

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: 611600

School Food Authority: Eleva Strum SD

Review Date(s): 1/30-1/31, 2017 **Date of Exit Conference:** 1-31-17

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

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

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

Appreciation/Commendations/Noteworthy Initiatives:

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

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>. I would highly recommend that your Determining and Verifying Official take the Free & Reduced/Verification course as she is a new employee to your district and is responsible for completing these tasks correctly each year.

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

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

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

Review Areas

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

Appreciation/Commendations/Noteworthy Initiatives:

- Of those 234 students eligible for free/reduced price meals in December, a sample of 176 was pulled and all were determined correctly, and direct certification had been run in the appropriate timeframes. Kudos for a job well done!

Comments/Technical Assistance/Compliance Reminders:

Certification and Benefit Issuance

- Direct Certification Eligibility for free meals is extended to all children in a household if any member of the household is eligible for benefits under the qualifying Assistance Program. LEAs are encouraged to take appropriate steps to identify the children who are part of the family but were not identified through the direct certification process.
- Previous year eligibility status remains in effect for 30 school days into the new school year.
- As a reminder, for the household income size box:
 - If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
 - If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Verification

- Verification must be completed each year by November 15.
- The Verification sample pool uses the total number of approved applications on file as of October 1 of the current school year. The sample pool depends on the number of approved applications, paper or electronic, and is not based on the number of children eligible for free and reduced priced benefits.
- Once the sample pool is determined, the LEA calculates the sample size, which is the number of applications that must be verified. When calculating the sample size, all fractions or decimals are rounded upward to the nearest whole number. At least one application must always be verified.
- With the exception of verification for cause, LEAs must not verify more or less than the standard sample size or the alternate sample size (when used), and must not verify all (100%) of the applications.
- When applications are chosen for verification, the person designated as the Confirming Official, should be reviewing only these applications to make sure that the original determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- When benefit's eligibility status increases, the change must take place within 3 days. When benefit's eligibility decreases, due to Verification or error correction, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.

Meal Counting and Claiming

- When entering the claim it is necessary to use the edit check (AccuClaim for Skyward) to calculate your reimbursable meals by site for consolidation.
- Each site listed on Schedule A of your on-line contract must have its own edit check to view before claim consolidation.

Findings and Corrective Action Needed:

- Finding #1:** The December Benefits Issuance List had the same student listed multiple times if their benefit changed throughout the school year. When Direct Certification is run or when a new income application is submitted it should over-ride all previous applications.
Corrective Action Needed: Please contact your software provider to make sure that this over-riding process is functional and submit a Benefits Issuance List for the month of January. The benefits were being correctly distributed so no fiscal action is required. Completed on-site no further action required.
- Finding #2:** Eligibility Benefits carryover for 30 school days into the new school year not 30 calendar days.
Corrective Action Needed: Please provide a statement of understanding that all eligibility benefits will carry over for 30 school days into the new school year.
- Finding #3:** The FNS-742 Verification Collection Report (VCR) was submitted online by November 15, 2016, but Verification had not actually been conducted and the incorrect sample size was selected. Thus, Section 5 was answered incorrectly.
Corrective Action Needed: Please view the Verification webcast <http://dpi.wi.gov/school-nutrition/training/webcasts#verif>, redo the Verification process, and resubmit the Verification Collection Report.
- Finding #4:** The wrong enrollment number is being used for your School Breakfast and Severe Need Breakfast claims.
Corrective Action Needed: Please submit a statement of understanding that the actual site enrollment will be used for all breakfast types in claiming.
- Finding #5:** The SFA has 3 sites and was claiming using only 2 edit checks, thus, the school breakfast and severe need school breakfast sites were claimed incorrectly.
Corrective Action Needed: Please correct the edit check process so all sites are included in the proper entity, and submit lunch and breakfast edit checks for January and February after the claims have been submitted. Fiscal action will be calculated for December, January, and February, but there is a \$600.00 disregard before fiscal reclaim is required.

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

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to all staff for the warm welcome to Eleva Strum School District. Thank you to the Food Service Director for sending all documentation ahead of time and being quick to respond to questions. Your positive attitude, ability to problem solve, and hands-on work ethic is admirable. Thank you also to the kitchen staff at Strum Elementary for doing a great job preparing and serving nutritious, tasty meals to students. Offering so many fresh fruit and veggie options on the garden and salad bar is wonderful to see. Students took a variety of these foods, which encourages healthy, lifelong eating habits. Allowing young students to serve themselves is part of the learning experience and fosters independence in making good food choices. When students make their own decisions about what to eat, they are more likely to consume what they've selected. It is also nice to see menu items made from scratch. The Blueberry Coffee Cake at breakfast was a hit! Great job!

