

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Norris Adolescent Center

Agency Code: 679156

School(s) Reviewed: Norris Adolescent Center

Review Date(s): May 17-18, 2017

Date of Exit Conference: May 18, 2017

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

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

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section. RCCI's **are exempt** when there is non-pricing of meals.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Norris Adolescent Center 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.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Findings and Corrective Action Needed

Certification and Benefit Issuance

- If Norris chooses to send free and reduced price meal applications for day students for meal eligibility, it would be helpful to attend the 8 hour training offered in the summer on Free/Reduced Meal Benefits and the Verification Process. Information can be found here: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications>.
- In addition if Norris does take applications, direct certification must also be run, More information can be found at: <https://dpi.wi.gov/school-nutrition/direct-certification>.
- A **benefit issuance document** would then need to be developed and contain the names and benefit status for all free and reduced-priced students and effective date in the SFA if Norris chooses to go with this meal eligibility option.

Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges.
- FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year.
- Source documentation from the school is required. The transfer of eligibility between LEAs for students attending Community Eligibility Provision (CEP) schools will be required by July 1, 2019. **Technical assistance** was provided.

Meal Counting and Claiming

- Meals may only be charged to a student at the time of receipt of a reimbursable meal to assure proper benefits issuance. **Technical assistance** was provided.
- When entering the claim, it is necessary to use the edit check to calculate your reimbursable meals by site for consolidation. **Technical assistance** was provided.

Findings and Corrective Action Needed

Finding #1: While there was a point of service and a roster check off in place for counting and claiming, it was felt that the checklist needed to be adjusted to more clearly identify reimbursable and non-reimbursable meals.

Corrective Action Needed: Please submit a copy of the type of roster that will be used to correct this issue. It may be as simple as using the same roster style with a key added to mention what a checkmark identifies on the roster in each of the columns. Or perhaps at the beginning of each column as an example: Brkfst-R or Brkfst NR.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to food service staff for their positive attitudes, willingness to assist with the review process, and for their dedication to providing excellent customer service to students. It was great to see Offer versus Serve in action at Norris Adolescent Center. Allowing students to select the foods they want empowers them to make healthy choices. A colorful garden bar was available to students and it was encouraging to see many select vegetables from it. Offering a wide variety of fruits and vegetables on a daily basis helps students find options that they are willing to select and eat. Keep up the good work!

Technical Assistance

Make sure to review the training webcasts at <http://dpi.wi.gov/school-nutrition/training/webcasts>. There are short webcasts available that provide more information on each meal pattern component and on additional topics such as production records, product formulation statements, and Offer versus Serve (OVS). These quick webcasts are great training tools to share with staff. Make sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What's New with School Nutrition* webinar. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.

Whole fruit is available at breakfast and lunch but kept behind staff and students have to ask for it. It was observed that very few students asked for whole fruit at lunch and none at breakfast. Making fruit the easy choice makes it more likely that students will choose fruit. While juice was also available, consider cutting fresh fruit for service and offering it on the service line to encourage consumption.

As a reminder, signage that helps students understand how to create a reimbursable meal must be posted at or near the beginning of the service line for both breakfast and lunch. Signage was found toward the end of the line that had all of the required information and technical assistance was provided to move that to the bulletin board at the start of the line.

Make sure to include a planned portion size on production records for all items offered on the garden bar. Also make sure to update the portion size of cereal on your breakfast production record because it does not represent current practices. Additional information on production records can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.

Norris Adolescent Center is responsible for evaluating meal pattern compliance. All meal pattern documentation must be available to them for review. Technical assistance was provided onsite about making staff aware of where documentation can be found in the cafeteria building.

Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service 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. Instructions for standardizing recipes and recipe templates can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

Crediting documentation was not submitted for the Genoa Salami product used during the review week. Because this type of product cannot be credited using the Food Buying Guide, a CN label or PFS is required. The product in question was not CN labeled, so technical assistance was provided that a PFS is needed. The PHN on the review emailed the manufacturer while onsite and the PFS received was forwarded to food service staff. If using other processed products in the future that cannot be credited by using the Food Buying Guide and are not CN labeled, remember to contact the manufacturer directly for a PFS to determine crediting prior to serving the product.

Findings and Corrective Action Needed

☐ **Finding #1:** To create a reimbursable meal, students are required to take a minimum ½ cup fruit, vegetable, or combination of fruit and vegetable at both breakfast and lunch. It was observed onsite that meals not meeting that requirement were being marked down as reimbursable. In total, we observed 11 non-reimbursable lunches and 6 non-reimbursable breakfasts. After technical assistance, these were marked as non-reimbursable and will not be claimed. Staff expressed that they have not had Offer versus Serve (OVS) training and were not familiar with the ½ cup fruit/vegetable requirement.

Corrective Action Needed: Submit a detailed written statement addressing the training that has been conducted to instruct staff on OVS. In the written statement, include what steps have been taken to encourage students to take a reimbursable meal and include information on how staff have been trained to handle non-reimbursable meals.

☐ **Finding #2:** Non-whole grain rich items were observed during review week and onsite, which included sliced bread and pasta varieties.

