

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

School Food Authority: Waterford Graded Joint #1 School District

Agency Code: 51-6113

School(s) Reviewed: Evergreen Elementary School

Review Date(s): 3/27/18-3/28/18

Date of Exit Conference: 3/28/18

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:

GOALS

- 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, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

SNSDC TRAININGS

- The School Nutrition Skills Development Courses that are presented by the DPI School Nutrition Team will be available this summer in Green Bay, Wausau, Rice Lake, Madison and Milwaukee. There will be emails sent in the coming months regarding the trainings available at these locations. You may also check back on the [School Nutrition Team Training](https://dpi.wi.gov/school-nutrition/training) webpage (<https://dpi.wi.gov/school-nutrition/training>).

SOCIAL MEDIA

- Submit photos to the School Nutrition Team to be posted on the DPI SNT Facebook page, Twitter page or Instagram page. Send photos to Dana Colla at dana.colla@dpi.wi.gov.

Appreciation/Commendations:

Thank you to the Bookkeeper, Food Service Director, Food Service Manager, District Secretary, and Food Service Staff for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information throughout the on-site review. Thank you for taking the time to send all of the documentation for the review prior to the on-site review! This was much appreciated and helped expedite the review process!

Thank you for all that you do to feed the students healthy meals!

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Technical Assistance/Compliance Reminders

- 173 eligibility determinations were reviewed; 1 error was identified.

Effective Date of Eligibility

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

Annualizing Income

- For household applications that list the same pay frequency (i.e. all income listed as bi-weekly), it is not necessary to annualize the income. Annualizing the income when not necessary may change the eligibility status.

Disclosure

- For any staff that has access to students' eligibility status that isn't within the School Nutrition Office (i.e. IT Department, Principals, Secretaries) they should sign off on the *Disclosure Agreement* form and keep a copy on file at the district. This is to protect the students from any overt identification. A template [Disclosure of Free and Reduced Price Information](#) form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).

Direct Certification

- As a reminder, you are required to run direct certification a minimum of three times a year: at or near the beginning of the school year, three months after the initial run and six months after the initial run.
- Best practice is to run Direct Certification monthly to be sure to capture as many students receiving benefits as possible.
- In addition to this, you must run Direct Certification in March, prior to April 1 for a CEP notification report that is submitted to USDA by DPI.

Verification

Commendations/Technical Assistance

- Verification was completed in a timely manner, prior to the November 15 deadline and completed correctly.
- One application was verified.
- All DPI template letters were used.
- Verification Collection Report was completed prior to the February 1 deadline and completed correctly.
- As a reminder, Verification can begin on October 1, with the pool of applications from July 1 to October 1.

- Applications chosen for Verification should submit proof of one month's income. They can provide the month prior to application, or the month applied, or any month after the month applied.
- If a paystub lists overtime, be sure to average the paystubs and compare it to the Eligibility Guidelines.
- [Verification Tracker Sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx) can be helpful when completing Verification (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx).

Findings and Corrective Action Needed

- ❑ **Finding #1:** One of the applications reviewed had listed a case number for SSI. Having SSI does not qualify for benefits within the School Nutrition Programs. By calculating the income on the application, the household should have been determined reduced-eligible.

Corrective Action: Notify the household, whose benefits will be decreased from free to reduced, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the students' eligibility in the system, 10 calendar days from the date the notification letter was sent out. **Completed on-site. No further action required.**

- ❑ **Finding #2:** The notification of approval of benefits letter and the denied benefits letter do not have the correct size USDA Non-discrimination statement. The USDA Non-discrimination statement must be the same font and the same size as the content of the letter.

Corrective Action: Update the letter within Skyward to have to USDA Non-discrimination statement match the content of the letter's font and size. **Submit a copy of the updated letters.**

Meal Counting and Claiming

Technical Assistance

- The lunch claim was completed correctly.

Findings and Corrective Action Needed:

- ❑ **Finding #1:** The breakfast claim included a la carte items as reimbursable breakfasts at the Middle School.

