

## USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority: Fontana J8 SD**

**Agency Code: 64-1870**

**School(s) Reviewed: Fontana**

**Review Date(s): 1/10-11/18**

**Date of Exit Conference: 1/11/18**

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

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

### **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. 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](http://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](http://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 Fontana J8 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

#### Certification and Benefit Issuance

##### Commendations/Comments/Technical Assistance/Compliance Reminders

Of the 67 students eligible for free/reduced price meals in December, all were determined correctly, and direct certification had been run in the appropriate timeframes. Kudos for a job well done!

##### 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.

##### Household Size Box

The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for the application to be considered complete.

##### Free and Reduced Price Meal Applications

When an application only has one frequency of payment indicated for all of their reported incomes on the application, the income should not be converted to annual, but using the [Income Eligibility Guidelines](#) one would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).

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

- Finding #1:** From the student sample reviewed for benefit's issuance, one application is missing the social security number.  
**Corrective Action Needed:** Please contact this household to supply you the social security number. Record date that corrective action is taken on the **SFA-1** form and send completed copy as corrective action. Completed on site, no further action required.
- Finding #2:** The household size box on 1 application was left blank.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will be checked to make sure names on application match household size box.
- Finding #3:** The applications had income annualized.  
**Corrective Action Needed:** Please provide a statement of understanding that going forward, all applications will not be converted to yearly unless more than one frequency of income is reported.

#### 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.

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application.

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

- ❑ **Finding #1:** Confirmation reviews were conducted on all applications and this is only required for applications that are chosen for verification.

**Corrective Action Needed:** Please submit a statement of understanding to do a confirmation review for Verified applications only going forward. Information on the verification process can be found on our [Verification](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>).

### **Meal Counting and Claiming**

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

- SFAs who are “in Joint” with another SFA operated by a FSMC must be responsible for their own Point of Service. This may not be delegated to the Food Service Management Company if the SFA is not operated by the FSMC.
- DPI has created [Field Trip meal resources](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) to help schools offer student meals each day school is in session (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>).

### **Findings and Corrective Action Needed: Meal Counting and Claiming**

- ❑ **Finding #1:** The FSMC employee at Fontana J8 is responsible for your point of service which is not allowed under USDA regulation.

**Corrective Action Needed:** Please reconfigure your line so a SFA employee is the point of service.

## **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

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

The food service employee at Fontana Elementary School is doing a working hard to serve healthy meals to students each day. She is doing a wonderful job of preparing, serving, and cleaning up after meals all on her own! She is open to feedback and eager to learn. Thanks also to the food service director at Williams Bay School District for providing meal pattern documentation for Fontana prior to the on-site review.

#### **Signage**

Posted signage is adequate, but the entrees listed on the lunch signage are difficult to read because they are typed in a very small font. It would be beneficial to students if the daily entrees on the lunch signage were more easily readable. Also, on the day of observation the signage listed half of a banana as a fruit option, when in reality a whole banana was offered. Signage should be consistent with what is actually being served.

#### **Crediting Documentation**

Product formulations change frequently, so it is important that nutrition facts labels, Child Nutrition (CN) labels, USDA Foods Product Information Sheets, and Product Formulation Statements (PFS) on file are kept up-to-date. The USDA Foods product information sheet for deli turkey was outdated and

contained different crediting documentation than the currently available product. State-Processed Product Information is updated annually and can be found:

- [SY 2016-2017 State-Processed Product Nutrition Information](https://dpi.wi.gov/school-nutrition/usda/product-information) (https://dpi.wi.gov/school-nutrition/usda/product-information)
- [SY 2017-2018 State-Processed Product Nutrition Information](https://dpi.wi.gov/school-nutrition/usda/product-information) (https://dpi.wi.gov/school-nutrition/usda/product-information)
- [USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) (https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets) are organized by component and updated annually. CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

### Standardized Recipes

Product information and crediting information should be updated on standardized recipes as products change and as new products are introduced. The taco meat recipe lists crediting information that is no longer accurate. State-Processed USDA beef crumbles are used in the recipe, but the crediting and product number of this item can change from year to year. The beef crumbles for this current school year (product number C412) credit ounce for ounce: 1 ounce of beef crumbles credits as 1 ounce equivalent (oz eq) meat/meat alternate (M/MA). When standardized recipes contain inaccurate crediting information, it is more likely that meal pattern requirements may not be met.

### Production Records

Many of the crediting values for entrees listed on the production records were incorrect. For example, the cheeseburger credits as 2.5 oz eq M/MA but is recorded as 2 oz eq, the breaded fish patty with cheese credits as 1.75 oz eq M/MA but is recorded as 2 oz eq, the chicken bacon ranch melt credits as 2.5 oz eq M/MA but is recorded as 2 oz eq, the meat pasta sauce credits as 1.5 oz eq M/MA but is recorded as 2 oz eq, and the hot ham and cheese sandwich credits as 2 oz eq M/MA but is recorded as 2.5 oz eq. To avoid confusion and to ensure that reimbursable meals are offered and served, please update production records to reflect accurate and current crediting information.