Corrective Action Needed: The non-whole grain rich items cannot be credited toward meal pattern requirements. Submit a written statement describing steps taken to phase these products out or describe how these will be handled as non-creditable “extras.”

☐ **Finding #3:** Beans/peas/legumes were not offered to students on the review week menu and this subgroup was not recorded on production records for the review week. Other weeks did contain vegetables from the beans/peas/legumes subgroup.

Corrective Action Needed: Submit an updated menu for that cycle week along with a written statement detailing the steps taken to ensure menus are planned to meet vegetable subgroup requirements.

☐ **Finding #4:** It was discussed onsite that the recipes submitted for review from TrakNow were not necessarily the ones being used in the kitchen. When we asked kitchen staff for a Pasta Bake recipe, which was menued during the review week, the staff were unable to find one. Staff said that they do not necessarily refer to recipes but new people might. As a reminder, standardized recipes are an important part of the menu planning process to determine proper crediting, portion control, and control food cost. Recipes need to be standardized for this operation using the actual products used and scaled to an appropriate number/yield for the amount of students served.

Corrective Action Needed: Submit a written statement describing steps taken to ensure staff are using standardized recipes. Submit a standardized recipe for Pasta Bake that will be used in the kitchen moving forward.

☐ **Finding #5:** All students (ages 12-17) were offered the same 9-12 meal pattern during the review month.

Corrective Action Needed: A grade group waiver was granted prior to onsite observation that will allow this site to continue that practice. **No further corrective action needed.**

☐ **Finding #6:** The food service operation is currently not meeting meal pattern regulations due to excess amounts of food being offered with the reimbursable meal. It was observed onsite that all students had the ability to take unlimited additional portions of all offered menu items at breakfast and at lunch. Staff at Norris Adolescent Center verbally told us that students were limited to one round of “seconds” but this was not observed as students were not limited in what they could take at breakfast or at lunch. Observation at both meals indicated many students were taking two to three times the amount that would be menu planned to meet meal pattern requirements for dietary specifications. This was discussed with food service staff and school administration while onsite and the finalization of an exit report was delayed while we requested guidance from USDA to explore what flexibilities may be allowable for the additional foods. Here is the response from USDA:

An RCCI that offers additional food items at no cost to students who have already been served reimbursable meals must include the additional food items in the weekly meal pattern. That is, all of the extra food served to students at no cost must be included when determining compliance with the dietary specifications found at 7 CFR 210.10. This applies even if the General Fund is covering the cost of the additional items, because these items were made available to students at no cost. See [SP 10-2012 \(v.9\)](#), *Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”* which states that “if a school elects to offer second servings of any part of the reimbursable meal without any additional charge, these foods must be counted toward the weekly dietary specifications.” However, these additional foods do not have to comply with Smart Snack requirements as they are not being sold (see 7 CFR 210.11(a)(2)).

If the RCCI has written medical statements from a State licensed health care professional indicating that students need access to additional food due to medical condition, these additional foods could be offered without regard to the dietary specifications and would be eligible for reimbursement. [SP 26-2017](#), *Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As)* states “Modified meals that do not meet the Program meal pattern requirements served to a child due to a disability are eligible for reimbursement. However, in order to receive reimbursement for such meals, the school must obtain and keep on file written documentation of the medical statement that supports the meal modification.” However, disability status must be determined on an individual basis.

Unless Norris Adolescent Center has written medical statements for students as described above, meal service must be planned and implemented in a way that meets all meal pattern regulations, including the dietary specifications. While it will be a difficult transition at first for students, limiting the amount of additional foods taken will help reduce food cost and help students build healthy eating habits they can take with them into adulthood. To help reduce calories, saturated fat, and sodium,

consider removing bread from daily service at breakfast and lunch. Consider using butter pats or another method of controlling the amount of butter or margarine students take when bread is offered. Encouraging students to take additional servings of fruits and vegetables can help them feel fuller while not making a sizable impact on the dietary specifications of meals. Planning menus to meet meal pattern component requirements within the minimums and target maximums set for grains and meat/meat alternates, while limiting the number of times during the week extra foods are offered, will help bring your menus into compliance.

Corrective Action Needed: Submit a detailed written statement describing the steps that will be taken to bring meal service into compliance with meal pattern regulations. Include a detailed timeline of when changes will occur. It is imperative to submit the statement and timeline by the corrective action deadline specified in this report. Please be aware that fiscal action in the form of stopping your additional 6 cent performance-based reimbursement and/or placing your program in claims withholding may be necessary until operations are brought into compliance.

SMART SNACKS

Comments/Technical Assistance/Compliance Reminders

At this time, there are no foods or beverages outside of the reimbursable meal being sold to students for consumption during the school day. If this changes in the future, make sure to review any foods or beverages sold to students for compliance with Smart Snacks regulations. Information on this can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

Nonprofit School Food Service Account

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.
- Since this is RCCI has expenses larger than revenues received, money needs to be transferred from non-Federal sources into the food service fund to bring the balance to \$0.00, as the food service fund may not end in a negative balance. **Technical assistance** was provided.

