

# **Administrative Review Summary Report**

## **Technical Assistance and Corrective Action Plan**

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**Agency Code:** 616426

**School Food Authority:** Whitehall SD

**School(s) Reviewed:** Whitehall Memorial Senior High School

**Review Date(s):** 2/1-2/2, 2017

**Date of Exit Conference:** 2-2-17

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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 School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrative corrective action was completed are specified.

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Whitehall School District for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review and we greatly appreciated the work done prior to the review in completing the Off-site Assessment Tool. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The 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 can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

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.

### **Review Areas**

#### **1. Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming**

##### **Appreciation/Commendations/Noteworthy Initiatives:**

- Of those 346 students eligible for free/reduced price meals in December, a sample of 208 was pulled and all but 3 were determined correctly, and direct certification had been run in the appropriate timeframes.

## Comments/Technical Assistance/Compliance Reminders:

### Certification and Benefit Issuance

- 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.
- Only Direct Certification benefits extend from one student in a household to another household. Income application benefits do not extend to other family members in another household.

### Verification

- When applications are chosen for verification, the person designated as the Confirming Official, should be reviewing these applications to make sure that the original determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.

### Meal Counting and Claiming

- When entering the claim it is necessary to use the edit check (AccuClaim for Skyward) to calculate your reimbursable meals by site for consolidation.

## Findings and Corrective Action Needed:

- Finding #1:** Two students were given Direct Certification benefits who were ineligible for benefits. **Corrective Action Needed:** Please notify these households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for the months of December and January, but there is a \$600.00 disregard before fiscal reclaim is necessary.
- Finding #2:** One student was extended free benefits from another household that should not have extended and her benefit should have remained reduced. **Corrective Action Needed:** Please notify this households of the reduction in benefits (to take effect 10 days from the date they are notified in writing). Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Fiscal action will be assessed for the months of December and January, but there is a \$600.00 disregard before fiscal reclaim is necessary.
- Finding #3:** One Verified application was marked as “free” eligible and was actually approved as reduced. The Confirmation review did not note this and Confirmation review occurred after the letter was sent to the household. **Corrective Action Needed:** Please submit a statement of understanding to do a confirmation review **before** Verification letter is sent going forward. Information on the verification process can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>.
- Finding #4:** On the December claim, there was an over claim of 15 lunch meals in the paid category, 28 lunch meals in the free category, and 26 severe need breakfast meals in the free category because the claim numbers were taken from the software’s Monthly Lunch Summary Report instead of the required edit check (AccuClaim for Skyward) report. **Corrective Action Needed:** When submitting the reimbursement claim it is necessary to use the edit check report to calculate your reimbursable meals. Please submit your edit checks for the months of January and February that you use to consolidate your claims for breakfast and lunch. As this is considered a “systemic” issue, fiscal action will be calculated for all months in error from the beginning of the current school year. Months include, September, October, November, December, and January, but there is a \$600.00 disregard before fiscal reclaim is necessary.

## 2. Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the Food Service Director at Whitehall School District for sending documentation, including production records, labels, Product Formulation Statements (PFS), CN labels, and recipes prior to the review as this helped expedite the process. Great job at serving many made-from-scratch recipes like Goulash, Coleslaw, and Blueberry Crisp; this is highly encouraged versus processed, pre-packaged foods. Great job!

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

- Blueberry Crisp:
  - Grain Crediting (recipe stated 0.75 oz eq grain; should be 0.5 oz eq grain):
    - Oatmeal:
      - 5.25 quarts = 21 cup
      - 21 cups x 81 grams per cup = 1701 grams per recipe ([see page 13 of Food Buying Guide](#))
      - 1701 grams / 16 grams per ounce equivalent = 106 oz eq grain from the oatmeal
    - Whole Wheat Flour:
      - quarts = 9 cups
      - 9 cups x 120 grams per cup = 1080 grams per recipe ([see page 13 of Food Buying Guide](#))
      - 1080 grams / 16 grams per ounce equivalent = 67.5 oz eq grain from the flour
    - Enriched Wheat Flour:
      - quarts = 9 cups
      - 9 cups x 125 grams per cup = 1125 grams per recipe ([see page 13 of Food Buying Guide](#))
      - 1125 grams / 16 grams per ounce equivalent = 70.3125 oz eq grain from the flour
    - Adding all together: 106 oz eq + 67.5 oz eq + 70.3125 oz eq = 243.8125 oz eq / 480 servings per recipe = **0.50 oz eq**
  - Fruit Crediting (recipe states ½ cup fruit; should be 3/8 cup fruit)
    - Apples, canned: 14 cans x 11.875 cups/can = 166.25 cups
    - Blueberries, canned: 6 cans x 9.25 cups/can = 55.5 cups
    - Juice, lemon: 3 cups
    - Adding all together: 166.25 cups + 55.5 cups + 3 cups = 224.75 cups / 480 servings = 0.468. Round this down to the nearest 1/8<sup>th</sup> cup = **3/8 cup fruit**.
- Crediting: Make sure to update the crediting of food components on all recipes and production records with consistent amounts. This will help reduce confusion and ensure the meal pattern is being met for the appropriate age/grade group.

