

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Blair-Taylor School District

Agency Code: 610485

School(s) Reviewed: SoSET Charter School

Review Date(s): April 24-26, 2017

Date of Exit Conference: April 26, 2017

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, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage 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 webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Blair-Taylor 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

187 eligibility determinations were reviewed, zero (0) errors were identified. Thank you to the Determining Official (DO) for being available to answer questions and clarify information. While no benefit errors were observed during the review period of March 2017, it is imperative to clarify information with households should the SFA have any questions during the processing of applications. The following technical assistance is provided to the SFA on *Certification and Benefit Issuance*.

Household Size Box

If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.

If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional Office, any application that does not have this box completed is considered an incomplete application.

Disclosure

SFAs must seek written consent from the household to use information provided on the meal application or through DC for non-food service program purposes, such as athletic or testing fee waivers. Consent must be obtained each school year. A template [Sharing Information Form](#) is located on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#). Alternatively, a SFA can ask programs requesting benefit information to have households self-disclose by providing a copy of their [Letter to Households of Approval/Denial of Benefit](#) notification letter. This option is encouraged as it reduces administrative recordkeeping for food service.

A [Disclosure Agreement](#) form should be signed and on file at the SFA for anyone receiving eligibility information to approve students for non-food service program benefits or with access to the meal benefit information. This form can be found on the [DPI SNT Free and Reduced Meal Applications and Eligibility webpage](#).

Effective Date of Eligibility

SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is received if a process is in place to capture when the application is received. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. The DPI SNT must be contacted prior to implementing this flexibility for approval. Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.

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. The SFA may return the application to the household or contact the child's parent or guardian either by phone, or in writing, including email. The Determining Official (DO) should document the details of the conversation, 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.

Transferring Students

SFAs can share eligibility data with other districts when requested for specific students but are not required to do so, as noted on page 39 of the [Eligibility Manual for School Meals](#).

If a student(s) received free meals via Direct Certification (DC) at a previous SFA, a copy of the original DC run with all names blacked out except for the student(s) requesting free meals should be obtained from the previous SFA. The date of the DC run as well as the match code for the student(s) should be visible to the new SFA. If a student received free meals via application at a previous SFA, a copy of the original application should be obtained. Alternatively, the student(s) can be run individually through DC or complete a new meal application with the new SFA.

Limited English Proficiency (LEP)

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.

To assist SFAs in reaching households with limited English proficiency, the DPI SNT provides the Wisconsin-ized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian on the [DPI SNT Free and Reduced Price Meal Applications and Eligibility webpage](#).

Public Release

The SFA did not send out the NSLP/SBP Public Release for SY 16-17. As a reminder, the SFA should send the public release to media and grassroots organizations. In addition, the SFA should send the release to major employers contemplating or experiencing large layoffs and local unemployment offices, as applicable. Please see the *Corrective Action* below that addresses this *Finding*.

Other Source Categorical

If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.

Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. The benefit does not extend to other household members.

Verification

Verification activities were not completed by November 15th. The SFA did not enforce due dates for households selected for verification. This allowed households to continue to receive benefits without timely verification of supporting documentation. As discussed during the on-site, verification is intended to maintain the integrity of USDA Child Nutrition Programs. Not abiding by established rules and timeframes weakens this method of ensuring program integrity. Please see the *Finding* and *Corrective Action* below that addresses verification.

Meal Counting and Claiming

Breakfast was observed on Tuesday, April 25, 2017 at SoSET Charter School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

Lunch was observed on Tuesday, April 25, 2017 at SoSET Charter School. Reimbursable meals were correctly identified and claimed. No meal counting errors were observed.

The March 2017 claims for reimbursement for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) were reviewed and validated. Consolidation of the SFA's edit check forms, of which there are two (2) currently separated as Blair-Taylor High School and Blair-Taylor Elementary School/SoSET Charter School, supported the March 2017 claims for reimbursement.