Comments/Technical Assistance/Compliance Reminders:

- Basics at a Glance: The Institute of Child Nutrition has resources with recipe abbreviations, measurement conversions, portioning tools, and steamtable pan capacity. Print-outs and posters can be found: <http://nfsmi.org/ResourceOverview.aspx?ID=250>

- USDA Quantity Recipes: USDA has new, What's Cooking? Recipes with nutritional information and crediting. They are a great resource to use in child nutrition programs and can be found: <https://www.fns.usda.gov/usda-standardized-recipe>
- Production Records: make sure production records are being filled out completely. Some menu items during the week of review did not have serving sizes. It is important this information is documented so kitchen staff know how much to serve each student and also ensures meal pattern requirements are being met.
- Fruit at Breakfast: There seemed to be quite a bit of confusion among students about selecting a full ½ cup of fruit at breakfast. Many students were sent back to obtain more. Because this age/grade group is so young, consider additional signage or pictures showing how much is a ½ cup for a specific fruit. For example, 4 orange slices = ½ cup fruit, 1 banana = ½ cup fruit, ½ apple = ½ cup fruit. This may help students select the proper portions, thus creating a reimbursable meal.

Findings and Corrective Action Needed:

- **Finding #1:** Offer versus Serve (OVS): There was some confusion about Offer Versus Serve (OVS) requirements at lunch during meal service. Although all students observed at lunch took a reimbursable meal, it is important for staff to fully understand the OVS requirements. For example, knowing that a student does not *have* to take the entrée, but could take a fruit, vegetable, and milk (in their appropriate amounts) and that would be a reimbursable meal.
Corrective Action Needed: Have all staff responsible for determining reimbursable meals attend a training on Offer versus Serve. The lunch meal pattern <http://dpi.wi.gov/school-nutrition/training/webcasts#lunch> and Offer versus Serve <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs> webcasts may be used. Please submit the attendance sign-in roster when complete.
- **Finding #2:** Food products and ingredients used to prepare school lunches must contain zero grams of trans-fat per serving (less than 0.5 grams per serving) according to each product's nutrition labeling or manufacturer's specifications. If it is likely that trans-fat appearing on a label is naturally occurring, the school food authority (SFA) must request documentation from the manufacturer that reports the source of the trans-fat prior to continuing use of the product. The Margarine found in the cooler contains 3g trans-fat.
Corrective Action Needed: Please submit a nutrition facts label for a new Margarine that contains 0 grams trans-fat.
- **Finding #3:** The Macaroni and Cheese USDA quantity recipe is out of date, as it uses the old grain crediting standard of 14.75 grams of creditable grain per serving rather than the current standard of 16 grams of creditable grain per serving. Because of this, the recipe credits as 0.75 oz eq grain per serving rather than the intended 1 oz eq. As this was the only grain offered on Thursday during the week of review, this resulted in a grain shortage. You may continue to use this recipe, but you will need to increase the amount of whole grain-rich pasta in the recipe to make sure it credits as at least 1 oz eq grain per serving. In order to offer 1 oz eq grain per 2/3 cup serving, the recipe must include 100 oz (6.25#) of dry past for 100 servings.
Corrective Action Needed: Please submit an updated standardized recipe for the Macaroni and Cheese that provides at least 1 oz eq grain per serving.
- **Finding #4:** There was a weekly grain shortage during the week of review. Only 5.25 oz eq grain were offered and for the K-5 meal pattern, a minimum of 8 oz eq is required.
Corrective Action Needed: Please submit a statement explaining what you will do to the week of review so that a minimum of 8 oz eq grain is offered. Include items, serving sizes, and on what days they will be served.