### **Findings and Corrective Action Needed:**

- Finding #1:** There was a weekly grain shortage during the week of review at breakfast for the alternate cereal option (1 oz eq grain). Although you are correct to offer 1 oz eq cereal as an alternate, which meets the daily requirement, this also needs to meet the weekly requirement. If a 1 oz eq grain cereal were offered daily, that would amount to 5 oz eq grain over the course of the week. However, 9 oz eq grain is the weekly requirement for the breakfast meal pattern. Some days you will need to offer more grain to meet the weekly requirement.  
**Corrective Action Needed:** Please submit a statement explaining what you will do to the week of review so that a minimum of 9 oz eq grain is offered over the course of the week. Include items, serving sizes, and on what days they will be served with the cereal as the alternate choice.
- Finding #2:** Milk usage is not being recorded on the production records. Production records are the SFA's way of proving that reimbursable meals are being served; therefore, all items offered as part of

the reimbursable meal must be recorded. You do have a milk recipe on file, however you need to record total milks served each day (but you do not need to count each milk by type).

**Corrective Action Needed:** Please submit one week of production records showing the leftover number of milks served each day.

- **Finding #3:** There was a daily meat/meat alternate (M/MA) shortage on Tuesday during the week of review for the Goulash recipe. The crediting for the M/MA is incorrect. If using the crediting documentation for the beef crumbles, please note these do *not* credit ounce for ounce, but 2.44 oz (by weight) = 2 M/MA (or 1.22 oz = 1 M/MA). Therefore, if using 52.5# of beef crumbles for 440 servings, this will equate to 1.5 oz eq M/MA per serving, which is a shortage as 2 oz eq M/MA is the daily minimum for high schoolers. See math below:

- 52.5# = 840 ounces
- 1.22 oz = 1 M/MA. Therefore,

$$\begin{array}{r} 1.22 \text{ oz} \qquad 840 \text{ ounces} \\ \hline 1 \text{ M/MA} \qquad \qquad X \end{array}$$

Solve for X:  $1.22X = 840 \text{ ounces/M/MA}$

$X = 688.52 \text{ oz eq in the entire recipe} / 440 \text{ servings} = \mathbf{1.5 \text{ M/MA per serving}}$

**Corrective Action Needed:** Please state what you will do to Tuesday during the week of review so that a full 2 oz eq M/MA is offered to high school students. Please submit any necessary recipes and/or food labels and serving sizes.

- **Finding #4:** The assorted cereals sent for the week of review were not all whole grain-rich. Specifically, the Berry Colossal Crunch, Frosted Flakes, Apple Zings, and Tootie Fruities. Every grain served and credited as part of a reimbursable meal needs to be whole grain-rich, meaning greater than 50% of the product needs to be whole grain. When determining if an item is whole grain-rich, the first word in the ingredient list needs to say *whole* or have a whole grain listed first. The four mentioned do not.

**Corrective Action Needed:** Please find new, whole grain-rich versions of the following products and submit nutrition facts labels and ingredient lists:

- Berry Colossal Crunch
- Frosted Flakes
- Apple Zings
- Tootie Fruities

- **Finding #5:** There was a daily fruit shortage on both Monday and Friday for lunch during the week of review. Only 7/8 cup of fruit were offered and a full cup needs to be offered to high school students daily.