Corrective Action: Discontinue claiming a la carte items as reimbursable breakfasts immediately, reflecting this in the March claim. Submit an excel spreadsheet of the adjusted F, R, and P breakfast counts at the Middle School from September – February.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

We extend sincere appreciation to the FSD and nutrition professionals at Waterford Graded Joint #1 School District. Thank you for the time, organization, and efforts that you have put into preparing for this review. The time that you took to meet with us and answer questions on site is greatly appreciated. The nutrition professional working at the POS was friendly, personal, and encouraging with all students. Thank you for your patience and enthusiasm with students. All observed meals were reimbursable. Keep up the great work!

Comments/Technical Assistance/Compliance Reminders

Graham crackers

One package of 14g Nabisco Grahams credits as ½ oz eq grains at breakfast. Please note that this does not count as one item when creating reimbursable meals. Graham crackers served at breakfast may either be an “extra” or should be bundled with another grain source.

Breakfast OVS

Students must select 3 items at breakfast, one of which must be ½ cup fruit and/or vegetable. On the day of review, the offered items included:

- Cereal (1 oz eq grain)
- Crackers (1 oz eq grain)
- Milk (1 cup)
- Apple (1/2 cup)
- Juice (1/2 cup)

This meets the requirements that 4 items must be offered, including required 1 oz eq grain, 1 cup fruit, and 1 cup milk. If a student declines to take milk, they may one of the following reimbursable meals:

- ½ cup fruit, cereal, crackers
- ½ cup juice, cereal, crackers
- Fruit, juice, cereal
- Fruit, juice, crackers
- Fruit, juice, cereal, crackers

On the day of review, students could potentially decline the milk and still make a reimbursable meal without taking both fruit and juice.

CACFP

The updated Child and Adult Care Food Program (CACFP) meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. Pre-kindergarten is exempt from the CACFP meal pattern *if* they are comingled with older students following the National School Lunch Program; *meaning that pre-k students can follow the NSLP meal pattern if they are served at the same time as older students and without distinction*. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). Contact Erin Opgenorth (erin.opgenorth@dpi.wi.gov) or Tanya Kirtz (tanya.kirtz@dpi.wi.gov) with any questions.

Findings and Corrective Action Needed:

- ❑ **Finding #1: Weekly grain shortage** ***Please note that on future Administrative Reviews (AR), repeat violations of minimum quantity shortages may result in fiscal action.*

Each entrée must be considered as a separate service line, and be evaluated for meal pattern compliance individually. Salads are offered daily during the week of review as an alternate meal, and provide between 1-1.75 oz eq grain. Students were being offered at minimum 6.25 oz eq grain during the week, which does not meet the K-8 meal pattern requirement of minimum 8 oz eq grain per week. Outlined below are the minimum daily grain contributions:

- Monday: 1 oz eq grain from slice of bread with salad meal

- Tuesday: 1 oz eq grain from slice of bread with salad meal
- Wednesday: 1 oz eq grain from slice of bread with salad meal + 0.5 oz eq grain from cookie = 1.5 oz eq grain
- Thursday: 1 oz eq grain from slice of bread with salad meal + 0.75 oz eq grain from popcorn chicken with salad meal = 1.75 oz eq grain
- Friday: 1 oz eq grain from slice of bread with salad meal

Corrective Action Needed for Finding #1: Please submit a written statement on how you will ensure each meal option offered to the K-8 graders meets the weekly minimum of 8 oz eq grains.

❑ Finding #2: Incorrect meal pattern

During the review week, Evergreen Elementary served the K-5 meal pattern. The school has K-6 students. Two options exist to remedy the situation

- Serve a K-5 meal pattern to K-5 students, and 6-8 meal pattern to 6th grade students
- Serve a K-8 meal pattern to all students at Evergreen Elementary

Corrective Action Needed for Finding #2: Submit a written statement explaining which meal pattern will be followed to accommodate for all students at Evergreen Elementary. Please explain how the menu will be modified to meet the meal pattern.

