



NSLP Administrative Review Summary 2016-2017

Youth Emergency Services

Date of Administrative Review: 6/7/17

Date Review Closed: 8/31/2017

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 menu includes items that students have designed or created themselves. These menu items are some of the most popular on the menu. Also, the school hosts theme meals (like Mediterranean) to introduce students to different foods and ways of eating.
- Every day at lunch, the students have the opportunity to choose a variety of fruits and vegetables from the salad bar. This is a great way to ensure students are being offered a wide-range of vegetable subgroups.
- The salad bar is a great addition to the meal program.
- The school staff does a great job ensuring the students have healthy and delicious meals for breakfast, lunch and snack. It is obvious that they care about the students and want the best for them



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Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
100 - Certification and Benefit Issuance	The SFA works with the school district to obtain online F& R applications and direct cert status. However, if student does not have an application with the district or a direct certification letter, the SFA is determining eligibility based on income information from household that was provided for a different purpose. This is unallowable. Households must complete an application and student eligibility will be determined based on the completed household application	Obtain a free and reduced application from applicable households. For example, students who do not have a direct cert letter, no application on file with the school district, or if their current eligibility was determined using income information. Based on completed applications, make needed updates to point-of-service documentation so students are claimed correctly. To the review, attach the applications that the SFA receives from households and note any F&R status changes based on completed applications. State who will be responsible for ensuring the application process is completed for all applicable students and outline the process the SFA will put into place for determining students' F&R status.
1000 - Local School Wellness Policy	The Wellness Policy does not meet requirements. For example: - Policies must designate one or more LEA officials or school officials to ensure that each school complies with the wellness policy. Must identify the position title of the official responsible for oversight. - The Wellness Policy must permit the public to participate in policy development, implementation, review and updates (parents, students, teachers, school nurses, school board, school admin, and general public) - The wellness policy must include specific goals for nutrition promotion (surveys, taste tests, providing information to households on nutrition/school lunch, posting nutrition posters, etc.) and nutrition education. - Reminder: wellness policies must include specific and measurable goals for physical activity and other school-based wellness activities. - The policy must use evidence-based strategies (evaluated, studies and peer reviewed). These goals must be specific and measurable. - The policy	Update the wellness policy to meet the requirements of the wellness policy final rule. These updates must be implemented by July 1, 2017. Upload the updated wellness policy to the review for approval



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Area	Finding Description	Required Corrective Action
	<p>must include policies for permitting marketing of only foods/beverages that meet Smart Snack standards (does not apply to marketing after school hours). - Assessment of the policy must occur at a Update the wellness policy to meet the requirements of the wellness policy final rule. These updates must be implemented by July 1, 2017. Upload the updated wellness policy to the review for approval. Page 2 of 5 Report Run: 8/31/2017 4:21:20 PM minimum of every 3 years. The results of the assessment must be made public. (WDE recommends annual assessment of the Wellness Policy. - The public must be informed of the content, implementation, and updates of the wellness policy (annually).</p>	
200 - Verification	<p>Verification was not done correctly. The SFA verified a directly certified student which is not allowable. Verification is only done on free and reduced applications.</p>	<p>Verification for the 17-18 school year must be completed using a free and reduced application of a day student. The SFA should verify an application(s) based on the appropriate sample pool selected from the applications obtained from the school district or that were obtained directly from the household. The SFA should complete all verification steps as outlined in the Eligibility Manual. State to the WDE the individual who will be in charge of verification and how the SFA will ensure verification is completed correctly</p>
700 - Resource Management	<p>Youth Emergency Services has a separate food service revenue account but does not have a separate expense account to ensure food service revenue is only going towards allowable expenses.</p>	<p>The SFA can either account for revenues and expenses in a ledger account or create a separate food service account that the revenue is posted to and all expenses are paid from. The SFA can then do general fund transfers into these accounts for any shortages. State to the WDE how the SFA will account for food service revenues and expenses separately from other revenues/expenses. Provide documentation of the accounting system that will be in place that is compliant with this requirement.</p>
900 - SFA On Site Monitoring	<p>Onsite monitoring of breakfast and lunch does not occur</p>	<p>Onsite monitoring must occur by February 1st each year. Lunch must be reviewed annually and 50% of breakfast sites must be monitored every other year using the WDE form (if only 1 breakfast site, monitor that site annually). Conduct monitoring of the breakfast and lunch service in the next 30 days. Submit the completed monitoring forms to the review. State the individual in</p>



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Area	Finding Description	Required Corrective Action
		charge of conducting monitoring every year by the February 1st deadline.

Site-Level Findings: Youth Emergency Services

Area	Finding Description	Required Corrective Action
1400 - Food Safety	The facility does not have a HACCP/food safety plan in place for the main kitchen and for each cottage where food is served.	Create a HACCP/food safety plan for the main kitchen and for each cottage where food is served. WDE requires that the HACCP plan be reviewed annually and updated as needed. All food service employees must be trained on the HACCP plan each year. The review, updates, and training provided on the HACCP plan should be documented. Send WDE a copy of the final HACCP plan that will be implemented and used at the central kitchen and in the cottages. State the individual in charge of ensuring the HACCP plan will be implemented and reviewed each year. Send documentation of the training provided to staff on the HACCP plan.
1400 - Food Safety	The food safety inspection posted in the serving area was from 2013. The most recently conducted food safety inspection must be posted in the serving area where it is visible to the public.	Post the most recent food safety inspection in the serving area so it is visible to the public. State to the WDE who will be in charge of ensuring this is done. If possible, send WDE a picture of the food safety inspection that is posted.
1400 - Food Safety	The SFA is purchasing and serving noncompliant grains in the school lunch program. Non-whole grain-rich items include: tortillas, burritos, noodles, crackers, English muffins, buns, macaroni and cheese, cereal, baking mixes, rice.	Obtain whole grain-rich items for all grain items served in the school lunch and breakfast program. Send WDE the labels of the whole grain items that the facility will serve. The first ingredient must be whole grain; whole wheat, & whole grain corn, etc.
1400 - Food Safety	SFA is not documenting products that do not comply with the Buy American Provision.	Begin requesting a preference for products that meet the Buy American Provision when procuring foods for NSLP. Document the products that do not meet this requirement and the reason. Upload the documentation that the SFA will use to comply with this requirement.
1700 - Afterschool Snack	Production records for afterschool do not indicate the serving size provided to students. Additionally, non-creditable items are served: corn nuts, popcorn, Oreos, 7-layer bars (only two "sweets" are permitted per week, provided that they still meet the grain/bread component requirements). The milk being served	Review the afterschool meal pattern requirements. On production records, begin documenting the serving size of items served. Provide an allowable milk variety (either fat-free flavored, fat-free white, or 1% white). Send WDE the planned production records for the month of July that reflects compliance with meal pattern requirements