However, there is a requirement to generate edit checks by school for review of claiming figures by site, meaning Blair-Taylor Elementary School and SoSET Charter School are required to have separate edit checks. Furthermore, DPI has plans to move to site-based claiming in SY 17-18, further supporting the requirement of edit checks by school site. Please see the *Finding* and *Corrective Action* below that addresses the need for edit checks to be completed by school site.

Finding #1: The NSLP/SBP Public Release was not distributed for SY 16-17.

Corrective Action Required: Please submit a summary noting how the SFA will ensure distribution of the NSLP/SBP Public Release for SY 17-18. Please include the locations/publications of where NSLP/SBP Public Release will be distributed.

Finding #2: Blair-Taylor Elementary School and SoSET Charter School are required to have separate edit checks.

Corrective Action Required: The SFA is recommended to consult with its software vendor on how to generate separate edit checks for Blair-Taylor Elementary School and SoSET Charter School. Alternatively, the SFA could complete a manual edit check for each school although this option is not encouraged as the SFA has a software system. Additionally, the SFA is recommended to discuss the additional meal reported on the monthly activity reports. As edit checks were used and support the submitted claims, no errors were noted for the March 2017 claims for reimbursement. However, the SFA is encouraged to discuss the meal with its software vendor to ensure the SFA is claiming and receiving payment for all reimbursable meals.

Finding #3: Verification activities were not completed by November 15th. The SFA did not enforce due dates for households selected for verification.

Corrective Action Required: Please review the requirements of *Verification*, both on the [DPI SNT Verification webpage](#) and the [Eligibility Manual for School Meals](#). Submit a summary detailing how the SFA will ensure *Verification* is completed correctly in the future. Please provide explanation to demonstrate understanding of required response and benefit change date timeframes.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the Food Service Director (FSD) at Blair-Taylor School District for a great administrative review. All documentation was sent ahead of time in an orderly fashion, with no missing information. Because there was only one error among the documentation, this review was made into an off-site review as the documentation was nearly perfect. Meaning, the Public Health Nutritionist (PHN) did not have to come on-site for the meal pattern compliance section. This shows the FSD's dedication to following and understanding the regulations and serving healthy, nutritious meals to students. Great job!

Offer versus Serve

Staff at Blair-Taylor Elementary/SoSET Charter School were knowledgeable on the requirements of reimbursable meals for breakfast and lunch. Students were requested to return to the service line to select missing components. Technical assistance was provided to encourage students to select more fruits and/or vegetables when the ½ cup fruit and/or vegetable requirement appeared questionable.

Finding #4: There was a weekly meat/meat alternate and grain shortage for the week of review for the alternate meal of PB&J, which credits as 1 oz. eq. meat/meat alternate, 1 oz. eq. grain. Although this meets the daily minimum for meat/meat alternate and gain, it will not meet the weekly if offered alone. Therefore, additional items will need to be paired with this a few times a week. Under the K-8 meal pattern, 8 oz. eq. grain and 9 oz. eq. meat/meat alternate need to be offered over the course of the week, with a daily offering of 1 oz. eq. grain and 1 oz. eq. meat/meat alternate.

Corrective Action Required: Please state what you will do to the week of review so that additional meat/meat alternate and grain and offered with the PB&J so that 8 oz. eq. grain and 9 oz. eq. meat/meat alternate are offered over the course of the week. **The Food Service Director will add a cheese stick (1 oz. eq. meat/meat alternate) four times per week and whole grain-rich Sun chips (1 oz. eq. grain) three times per week to meet the weekly requirements. No further action required.**

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Access to the SFA's Child Nutrition Report, which provides a compilation of meals claimed, reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch and breakfast, is described in the document [Viewing the Child Nutrition Report](#). The DPI Aids Register is also available to track all program deposits made to the SFA's account as well as the amount deducted from reimbursement to pay for shipping, handling and processing costs of USDA Foods. The Aids Register is available on the DPI SNT [Financial Management webpage](#). Both resources are also accessible from the [Online Services webpage](#).