❑ Finding #3: Incomplete production records

- Grade groups reads “K-8” while service area reads “K-5”
- “Actual served total” column in incomplete

A list of production record requirements (“Must Haves and Nice to Haves”) and sample production record templates can be found on our [Production Records](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Corrective Action Needed for Finding #3: Please submit completed copies of breakfast and lunch production records for 3 consecutive days (M-F) from Evergreen Elementary School.

❑ Finding #4: Standardized recipes

Recipes for sandwiches with turkey are conflicting. Directions say to slice turkey into ½ ounce slices. Crediting documentation says that turkey is sliced in ¾ ounce slices.

Recipe for the cheese sandwich states it provides 2 oz eq M/MA from the 5 slices of cheese. If 2 slices of cheese = 0.75 oz eq, then 5 slices actually credit as 1.75 oz eq.

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. Be sure to update standardized recipes as products change.

Corrective Action Needed for Finding #4: Please submit updated standardized recipes for

- Turkey sandwich
- Turkey and cheese sandwich
- Cheese sandwich

Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware

that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.

3. RESOURCE MANAGEMENT

Commendations

PLE Tool

- SFA is running the PLE tool correctly and adhering to the required lunch price increases every year.
- USDA has not yet released the PLE tool for the 2018-19 SY. Once it is released, you will get an email through the SNT listserv.

Technical Assistance/Compliance Reminders

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. For a snap-shot on what the policy must include, see the [Unpaid Meal Charges In a "Nutshell"](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>). For a more comprehensive overview, see SP 23-2017: [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>).
- The SFA currently has a written unpaid meal charge policy in place.
- If alternate meals are not being claimed and the student isn't charged, you may serve the student(s) any food/beverage you decide at no charge. It does not have to meet Smart Snacks. However, you must keep track of the cost of those items served as well as labor and any other costs incurred to make a fund transfer into Fund 50. Non-federal funds must cover the cost of these alternate meals.

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, if money is not collected within the current school year (July 1- June 30). [SP23-2017 Unpaid Meal Charges guidance Q & A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) may be found on the Financial Management webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf>). A best practice is to continue to collect on the unpaid meal charges as long as you are able to and the student is still enrolled. If unable to collect, then a transfer is required to Fund 50 from Fund 10 or another non-federal fund.
- Per question 15 of the [Financial Q&A](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf), student lunch account debt accrued during the current school year is no longer allowed to be abated, with the debt being absorbed by Fund 50 (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/financial-questions-answers.pdf>). Best practice is to continue trying to collect on those negative lunch account balances as long as the student is in the district. If unable to collect, a transfer should be made to Fund 50.

Refunds of Student Meal Accounts

- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning [unclaimed property](https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf) that must be followed (<https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf>).

Revenue from Nonprogram Foods

Technical Assistance/Compliance Reminders

- Nonprogram foods sold at the school district include: Adult Meals, Extra Entrees, A la Carte and Extra Milk
- Be sure to keep track of all nonprogram expenditures and revenues to record this on the Annual Financial Report.
- The USDA Nonprogram Revenue Tool must be completed annually, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#), located on the SNT 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>).

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

Findings and Corrective Action

- ❑ **Finding #1:** On the Annual Financial Report, labor is not being documented. The SFA has a fixed rate contract with the FSMC. All expenses need to be split out and allocated for each program within the five expenditure categories: Labor, Food, Equipment, Purchased Services, and Other. By not having this split out, it is difficult to see if Nonprogram expenditures are being covered by revenues. If Nonprogram expenditures are not being covered, a transfer must be made to cover the difference. A copy of the completed DPI Nonprogram Food Price Calculator Tool was reviewed. All prices set by the FSD are sufficient and the tool shows the nonprogram revenues exceed the nonprogram expenditures.

Corrective Action: Update the 16-17 Annual Financial Report so that labor is allocated for each program. Update the rest of the expenditure categories as necessary. Submit an email to Jacqueline Jordee at jacqueline.jordee@dpi.wi.gov with the updated information, copy the consultant on the email.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Civil Rights training was completed for all Food Service staff involved with the School Nutrition Programs at the beginning of the school year. The PI 1441 form was completed correctly and kept on file.

