



NSLP Administrative Review Summary 2016-2017

Carbon CSD #1

Date of Administrative Review: 11/17/2016

Date Review Closed: 8/24/17

Child Nutrition Program Participation:

- School Breakfast Program (SBP)
- National School Lunch Program (NSLP)
- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Care Program (ASCP)
- Special Milk Program (SMP)
- Child and Adult Care Food Program (CACFP) At-Risk Supper

Special Provision Option:

- Community Eligibility Program (CEP)
- Special Provision 1
- Special Provision 2
- Special Provision 3
- N/A

Areas of Review

- Program Access and Reimbursement
(Certification and Benefit Issuance, Verification, Meal Counting and Claiming)
- Meal Patterns and Nutritional Quality
(Meal Component and Quantities, Offer vs. Serve, Dietary Specifications, Nutrient Analysis)
- General Program Compliance
(Civil Rights, Food Safety, Local Wellness Policy, Smart Snacks/Competitive Foods, Water Availability, On-site Monitoring, Reporting/Record Keeping, Professional Standards, SBP and SFSP Outreach, ASCP, FFVP)

Commendations:

The employees at the middle school were very friendly and welcoming. They worked well as a team to serve students their meals every day.

There is a lot of interest from the district in improving the school wellness policy. There is work being done to encourage parent, teacher and community involvement in the development and implementation of the wellness policy. Keep up the great work!

Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Procurement	The food service does not use any contracts or documented procurement practices to purchase	Once a procurement policy has been updated to include required components, follow the practices outlined in the procurement policy. This will include following the



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	goods and supplies for NSLP. Due to this, the FSD has accepted non-compliant products (non-whole grain rich) and served them in the school lunch program with no repercussion to the vendor	purchase thresholds and obtaining contracts with vendors that meet the appropriate purchase thresholds. Additionally, the contracts with vendors can state product acceptability, delivery times, condition of food upon delivery, etc.
Procurement	The SFA has a district procurement policy that does not meet USDA NSLP procurement policy requirements	Update the district procurement policy to include the required clauses and thresholds or create a food service procurement policy that meets USDA regulation requirements. Once the new policy is created, it should be used to purchase goods and services for NSLP. Send WDE the updated procurement policy for review and approval.
100 - Certification and Benefit Issuance	Two applications were figured incorrectly as free with household income actually exceeding that of the free benefit and need to be reclassified from free to reduced. The second application was classified as free with a household of 2 and bi-weekly income of \$800. This puts them in the reduced category. As found in TA, two other applications are waiting on verification from FSD as to household size. If household size is determined as the number of family members listed on the application vs. the number stated as household size-benefits could be denied or reduced from free to reduced.	Update the status of the two students whose status' changed from free to reduced based on household income. Send the households a letter notifying them of the status change. The household must be given a 10 day notice of adverse action prior to the change from free to reduced occurring. Update the POS list. Send the documents sent to households to the WDE for review and approval. Clarify household size on the two applications. Change the students' status if necessary based on correct household size. Send WDE documentation of the updated household size, notice of status change if applicable and updated POS list.
1100 - Smart Snacks	The middle school beverage vending machines are selling non-compliant beverages during the school day. The only allowable beverages in middle school are milk and juice no more than 12 oz. and water if the machines are on during the day.	Only sell compliant beverages in the vending machines at the middle school if it is on during the school day. Noncompliant beverages can be sold if the vending machines are off during the school day. The school day is defined at 12am to 30 minutes after the last bell. State to the WDE the schools plan for being in compliance with Smart Snack/All Food Sold in School regulations for beverages in the middle school. If the machines are going to sell compliant items during the school day (milk, juice and water) send WDE a list of the items to be sold with the nutrition labels
300 - Meal Counting and Claiming	The permanent agreement states that the POS is after the students go through the lunch line. However, the students pin in their ID numbers prior to going through the lunch line. It is required that the POS be at the end	Move the POS for both lunch service lines so that the POS is after the students go through the lunch line. If possible, send WDE a picture of how the POS will be rearranged so the POS is after the lunch line. Describe to the WDE where the POS will be for both 2-3 and 4-5 grades.



