



## NSLP Administrative Review Summary 2016-2017

### Fremont CSD #14

Date of Administrative Review: 12/1/2016

Date Review Closed: 7/21/17

#### 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

It was very cool to see a drum circle playing at breakfast. Most schools would not allow that noise level and its an awesome way to incorporate the local culture into the school.

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Procurement	The district's food service procurement policy does not contain the USDA required clauses and does not meet requirements.	Update the food service procurement policy to include the required clauses and thresholds. Use the WDE template as a resource. This policy must be used when purchasing any food or supplies for NSLP. Send the WDE the updated policy for review and approval.
Procurement	There is no documentation that food service purchases were made competitively.	The SFA did not follow correct procurement procedures for small and formal purchases (purchases outside of the co-op). Additionally, there was a geographical preference for the purchase of milk through



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	<p>Additionally, the SFA did not follow correct procurement procedures for small and formal purchases (purchases outside of the co-op). Additionally, there was a geographical preference for the purchase of milk through Meadow Gold which is not allowed with federal funds.</p>	<p>Meadow Gold which is not allowed with federal funds. The SFA will update the food service procurement policy to include a micro purchase threshold and other required clauses which will be used to purchase goods and supplies for the operation of NSLP. The SFA will properly conduct procurement for purchases that meet the small and formal purchase threshold for next school year. WDE will provide guidance and assistance during this process. When going out to bid, send WDE the updated procurement policy that the district will follow when developing solicitation documents, specifications, evaluation criteria, and contract/contract terms. Send WDE the updated procurement policy the district will use for all NSLP purchases.</p>
<p>1100 - Smart Snacks</p>	<p>The regulation states that food cannot be served from midnight until 30 minutes after the last bell. The response to this question states that the school's policy is 30 minutes before school starts. No response was received to my email dates November 30 requesting clarification.</p>	<p>This finding will be removed if the school will respond to my email of November 30 clarifying the times that they allow non-Smart Snack food to be sold to students. If the school allows food to be sold between midnight and 30 minutes prior to the start of the school day, this finding will stand and that practice will need to be corrected. The times food is sold in school should be made part of the Wellness Policy.</p>
<p>1200 - Professional Standard Review Form</p>	<p>Some staff attended the SNA conference in June, but the director did not. There is a spreadsheet document showing that 10 of the 13 staff listed have been trained on Blood borne pathogens for Educators, FRPA and HIPAA, and Harassment Awareness. There is no way to tell exactly how many hours of training this is but from the certificates, it looks to be around a half hour each. The sign in sheets for Civil Right training indicate only 7 of the 13 food service staff have been trained.</p>	<p>All staff must receive the required continuing education hours. Your response to the review shows that you have 1 director who will need 12 hours of continuing education, 3 managers who will need 10 hours of training, 7 other full time staff who will need 6 hours of training and 2 part time staff who will need 4 hours of training. In response to this finding, fill out the Training Log provided in download forms, and in email dated 11/30 from Roxann, for all staff training received since 7/1/16. Attach all training certificates to the filled out log as well. The log you have is a good start but it does not show what category the training is or how many hours of training received. Provide a calendar of planned training(s) for the year that staff can take to ensure they complete their required hours.  <a href="http://www.fns.usda.gov/sites/default/files/cn/profstandards_flyer.pdf">http://www.fns.usda.gov/sites/default/files/cn/profstandards_flyer.pdf</a>  <a href="http://www.fns.usda.gov/sites/default/files/cn/ps_trainingtopics.pdf">http://www.fns.usda.gov/sites/default/files/cn/ps_trainingtopics.pdf</a></p>
<p>800 - Civil Rights</p>	<p>The public release was not done. This is a repeat finding from SY13-14</p>	<p>Devise a procedure to ensure the public release will be done each year. Upload that procedure to this finding. The WDE's NSLP consultant will also be asking for proof that the public release was done in August 2017, since this is a repeat finding.</p>
<p>800 - Civil Rights</p>	<p>The special dietary needs forms are only on file for</p>	<p>All food substitutions and omissions must be documented on the Special Dietary Needs form. WDE recommends these forms be</p>

