



NSLP Administrative Review Summary 2016-2017

Fremont County School District #24

Date of Administrative Review: 10/31/2016

Date Review Closed: 3/6/2017

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 entire K-12 school has a very good student participation rate at 68%. We would love to see the district start serving breakfast, and consider the fresh fruit and vegetable and the after school care snack program, now that you are in a new facility.

The storage facility is very well organized and very well dated and labeled. I've not seen many others that were this detailed.

The facility has a very nice a la carte line that offers a wide variety of smart snacks for the kids.



NSLP Administrative Review Summary 2016-2017

Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Non-program Foods/Procurement	Per the Non-program Foods Survey provided WDE the Revenue Ratio was 6.32% while the cost ratio was 6.54%. The SFA has priced non program foods too low and the SFA must increase non program food prices. Additionally, the SFA must contribute non-federal funds to the nonprofit school food service account in the amount of the revenue shortfall.	Adjust the price of all non-program foods so that the revenue ratio food cost ratio. Additionally, the cost of seconds provided to students should at least cover the price of the food. General fund transfers to the food service fund for specific purposes should be done at least monthly so that the transfer covers the costs accurately and that the specific purpose of the transfer is noted in accounting records. Use the attached tool to determine how to adequately price all non-program foods (seconds, a la carte, adult meals, etc.). Send WDE the completed tool plus documentation from one quarter demonstrating the cost of a la carte foods and the monthly transfer of general funds to the food service fund that will specifically cover the potential revenue shortfall.
Procurement	The SFA's food service procurement policy is out of date and does not include required clauses and requirements. Including: <ul style="list-style-type: none"> - There is a geographic preference (unallowable) - There is not a stated micro-purchase threshold of \$3500. Therefore, based on the current policy, ALL purchases should have been done competitively. - Purchases between \$3500 and the small purchase threshold (\$10,000), must be done competitively. - The Debarment and Suspension Clauses needs to be updated. - Remove the non-discrimination statement 	Update the food service procurement policy to include the required components. The updated procurement policy must be followed when procuring products for NSLP. See WDE's policy templates for guidance. Send WDE a copy of the updated policy.
100-Certification and Benefit Issuance	Of the applications reviewed, there were two issues that need to be addressed: 1) There are two application that have no adults listed in the household. These are incomplete applications and need to be fixed to determine household size 2) One student was categorized as Reduced but should be Free.	1)The determining official needs to contact the guardian and add the adults to the application and then date it and note the time of the phone call on the application or make the guardian come back to the school and complete the application. At this time the determining official is only guessing at the actual household size. 2) The one student should have been classified as Free not Reduced. Two people checked and signed this application, so the error should have been caught. Update this student's status and notify the household. Send WDE a copy of the updated POS and



NSLP Administrative Review Summary 2016-2017

Area	Finding Description	Required Corrective Action
		letter sent to the household informing them of the status change.
100-Certification and Benefit Issuance	There were multiple conversion errors when determining students' eligibility based on income. First, when there are not multiple incomes with multiple pay periods, no conversion is necessary. There were multiple conversion errors which were not necessary, so the conversion error could have been avoided completely. Secondly, there were multiple conversion errors when converting bi-weekly incomes to monthly incomes. Conversion should be done to an annual income, not a monthly income and bi-weekly must be multiplied by 26 not 24.	When double checking applications re-do the math and if it is incorrect, fix it on the application, not just in the system. Also stop converting incomes when it is not necessary. State to the WDE the individual who will be assigned to ensure applications are determined correctly and what training will be provided.
100-Certification and Benefit Issuance	One student was denied but should have been categorized as reduced based on income.	Update the student's status to reduced. Inform the household of the eligibility change. Send WDE an updated POS list with the corrected status and a copy of the letter sent to the household.
100-Certification and Benefit Issuance	Foster kids are all categorized correctly as Free, however they are not directly certified as Free, so there needs to be documentation attached to verify they are Foster. The students that are determined to be foster do not have a letter on the Direct Cert site. This is a repeat finding from the SY13-14 review.	Send WDE documentation for all foster students indicating how they were determined to be free based on foster direct certification. If they are not truly foster (under guardianship of the state), these students' eligibility needs to be determined by income. Send WDE all documentation for each foster student to ensure eligibility is determined correctly (Direct Cert foster letter or documentation or household application).
100-Certification and Benefit Issuance	There are 14 students that are listed in Infinite Campus as Free, non-direct, income who are in fact Free due to Direct Certification from SNAP	These 14 children may have had a free and reduced application on file prior to the school receiving the direct certification letter, however once a direct certification letter is received, the child's status needs to be changed to Directly Certified Free in Infinite Campus. Send WDE an updated POS list with the 14 students' status changed to Directly Certified Free.
1200-Professional Standards	The FSD is not tracking professional standards training hours so SA unable to determine how many hours of training has been completed. All NSLP employees must meet annual professional standard training requirements. These hours must be documented in a training tracker with the required information.	Begin tracking professional standard training hours for all NSLP employees. See the attached WDE training tracker template as an example of how the employees and FSD can track their training hours. Send the WDE a copy of the training tracker for all employees that they plan on using to ensure annual training hours are met.