Annual Financial Report

In SY 16-17, all revenues including reimbursements and student payments and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. Please note there are additional categories than in previous years:

- **NSL** - schools participating in the National School Lunch Program.
- **SB, SBSEVERE** - both regular School Breakfast and Severe Need Breakfast.
- **SK-NSL, SK-NSLAE** - both After School Snacks and Area Eligible Afterschool Snacks.
- **SMP** - Special Milk Program.
- **Grants** - all grant awards and expenditures.
- **WSDMP** - Wisconsin School Day Milk Program.
- **EN** - Elderly Nutrition.
- **Nonprogram Foods** - all Nonprogram Foods (including: a la carte items, adult meals, milk only, extra entrees, vended meals sold under a joint agreement, catered meals, vending machines, etc.)
- **CACFP** - daycare and supper meals claimed under Child and Adult Care Food Program.
- **SFSP** - meals claimed in Summer Food Service Program.

The [new SY 16-17 Annual Financial Report instructions](#) are located on [DPI SNT Financial Management webpage](#).

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](#). For a more comprehensive overview, see [SP 58-2016: Unpaid Meal Charges Guidance](#). In addition, bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs, as noted in [SP57-2016 Unpaid Meal Charges Guidance](#).

Paid Lunch Equity

The SFA is in compliance with PLE.

Revenue from Nonprogram Foods

The SFA flagged for a comprehensive resource management review in the *Revenue from Nonprogram Foods* section as it sells nonprogram foods. Please see the *Finding and Corrective Action* below that addresses this flag.

Nonprogram foods include:

- Adult Meals
- A la Carte
- Extra Entrees
- Extra Milk (for cold lunch or milk break),
- Vended Meals (meals sold to other agencies)
- Catered Meals
- Vending Machines operated by Food Service

All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals nor be absorbed by the food service account. Nonprogram food costs and revenues must be separated from program food costs and revenues. In regards to adult meals, 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, which are outlined in the [Wisconsin Adult Meal Pricing Worksheet](#). SFAs must reassess adult meal prices annually prior to contract submission to ensure student reimbursement is not being used to subsidize adult meals.

At a minimum, the [USDA Nonprogram Food Revenue Tool](#) must be completed yearly. The [DPI Nonprogram Food Revenue Tool/Calculator](#) aids in calculating prices of nonprogram foods and feeds into the USDA Nonprogram Food Revenue Tool to determine compliance with USDA nonprogram food regulations.

To complete the USDA Nonprogram Food Revenue Tool, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio for the entire SFA to determine if the revenue ratio is equal to or greater than the food cost ratio (see Figure 1 below). Rather than separating all costs for the entire year (although recommended), SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

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

Figure 1 - Nonprogram Foods Revenue and Costs Ratio

Nonprogram food revenue is the dollar amount of nonprogram food sales sold through the nonprofit school food service account including la carte sales, adult meals, vending machines, extra/cold lunch milks, etc. Total program and nonprogram revenue includes the dollar amount from program and nonprogram food sales.

If using the DPI Nonprogram Food Revenue Tool/Calculator to complete the USDA Nonprogram Food Revenue Tool (recommended), to determine nonprogram food cost data, gather an itemization of all nonprogram foods offered during the selected reference period and enter the per item raw food cost of each nonprogram food and the number of servings/items sold in the selected reference period. For total program and nonprogram food costs, include all program and nonprogram food costs. Program food costs data should be available using production records, invoices, etc.

The [Nonprogram Foods Revenue Rule SP 20-2016](#) and the [Nonprogram Foods In a ‘Nutshell’](#) can provide additional guidance and clarification on nonprogram foods.

Finding #5: The USDA Nonprogram Food Revenue Tool was not completed by the SFA. Technical assistance was provided to the FSD during the on-site.

