



## NSLP Administrative Review Summary 2017-2018

### Albany CSD #1

Date of Administrative Review: 11/15/17

Date Review Closed: 11/29/17

#### 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) (Whiting High School)
- 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)



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### Commendations

The eligibility applications are in excellent shape. They are organized well and easy to find. Jody even puts a copy in multiple places if there are multiple last names in the home, which is a huge help to us, and she attaches the adding the machine tape to show how to converted the income, so it is easy to see where an error exists, although there were no mathematic errors that I found. Very excellent job with the applications, it is the reason we were able to finish the review the in 2 days instead of 3.

You have a large number of denied applications, which is actually a very good thing. It shows us that you are doing an excellent job of outreach to ensure that as many kids that can qualify for a free or reduced meal are receiving them. Excellent job.

Harmony is doing an excellent job of providing choice while still limiting food waste. It is a difficult balancing act at such a small school.

Whiting is also doing an excellent job of providing a lot of choice for not very many students. I was impressed to see a hot breakfast option and the salad bar is really very good for such a small number of students. Great job!

### Review Findings

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
100 – Certification and Benefit Issuance	There are 7 applications that are marked Free-Categorically Eligible and they should be Free Direct Certification. These were all applications where a Case Number was provided and was verified with DFS and changed to Categorical. However, the next step should be to check the Direct Certification website. Application 18204 had one income of three that was left out in the income calculation. The error changes the eligibility of the children from Free to Reduced.	After verifying a case number with DFS, check the Direct Certification website before making them Categorically eligible to see if they are Directly Certified eligible. Change the eligibility status of application 18204 in Power School. Inform the household of the change in status and allow 10 days' notice before charging the students at the reduced rate for meals. Send WDE a copy of the updated status change in Power School for the students on application 18204 and a copy of the letter sent to the household notifying them of the status change from free to reduced.
100 – Certification and Benefit Issuance	All applications are being converted to annual income. All were determined correctly, however they should not be converted to annual unless there are two or more income frequencies such as one income reported as weekly and another as monthly.	The only time income should be converted is when there are different payment frequencies. So if there is a weekly and monthly paycheck amount provided on the application, this is the only time income should be converted to annual. The reason is anytime you add math,

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Area	Finding Description	Required Corrective Action
		<p>you increase the risk of a mathematical mistake. Even when there are multiple incomes, as long as they are all the same, such as monthly, just add them together and make a determination based on the monthly income. Even though you are converting income when it is unnecessary I did not find a single mathematical error. For the corrective action response, state how the SFA will ensure that income provided on applications is converted correctly.</p>
200 – Verification	<p>The SFA was required to choose 6 applications for verification. They did choose 6 but one of them became directly certified as of October 1. They should have chosen another application to verify.</p>	<p>Because the application was found to be directly certified in October, the SFA had time to choose another application for verification in order to meet the required number of applications for verification.</p> <p>For the corrective action response, state how the SFA will ensure that verification is completed correctly for the 18-19 school year. Include trainings that will be provided, resources that will be used, etc.</p>
200 – Verification	<p>None of the applications chosen for Verification have been signed by a Confirming Official or a Verifying Official.</p>	<p>A confirming official must check the application for correctness, and sign it, before a verification letter is sent to the parent/guardian notifying them that they were selected for verification. In the corrective action response, state who the confirming official will be and how the SFA will ensure that the confirmation review is conducted for verification next school year.</p>
200 - Verification	<p>None of the applications selected for verification were reviewed and signed off by a Verifying Official.</p> <p>There were three errors found with verification:</p> <ol style="list-style-type: none"> <li>1) Application 18771, income calculated incorrectly (F&amp;R status remains the same)</li> <li>2) Application 18349, income calculated incorrectly (F&amp;R status remains the same).</li> <li>3) Application 18531, pay stub does not show pay periods. Must get additional information from the employer.</li> </ol>	<p>Once a household responds to verification the Verifying Official must also check the income, determine eligibility (independent from the Determining Official) and sign the application.</p> <ol style="list-style-type: none"> <li>1) Application 18771 provided 3 pay stubs. The three should be averaged together, you cannot select the lowest or highest pay stub.</li> <li>2) Application 18349 provided 3 months of child support. The three should be averaged together, you cannot select the lowest or highest payment. When converting pay periods to annual, do not round to the nearest dollar, use the actual amount. Rounding can change the annual income by enough to change an eligibility status.</li> <li>3) Application 18531 only provided one stub</li> </ol>



