

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

School Food Authority: Ithaca School District

Agency Code: 522660

School(s) Reviewed: Ithaca Elementary School

Review Date(s): 1/29/19 & 2/1/19

Date of Exit Conference: 2/1/19

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 for \$10 for the week. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.usda.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Appreciation/Commendations/Noteworthy Initiatives:

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

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

The Nutrition Program Consultant reviewed 158 students who were receiving free and reduced benefits during the month of December. All of the households were receiving the correct benefits except for two households.

Public Release

The Public Release was sent out for the 2018-2019 SY.

Direct Certification

SFA did a great job running Direct Certification frequently.

Verification

SFA completed the Verification Process. The SFA spoke on the phone with the household selected for verification and documented it. The household stated they could not supply documentation and to change them back to paid.

SFA completed the 2018-2019 Verification Collect Report.

Meal Counting and Claiming

SFA used a software system for their counting and claiming. Students came through the line and entered in their student codes. The SFA runs a monthly edit check before submitting their claims. Claims were validated on site.

The SFA may be eligible for Severe Need Breakfast next school year. When filling out the 2019-2020 contract, work with your assigned consultant to see if your numbers qualify for Severe Need Reimbursement.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Ithaca's on-site dates were shifted due to weather. We extend sincere appreciation to the FSD for her cooperation, flexibility, and patience. The FSD at Ithaca plans well rounded menus, and runs a well organized program. Food service staff was very friendly and welcoming during the on-site review. It was a pleasure to visit and review the Ithaca School District. Keep up the good work!

Comments/Technical Assistance/Compliance Reminders

Grab-n-Go breakfast: The daily grab-n-go breakfast bag contains 1 oz eq grain. This meets the daily K-12 [meal pattern requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/breakfast-meal-pattern-table.pdf). The K-12 meal pattern requires 9 oz eq grain to be offered weekly. Please alter the grab-n-go bag offerings so that weekly meal pattern requirements are met. *Please note, grab-n-go breakfast is only available for middle and high school students. The elementary school was the site selected for review. No corrective action required at this time.*

Offer vs. Serve: Under OVS, students must select at least ½ cup of fruit, vegetable or a combination as one of their three components. However, in order to meet minimum meal pattern requirements, they must be offered at least ¾ cup of vegetable and ½ cup of fruit (for grades K-8). Ithaca serves vegetables with a 1 cup spoodle. This does meet the ¾ cup requirement. However, 1 cup of a single vegetable can be overwhelming to students, and lead to increased waste and food costs. Consider offering two different vegetables daily and portioning each with a ½ cup spoodle. This will meet the daily requirements and satisfy OVS requirements.

Grain maximums: At this time USDA is not enforcing maximum limits. However, meals that far exceed the minimum requirements tend to be higher than calorie, fat, and sodium limits. For example, on the day of review students were offered a quesadilla (2 oz eq grain) and dinner roll (2 oz eq grain). Students who select a quesadilla are offered 4 oz eq grain total. This far exceeds the daily minimum requirements of 1 oz eq grain per day. Keep in mind that meals far exceeding the minimum requirements can lead to increased waste and food costs.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit School Food Service Account. Documentation was provided to support the comprehensive review.

Unpaid Meal Charge Policy

SFA was utilizing their unpaid meal charge policy that was on file.

Paid Lunch Equity

SFA completed the PLE survey and had a positive balance during January of 2018. Based USDA's PLE exemption guidance, Ithaca School District was except from having to raise the cost per meal for the 2018-2019 SY.

Revenue from Nonprogram Foods

SFA only sold extra milk and adult meals.

Indirect Costs

SFA was charging recycling to the food service account. The amount charged was based off of a percentage. The district did not have a time study.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

SFA was following USDA civil rights regulations. Staff were training annually on civil rights, the self compliance form was completed before October 31st.

On-site Monitoring

N/A to SFA

Special Dietary Need

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.

Local Wellness Policy

SFA had a local wellness policy on file. The policy was in the process of being sent to the Wellness Committee for updates.

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

Vending machine: The vending machine housed in the high school wing contains products that are only compliant for high school students. As verified on site, elementary students never have the opportunity to be near the high school wing and make a purchase. Please continue to ensure that access is restricted to high school students only. Consider putting signage on the vending machine to communicate with students that only high school students are allowed to make purchases.

Exemptions: The Wisconsin Department of Public Instruction (DPI) allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule, but sales may not occur in the meal service area during meal service times. All exempt fundraisers must be documented.

Ensuring product compliance: We recommend using the [Alliance for a Healthier Generation Smart Snacks Product Calculator](#) to assess product compliance

(<https://foodplanner.healthiergeneration.org/calculator/>). Simply answer a series of questions to see if the general and nutrition standards are met, then save and print the results for your records.

Professional Standards

Professional standards requirements were being met. Food Service Director did a great job recording hours for each employee.

Water

Water was available for breakfast and lunch.

Food Safety

SFA was actively using the food safety plan and had the appropriate SOPs on file. Food safety inspections were on file.

Buy American

Comments/Technical Assistance/Compliance Reminders

The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products.

