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wgr\\_nslp\\_sbp.pdf](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wgr_nslp_sbp.pdf)).

In order to document that the grain items served meet whole grain-rich criteria, program operators should maintain one or more of the following types of documentation on file:

- An ingredient declaration from a product carton that shows a whole grain as the primary ingredient by weight.\*
- A copy of a food label showing the amount of whole grain in grams for the appropriate NSLP/SBP serving size or copy of a food label displaying one of the FDA whole-grain health claims.\*
- USDA-Authorized CN Labels for entree items that include grains.
- A customized product formulation statement on manufacturer letterhead.\* [Sample product formulation templates](#) for grain products can be seen on page 25 of this document and accessed through the CN Labeling website at (<http://www.fns.usda.gov/cnd/cnlabeling/food-manufacturersindustry>).
- A recipe that includes the ingredients and ingredient amounts by weight and volume.
- USDA Foods Fact Sheet (applicable for USDA Foods indicated as meeting the whole grain-rich criteria. Please note that fact sheets must be accompanied by acceptable manufacturer documentation if it is not clear that the item meets whole grain-rich criteria).

\*Program operators may need additional information when using these items to document meal pattern compliance. Compare manufacturer documentation with ingredient statement and verify that crediting calculations on documentation are accurate.

### Findings and Corrective Action Needed: Weekly Grain Requirement

Finding #5: Daily whole grain requirements for K-5 is 1 oz eq and Weekly Whole Grain requirements for K-5 students is  $\geq 8$  oz eq. During the week of review the daily minimum of 1 oz eq was met, however the weekly was not. This is a repeat violation.

Fiscal action will be calculated and notification will be forthcoming, please note each program has a \$600 disregard.

Corrective action: Please send documentation (examples - CN/PFS Labels, recipes, ingredient lists) indicating how the program will meet the weekly grain shortage going forward.

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### 3. RESOURCE MANAGEMENT

#### Nonprofit School Food Service Account

##### **Technical Assistance:**

- The unpaid meal charge policy was not completed until December 2017. All households were sent hard copies of the policy when it was completed.

##### **Compliance Reminders:**

##### Unpaid Meal Charge Policy

- No later than July 1, 2017, all SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach to the issues surrounding unpaid meals.
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left “unclaimed”, they cannot be used to offset another student’s negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the [Wisconsin Department of Revenue](#) (DOR) as unclaimed property. The DOR has rules concerning unclaimed property that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

#### Findings and Corrective Action Needed: Nonprofit School Foodservice Account

**Finding #6:** The USDA Foods values utilized by the SFA must be reported on the Annual Financial Report (AFR) under NSLP revenues and expenditures.

**Corrective Action Needed:** Please correct this error and re-submit the AFR to Jacqueline Jordee ([jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov)).

##### **Resources:**

To see what the policy must include, reference 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>

## Revenue from Non-program Foods

### **Compliance Reminders:**

#### Annual Financial Report (AFR)

- These categories of the AFR that should be addressed when tracking revenues and expenditures include:
  - Food: only edible foods items and beverages
  - Equipment: should reflect major purchases of equipment
  - Other: expenses for paper supplies, chemicals, thermometers, and smaller equipment purchased such as a cart
  - Purchases Services: report any time you pay someone for services provides such as equipment repair and health inspections
  - Nonprogram: report the expenses for any food items served to students that are not claimed as part of the reimbursable meal, this includes adult meals and milks

#### Findings and Corrective Action Needed: Nonprofit School Foodservice Account

**❑ Finding #7:** The AFR did not separate adult meals and milks from NSLP revenues and expenditures. Therefore, the AFR indicated non-program foods are not sold at the SFA, when in fact they are.

**Corrective Action Needed:** Please code adult meals and milks to non-program foods and not NSLP. Correct this error and re-submit the AFR to Jacqueline Jordee ([jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov)).

**❑ Finding #8:** The WSDMP milks must be separated based on free and reduced versus paid student milks. Paid student milks must be categorized under non-program foods, while free and reduced student milks must be categorized under WSDMP within the AFR.

**Corrective Action Needed:** Please correct this error and re-submit the AFR to Jacqueline Jordee ([jacqueline.jordee@dpi.wi.gov](mailto:jacqueline.jordee@dpi.wi.gov)).

### **Resources:**

- [Nonprogram Foods In a “Nutshell”](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>)
- The new [16-17 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>).
- Please see the [Nonprogram Food Revenue Tool Exceptions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf) for additional guidance (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf>).

### Indirect Costs

#### **Commendations:**

Indirect costs were not observed during the onsite administrative review.

#### **Compliance Reminders:**

DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.

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## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### **Commendations:**

The Civil Rights Self-Evaluation Compliance form was completed by October 31, and the “And Justice For All” poster was posted in public view where the program is offered. The SFA is also aware of and implements all requirements regarding special dietary needs. Great work!

#### **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 which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**” Either of these statements must be in the same size font as the other text in the document.

#### Findings and Corrective Action Needed: Civil Rights

**Finding #9:** An outdated version of the nondiscrimination statement is currently being used on the breakfast and lunch menus. Additionally, the full nondiscrimination statement was not on the school webpages. The full statement or a link to the full statement is required to be on the any school webpages pertaining to the child nutrition programs.

**Corrective Action Needed:** Please update the menus with the shortened nondiscrimination statement and send to your assigned consultant. Additionally, please notify the consultant assigned to your review when the statement is on the school’s website.

**Finding #10:** Staff that help administer milks and snacks for the Afterschool Snack and WI School Day Milk programs do not have civil rights trainings.

**Corrective Action Needed:** Please train staff on civil rights and submit the civil rights training sign-off sheet to the consultant assigned to your review.

