

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

School Food Authority: De Soto SD

Agency Code: 62-1421

School(s) Reviewed: De Soto High School

Review Date(s): 3/12-13/18

Date of Exit Conference: 3/13/18

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, 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>).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at De Soto School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations/Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- Of the 264 students eligible for free/reduced price meals in February, a sample of 168 was pulled and all but one was determined correctly.

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/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

Findings and Corrective Action Needed: Certification and Benefit Issuance

- Finding #1:** From the student sample reviewed for benefit's issuance, 1 student is receiving reduced benefits and it is unclear of the correct income reporting.

Corrective Action Needed: Please follow-up with this household to assure accurate income has been reported and if not, please notify this household 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 figured for these errors for the review period (February) and month of on-site review (March).

Verification

Commendations/Comments/Technical Assistance/Compliance Reminders

- The LEA has a regulatory obligation to verify "for cause" all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- The Verification process must be complete by November 15 each year.

Findings and Corrective Action Needed: Verification

- Finding #1:** The district did not complete its verification process by November 15.

Corrective Action Needed: Please submit a statement that going forward, the Verification process will be complete by November 15, yearly.

- Finding #2:** One of the verified applications did not supply complete documentation of income for the child support income that was listed.

Corrective Action Needed: Please contact the household and retrieve missing documentation for the verified application and record date of validation on SFA-2 and submit as corrective action.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance/Compliance Reminders

- When entering the claim it is necessary to use the edit check to calculate your reimbursable meals by site for claim submission.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding #1:** The monthly edit checks were not being used in the submission of the Severe Need Breakfast claims for the Middle School and the High School as both totals were reported together on the edit checks. This is a systemic issue that will require fiscal action for all severe need breakfast claims since the beginning of the 17-18 school year.

Corrective Action Needed: Software issue corrected while on site. Please submit Severe Need Breakfast edit checks for the high school and middle school for the months of September 2017 through March 2018 from which the fiscal action will be assessed.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

Thank you to the DeSoto Area School District Food Service Director and the Nutrition Staff for the time and commitment that everyone has devoted to operating a successful school nutrition program. Ensuring all of your students have access to healthy meals. Everyone's openness and willingness to ask questions and learn is wonderful. We also witnessed great interaction between the onsite serving staff and students.

Training

- Information on upcoming trainings can be found on DPI's [Training Page \(https://dpi.wi.gov/school-nutrition/training#up\)](https://dpi.wi.gov/school-nutrition/training#up). Numerous webcasts are also available, which cover a wide array of topics including:
- [USDA food recipes](https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg) (https://www.youtube.com/watch?v=8tp4WCWcryg&list=UUNnBe12n6q4QT39Fz2y7BPg)
- [Offer Versus Serve](https://dpi.wi.gov/school-nutrition/training/webcasts#cyc) (https://dpi.wi.gov/school-nutrition/training/webcasts#cyc)
- These can be found on DPI's [Webcast Page](https://dpi.wi.gov/schoolnutrition/training/webcasts) (https://dpi.wi.gov/schoolnutrition/training/webcasts)
- The U.S. Department of Agriculture encourages schools to utilize [Smarter Lunchroom](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wp_ch6.pdf) techniques to encourage students to make healthy food choices. Smarter Lunchrooms use research-based principles that lead children to make healthy choices but still offer a full spectrum of choice. All Smarter Lunchroom techniques are low- or no-cost, sustainable, and focus on improving the lunchroom environment to promote healthful eating behaviors. [Smarter Lunchrooms Strategies](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies)

Standardized Recipe

- Use of standardized recipes is another important part of school meal programs. Any menu item that has more than one ingredient (even if it is water) should have a standardized recipe. This is defined as

one that has been tried, tested, evaluated, and adapted for use by your food service kitchen. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update recipes with current ingredients in stock.

- Standardized recipe are needed for menu planning to ensure that the portions offered are actually what is intended. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe has been tried, tested, evaluated, and adapted for use by your foodservice operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA's *What's Cooking?* Quantity recipes, especially when substitutions are made.
- Continue to use the resources on our website regarding [recipe standardization](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>). These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained.

Meeting Weekly Requirements when Offering Multiple Entree Options

- The meal pattern requires a minimum amount of each food component per age/grade group to be offered, regardless of what the student chooses to select. Each line needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Because students are only able to select one entree option, each entree option offered is viewed as one "line" and therefore needs to meet the daily as well as the weekly requirements. This guidance can be found in the following documents.
- [**Memo SP 10-2012 \(v.9\) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"**](#)
 - For menu planning purposes, when multiple choice menus are served, how are minimums calculated? - Weekly minimum - example 2: If a grade K-5 school offers a 1 oz. eq. grain item (salad) and a 3 oz. eq. grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz. eq. grain (1 oz. eq. x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz. eq. (pg. 37) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/SP10-2012v9s.pdf>).