The Buy American provision should be included in solicitations, contracts, and product specifications. 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.

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. More information on this new 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>).

Reporting and Recordkeeping

Records kept on file for 3 years plus the current.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program

The SFA was operating the WSDMP properly and was following their contract. The claim was verified on site.

Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at Ithaca School District, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area

- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

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

Corrective Action Needed

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed: Counting and Claiming

Meal Access Finding #1: Two households were issued incorrect benefits.

Corrective Action Needed #1: Send the household the adverse action that was sent to the SFA via e-mail. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10 days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed.

Meal Access Finding # 2: One household was given a benefit based on a program that does not qualify for NSLP.

Corrective Action Needed #2: Follow up with the household to clarify. Let the NPC know the results, before proceeding.

Meal Access Finding #3: During the Verification Process the SFA documented the phone conversation they with the household saying they were no longer eligible. The household should have been sent the "We Have Checked" letter with the appeal rights in it.

Corrective Action Needed #3: Send the "We Have Checked" letter to the household. Send a copy of the communication to the NPC.

Meal Access Finding#4: At the Point of Service, when the students entered in their code, the amount they owed came up on the screen.

Corrective Action Needed #4: Work with your software company to set up parameters to eliminate the price popping up on the point of sale screen. **Completed on site. No further action required.**

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

****Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.**

****☐ Meal Pattern Finding #1: Missing other vegetable subgroup**

During the week of review 0 cups of other vegetables were served. The K-5 [meal pattern](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf) requires that ½ cup [other vegetables](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) be offered weekly (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/lunch-meal-pattern-table.pdf; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf).

Corrective Action Needed for Finding #2: Submit completed [K-5 lunch menu planning worksheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc) for an upcoming week to ensure all vegetable subgroups are being offered in the appropriate quantity (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/menu-planning-worksheet-lunch-k-5.doc).

****☒ Meal Pattern Finding #2: Weekly daily grain shortage at breakfast**

The K-12 breakfast meal pattern requires that students be offered 1 oz eq grain daily and 9 oz eq weekly. Only 8 oz eq grain were offered at breakfast during the week of review.

- Monday: Mini Cinnis, 2 oz eq grain
- Tuesday: Cereal, 1 oz eq grain
- Wednesday: Breakfast pizza, 2 oz eq grain (1 oz eq grain and 1 oz eq M/MA)
- Thursday: Banana bread, 2 oz eq grain
- Friday: Cereal, 1 oz eq grain

It is recommended to offer an additional ounce equivalent of grain (bar, cracker, etc) or meat/meat alternate (cheese, yogurt, etc) on days when cereal is served.

Corrective Action Needed for Finding #2: *String cheese, Pop-Tart, and cereal was offered on the day of review. Students could select a combination of two items. FSD verbally stated her plan to offer an additional 1 oz eq of grain or M/MA on days when cereal is offered. Corrected on site, no further action required.*

☐ Meal Pattern Finding #3: Standardized recipes

Standardized recipes are required for all menu items that have more than one ingredient. 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 quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found on the [Standardized Recipes](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes). The following were made during the week of review and do not have a standardized recipe:

- Sloppy joes
- Cookie
- Roll

Corrective Action Needed for Finding #3: Submit standardized recipes for the items above.

☐ Meal Pattern Finding #4: Crediting documentation

Processed foods that are not listed in the USDA *Food Buying Guide* for School Meal Programs must be accompanied by a product formulation statement (PFS) or a Child Nutrition (CN) label to sufficiently

document meal component crediting. Please provide crediting information for these products by securing a PFS directly from the manufacturer or saving a CN label directly off the packaging the next time you receive the product(s). If proper documentation cannot be obtained, you should discontinue using these products for school meals. More information about crediting documentation can be found on the [NSLP Menu Planning](#) webpage, under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>). Acceptable crediting documentation was not available for the following products:

- Cod fish
- Omelet

Corrective Action Needed for Finding #4: Submit crediting documentation (PFS, CN label, USDA Fact Sheet) for the items. If applicable, find substitution items and submit crediting documentation.

☐ Meal Pattern Finding #5: Condiment table

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. The first sodium targets remain in effect throughout school year 2018-2019 until school year 2020.

Dishes of butter, sour cream, and shredded cheese are offered without proper portioning utensils as “extras” at the condiment table. Condiment usage is not monitored nor are portion sizes communicated to students. Students were observed taking inappropriate portions of condiments. Please monitor your school’s condiment usage and communicate appropriate portion sizes to students.

Students are offered adequate oz eq meat/meat alternates in the entrée without providing shredded cheese as an “extra.”

Promote appropriate serving sizes by adding signage at the condiment station with a photo of what one tablespoon of Ranch looks like, purchasing single-use, one ounce cups to aid in portion control, or using signage such as “One squeeze, please!” on self-serve squirt bottles. Consider eliminating unnecessary “extra” items, such as shredded cheese. Appropriately sized single-portioned packages of sour cream and butter can be purchased.