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	about half of the students with food allergies. The other half are old and still on prescription pad paper or just a note on the doctors stationary.	submitted annually to ensure students are receiving the food that is safe for them to consume. We would suggest the school nurse contact the student's parents to get these forms updated. SFAs are required to provide an omission/substitution when a healthcare provider licensed to write prescriptions in WY indicates the student has a disability related to the food allergy.
800 - Civil Rights	I asked for a copy of the free and reduced application given to all parents while on site and was not provided with it. Since the nondiscrimination statement provided in response to question 801 is incorrect, I have to assume the paperwork is incorrect too. (See email attached to question 809.)	Either submit a copy of the meal application given to parents currently, and if the correct non-discrimination statement is on there, this finding will be removed. If the incorrect statement is on the paperwork, it will need to be updated to the correct statement and the corrected paperwork will need to be attached to this finding.
Revenue from Non-program Foods Testing Chart	On the SFA's income and expense sheet for the 16-17 renewal application, it was indicated that they do not serve non-program foods. However, it was discovered onsite that the district sells adult meals. The district should be monitoring the revenues and expenses from non-program foods to ensure they are being adequately priced.	The district will complete the Wyoming non-program foods price calculator and the WY adult meals pricing worksheet to show the adult meal price is adequate. Send WDE a copy of the completed worksheets and if the SFA is changing non-program food prices. State how the non-program food revenues and expenses will be tracked.

**Site-Level Findings: Wyoming Indian High School**

Area	Finding Description	Required Corrective Action
1400 - Food Safety	Neither the elementary nor the high school have a written food safety plan on site that they could produce. This is a repeat finding from SY13-14.	Write a food safety plan for the school district. Ensure a copy is located at each of the 3 sites and ensure that HACCP (food safety training) has been conducted with all food service staff. A copy of the newly adopted food safety plan will need to be attached to this finding as a response to this finding. A sign in sheet showing that all food service staff have been trained on proper food safety practices will also need to be attached to this finding. The manager at the elementary school was unable to produce serve safe certificates for any staff other than one and states that the others had taken the training many times but had not always passed the test. They have retaken the



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		test and she's been assured that they have certificates but they have been emailed to the manager at the junior high school.
1400 - Food Safety	There is no health inspection report posted at either the elementary school or the high school. The most recent inspection must be posted and visible to the public at each serving and prep site.	The most recent health inspection must be posted in a main area where it can be seen by all. It cannot be posted in an area where there are staff or student restricted areas such as the kitchen. All pages of the inspection must be posted in a manner that does not require someone to have to flip the inspection over to see the back sides. This needs to happen at all three sites. Pictures of all three sites, showing their health inspection is posted, need to be uploaded to this finding as a response to this finding.
1400 - Food Safety	A food safety plan has not been implemented because no written food safety plan exists. Each site must have a HACCP plan on site that is regularly updated and reviewed with staff.	Response to the other finding regarding this issue will suffice as response to this finding, other than to say that through self-monitoring (also a finding because that is not being done either), the SFA needs to ensure food safety practices are being followed.
1900 - Fresh Fruit and Vegetable Program (FFVP)	Apples were put out in the boxes they came shipped in. Either a teacher or a student came down and counted out the number of apples they needed for their room and put them in a basket they brought with them, with bare hands.	Either kitchen staff or non-kitchen staff needs to wash the fruit as they would if they were serving it on the line. They also need to serve the fruit in washed and sanitized containers. So they either need to prepare each classrooms container for them, or someone from each room will need to obtain a clean container from the kitchen, put on a glove, and take the needed number of servings of washed fruit or vegetable and put them in the clean container. If non kitchen staff ends up preparing all produce for the school, they will need to be trained on proper HAACP procedures. There also seems to be an honor system going on that each classroom comes and get the snack for the day. There needs to be a procedure in place to ensure that all classrooms are indeed participating. This can either be a check sheet with each teacher's name on that must be check marked each day produce is served, or the kitchen staff can pre-prepare individual containers with each teachers name on them and then ensure each container is picked up each time. To respond to this finding, create a procedure for FFVP that will be followed and upload it to this finding.
400 - Meal Components and Quantities - Breakfast	For the week of 10/17: Whole grain requirement not met on 10/20. 100% of all grains must be whole grain-rich. On 11/30, as indicated on the component worksheet, the minimum grain is not being met. While checking food labels in the high school it was found that two types of	Obtain whole grain-rich products. Update the menu and component worksheets as needed. Send WDE grain labels for the day of 10/20 so WDE can verify the products are whole-grain rich. Send WDE the component worksheets and updated menu for the menu cycle with whole grain-rich products identified. Review the child nutrition label for "breakfast on a stick" and update the component worksheet to ensure that the minimum grain/whole grain-



