



NSLP Administrative Review Summary 2016-2017

Johnson CSD #25

Date of Administrative Review: 12/14/2016

Date Review Closed: 3/7/17

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 SFA and staff have a very organized system and it was easy to find everything we needed to complete the review efficiently and effectively. We can't thank you enough for being so organized.
- Execution of the FFVP at Cloud Peak is outstanding. We had the chance to observe Ms. Annie Gripp's 5th grade classroom during their snack! She is high energy and really engages the students. In addition to having the snack, they also learned about what the item was, where it came from and a description of what it tasted like! Once the students began tasting, they discussed how the fruit compared to other items they had tried, how it felt, what it smelled like, etc. Great job! We only observed the one classroom, but having observed several of the other teachers in hallway, there is no doubt they all have



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high energy and are making nutrition education fun and exciting! USDA said that the FFVP at Cloud Peak was the best program they've ever seen! Great work!

- The staff at Cloud Peak are awesome! Not only does Barbara do a majority of the work by herself, but she loves the kids and brings a happy attitude to the lunch line! All of the other staff were also extremely accommodating and easy to be around. All of our questions were readily answered and they were excited to show us how great their programs are!

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Procurement	The SFA did not have any solicitation documentation for purchases that met the formal purchase threshold (Meadow Gold). Additionally, there is not documentation that price quotes were obtained for purchases above the small purchase threshold.	For next school year, the SFA will follow the procedures written in the food service procurement policy for micro purchases, small purchases, and formal purchases. Documentation should be kept for all solicitations, quotes, contracts, etc. State to the WDE the individual who will be in charge of ensuring this will occur.
Procurement	The district's food service procurement policy needs updated to meet current USDA requirements.	Send WDE the updated procurement policy with the required elements. Send WDE the updated procurement policy for review and approval.
100 - Certification and Benefit Issuance	One application was calculated incorrectly and categorized as free when it should have been reduced. Annual income is \$27480 for a family of 3. According to the chart, the break point for free meals is \$26,208. On the calculation, the second income was not figured into the determining amount. The student must be classified correctly and all documentation sent to the family according to the required time frames. When determining students' eligibility for free/reduced meals, all calculations with varying periods of payment must be converted to an annual amount and then	Update the students' status. Inform the household of the status change and update the POS list so the students are charged and claimed correctly. Send WDE documentation of the notice sent to households and the updated POS list. Notify PowerSchool that applications with multiple income frequencies must be converted to annual not monthly per UDSA regulations (2016-2017 Eligibility Manual).

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	<p>add the annual amounts together, then reference the income eligibility guidelines. PowerSchool was calculating multiple income frequencies monthly rather than annually. The district contacted PowerSchool to change the software so it is in compliance with no response as of the end of December.</p>	
<p>1000 - Local School Wellness Policy</p>	<p>The wellness policy needs to state how often the wellness policy will be reviewed and designate an official who will ensure that the wellness policy meets regulations and that goals are being implemented and tracked.</p>	<p>Update the wellness policy to include how often the wellness policy and goals will be reviewed and tracked. State the individual in charge of ensuring wellness policy requirements are being met. View the Wellness Policy Final Rule in the technical assistance section for more information on what is required in the wellness policy beginning 6/30/17.</p>
<p>1100 - Smart Snacks</p>	<p>Some of the items in the high school vending machine did not meet Smart Snack requirements. The animal crackers and Goldfish crackers are not whole grain-rich. All grains available in vending machines or sold a la carte during the school day must be whole grain-rich.</p>	<p>Obtain whole grain-rich items to replace the Goldfish crackers and the animal crackers. Send WDE a food label of the products that will be used in place of these two items for review and approval if the vending machine will continue to be on during the school day.</p>
<p>1200 - Professional Standards</p>	<p>SFA just began tracking Professional Standards training hours this year by calendar year. The tracking tool does not contain the required elements including the number of hours each training contributes to the annual total number of hours.</p>	<p>Begin tracking NSLP employee professional standard training hours by school year. Include the number of hours each training contributes so it is easy to track if employees are meeting the number of hours required per school year. Send WDE a copy of the tracking tool that the SFA will use to track training hours that includes all required pieces.</p>
<p>1400 - Food Safety</p>	<p>There is no documentation for exemptions to the Buy American Provision.</p>	<p>The SFA should purchase to the extent possible products grown, processed, and manufactured in America per the Buy American Provision stated in the procurement policy. If the product desired does not comply with the Buy American provision, the SFA should find an alternate product if</p>