Corrective Action Needed for Finding #5: Please submit a written plan of action that will be taken at Ithaca School District to limit “extra” items placed on the condiment table. Explain what will be done to control the calories, sodium, and fat of condiment offerings daily.

☐ Meal Pattern Finding #6: Salad Bar

The salad bar is after the POS. Salad bar offerings are “extras.” There is a nice variety of vegetables available! Diced ham is available on the salad bar without proper portioning utensils. Ham is a significant source of calories, saturated fat, and sodium. Students are offered adequate oz eq meat/meat alternates in the entrée. Please consider one of the following options:

- Limit the salad bar to fruits and vegetables. Discontinue offering ham.
- Move the salad bar to be before the POS. Pre-portion ham. Utilize [signage](#) and appropriate service utensils so students can select a reimbursable meal (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/salad-bar-signage-template.docx>). Allow students to use the salad bar as a third entrée option.

Corrective Action Needed for Finding #6: Please submit a written plan of action that will be taken at Ithaca School District to limit “extra” items (other than vegetables) placed on the salad bar. Explain what

will be done to control the calories, sodium, and fat of salad bar offerings daily. If Ithaca decides to put the salad bar before the POS and use the offerings to make a reimbursable meal, please submit a photo and one week of production records.

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 require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT (RM)

Findings and Corrective Action Needed: Indirect Costs

RM Finding # 1: SFA was charging part of the trash & recycling to the food service account and the other part to the district. SFA used a percentage to charge the accounts. An indirect cost study was not completed to determine this calculation. In order to charge an amount to food service, methodologies for determining the cost must be specified and supported through documentation.

Corrective Action Needed # 1: Please submit a detailed statement outlining how the agency will proceed. Select one of the two options below.

1. Discontinue charging indirect costs to the food service account completely. A fund transfer will be required to cover the indirect costs allocated to the Food Service Account for the 2017-2018 school year and the current 2018-2019 school year.
2. Conduct a one-week trash bag & recycling study, this must be completed annually. This can be done by counting the total amount of trash bags used by the Food Service Program, compared to the total amount of trash bags used by the school and church for one week. Once completed, compare the costs and submit the results.

4. GENERAL PROGRAM COMPLIANCE

Findings and Corrective Action Needed: Wellness Policy

GPC Finding #1: SFA had a wellness policy but it was missing some components. Per the SFA's on site questionnaire, it was mentioned that "The district meets most of {regulations} but policy should include Nutrition Promotion, Other School-Based Strategies for Wellness and the Triennial Assessment. The "Local Wellness Policy Checklist" has been forwarded to the Wellness Committee to address in the School District's Wellness Policy".

GPC Corrective Action Needed #1: Submit a timeline for when the SFA plans to update the wellness policy.

Findings and Corrective Action Needed: Smart Snacks

GPC Finding #2: Tracking Tool

A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. Documentation is required for school fundraisers. Keeping records of school fundraisers, both compliant and noncompliant, using DPI-provided tracking tools, is a great way

to make sure schools are meeting Smart Snacks regulations. Templates, such as the Exempt Fundraiser Tracking Tool, are available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage, under the resources heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Corrective Action Needed for Finding #2: Please submit a completed tracking tool for fundraising done during 2018-2019 at Ithaca Elementary. Compliance will be assessed. Submit a summary outlining who will be responsible for oversight of Smart Snack regulations within Ithaca School District. Please address how current food and beverages not meeting Smart Snack standards will be made to comply with these regulations. Use the [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf) to review the guidelines (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/smart-snacks-in-a-nutshell.pdf>).

Findings and Corrective Action Needed: Buy American Provision

☐ GPC Finding #3: Non-compliant items

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:

- Pineapple- Philippines
- Mandarin Oranges- China
- Cucumbers- Mexico
- Roma tomatoes- Mexico
- Green bell pepper- Mexico
- Cod fish- Vietnam

Corrective Action Needed for Finding #3: Please submit a copy of completed non-domestic documentation for products identified above, as well as any other products found in inventory. The following information must be recorded on a Buy American Non-Compliant Product List of your choosing:

1. Date
2. Name of product
3. Country of origin
4. Reason
 - a) **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
 - *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
 - b) **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
 - *Ex. Blueberries are not available domestically during the months of December – June.*
 - c) **Availability** – Product(s) is not available to purchase domestically.
 - *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
 - d) **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
 - *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*

- e) **Distribution**- the SFA’s contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
 - *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
- f) **Other**- Please provide a written explanation.
 - *Ex. The SFA received a donation of non-domestic oranges*
 - *Ex. The SFA did not use School’s Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](#) can be found on the [Buy American webpage](#) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>; <https://dpi.wi.gov/school-nutrition/procurement/buy-american>). For more information on Buy American exceptions, visit the [Buy American Provision Memos](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/provision-memos>).

5. OTHER FEDERAL PROGRAMS REVIEWS

Findings and Corrective Action Needed: Seamless Summer Food Program

Other Finding #1: SFA was not promoting the Summer Food Program.

Corrective Action Needed #1: Submit a statement explaining how the district will notify households of the Summer Food Programs.

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

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

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](#) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