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	(2%) does not meet meal pattern requirements.	
1700 - Afterschool Snack	There is no documentation that the afterschool program has been monitored twice per year.	The ASCP must be monitored twice per school year. The first monitoring must occur within the first 4 weeks of operation and the second monitoring at some other time during the year. The monitoring must be documented on the form provided with the ASCP manual. Conduct ASCP monitoring in the next 30 days. Send WDE a copy of the completed form. State when the next monitoring will occur, who will conduct the monitoring, and how the SFA will ensure this is done twice per year from now on
1700 - Afterschool Snack	The "And Justice For All Poster" is not displayed in the snack service area.	The "And Justice For All" poster must be posted in a visible location in the snack service area (in each cottage where snack is served). Post the current poster and send a picture to the WDE for review and approval.
400 - Meal Components and Quantities - Breakfast	The milk offered for breakfast did not meet meal pattern requirements. Two-percent chocolate and 2% white milk was served to students. The acceptable milk varieties include fat-free white or flavored milk or low-fat (1%) white milk. Two choices of milk from these acceptable varieties are required to be offered to students	Begin serving the acceptable milk varieties to students. Inform WDE what types of milk the facility will serve. Send WDE the labels of the milk being served plus the nutrient analysis for the planned breakfast menu for one month/one menu cycle that includes the appropriate milk varieties.
400 - Meal Components and Quantities - Breakfast	Breakfast meals are not planned based on the daily and weekly minimum requirements for each grade group. Documentation on site does not indicate if meal pattern requirements are being met for each grade group for breakfast. Additionally, non-compliant whole grains were observed in storage and in production records. The SFA is not using approved production records. Current production records are missing required information. A majority of cereals available for students to choose are not whole grain-rich.	Create a compliant menu for each grade group for breakfast. Use the USDA component worksheets and simplified nutrient analysis to ensure that each week of the menu meets requirements. Ensure that all grains are whole grain-rich. Send WDE the labels of grain products to verify. Begin using the WDE production record that contains all required information. Send WDE the planned menu for one month (or for one cycle) and the component worksheets for each grade group for each week. Send WDE the planned production records for the same time period
400 - Meal Components and Quantities - Lunch	Unallowable milk varieties are served to students (2% white and 2% chocolate). The only allowable milk varieties include fat-free flavored, fat-free white, or low-fat (1%) white. Students must be offered two	Purchase and serve two different allowable milk varieties to serve at all meals. Send WDE a copy of the labels of the milk choices offered to students. Send WDE a copy of the label and nutrition facts for the non-dairy milk that will be served to students that require it.



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	choices of milk from these allowable varieties.	
400 - Meal Components and Quantities - Lunch	For lunch, there is no documentation that different serving sizes are being served to the different age groups to account for the corresponding meal pattern requirements.	Plan menus based on the different meal pattern requirements and dietary specifications for each grade group: K-5, 6-8, and 9-12. Send WDE the planned cycle menu or July menu, nutrient analysis, and component worksheets for each grade group that meets meal pattern requirements.
400 - Meal Components and Quantities - Lunch	Documentation on site does not indicate if meal pattern requirements are being met for each grade group. Meals are not planned based on the daily and weekly minimum requirements for each grade group. Additionally, non-compliant whole grains were observed in storage and in production records: corn dog, cheese bread stick, pepperoni pizza stick, pancake mix, tortilla.	Create a compliant one month or one cycle menu for each grade group for lunch. Use the USDA component worksheets and simplified nutrient analysis to ensure that each week of the menu meets requirements. Ensure that all grains are whole grain-rich. Send WDE the labels of grain products to verify. Begin using the WDE production record that contains all required information. Send WDE the planned menu for one month (or for one cycle) and the component worksheets for each grade group for each week. Send WDE the planned production records for the same time period.
600 - Dietary Specifications and Nutrient Analysis	SFA does not complete a nutrient analysis of meals so menus are not evaluated for compliance with dietary specification requirements for each grade group	For each grade group, evaluate breakfast and lunch menus for dietary specification compliance using the USDA Component Worksheets and Simplified Nutrient Analysis. Revise the menus if necessary if they are found to be out of compliance. When conducting a nutrient analysis for all meals, include everything offered to students. This includes all condiments and items on the salad bar (peanut butter, jelly, margarine/butter, croutons, dressings/sauces, seconds, etc.). Send WDE the final breakfast and lunch menus (month of July or August or complete menu cycle) plus the corresponding component worksheets and simplified nutrient analyses
800 - Civil Rights	The "And Justice for All" poster is not displayed during meal service.	Post the current "And Justice For All" poster in the serving area where it is visible to students. Take a picture of where the poster is posted and attach to the review.