Technical Assistance

Overt Identification

- Only staff who are required to know students' eligibility status to perform their job duties are allowed access to student eligibility status within the student software system. Allow access to these individuals only and restrict access to all others that use the student software system.

Civil Rights Training

- Civil rights training must be conducted on an annual basis for all staff who administer any portion of a school nutrition program, including district staff. This should be completed at the beginning of the school year.

Findings and Corrective Action Needed

- ❑ **Finding #1:** While watching breakfast service, one teacher denied the students in the classroom access to breakfast due to the students leaving for a field trip. Regardless of going on an all-day field trip, all students should have the option to participate in breakfast.

Corrective Action: Submit a statement of how this will be handled differently moving forward.

- ❑ **Finding #2:** The price for a lunch shows on the computer screen. It shows when a student has no charge for a lunch, \$0.00, indicating that the student is free eligible. It also shows the \$0.40 price on the screen for a reduced lunch. This is a form of overt identification which is unallowable.

Corrective Action Needed: Reconfigure the settings for each point of sale log in to remove the lunch prices from the screen. **Submit a statement confirming this has been completed.**

Local Wellness Policy

Commendations

The SFA has a Wellness Policy in place. It was last updated in 2017 and it is available on the school website. The Wellness Policy Implementation procedure provides excellent details on how the SFA will meet the goals of the policy.

Technical Assistance/Compliance Reminders

Content of the Wellness Policy

- While there are goals listed in the Wellness Policy, they should be updated to be measurable. For example, explain how often students will participate in physical activity per week. Another example, if teaching students a lesson in nutrition education, explain how often they will receive a lesson in nutrition education, who will teach the lesson, and what the lesson(s) will be focused on.

Triennial Assessment

- The final USDA rule requires triennial assessments of the LWP: how the LWP compares to model policies, district compliance with its own policy and progress made in attaining district goals. The first of these assessments is to be completed by June 30, 2020. The following is technical assistance regarding that.

SFA is required to complete an assessment of the LWP

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to assess the local school wellness policy (LWP) every three years, at a minimum. The first assessment should be completed within three years of the SFA's policy being updated, but no later than June 30, 2020 to be in compliance with this rule. The triennial assessment must evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP. SFAs must retain documentation of the results of the triennial assessment and when it took place. To assist SFAs with evaluating compliance with their LWP, a report card has been developed and is available at [School Nutrition Team's Wellness](#)

[Policy webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (https://dpi.wi.gov/school-nutrition/wellness-policy). A sample model wellness policy is available at the [USDA Wellness Policy webpage](http://www.fns.usda.gov/tn/implementation-tools-and-resources) (http://www.fns.usda.gov/tn/implementation-tools-and-resources). Public School Districts that participated in the Wisconsin Obesity Prevention's Wellness Policy project, in SY16-17, have received a copy of a report comparing their policy to a model policy (reports were sent in August, 2017). Additional information about interpreting your school's report is available at the [Wisconsin Health Atlas webpage](https://www.wihealthatlas.org/lwp/) (https://www.wihealthatlas.org/lwp/). Schools are encouraged to establish an account with the Rudd Center for Food Policy and Obesity to access the Wellness School Assessment Tool ([WellSAT](#)) for assistance in assessing the LWP.

SFA required to inform the public of the results of the most recent assessment

Technical Assistance: The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to inform and update the public about the assessment of the implementation of LWP. The notification should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. SFAs are required to retain a copy of the assessment and documentation regarding the public notification. SFAs may use a variety of methods to notify the public about the assessment. This may include mailing flyers, newsletters, emails, website postings, and newspaper articles. It is recommended SFAs include an improvement plan upon the results of the assessment.

Resources:

- Please refer to the USDA [summary of the requirements](#) for local school wellness policies.
- USDA Food and Nutrition Service has information on the [local school wellness policy](#) process and wellness policy elements.
- Wisconsin Team Nutrition has several [wellness policy resources](#) available, including a toolkit, a wellness policy builder, and wellness policy report card.