Corrective Action Required: Please submit a completed USDA Nonprogram Food Revenue Tool. If the Tool comes out in the red, requiring *Additional Revenue to Comply*, please submit a plan going forward for how the SFA will comply with the shortfall (i.e. raise nonprogram food prices and/or contribute non-federal funds to meet the required ratio. Please note, the SFA is encouraged to use the DPI Nonprogram Food Revenue Tool/Calculator which feeds into the USDA Nonprogram Food Revenue Tool.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Nondiscrimination Statement

The SFA is reminded that the [USDA non-discrimination statement](#) must be in the same size font as the most commonly used text in the document. When space is limited, such as on printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider.**”

And Justice for All Poster

An “And Justice for All” poster was available and readable in the cafeteria.

Civil Rights Training

Civil rights training had been completed and documentation was available for review.

Civil Rights Self-Compliance Form

The Civil Rights Self-Evaluation Compliance form was completed with October 31st but after October 31st. The SFA is reminded that this form should be completed as a self-evaluation prior to October 31st to ensure compliance with civil rights regulations.

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 practitioner. SFAs may use the [template Medical Statement Form](#) posted on the [DPI SNT Special Dietary Needs webpage](#). This template is also available in Spanish and Hmong. SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner.

School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA still have a completed [Medical Statement Form](#) on file from a medical authority, such as a school nurse, to support the request. These types of accommodations must be made according to the USDA's meal pattern requirements in order for the meals to be claimed for reimbursement. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are being handled equitably.

Processes for complaints

As a reminder, all verbal or written civil rights complaints regarding USDA Child Nutrition Programs that are filed with the SFA must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The [USDA Program Discrimination Complaint Form](#) is available to assist in filing these complaints and can be found on the [DPI SNT Civil Rights webpage](#).

On-site Monitoring

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) established the requirement to conduct on-site monitoring of the School Breakfast Program beginning in SY 16-17. The requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information, see [USDA Memo SP 56-2016](#). The [National School Lunch Program On-site Monitoring Form](#) and [School Breakfast Program On-site Monitoring Form](#) are currently available on the [DPI SNT Administrative Review webpage](#).

Breakfast and lunch monitoring forms were available for all schools in the SFA.

Local Wellness Policy (LWP)

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires SFAs to begin developing a revised local school wellness policy during SY 16-17 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. SFAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years (triennial assessment) to determine compliance with the policy, how the policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the triennial assessment, as well as the wellness policy and any updates to the policy, available to the public.

A summary of the requirements can be found at:

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 process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

The SFA's Local Wellness Policy (LWP) was reviewed and the SFA is reminded of the following:

- Food and beverage marketing guidelines should be included in the LWP, specifically noting that SFAs may only market products that adhere to Smart Snacks during the school day.
- The LWP should contain language regarding Smart Snack Standards
- Language should be included regarding the triennial assessment and how the results of the assessment will be made available to the public.

Smart Snacks in Schools

Smart Snack regulations went into effect on July 1, 2014 apply to all food and beverage items sold to students during the school day, with the school day being designated as midnight the night before until 30 minutes after the end of the school day. This includes foods sold through fundraisers with intended consumption during the school day (i.e. frozen pizza fundraisers would not be included as consumption is intended outside of the school day).

Since Smart Snack regulations apply to the entire school, it is important that all involved with the sale of food and beverage items, not just the food service department, be involved in monitoring and complying with the regulations. Involvement of school administration is highly recommended and encouraged. It is important to remember that the goal of Smart Snacks is not to regulate what student can and can't have but is in place to build healthy school environments and teach valuable life nutrition skills to all students.

The DPI SNT has developed several resources to assist schools and districts in meeting these regulations including a [Compliant Fundraiser Tracking Tool](#), an [Exempt Fundraiser Tracking Tool](#), a [Smart Snacks Tracking Tool](#), a [Smart Snacks in a Nutshell handout](#), and a [Smart Snacks – Strategies for Success handout](#).

Please visit the [DPI SNT Smart Snacks website](#) for more information. SoSET Charter School was determined to be in compliance with Smart Snack regulations, both in regards to daily food sales and food fundraisers.

Professional Standards

The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked. 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.