Meal Pattern Documentation under a Joint Agreement

- Current nutrition facts labels, Child Nutrition (CN) labels, and/or manufacturer's product formulation statements (PFS) clearly outlining dietary specifications (calories, saturated fat, sodium) and crediting information must be available onsite where meals are served, even if meals are prepared offsite. Crediting documentation should be updated at least twice per year and as new products are purchased or substituted.
- This requirement is outlined in the joint agreement template, #12: "The seller shall comply with all other requirements of their DPI agreement/application as it produces and makes available meals to the Purchaser, including providing the Purchaser with daily production/transport sheets indicating how menu items contribute to meal pattern requirements and *supporting documentation for contribution.*"

Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

- ❑ **Finding #1:** Standardized Recipes are required for all menu items that contain more than one ingredient, and need to be standardized to the kitchen the item is being prepared in with the ingredients used on site.

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

1. Mashed Potatoes
2. Chicken and Gravy
3. Meatballs and gravy
4. Sub Sandwiches (Turkey and Ham), the USDA sheet is indicating how much by weight (1.43 oz) is 1 oz eq m/ma. The JennieO label indicating that 2 slices is equal to 2.00 oz by weight, please update your recipe.

- ❑ **Finding # 2:** During the week of review, several foods offered on the breakfast menu credit as a 1.0 ounce equivalent (oz. eq.) of grain. While this will meet the daily grain requirement, if a student chooses the same 1 oz eq grain product each morning at breakfast, this would result in a weekly grain shortage. Bundling items to offer 1.5 -2.0 oz eq daily will help avoid weekly grain shortages. An item at breakfast is defined as 1.0 oz. eq. grain, 1.0 oz. eq. meat, ½ cup of fruit and/or vegetable, or 1 cup of milk. Under Offer Versus Serve, four food items must be offered at breakfast, and students must select at least three food items, including ½ cup fruit and/or vegetable to have a reimbursable meal. During the week of review and the day of observation, students were offered either a breakfast entrée, a pop tart, a cereal bar, or a bowl of cereal as their grain option. The Entrée consistently met the requirement (daily and weekly), each of the other single options met the daily requirement, but did not meet the weekly requirement, resulting in a grain shortage. This is a repeat finding.

Corrective Action Needed: Provide one week of production records (including all documentation) indicating an update to grains offered at breakfast and how you are meeting the meal pattern.

Fiscal action is required for any repeat violations at the SFA level (not site-specific) from the previous Administrative Review Cycle. Because a weekly grain shortage at breakfast was found during the last AR as well as the current AR, fiscal action will be applied. Per page 83 of the Administrative Review Manual, there will be a re-claim for meals for one weekday with the lowest participation at each site within the SFA serving the menu with the weekly quantity insufficiency.

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance/Compliance Reminders

Annual Financial Report (AFR):

- All revenues, including reimbursements and student payments, and expenses, including food, labor, equipment, purchased services, and other need to be allocated to the program to which they belong. The new [16-17 Annual Financial Report instructions](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf) are located on the DPI website (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/annual-financial-report-instructions.pdf>). The purchase record template on the DPI website <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/purchase-record-revenue-template-monthly.xlsx> may aid in this expense and revenue separation.

Allowable Costs

- 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. [SP23-2017 Unpaid Meal Charges guidance Q & A](#) may be found on our Financial Management webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>).
- Money from food service (Fund 50) cannot be used to support local initiatives to donate or give away food. It is critical for a school participating in the federal school nutrition programs to be able to show that federal and state reimbursement received for reimbursable meals is used specifically to support the cost of providing reimbursable meals.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, all of the expenses were not separated out by individual programs. Most of the expenses were put into NSLP and no labor expenses were allocated to nonprogram foods.
Corrective Action Needed: Please resubmit your 16-17 Annual Financial Report with revenues and expenses accurately broken out by program and category. To do this, you will need to contact Jacque Jordee at Jacqueline.jordee@dpi.wi.gov or 608-267-9134 and fax or email her an updated report to complete a manual update.