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	of the lunch service line to ensure all students have a reimbursable meal unless the State Agency has approved an alternate POS configuration with adequate proof that a system is in place to determine all meals to be reimbursable. This is normally due to cafeteria design.	
800 - Civil Rights	The district did not submit the required public release to the local newspaper for the 16-17 school year.	A public release informing households of the availability of the NSLP available in the schools must be submitted to the local newspaper prior to each school year. It is not required that the newspaper publish the public release due to a potential financial burden but documentation must be on file that it was at least submitted to the paper. The WDE sends the district FSD and business manager a public release template each year with what must be submitted to the paper. Draft a public release that will be submitted to the paper prior to the beginning of the school year for 17-18. Send to the WDE for review and approval. State who will be responsible for ensuring this is done for the 17-18 year and all years moving forward.
800 - Civil Rights	The complete nondiscrimination statement is not being used on program materials. Specifically, the letter sent home to households informing them of their students' free/reduced/denied application for school meals does not contain the full nondiscrimination statement.	All program materials must have the most current nondiscrimination statement. Update the letter sent to households with the full, current statement. Send WDE a copy of the letter for review and approval.

Site-Level Findings: Rawlins Elementary School K-5

Area	Finding Description	Required Corrective Action
1400 - Food Safety	There is not a HACCP plan onsite or in use at the elementary school. The district HACCP plan needs to be updated and reviewed with staff.	Create a HACCP plan for each site in the district. A copy of the HACCP plan must be at each serving and prep site and contain policies that are specific to each site. Review the HACCP plan with all employees so they are aware of the proper procedures. Update and review the HACCP plan annually and as needed. Send WDE a copy of the HACCP plan that will be in use at the elementary school for review and approval.
1400 - Food Safety	Temperature logs are not complete and temperatures are not taken as often as they should be to ensure food safety. Food is prepared at the central kitchen and done cooking at 9:30am. Prepared food doesn't leave	Review proper temperature procedures for taking food temperatures. Update the district's and each sites' HACCP plan to include the proper procedures. Train all employees on the correct procedures. State to the WDE the SFA's plan for training staff on food temperatures. After training is complete, send WDE documentation of



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	<p>for the satellite sites until 10:30-11am. Temperatures are only taken when the food is done cooking at 9:30am - not before the food leaves for the other sites. Food temperatures are taken when the food arrives at the satellite sites and recorded. However, temperatures are not taken at any other time during service. This is especially concerning for the middle school when hot food is taken in and out of the hot boxes between multiple meal services and set on milk crates during service. It was also observed that food was sitting in the steam tables at the elementary school more than 2 hours before lunch service. Review of temperature logs indicated that temperatures are completed in advance of service. For example, the SA reviewed temp logs on 11/15 for food that will be served 11/16 and 11/17 and the temperatures are already filled in for those foods. Therefore, temperature logs are not accurate and food served to students throughout the district is potentially hazardous and not being served at the correct temperature. Another important point to consider is that preparing food so far in advance to service and letting it sit in a steamer or hot box reduces the quality and texture of the food. This results in poor acceptability of the meals to students</p>	<p>what was covered in the training and employee sign-in sheet. Send WDE the district's HACCP plan that includes procedures for taking temperatures. The district also has the option to record food temperatures on production records for each school to avoid extra documentation and paperwork.</p>
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>There is not a sign at breakfast indicating to students what constitutes a reimbursable meal to students; including that they must take at least 1/2 cup of fruit</p>	<p>At breakfast, post a sign indicating to students what constitutes a reimbursable meal for breakfast and that they must take at least 1/2 cup of fruit. Send a photo to the WDE showing the signage that will be posted at meals.</p>
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>The SFA does not keep production records, nutrient analysis, or component worksheets for breakfast. The same menu is offered every single day. Therefore, all breakfasts</p>	<p>Update the breakfast menu to meet component and nutrient requirements. Begin keeping production records for all meals, even if the same meal components are served every day. Complete component worksheets and nutrient analysis for the breakfast menu. Since</p>