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

- ❑ **Finding #1:** At breakfast, baby carrots are portioned in 4 fluid ounce (or ½ cup) cups. Because the carrots do not fill up the entire space inside the cup, they are not being offered in ½ cup portions. This is problematic if baby carrots and 4 fluid ounces of juice are the only fruit/vegetable offered as it means that students are not being offered 1 cup of fruit and/or vegetable as required. It may also result in the 50 percent juice limit being exceeded. No more than half (50 percent) of the fruit offered over the course of a week can be in the form of juice. On the day of observation, bananas were also offered and the bananas and carrots were bagged together so all students had reimbursable meals and all students were offered the correct amount of fruit/vegetable. We discussed the steps for determining how many baby carrots make up ½ cup, and then offering the carrots in a larger container (either a larger portion cup or a baggie). If you start receiving baby carrots that are noticeably larger or smaller, you will need to recalculate how many carrots it takes to make up ½ cup. We also discussed that vegetables are not required to be offered at breakfast, so it may be advisable to no longer include them in the grab and go bag and instead offer them separately so students can turn them down if they wish.

**Corrective Action Needed:** Please submit a written statement explaining how you will ensure that ½ cup of carrots are offered at breakfast. Please submit one week of completed breakfast production records to show that the fruit/vegetable requirement is met and that the juice limit is not exceeded.

❑ **Finding #2:** The food service employee at Fontana Elementary was somewhat unclear about the Offer versus Serve (OVS) requirements for breakfast. Although all students observed at both meals took a reimbursable meal, it is important for staff to fully understand the OVS requirements. At breakfast, students must leave the line with 3 items, including ½ cup fruit and/or vegetable, 1 ounce equivalent (oz eq) cereal, 1 oz eq graham cracker, ½ cup fruit, ½ cup juice, and 8 fl oz milk each count as one item. So, for example, a student could select a 3-count graham cracker, banana, and milk, and have a reimbursable meal. At lunch, students must leave the line with three full components, including ½ cup fruit and/or vegetable. We highly recommend viewing our [Offer versus Serve webcast](https://dpi.wi.gov/school-nutrition/training/webcasts#ovs) (<https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>).

**Corrective Action Needed:** Please submit a written statement explaining how you have ensured that the food service employee at Fontana Elementary is sufficiently trained in OVS. Include specific training resources that were used.

❑ **Finding #3:** The graham crackers offered at breakfast on the day of observation were a 2-count package, which credits as 0.5 oz eq grain and does not count as an item at breakfast. The production records list a 3-count package which credits as 1 oz eq grain and counts as 1 item at breakfast. During breakfast observation this did not result in any non-reimbursable meals because all students took the graham crackers with another grain component (either cereal or the banana loaf). However, a 0.5 oz eq graham cracker package would lead to a weekly grain shortage if offered daily.

**Corrective Action Needed:** Please submit a written statement confirming that you have switched to serving a graham cracker package that credits as 1 oz eq grain. Please also submit a written statement explaining what you will do if you mistakenly receive 2-count packages again in the future.

### 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. This will also aid the school in calculating its “yearly” reference period for its required nonprogram food compliance. The new [16-17 Annual Financial Report instructions](#) 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/Revenue Template](#) may aid in this expense and revenue separation (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/purchase-record-revenue-template-monthly.xlsx>).
- Because of the Nonprogram Revenue Rule, expenses must be broken out by actual Labor, Food, Purchased Services, Equipment, or Other, and not all reported in Purchased Services as was previously done for SFAs with Food Service Management Company or Vended Meal contracts.

##### 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>).

### Unpaid Meal Charge Policy

- 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.

### Findings and Corrective Action Needed: Nonprofit School Food Service Account

- ❑ **Finding #1:** On the Annual Financial Report, the revenues and expenses were not broken out by program or by expense category and were reported in Food and Purchased Services under NSLP. No revenues or expenses were recorded in nonprogram foods, breakfast, or Special Milk Program  
**Corrective Action Needed:** Please provide a statement of understanding that the 17-18 Annual Financial Report will have nonprogram food revenues and expenses broken out from National School Lunch.
- ❑ **Finding #2:** The district has not yet distributed their written unpaid meal charge policy to families which was required to be done by July 1, 2017.  
**Corrective Action Needed:** Distribute your unpaid meal charge policy to households by the corrective action due date.

### 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:** After completion of the Nonprogram Foods Revenue Tool the district was found to be noncompliant with the correct revenue ratio 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) (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story\_html5.html). After this, please submit a plan of how you intend to meet the correct ratio whether by increasing prices or alternate procurement methods such as purchasing your own nonprogram foods rather than going through Williams Bay.