Special Dietary Needs

Technical Assistance

Students seeking accommodations for a diet-related disability must provide a medical statement signed by a licensed medical practitioner (such as a physician, nurse practitioner, or physician assistant). The signed medical statement 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). More information regarding accommodating special dietary needs, including a physician's form template, can be found on the [Special Dietary Needs](#) webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).

Smart Snacks

Comments/Technical Assistance/Compliance Reminders

At the time of the on-site review there were no competitive foods or beverages sold at Evergreen Elementary. 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 (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Professional Standards

Technical Assistance

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, substitute, 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 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
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.

Findings and Corrective Action

- Finding #1:** Training is not being monitored on a tracking tool for all staff with the required items. Clearly document all training information, the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, substitute, volunteer, etc.), professional standards position (director, manager or staff).

Corrective Action Needed: Include all current training hours for each employee involved in the school nutrition programs (Business Manager, Food Service Director, Determining Official(s), Food Service Employees) onto the [DPI tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls) or create your own on a Google Sheet (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>). **Submit a copy of the tracking tool with trainings entered.**

Buy American

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. 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>) 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. More information on this new requirement, including a tool to assist with tracking noncompliance products, can be found on the [SNT Procurement](http://dpi.wi.gov/school-nutrition/procurement/buy-american) webpage (<http://dpi.wi.gov/school-nutrition/procurement/buy-american>).

Findings and Corrective Action Needed:

❑ Finding #1: Non-compliant items

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:

- Ardmore fruit juice cartons

Corrective Action Needed for Finding #1: 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](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>). *Corrected on site- no further action required.*

Food Safety and Storage

Findings and Corrective Action

- ❑ **Finding #1:** Standard operating procedures (SOPs) regarding Field Trips, Time as a Public Health Control for TCS Food, and Milk Bags are not included in the food safety plan at Evergreen Elementary. SOPs are required for all applicable programs and processes occurring at the site.

Corrective Action Needed: Create or adapt SOPs (from the SNT website) to reflect *site-specific* procedures—particularly referring to the Field Trips, Time as a Public Health Control for TCS Food, and Milk Bags at Evergreen Elementary School. At Evergreen Elementary School, TCS food is removed from temperature control (mechanical refrigeration) and put onto ice packs. This requires a site specific SOP for the use of [Time as a Public Health Control](https://datcp.wi.gov/Documents/TimePHCFactSheet.pdf) (<https://datcp.wi.gov/Documents/TimePHCFactSheet.pdf>). Time as a public health control is used when hot or cold food is removed from temperature control for display or sale. The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold 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. Work with your local sanitarian to create/edit these 3 SOPs. **Submit a copy of the 3 updated SOPs for Evergreen Elementary regarding Field Trips, Time as a Public Health Control, and Milk Bags to the assigned DPI Nutrition Program Consultant via email.**

- ❑ **Finding #2:** The most recent food safety inspection report is not posted at Evergreen Elementary School.

Corrective Action Needed: Post the most recent food safety inspection report. **Completed on-site. No further action required.**

Reporting and Recordkeeping

Commendations/Technical Assistance/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All documents pertaining to the School Nutrition Programs must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain. In other words, keep all documents for 3 years plus the current school year.

School Breakfast Program (SBP)

Comments

- At the beginning of the school year, the SFA notifies families of the availability of breakfast through the public release, school newsletters, as well as the menu being posted in the school offices and on the school website.

Summer Food Service Program (SFSP) Outreach

Technical Assistance

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round.

USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (<http://www.fns.usda.gov/summerfoodrocks>)

As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).

5. OTHER FEDERAL PROGRAMS REVIEWS

Special Milk Program

Commendations

- The claim for February was correctly consolidated and claimed for.

Technical Assistance

- The students aged 5 and younger (not in Kindergarten) are only allowed to have white milk as part of the new CACFP meal pattern guidance. Discontinue serving these students flavored milk.

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).



With School Nutrition Programs!