NSLP Administrative Review Summary 2016-2017

Area	Finding Description	Required Corrective Action
1200-Professional Standards	The SFA is not tracking NSLP employees' annual training hours so the SA is unable to determine if professional standard training requirements are being met.	Begin tracking employees' training hours. See the WDE training tracker template for guidance. Send WDE a copy of the training tracker that the SFA will use to track employee training hours.
200-Verification	No confirmation review was done on the applications chosen for verification in SY15-16.	A confirmation review must be done on all applications chosen for verification prior to the verification letter being sent out. The purpose is to catch any categorical errors prior to requesting income verification especially since these applications are more prone to be mis-categorized due to the income already being close to the guidelines. State to the WDE how the SFA will ensure that a confirmation review is conducted for verification. State who the confirmation reviewer is for the district.

Site-Level Findings: Shoshone Elementary

Area	Finding Description	Required Corrective Action
1100-Smart Snacks in School	The 100-calorie Oreo thin crisps, 100-calorie cookies and Doritos sold a la carte at lunch are not whole grain-rich so they do not meet Smart Snack requirements. Under Smart Snack/All Food Sold in School standards, all grains must be whole grain-rich. The first ingredient on grain products must be whole grain; whole corn whole meal. etc. The drink machine contains Gatorade which is not Smart Snack compliant and the reviewer was able to purchase one during the meal service.	Obtain whole grain-rich products to replace the Doritos, cookie and Oreo packs. Send WDE a copy of the food label of these products or replacement products so the WDE can verify that they are whole grain-rich. Gatorade must either be replaced or removed from the vending machine or the vending machine must be reprogrammed to not vend Gatorade during certain hours. To respond to this finding, please respond with what was done to comply with the machine.
400-Meal Components and Quantities	<ol style="list-style-type: none"> The finger steaks are not whole grain-rich and there is not a whole grain exemption form on file with WDE. The meal components are not correctly identified. For the day of review, the minimum and maximum grain on the component worksheet is 1 oz eq. However, both Fritos and animal crackers are offered. The animal crackers by themselves are 1 oz eq. Therefore, the minimum and maximum grain should be different amounts. The product formulation statement from Sysco for the chili states that 1 cup serving provides 1/2 oz eq M/MA. On the component worksheet for the week, it states that 2 oz eq of M/MA is offered. Additionally, the PFS states that the chili doesn't 	<ol style="list-style-type: none"> Obtain a product that is whole grain-rich to replace the steak fingers product. Send WDE a copy of the food label to verify that the product is whole grain-rich. 2 and 3. Obtain CN labels or product formulation statements for all products so that the correct ounce equivalents can be obtained and to ensure products meet meal components requirements. Ensure that the oz eq are entered correctly into NutriKids and that meal components are being met for all grade groups. Send WDE a copy of the December 2016 menu with the component worksheets for each week of the month



NSLP Administrative Review Summary 2016-2017

Area	Finding Description	Required Corrective Action
	<p>provide any beans/legumes. The component worksheet states that .5 cup of legumes is offered.</p> <p>4. All items offered to students must be included in the nutrient analysis and component worksheets. Students who didn't take chili, were given a cheese stick on the day of review (Oct. 31). The cheese stick was not included in the nutrient analysis or the component worksheet. The nutrient analysis should be weighted to reflect the proportion of students taking each item. Students were required to take either chili or a cheese stick. However, the students would have a reimbursable meal without chili or cheese stick under OVS. OVS needs to be reviewed with all food service employees.</p> <p>5. The production records are not being used correctly and do not contain the required information. Required information missing includes: planned a la carte, served reimbursable, and served a la carte.</p>	<p>4. All items offered to students must be included in the nutrient analysis. For the December menu, ensure that the menu planner conducts a weighted nutrient analysis including all items offered to students. Review OVS with the FSD and NSLP employees.</p> <p>5. Review the WDE production record resources and instructions. Train staff on how to correctly complete production records. Send WDE a copy of completed production records and menu from the month of November 2016 to view and approve.</p>