Revenue from Nonprogram Foods

Commendations/Comments/Technical Assistance/Compliance Reminders

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

Findings and Corrective Action Needed: Revenue from Nonprogram Foods

- ❑ **Finding #1:** The Nonprogram Foods Revenue Tool has not been completed for the current school year.
Corrective Action Needed: Please watch the [Nonprogram Foods Revenue Tool](#) webinar (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and complete the Nonprogram Food Revenue Tool for the current school year using a minimum of a 5-day reference period.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance/Compliance Reminders

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view where the program is offered.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- All SFAs must have 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. Please refer to the [USDA Program Discrimination Complain Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the [prototype Medical Statement](#) for Special Dietary Needs posted on our website, which is also available in Spanish and Hmong (r).
- Medical statements must include
 - A description of the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet, and
 - An explanation of what must be done to accommodate the disability (for example, the food(s) to be omitted and food(s) to be substituted).
- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to students with special dietary needs who have a signed medical statement from a licensed medical practitioner 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>).
- Food Service should have copies of all medical statements for students within their school to provide correct meal substitutions.

Findings and Corrective Action Needed: Civil Rights

- **Finding #1:** The “And Justice for All” poster was not posted out in the cafeteria for public view.
Corrective Action Required: Please move out into cafeteria. Completed on site. No further action required.
- **Finding #2:** The district does not have a policy in place for handling discrimination complaints in the Child Nutrition Programs.
Corrective Action Required: Please develop and submit a policy for handling discrimination complaints in the Child Nutrition Programs.

Local Wellness Policy

Commendations/Comments/Technical Assistance/Compliance Reminders

- Nice job on Local Wellness Policy!

Smart Snacks in Schools

Commendations/Comments/Technical Assistance/Compliance Reminders

- The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. [Smart Snacks in a Nutshell](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf) is a clear concise sheet with information. (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>)
- If multiple grades have access to vending machines with beverages, products must meet Smart Snacks standards for the youngest age/grade group. For example, if a vending machine with beverages is available to 6-12th graders, beverages must meet Smart Snacks standards for the 6-8 age/grade group; therefore, items like caffeinated, low-calorie (≤ 5 kcal/fluid oz.) flat or carbonated, or no-calorie beverages (< 5 kcal/8 fluid oz; ≤ 10 kcal/20 fluid oz.) flat or carbonated beverages are unallowable.
- We recommend using the Alliance for a Healthier Generation Smart Snacks Product Calculator, found on the [Smart Snacks webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>) to assess product compliance. 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. [Smart Snacks webinar](#) for more information. (<https://dpi.wi.gov/school-nutrition/training/webcasts#ss>).

Findings and Corrective Action Needed: Smart Snacks

- **Finding #1:** Beverages in the cafeteria vending machine are not age group compliant. De Soto High School cafeteria has two vending machines, one contains snacks stocked by the FSD and the other contains beverages provided by Pepsi co. Since the cafeteria is being used by both the middle school and the high school students, all the smart snacks must meet the standards for that age group. All the snacks meet the standards for the middle school students. Unfortunately the beverages are not in compliance.
Corrective Action Needed: Please indicate your plan of action to replace beverages with compliant beverages.

Professional Standards:

Commendations/Comments/Technical Assistance/Compliance Reminders

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our [Professional Standards](http://dpi.wi.gov/school-nutrition/training/professional-standards) webpage (<http://dpi.wi.gov/school-nutrition/training/professional-standards>).
- **Annual Training Requirements for All Staff**
Directors: 12 hours
Managers: 10 hours
Other Staff (20 hours or more per week): 6 hours
Part Time Staff (under 20 hours per week): 4 hours

Findings and Corrective Action: Professional Standards

- Finding #1:** Training is not being monitored on a tracking tool.
Corrective Action Needed: Include all current training hours for each food service employee onto the DPI tracking tool and submit as part of corrective action.

Food Safety, Storage and Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

- The most recent food safety inspection must be posted in a publically visible location.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°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 TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Findings and Corrective Action: Food Safety

- **Finding #1:** The most recent Food safety inspection was not posted out in cafeteria in public view.
Corrective Action Needed: Corrected on site no further action required.

Buy American

Commendations/Comments/Technical Assistance/Compliance Reminders

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports the local economy, small local farmers and provides healthy choices for children in the school meal programs. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Furthermore, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.
- 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. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

Findings and Corrective Action Needed: Buy American

- **Label does not identify country of origin:**
In USDA Memo SP 38 -2017, any product that does not identify the country of origin now requires certification from the manufacturer or distributor. See the TA notes above for sample certification language. This will be treated as TA for the 2017-18 school year, but work with your distributor/supplier to move toward compliance.

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

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

For more information on this initiative, please visit the [Wisconsin DPI Every Child a Graduate](http://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).