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On-site Monitoring

**Commendations:**

Thank you for completing the required on-site monitoring forms within the required timeframes!

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Local Wellness Policy (LWP)

Findings and Corrective Action Needed: Local Wellness Policy (LWP)

**Finding #11:** The LWP had several missing components, including language regarding Smart Snacks, Nutrition Promotion and Smarter Lunchroom Techniques, Triennial Assessments, and updating/informing the public.

**Corrective Action Needed:** Please submit a revised LWP to the consultant assigned to your review.

**Resources:**

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies ([http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\\_finalrule.pdf](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf)).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

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Smart Snacks in Schools

**Technical Assistance:**

Information was given to responsible employees regarding Smart Snacks for their future use.

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Professional Standards

**Commendations:**

Wonderful job tracking training hours for foodservice employees!

**Compliance Reminders:**

- Annual Training Requirements for All Staff
  - Directors: 12 hours
  - Managers: 10 hours
  - Staff (20 hours or more per week): 6 hours
  - Part-Time and Non-Foodservice Staff (under 20 hours per week): 4 hours
- If employee is hired January 1 or later, only half of the training hours are required during the first school year of employment.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

Findings and Corrective Action Needed: Professional Standards

**Finding #12:** Point of Service (POS) staff do not have the minimum of 4 hours of professional standards annual trainings required for non-foodservice staff.

**Corrective Action Needed:** Please train the two POS staff accordingly and send the training tracker for each staff member to the consultant assigned to your review.

**Resources:**

- Please visit [DPI's training webpage](https://dpi.wi.gov/school-nutrition/training) for online webcasts and upcoming trainings (https://dpi.wi.gov/school-nutrition/training).

Water

**Commendations:**

Free potable water was readily accessible to students during meal service. Thank you!

**Food Safety, Storage and Buy American**

**Commendations:**

Neither food safety nor storage violations were observed onsite. A food safety plan was readily available, and the most recent food safety inspection was posted publicly in the service area. Nice Job!

**Compliance Reminders:**

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
  - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
  - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: “We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.,” This can accepted within an email.
  - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor’s certification as mentioned above.
  - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
  - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school’s required meal pattern.
  - Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
  - The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. [Sample written procurement contract management procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management) and [Buy American monitoring procedures](https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america) (https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/buy-america).
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above ( “non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

**Label does not identify country of origin:**

In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the notes above for sample certification language. Many products in the dry storage and refrigerator were not labeled with a country of origin, substituting this information for “manufactured by” or “distributed by”. This made identifying compliance and noncompliance with the Buy American Provision challenging. As part of South Shore School District’s Procurement Review, SNT will check that the procurement manual includes language pertaining to Buy American. An additional attestation from food service’s distributors and/or vendors

may be required. Further information is available on the USDA Foods [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>). This will be treated as TA for the 2017-18 school year, but work with your distributors and/or vendors to move toward compliance.

Findings and Corrective Action Needed: Food Safety, Storage, and Buy American

**Finding #13:** The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

1. *Frozen Mixed Vegetables from Canada*
2. *Cauliflower from Mexico*
3. *Berry Perfect Mix from Chile*
4. *Many Sysco items had No Country of Origin Listed*

**Resources:**

More information on the new Buy American requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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Reporting and Recordkeeping

**Commendations:**

Records are being retained for the required amount of time. Nice work!

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

**Commendations:**

At the beginning of each school year, the SFA inform households of the School Breakfast Program. Each year, in the month of May, the SFA notifies households of available Summer Food Service Programs in their area. Great job!

**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 South Shore, USDA requires all SFAs to inform families of where their students can receive a free

meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

**Resources:**

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:  
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator  
Phone: 608.266.7124; e-mail: [amy.kolano@dpi.wi.gov](mailto:amy.kolano@dpi.wi.gov)

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## 5. OTHER FEDERAL PROGRAMS REVIEWS

### Afterschool Snack Program (ASP)

**Commendations:**

Wonderful communication between the staff and students regarding the required snack items!

**Compliance Reminders:**

- Each site participating in the Afterschool Snack Program needs to have an onsite monitoring review completed within the first four weeks of operation, and a second review at another point within the school year. The review form to complete may be found on [DPI's Afterschool Snack Program webpage](http://dpi.wi.gov/school-nutrition/after-school) (http://dpi.wi.gov/school-nutrition/after-school).

Findings and Corrective Action Needed: Afterschool Snack Program

**Finding #14:** On-site monitoring forms have not yet been completed for this school year.

**Corrective Action Needed:** Please complete two separate on-site monitoring forms and submit them to your assigned consultant.

**Finding #15:** Students are given their reimbursable snacks as they are seated at their tables, and then the staff member marks off all students with the reimbursable snack. It is required that a student is only marked off as having a reimbursable snack as they receive it. The review team has confidence the counts for the reimbursable snacks are correct, however, the method in which the student are marked off needs to be altered.

**Corrective Action Needed:** Please submit a statement to your assigned consultant detailing how the change has been made so that students are being marked off

directly after receiving their snack, and not after all students have received their snacks.

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Wisconsin School Day Milk Program (WSDMP)

**Commendations:**

The SFA had a wonderful method to involve students in their milk break.

Findings and Corrective Action Needed: WSDMP

**Finding #16:** With supervision, students grab their milks and then line up to be marked off one at a time. It is required that a student is only marked off as having a milk as they receive it. The review team has confidence the counts for the milks are correct, however, the method in which the student are marked off needs to be altered.

**Corrective Action Needed:** Please submit a statement to your assigned consultant detailing how the change has been made so that students are being marked off directly after receiving their milk, and not after all students have received their milks.

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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 ([dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017)).



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