Annual 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>
- When tracking revenues and expenditures, please keep in mind:

- Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
- “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
- Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
- Under “A la Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel. The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- 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>. If line items like garbage disposal are charged to food service, it must be calculated in a direct fashion, like counting the number of garbage bags for food service versus the other departments on school grounds,

Revenue from Non-program Foods

- **Non-program Foods Revenue Rule SP-20-2016**
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
 - Non-program Foods “In a Nutshell” <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
 - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues or a transfer of funds. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
 - Non-program Food costs and revenues must be separated from Program Food costs and revenues.
 - Adult meals are considered non-program foods. Either the SFA must charge for Adult meals appropriately per this **Wisconsin Adult Meal Pricing Worksheet** <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc> or show a transfer of non-Federal funds to the food service fund to cover any excess expenses over revenues in this category. **Technical assistance** was provided and resources left on-site.

Edit Check

U. S. Department of Agriculture (USDA) regulations require school agencies to complete an edit check for each of its schools that participate in the National School Lunch Program prior to consolidation of the daily lunch counts for the monthly reimbursement claim. The purpose of the edit check is to identify errors in the schools' lunch counts and/or problems with the meal counting and claiming procedures so that necessary corrections are made.

The prototype daily participation/ edit check form is provided by DPI. School agencies are not required to use this particular form but must perform an edit check after completing the calculations shown on the bottom of the form. Here is the website page to access the edit check: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/contracts-claims-reports>. On the page you will look for the edit check form. **Technical assistance** was provided.

Findings and Corrective Action Needed

Finding #1: It was found that there was no Adult meal prices listed on contract for breakfast and lunch meal charges. This is a requirement for the NSLP. Adult meal pricing is also important for the purpose of resource management regarding the breakout of non-program foods.

Corrective Action Needed: Please submit a statement on when you will have an adult prices available and what that charge may be. In addition, please update the contract to include these prices.

Finding #2: It was found that edit check process did not meet the requirements of the program.

Corrective Action Needed: Please use **edit check mentioned in the report** and submit a month of claims with the edit check.

4. GENERAL PROGRAM COMPLIANCE

Comments/Technical Assistance/Compliance Reminders

Civil Rights

Nondiscrimination Statement

- When including the nondiscrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.
- However, when space is very limited, such as on printed menus, only this 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. **Technical assistance** was provided.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually. **Technical assistance** was given.

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. 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>.

Processes for complaints

- All SFAs should have procedures (written procedures preferred) for receiving and processing any complaints alleging discrimination within the National School Lunch Program and School Breakfast Program.
- An 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.
- 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.

Local Wellness Policy

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with full compliance of the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness

policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

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

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment results available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>. **Technical assistance** was provided and resources left on-site to assist in updating the school's existing wellness policy.

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.
- 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 website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>. **Technical assistance** was provided regarding tracking professional standards for food service and non-food service staff. Resources were left on-site.
- **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.

Directors	Managers	Full-time Staff	Part Time Staff
		(20 hrs or more/week)	(less than 20 hrs/week)
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

- Staff training for kitchen personnel may include any food safety topics, Offer vs. Serve, School Breakfast Program, Menu Planning and Meal Pattern, as found on our training webpage <https://dpi.wi.gov/school-nutrition/training>. The individuals who need specific training may find topics like the Annual Financial Report, Meal Claims, Direct Certification and Verification Collection Report, also on that webpage. **Technical assistance** was provided.

Food Safety and Storage

Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log.

Food Safety Plans

- SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable. **Technical assistance** was provided regarding the HAACP 1, 2 and 3 sheet.

Storage

- SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

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.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy->

[american-noncompliant-list.docx](#). Please complete this non-compliant document for any items which are not a “Product of the USA”, like canned mandarin oranges and pineapple or fresh produce at certain times of the year. **Technical assistance** was provided and non-compliant form was on left on-site.

Findings and Corrective Action Needed

Finding #1: It was found that the non-discrimination statement on the menu posted in the cafeteria area and on the on-line menu posted on the website does not contain the most recent statement.

Corrective Action Needed: Please submit a copy of a menu that show the current non-discrimination statement.

Finding #2: It was found that the civil rights self –compliant form was not completed. This must be completed each year by October 1st.

Corrective Action Needed: Please submit a completed copy of the civil rights self-compliant form. It can be accessed on this webpage: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>.

Finding #3: It was found that the HAACP process 1, 2 and 3 sheet was not completed.

Corrective Action Needed: Please submit a completed copy of the HAACP Sheet with the food items used by the food service. HAACP Sheet was completed and submitted to reviewer. **No further action needed.**

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

An Afterschool Snack Program can participate as "**area eligible**" if it is located at a school or in the attendance area of a school where at least 50 percent of the enrolled children are eligible for free or reduced price meals. In an Area Eligible Afterschool Snack Program, all participating students are claimed in the free eligibility category when a reimbursable snack is selected. Programs must qualify annually. **Technical assistance** was given to encourage Norris to participate in the Afterschool snacks program.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

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

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