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		possible. If no comparable product is available, the SFA should document the products that do not comply and the reasoning for purchasing non-compliant products. The SFA can begin working with vendors to ensure all products meet with the Buy American provision. State to the WDE how the SFA will comply with the Buy American Provision.
200 - Verification	All applications selected for verification were online applications. There was no documentation that these applications underwent a confirmation review to ensure that the computer determined students' eligibility correctly.	When verifying applications submitted online, implement a system where the household incomes and students' status for F&R are confirmed before sending out the verification notice to households. State to the WDE who will be the confirming official and how the SFA will document that the applications selected for verification underwent a confirmation review.
800 - Civil Rights	The district did not submit a press release to the local paper at the beginning of the school year advertising the school meal programs with the updated income eligibility guidelines.	Each year prior to the start of school, the SFA needs to submit a press release with current income eligibility guidelines to the local paper advertising the availability of NSLP. State who will be responsible for ensuring that the press release is submitted to the local paper for the SY 17-18.
800 - Civil Rights	The SFA's complaint procedure needs to be updated with the required components set forth by USDA.	The civil rights complaint procedure must contain: whether an allegation is made verbally or in person, the person receiving the allegation must transcribe the complaint; the SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted; and the procedures must identify the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). Additionally, the SFA's procedures must not indicate that they attempted to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Update the district's complaint procedure. Send WDE the updated procedure for review and approval.
800 - Civil Rights	The notice to households printed from PowerSchool contains the old non-discrimination statement. All menus must also display the short non-discrimination statement. The	Update all program materials with the updated non-discrimination statement. Send WDE a copy of the notice to households of eligibility that contains the correct non-discrimination statement. Send WDE a copy of the menu that contains the

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	website does not display the non-discrimination statement	shortened statement ("USDA is an equal opportunity provider and employer").
Resource Mgt Comprehensive Review	No documentation is available to ensure that the proportion of non-program food costs is proportional to the revenue. This just needs to be done for a one week time period per year.	Complete the WY Non-program food testing chart to ensure that non-program food revenue is adequate to cover costs. Attach the completed tool to the review for approval.

Cloud Peak Elementary School

Area	Finding Description	Required Corrective Action
400 - Meal Components and Quantities - Lunch	For the week of review, the minimum 1 cup fruit is not being offered to students for breakfast on 12/13, 12/14, 12/15. Students must be offered 1 cup of fruit and must take 1/2 cup to be a reimbursable meal. Also for the week of review, the banana bread squares are not whole grain-rich and do not meet the minimum 1 oz. eq requirement. This item was less than the 1 oz. minimum grain requirement. For the month of review, the minimum 1 cup of fruit wasn't being offered to students on the following days: 11/1, 11/3, 11/8, 11/15, 11/16, 11/17, 11/21, 11/29. Only 1/2 cup of fruit was offered on these days. The cinnamon roll on 11/2 and 11/30 is not whole grain-rich and did not meet the 1 oz. eq requirement. On 11/9 the animal cracker is not whole grain-rich. The meal component worksheets indicate that the minimum milk requirement isn't being met when the students are offered two varieties of milk for breakfast.	Update the breakfast menus, production records, component worksheets and nutrient analyses so that the minimum 1 cup of fruit is being offered to students daily. Ensure that all grains are whole grain-rich. Obtain whole grain-rich products to replace the cinnamon rolls, banana bread squares, and animal crackers. Update the menu materials to include the whole grain-rich products. Update the production worksheets and nutrient analysis for these products. Additionally, the NutriGrain bar offered for breakfast does not meet the minimum component requirement. An additional grain will have to be offered for this day to meet the minimum grain component requirement (1 oz. eq/day). Ensure that the component worksheets accurately reflect what is being offered to students. Begin gathering child nutrition (CN) labels/product formulation statements (PFS) for all products so that component worksheets can be completed accurately. Send WDE updated menu materials with the fruit, grain, MMA and milk components completed correctly. Send WDE the updated breakfast menu, production records, component worksheets, CN labels/PFS, recipes for the updated cycle menu.



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Area	Finding Description	Required Corrective Action
500 - Offer versus Serve	There is not signage at breakfast indicating to students what constitutes a reimbursable meal including that they must take at least 1/2 cup of fruits/vegetables.	At each meal, indicate to students how each component contributes to a reimbursable meal and that they must take at least 1/2 cup of fruit and/or vegetable. State to the WDE how the school will ensure this is being done each day and at each meal.
600 - Dietary Specifications and Nutrient Analysis	The trans-fat limit is exceeded during the month and week of review. Zero grams of trans fat per serving is allowed.	Obtain products that contain zero grams of added trans-fat. For example, the gravy served has trans-fat. When sending the WDE the updated lunch production records, menu materials, and nutrient analysis, ensure that products do not contain trans-fat and that the nutrient analysis reflects this requirement.