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	<p>served are not reimbursable since the whole grain-rich requirement and fruit components requirements are not met. Students are served graham crackers (non-whole grain-rich), cereal, juice, milk, and a cheese stick. No whole fruit is offered so the requirement that 50% of fruit at breakfast over a week period must be whole fruit.</p>	<p>nonreimbursable breakfasts were served to all students, WDE is evaluating the fiscal action that will be incurred due to the service and claiming of non-reimbursable meals from the beginning of the school year. In order to determine the extent of fiscal action to be taken, WDE will input the breakfast meals into NutriKids and/or the USDA component worksheet to determine if any breakfasts served were reimbursable. The SFA will send WDE the food labels, CN labels/product formulation statements, recipes, and other documentation in order for the worksheet to be completed. WDE recommends that the district discontinue serving the pre-packaged breakfasts to students as they do not contain required meal components. Additionally, they are more expensive than buying the ingredients separately. Send WDE the district's plan for the menu for breakfast. Outline what will be served and send WDE component worksheets, nutrient analysis, food labels, etc. for the planned breakfast menu for one month or one menu cycle.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>For the day of review, the K-5 students were not being offered or served the minimum daily requirement for fruits and vegetables. The planned serving size for green beans was 3 oz. when the requirement is 3/4 cup. The planned serving size for fruit was 3 oz. when the requirement is 1/2 cup. According to the limited records provided, all grade levels are not receiving the minimum component requirements, especially for fruits and vegetable subgroups</p>	<p>Review the meal pattern and nutrient requirements for all grade groups for lunch. Update the menus to meet the requirements for all age groups. Send WDE a copy of the updated menus and production records for the months of December, January, and February (or one menu cycle) for WDE to review and approve.</p>
<p>400 - Meal Components and Quantities - Breakfast</p>	<p>The milk substitute offered does not meet nutrient requirements (Silk Soymilk vanilla).</p>	<p>Purchase an acceptable milk substitute for students that require one. Send WDE the product name and nutrition label of the product that will be served.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>The SFA has not been keeping production records so it is unclear whether meal pattern component requirements are being met. There are some cases in the menu documentation that indicates the minimum required components are not being met. For example only 2-3 oz. each of fruits and vegetables are being served for lunch. Additionally,</p>	<p>Review the meal component and nutrient analysis requirements for all grade groups. Re-evaluate the entire district's lunch menus for meal component and nutrient analysis compliance. Update all menus to meet the requirements using NutriKids or the USDA meal component worksheets and simplified nutrient analysis worksheets. Due to incomplete records and indications that students are not receiving the required components, meals served to students were non-reimbursable and will require fiscal action. To determine the extent of fiscal</p>



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	<p>there are products in the dry storage and freezer that do not meet the whole grain-rich requirement (muffins, Hoagie rolls, chicken tenders, noodles, muffins). Three noncompliant grains were served to students at lunch during the on-site review (noodles, white rice and Hoagie buns). According to the menu documentation that is available, it appears like all grade levels (k-12) receive the same serving sizes. Therefore, all grades do not receive the minimum required meal components per day or over the week. These meals are not compliant with the regulations. Due to incomplete records and indications that students are not receiving the required components, meals served to students were nonreimbursable and will require fiscal action.</p>	<p>action required, WDE will complete a nutrient analysis and component worksheets for each grade group from the beginning of school to the week of review. The SFA will send WDE all recipes, food labels, child nutrition (CN) labels, product formulation statements, production records, and any other available documentation for all meals served to the elementary, middle, and high schools. WDE will then contact the district with the fiscal action required. WDE will provide any technical assistance necessary in order to assist the district in providing reimbursable meals to all students.</p>
600 - Dietary Specifications and Nutrient Analysis	<p>The SFA does not complete a nutrient analysis for any of the breakfast or lunch menus. There is very little menu documentation kept by the SFA. Additionally, all grades receive the same menu and serving sizes for lunch.</p>	<p>Complete the USDA component worksheets with the simplified nutrient analysis (or use NutriKids) for all menus for all weeks for all grade groups. Send WDE the completed worksheets and nutrient analysis for the months of December, January and February or the cycle menus for breakfast and lunch.</p>