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	cereal were not whole grain and malt o meal was not whole grain.	rich requirement is being met. Ensure all products received are whole grain or whole grain rich. Each shipment needs to be double checked as you cannot rely on the food distributor to ship what was ordered.
400 - Meal Components and Quantities - Lunch	The whole grain-rich requirement is not being met for lunch on Thursday, December 1st. All grains served must be 100% whole grain-rich.	Obtain whole grain noodles for this day's menu. Update the component worksheet. Send WDE a copy of the food label for this product with the update component worksheet.
400 - Meal Components and Quantities - Lunch	There is no signage indicating to students what they need to have on their tray to make up a reimbursable meal. This is a new school building and the signs did not make it over from the old building.	Obtain a sign explaining what a reimbursable meal is and what all the components of the meal are and that students must take at least 1/2 cup of fruit/vegetable. There are good ones fairly cheap at <a href="http://www.learningzonexpress.com">www.learningzonexpress.com</a> or you can create your own. This poster would be good for the junior high and high school explaining what a reimbursable meal is under offer vs serve: <a href="http://www.learningzonexpress.com/build-your-tray-poster.html">http://www.learningzonexpress.com/build-your-tray-poster.html</a> Since you are serving at the elementary school this would be a better option: <a href="http://www.learningzonexpress.com/build-your-tray-poster.html">Learning Zone Express</a>
400 - Meal Components and Quantities - Lunch	Required meal components are not met during the month of review (October): -Week of Oct. 3rd -- daily minimum of 1/2 cup fruit not met 10/3, 10/5, 10/7 (according to the contribution worksheet, serving size listed correctly but the component requirement does not match) - whole grain requirement not met; 100% of grains must be whole grain-rich - Week of Oct. 17th-- Daily minimum of 1/2 cup fruit not met 10/18, 10/20 - whole grain requirement not met; 100% of grains must be whole grain-rich -Week of Oct. 24th- Daily minimum of 1/2 cup fruit not met 10/27, 10/28 - whole grain requirement not met; 100% of grains must be whole grain-rich - Other vegetable weekly component requirement not met (at least 1/2 cup/week)	Review component requirements for lunch. Update the menu, nutrient analysis, and component worksheets to meet all component requirements. Send WDE the updated menu, component worksheets, and nutrient analysis for one lunch menu cycle (or month of January).
600 - Dietary Specifications and Nutrient Analysis	Week of 10/10, weekly average for calories for lunch below the range of 550-650 (nutrient analysis shows 515 calories); saturated fat over the 10% limit. Weeks of 10/10 and 10/24, breakfast saturated fat over the 10% of calories limit.	Update the menu for lunch and breakfast to meet calorie and saturated fat requirements. Send WDE the updated menu, component worksheets, and nutrient analysis for one menu cycle (or month of January) for review and approval.



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900 - SFA On Site Monitoring	The self-monitoring that must be done prior to February 1 of each year has not been completed by the elementary or the high s	Each site must complete the self-monitoring form each year prior to February 1. To respond to this finding conduct the self-monitoring form found on Download Forms, scan and attach to this finding, and respond with a procedure for ensuring this requirement is met each year at all sites. Beginning SY 16-17, 50% of breakfast sites must be reviewed every other year. Use the updated form and indicate which meal is being reviewed.
<b>WY Indian HS</b>		
500 - Offer versus Serve	Offer versus serve is required for all high schools. The high school is still doing serve only and this is a repeat finding from SY13-14. The high school is pre-plating the main dish a vegetable and a fruit. They need to be asking the students if they want each of those items. The kids then go to another cart for additional fruits and vegetable and then go to the milk cooler. They need to ask kids about the items that are being served and then have a staff member stand at the milk cooler and ensure that there is a reimbursable meal on the plate	All high schools are required to operate under offer versus serve. All high school staff will need to be trained on how to do offer vs serve and implement that change immediately. WDE will be conducting unannounced visits later in the year to ensure the change has taken place as this is a repeat finding. 501. As a response to this finding, training materials and a training sign in sheet will need to be uploaded to this finding to show training has been attended by all high school kitchen staff. 502. There also needs to be signage at the high school explaining what a reimbursable meal looks like for the students and that they must take at least 1/2 cup of fruit and/or vegetables. Additionally the meal time for lunch listed in the high schools application were incorrect. ; I arrived at 11:45 for a noon meal service and service was almost complete. Make sure the information provided in the application is accurate.