Food service staff receive training throughout the school year. Documentation is organized and all staff have met continuing education requirements for SY 16-17. The SFA is reminded that those involved with the processing of Free and Reduced Price Meal Applications should receive yearly job-specific trainings. The [DPI SNT Training webpage](#) has a variety of training opportunities that all are encouraged to explore. The SFA should maintain a continuing education log of all staff to determine compliance with the regulation at-a-glance. Additionally, the SFA is reminded that continuing education logs should include the name of the staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff).

Training requirements for all staff are as follows:

	School Nutrition Program Directors* Category 1	School Nutrition Program Managers* Category 1	Full Time School Nutrition Program Staff* Category 1	Part Time School Nutrition Program Staff or Non-School Nutrition Program Staff with Job Duties Pertaining to School Nutrition Programs* Category 1 or 2
School Year 2015-16	8 hours	6 hours	4 hours	4 hours
School Year 2016-17	12 hours	10 hours	6 hours	4 hours

**Note: If hired January 1 or later, only half of the hours is required during first school year of employment.*

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment. Additionally, in terms of Professional Standards, full time is >20 hours per week while part-time is <20 hours/week.

Water

Water was available at lunch and breakfast via a drinking fountain in the cafeteria.

Food Safety and Storage

Food Safety Inspections

The most recent food safety inspection was posted in a publically visible and readable location.

Food Safety Plan

The food safety plan and signed Employee Reporting Agreements were up-to-date and available for review.

Temperature Logs

All temperature logs were up-to-date and available for review.

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 small local farmers and provides healthy choices for children in school meal programs as well as supports the local economy. 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.

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.

SFAs must monitor contractor performance to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This is accomplished by ensuring the product label designates the United States, or its territories, as the country of origin. Therefore, SFAs must ensure that products delivered comply with any Buy American contract provisions by reviewing products and/or delivery invoices/receipts to identify the country of origin is the United States or its territories. SFAs also need to conduct a periodic review of storage facilities, freezers, refrigerators, dry storage, and warehouses to ensure products comply with the Buy American provision, unless a limited exception has been approved.

The following items were found to be non-compliant during the on-site review:

- Garlic Powder - China
- Sugar Snap Peas - Mexico
- Canned Fruit - Thailand

The SFA should work with its distributor to determine if these products are available domestically. If not, documentation requested in the [Non-compliant Product List](#) should be obtained. Please note, the use of this form is the exception, not the rule. More information on this new requirement can be found on the [DPI SNT Procurement webpage](#). The SFA is encouraged to ask questions on this regulation during their Procurement Review.

Reporting and Recordkeeping

The SFA is meeting record retention requirements for USDA Child Nutrition Programs.

School Breakfast Program (SBP) Outreach

The SFA participates and meets promotion requirements for the School Breakfast Program (SBP).

Summer Food Service Program (SFSP) Outreach

As part of the National School Lunch Program (NSLP), it is requirement to complete SFSP outreach. The purpose is to inform students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Options for outreach include informing families via email and/or newsletter about the availability of free summer meals via the [Summer Meals Map](#), the option to call 2-1-1 to connect with local health and humans services, the option to text ‘food’ to 877-877, and/or [posting free SFSP posters](#) in the SFA. For more information on Summer Food Service Program, please contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
E-mail: amy.kolano@dpi.wi.gov

The SFA participates in the Summer Food Service Program and meets promotion requirements for the program as part of participation in the National School Lunch Program (NSLP).

5. OTHER FEDERAL AND STATE PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Claim documentation was reviewed for the WSDMP operated in SY 15-16. No issues were noted in the claim for reimbursement. The follow reminders are standard for operation of the program.

- Schools must serve Wisconsin-produced milk. Please verify this with your distributor and include in your milk bid.
- Students of paid meal status that take milk during the operation of the WSDMP cannot be claimed in the program and must be assessed a charge for the milk. If the SFA wishes to provide milk to paid students free of charge, it can but the cost cannot be absorbed by the food service account. A transfer from an outside fund (i.e. SFA’s General Fund/Fund 10) to the non-profit food service fund (Fund 50) would need to be completed.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. 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 your students’ success.

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate webpage](#).