- Monday: banana (1/2 cup), Blueberry Crisp (3/8 cup) = total of 7/8 cup fruit (see above for Blueberry Crisp crediting)
- Friday: Kiwi (1/4 cup), Peaches (1/2 cup) = total of 7/8 cup fruit

**Corrective Action Needed:** Please state what you will add to Monday and Friday during the week of review so that a full 1 cup fruit is offered to high school students. Submit any necessary serving sizes.

**The Food Service Director will increase the serving size of kiwi to 2 each for Friday, which will increase the crediting to 1/2 cup. That, with the peaches (1/2 cup), will satisfy the 1 cup requirement of fruit at lunch on Friday for the 9-12 meal pattern.**

- **Finding #6:** There was a daily vegetable shortage on Thursday for lunch during the week of review. Only 7/8 cup were offered and a full cup needs to be offered to high school students daily.

- Thursday: Coleslaw (3/8 cup), Corn (1/2 cup). See math below for coleslaw crediting (which is incorrect on recipe and production records):

- Cabbage (10#) is about 6.75 cups/lb (using Cabbage, fresh, green, shredded from the [Food Buying Guide \(FBG\)](#)). Therefore,  $6.75 \text{ cups} \times 10\# = 67.5 \text{ cups}/160 \text{ servings} = 0.42 \text{ cups/serving}$ . Rounded

down to the nearest 1/8<sup>th</sup> cup = 3/8 cup other vegetable. Although the serving size is ½ cup, this doesn't necessarily mean it credits ½ cup as other ingredients like sugar, vinegar, milk, etc. are in this recipe.

- Food Buying Guide <https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>

**Corrective Action Needed:** Please state what you will add to Thursday during the week of review so that a full 1 cup of vegetable is offered to high school students. Submit any necessary recipes, food labels, serving sizes, etc.

### 3. Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs

#### Comments/Technical Assistance/Compliance Reminders:

##### Annual Food Service Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance."

##### Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>

- 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 or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.
- SFAs must annually be provided information on food costs and revenues from Food Service Management Companies (FSMC). The information must include food cost for reimbursable meals, food cost for non-program food, revenue from nonprogram food, and total revenue to determine SFA compliance with nonprogram food revenue requirements.

##### Allowable Expenditures

- The nonprofit school food service account is to be used only for the operation of the school meal program including food, supplies, equipment and personnel. .
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private 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.
- **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.

##### **Unpaid Meal Charges Policy**



- All School Food Authorities (SFA) operating federal school meal programs must have a written and clearly communicated policy to address unpaid meal charges in place by July 1, 2017. Information is located on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial> scroll down to the unpaid meal charges section.
- SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- The policy must explain how the SFA will handle situations where children eligible to receive reduced price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service.
- The policy should be implemented and enforced SFA-wide.
- The SFA has discretion to vary policy based on student grade level.
- The policy must be provided in **writing** to all households at the start of each school year and to households transferring to the school district during the school year. Simply posting the policy to the school website does not meet the requirement.
- The policy must be provided in writing to all school or SFA-level staff who are responsible for policy enforcement. SFAs are encouraged to provide information about the policy to principals and other school or district administrators to ensure the policy is supported.

#### **Findings and Corrective Action Needed:**

- **Finding #1:** Cleaning of the cafeteria after service is charged indirectly to food service without documentation, and this is an unallowable cost to food service.  
**Corrective Action Needed:** Please submit a time study for one week of actual direct labor used to clean the cafeteria after breakfast and lunch, only, to determine cleaning time that is an allowable food service expense.

#### **4. General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach**

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

##### **Civil Rights**

- 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 just updated in October 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, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.
- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually <http://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>.
- All SFAs should have written procedures in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A SFA may always attempt to resolve a situation that is occurring in real time. However, if 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 form to assist in filing these complaints can be found on the DPI SNT website at [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)

##### **Local Wellness Policy and School Meal Environment**

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.

- LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
- SFA must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
- SFA must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
- SFAs must permit parents, students, physical education teachers, school health professionals, and school administrators, school board representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation that all have been notified of participation availability.
- The SFA must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* ([http://fns.dpi.wi.gov/fns\\_wellnessplcy2](http://fns.dpi.wi.gov/fns_wellnessplcy2)).
- SFA is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification.