- ☐ **Finding #5:** There was no Product Formulation Statement (PFS) available for the Tyson, Fully-cooked, low sodium, ½” diced, mostly dark Chicken. Because there were many other ingredients listed such as fillers and additives, this product cannot be credited using the Food Buying Guide (FBG) and requires further documentation.
Corrective Action Needed: Please submit a PFS from the manufacturer for the Tyson, Fully-cooked, low sodium, ½” diced, mostly dark Chicken. **A correct PFS was provided the day after service. Please send updated Chicken Fajita recipe with this new crediting information.**
- ☐ **Finding #6:** There is no standardized recipe on file for the cheese sandwich that is served as a daily alternate. Any food with more than one ingredient must have a standardized recipe on file. More information on standardized recipes, including templates and requirement checklists, can be found here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.
Corrective Action Needed: Please submit a standardized recipe for the cheese sandwich.
- ☐ **Finding #7:** The only allowable milk types to serve in Child Nutrition Programs are non-fat unflavored milk, nonfat flavored milk (e.g., chocolate) and 1% unflavored milk. Neither 1% (flavored) nor 2% (flavored or unflavored) milk can be served. Please discontinue serving 1% chocolate milk. As a reminder, at least two choices of allowable milk types must be offered daily at each meal.
Corrective Action Needed: Please submit a statement explaining your understanding of the allowable milk types and that you will discontinue use of 1% chocolate milk.
- ☐ **Finding #8:** Using Exhibit A (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf), any grain item with a superscript 3 is only allowed at lunch. Any grain item with a superscript 4 is allowed at both breakfast and lunch. Pie Crust, including cobbler, was offered at breakfast on Tuesday during the week of review. This is an unallowable grain during breakfast and resulted in a shortage for the day.
Corrective Action Needed: Please submit a statement explaining what you will do so that an allowable grain option crediting a minimum of 1 oz eq is offered. Submit any necessary recipes and/or product labels.

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

Comments/Technical Assistance/Compliance Reminders:

Annual Food Service Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>

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

- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program Food costs and revenues.
- The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The DPI Nonprogram Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.

Allowable Expenditures

- The nonprofit school food service account is to be used only for the operation of the school meal program including food, supplies, equipment and personnel. .
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- **Bad debt** is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs.

Unpaid Meal Charges Policy

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

Findings and Corrective Action Needed:

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

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually <http://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>.
- 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 a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements.

On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.

Local Wellness Policy and School Meal Environment

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.
 - LWPs should include language related to nutrition education, nutrition promotion, and nutrition guidelines available for all foods on campus, physical education, and physical activity.
 - SFA must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
 - SFA must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.
 - SFAs must permit parents, students, physical education teachers, school health professionals, and school administrators, school board representatives of the SFA, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). SFA wellness committees should include a diverse team of committed school and community stakeholders. SFAs are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation that all have been notified of participation availability.
 - The SFA must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. SFAs are required to retain a copy of the assessment on file. The assessment should include the extent to which SFAs are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the SFA's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist SFAs to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* (http://fns.dpi.wi.gov/fns_wellnessplcy2).
 - SFA is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). SFAs are required to retain a copy of the assessment and documentation regarding the public notification.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new "Smart Snacks" regulation that is effective July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked SFA-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Professional Standards

- 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.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- 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.).
- **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	Other Staff (20 hrs or more/week)	Part Time Staff (less than 20 hrs/week)
12 hours	10 hours	6 hours	4 hours

Food Safety and Storage

- All food service employees must have a signed Employee Reporting Agreement on file.
- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

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

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.
- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of

Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

SBP and SFSP Outreach

- It is necessary to inform the community about access to Summer Food Service feeding sites in your area even if your school does not provide summer meals. This information is located at <http://dpi.wi.gov/community-nutrition/sfsp/outreach> and may be posted as a flyer or a phone number list in your spring newsletter.

Findings and Corrective Action Needed:

- Finding #1:** The Civil Rights Self-Evaluation Compliance form was not completed by October 31.
Corrective Action Needed: Please submit a copy of the form when it is completed.
- Finding #2:** Your district hired a Food Service Director (FSD) that does not meet the minimum hiring requirements for a new Food Service Director of a high school diploma (or GED) and at least three (3) years of relevant school nutrition program experience. The ultimate goal is to receive a GOALS Certificate <https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills/certificate-levels> by August 31, 2018.
Corrective Action Needed: By March 6, 2017, please view webcasts and complete quizzes at end of webcasts to serve as documentation. If no quiz, submit short recap.
- Finding #3:** Employee reporting agreements not on file.
Corrective Action Needed: Please have all food service staff and volunteers fill out an employee reporting agreement and submit signed copies <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf>
- Finding #4:** The fresh cucumbers came from Mexico and the fresh grapes came from Chile.
Corrective Action Required: Please submit a statement of understanding that all procurement documentation must include the “Buy American” language in the contract.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. Part 210.08 of federal regulations requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency’s publicly available website, and the SFA is strongly encouraged to post a summary on the SFA’s public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.