## 4. GENERAL PROGRAM COMPLIANCE

### Civil Rights

#### Commendations/Comments/Technical Assistance/Compliance Reminders

##### 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 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- 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>).
- 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 have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, lactose free milk may be offered, or schools may choose to provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide the nutrition information from the product you will be using. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Review the use of appropriate fluid milk substitutions which must be nutritionally equivalent to cow's milk and pre-approved through DPI. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP, which allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. SFAs may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use.

### Local Wellness Policy

#### Commendations/Comments/Technical Assistance/Compliance Reminders

Excellent Wellness Policy! Thank you for your attention to detail!



## Smart Snacks

### Comments/Technical Assistance/Compliance Reminders

#### Smart Snacks Rule

- 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 if they do not qualify for an exemption. More information, including a helpful *Smart Snacks in a Nutshell* handout, can be found on our [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).
- The only competitive foods currently sold at Fontana Elementary are water and juice sold a la carte by food service, and these items are compliant with the rule. There are currently no food or beverage fundraisers at Fontana Elementary that fall under the Smart Snacks rule. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our Smart Snacks webpage.

## Professional Standards

### Commendations/Comments/Technical Assistance/Compliance Reminders

- 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.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

#### Professional Standards: Training Requirements

- 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

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:** The person who is now designated as the food service director has not yet met the director continuing education required for the 16-17 and 17-18 school years  
**Corrective Action Needed:** Please provide a timeline with planned training hours to meet the 12 hour per year requirement with a two year flexibility.

## Food Safety, Storage and Buy American

### Commendations/Comments/Technical Assistance/Compliance Reminders

#### Food Safety Plans

- All schools must have a comprehensive, *site-specific* food safety plan on-site, which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOPs), all equipment, and a listing of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the [SNT Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

#### Buy American

- 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.
- SFAs must monitor contractor performance as required in 2 CFR Part 200.318(b), formerly in 7 CFR Part 3016.36(b)(2), to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
  - The following products may be exceptions to Buy American provisions: pineapples, mandarin oranges, olives, tuna, bananas and coffee.
  - If no country of origin identified on label, than SFA must get certification from distributor or supplier stating: "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can accepted within an email.
  - What is acceptable to determine compliance on a label? Label should indicate if the product is grown, processed and packed in the continental U.S. and any U.S. Territories. If label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.
  - Any substitution of a non-domestic product for a domestic product (which was originally a part of the RFP), must be approved, in writing, by the food service director, prior to the delivery of the product to the School.
  - Any non-domestic product delivered to the school, without the prior, written approval of the Food Service Director, will be rejected. Should non-domestic substitutes that were not pre-approved in writing by the food service director be delivered to and rejected by the school, selected distributor(s) shall be held accountable for all over-claims that result from failure to meet the school's required meal pattern.

- Agricultural products which are processed and produced outside of the U.S. may be accepted with proof from manufacturer that poor market conditions exist (weather, and/or supply availability of market); this requirement applies to private labels as well as other labels.
- The SFA should maintain written procedures to ensure product received and inventory is compliant with the Buy American procedure. Sample written procurement contract management procedures and Buy American monitoring procedures can be found in the [Contract Management](#) chapter of the *Introduction to the Procurement Policy and Procedures Handbook* (<https://dpi.wi.gov/school-nutrition/procurement/contract-procedures/contract-management>). Additional Buy American monitoring procedures can be found on the [Buy American Provision](#) webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american/monitoring>).
- 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.
- More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the SNT [Procurement](#) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

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

- **Finding #1:** The following products were identified in SFA’s storage area as non-domestic and not listed on the SFA’s Buy American – Noncompliant List or SFA equivalent form or did not have proper labeling to identify the country of origin:

- Cucumbers from Mexico
- Garlic Powder from China

**Corrective Action:** The identified noncompliant food item(s) qualify to be on the non-compliant product list, but the SFA does not have a noncompliant list/process in place for tracking.

Begin using a Noncompliant Product List for tracking nondomestic products. Provide a copy of the form that will be used and include any noncompliant products currently in the SFAs food storage areas. Provide the completed list as corrective action. A [template form](#) is located on the procurement webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>).

- **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.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Special Milk Program**

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

- Point of Service Counts (POS) for the Special Milk Program must be recorded by who “did” take milk not by marking who “did not” take one.

### **Findings and Corrective Action: Special Milk Program**

- **Finding #1:** The excel spreadsheets for the SMP defaults to the child being present requiring the check mark to be deleted if the child does not take a milk. This is an unreliable Point of Service as milk may only be checked off on the POS worksheet after the milk has been received.

**Corrective Action Needed:** Because this is an unreliable Point of Service, a recalculation must be done on all special milk claimed since the beginning of the year and fiscal action applied. Please correct the point of service and submit 30 days of clean counting data to DPI to complete this recalculation.

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).