### **Smart Snacks in Schools**

- Make sure to review any foods or beverages sold to students during the school day for compliance with Smart Snacks regulations. It is best to run products through a calculator tool like the one available from the Alliance for a Healthier Generation at [https://www.healthiergeneration.org/take\\_action/schools/snacks\\_and\\_beverages/smart\\_snacks/alliance\\_product\\_calculator/](https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/). Remember that products may be compliant for one grade group but not another. It is recommended to print out the calculator results and keep them on file. Refer to the Smart Snacks "In a Nutshell" handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf> for more information. A print copy was left onsite. Additional information can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- Middle School Beverages
  - Plain water or plain carbonated water (no size limit);
  - Low-fat milk, unflavored (≤12 fl oz);
  - Non-fat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements;
  - 100% fruit/vegetable juice (≤12 fl oz); and
  - 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤12 fl oz).
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

### **Professional Standards**

- 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.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

<b>Directors</b>	<b>Managers</b>	<b>Other Staff</b>	<b>Part Time Staff</b>
		(20 hrs or more/week)	(less than 20 hrs/week)
<b>12 hours</b>	<b>10 hours</b>	<b>6 hours</b>	<b>4 hours</b>

**Food Safety and Storage**

- All food service employees must have a signed Employee Reporting Agreement on file
- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP) for each individual site, all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety#fsp>.
- When using “Time as a Public Health (Temperature) Control”:
  - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
  - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
  - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

<b>Must be kept above 135 on hot line with mechanical heat</b>	<b>Must be kept under 41 degrees with mechanical refrigeration</b>
<b>Animal protein – eggs, meat, chicken, fish, shellfish, etc</b>	<b>Milk and cheese, including house made dressing made with milk</b>
<b>Tofu and soy products –texturized vegetable protein, hot edamame</b>	<b>Hard boiled eggs</b>
<b>Baked potatoes</b>	<b>Tofu, edamame, soy</b>
<b>Heat-treated plant food, such as cooked rice, beans, vegetables</b>	<b>Sliced melons, cut leafy greens, cut tomatoes</b>
<b>Anything with cheese</b>	<b>Untreated garlic-and-oil mixtures</b>
	<b>Sprouts</b>

**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 the school meal programs. Purchasing from these entities also 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. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- 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.

**SBP and SFSP Outreach**

- It is necessary to inform the community about access to Summer Food Service feeding sites in your area even if your school does not provide summer meals. This information is located at



<http://dpi.wi.gov/community-nutrition/sfsp/outreach> and may be posted as a flyer or a phone number list in your spring newsletter.

### **Findings and Corrective Action Needed:**

- Finding #1:** The Civil Rights Self-Evaluation Compliance form was not completed by October 31.  
**Corrective Action Needed:** Please submit a copy of the form when it is completed. Completed on-site no further action required.
- Finding #2:** The lunch menus posted on the website do not contain the correct current shortened nondiscrimination statement  
**Corrective Action Needed:** Please submit a copy of the February menu with the correct statement printed on it. **“This institution is an equal opportunity provider.”**
- Finding #3:** There must be an active wellness committee in the district.  
**Corrective Action Needed:** Please submit a roster of the wellness committee members and titles.
- Finding #4:** Flavored water is currently being offered as an a la carte item at both the middle and high school levels. As discussed, flavored water would only be compliant at the high school level.  
**Corrective Action Needed:** Submit a written timeline describing how beverage requirements will be met moving forward.
- Finding #5:** Employee reporting agreements not on file.  
**Corrective Action Needed:** Please have all food service staff and volunteers fill out an employee reporting agreement and submit signed copies <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf>. Completed on-site no further action required.
- Finding #6:** The Food Safety Plan does not contain site specific SOPs  
**Corrective Action Required:** Please review your Food Safety Plan and make site specific updates to the plan and submit when complete. An updated prototype may be found on our website. <http://dpi.wi.gov/school-nutrition/food-safety#fsp>
- Finding #7:** Canned fruit cocktail came from South America and canned pumpkin came from China.  
**Corrective Action Required:** Please submit a statement of understanding that all procurement documentation must include the “Buy American” language in the contract, and that all noncompliant items will be clearly documented <http://dpi.wi.gov/school-nutrition/procurement/buy-american>.

### **5. Other Federal and State Programs – Wisconsin School Day Milk Program**

#### **Appreciation/Commendations/Noteworthy Initiatives**

- Claim consolidated and claimed correctly.
- Updated contract in process.