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Area	Finding Description	Required Corrective Action
		<p>which only shows the end date of the pay period. You cannot determine if this a weekly, bi-weekly or monthly paystub when there is only one. When this happens you need to get additional documentation from the employer. This is a non-issue because the parent also provided their tax return, but something to remember in the future.</p> <p>For the corrective action response, state how the SFA will ensure that all steps of verification are completed correctly for the 18-19 school year. Provide training that will be provided, resources that will be developed, etc.</p>
Procurement	The SFA did not check the equipment list prior to purchasing equipment costing more than the capitalization threshold.	For all food service equipment purchases more than the capitalization threshold (\$5000) the SFA must request WDE's approval if the item is not on the pre-approved equipment list. State how the SFA will ensure that this is done for future equipment purchases above the capitalization threshold.

### Site-Level Findings: Harmony Elementary

Area	Finding Description	Required Corrective Action
1400 – Food Safety	A copy of the written food safety plan, specific to the site, is not located on site.	A site specific food safety plan must be located on site in each kitchen.
500 – Offer vs. Serve	There is not a sign in the lunch room showing the meal for the day and what foods meet each component.	Put a sign up, a reusable wipe off would be best, that shows which foods being served that day meet which meal component. This sign will need to be changed each day for breakfast and lunch. Provide the WDE with a copy of the sign that will be used and updated each day to meet this requirement.
600 – Dietary Specifications and Nutrient Analysis	<p>For the month of review, there were weeks that did not meet the nutrient requirements:</p> <p>Week of October 8th: Saturated fat 10.24% of calories.</p> <p>Week of October 16th: Saturated fat 10.12% of calories</p> <p>Week of October 23rd: Average weekly calories 700.85.</p> <p>Week of October 30th: Average weekly calories 678.94.</p>	Adjust the menu so that the weekly average for calories is within the required range for K-5 grades at lunch (550-650 calories) and saturated fat less than 10% of calories. Send WDE the corrected menu, production records, and nutrient analysis for the weeks stated in the finding.



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### Site-Level Findings: Velma Linford Elementary

Area	Finding Description	Required Corrective Action
1400 – Food Safety	Linford Elementary does not have a copy of the HACCP/food safety plan on site.	Each serving site must have a HACCP/food safety plan that is specific to each site. Employees must be trained on this plan annually. Create a HACCP plan for Linford Elementary and send to WDE. Ensure that a copy of this plan is available at the school. State the SFA's plan for training employees on the contents of the HACCP plan.
1900 – Fresh Fruit and Vegetable Program	<p>Cut produce for the fresh fruit and vegetable program was delivered to the classroom in the morning but was not served to students until the afternoon. The produce was not under refrigeration or kept cold.</p> <p>Whole fruits and vegetables can be delivered to classrooms and be allowed to sit out until service. However, cut fruits and vegetables need to stay refrigerated until time of service for food safety.</p>	<p>The way in which service is conducted needs to change to allow for cut produce to remain refrigerated until service. I would suggest having the teachers send a student down to the cafeteria to collect the produce at the time they want to do service. Or purchase some mini-fridges and store the produce in a couple of classrooms and let students collect them from a classroom near them when they want to serve. Any solution allowing for refrigeration will be considered. Adjustments need to be made at all sites serving FFVP, not just Linford. State how the SFA will change FFVP service to ensure that cut produce remains refrigerated/at the proper temperature prior to actual consumption by the students.</p>
500 – Offer vs. Serve	There was not a sign posted for lunch on the day of review indicating to students how the components of the meal contribute to a reimbursable meal. There is a sign that tells them they must take at least 1/2 cup of fruit and/or vegetable. There was a sign at breakfast indicating to students how the meal contributed to a reimbursable meal.	Post a sign in the lunch room that communicates to students at each meal how the day's menu contributes to a reimbursable meal. This can be a MyPlate poster that has the meal components written on it with a dry erase marker. Send WDE a photo of the sign that will be used and shows where it is posted in the lunch room so it is visible to students.
600 – Dietary Specifications and Nutrient Analysis	For the week of 10/23, average weekly calories were over requirement at 686; required range is 550-650 calories for the K-5 age group.	Update the menu for this week in the cycle menu to ensure calories are within the range for the K-5 age group. Send WDE the corrected menu, production record, nutrient analysis for review and approval. (This finding was corrected during the onsite review)



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### Site-Level Findings: Whiting High School

Area	Finding Description	Required Corrective Action
1400 – Food Safety	There are food safety instructions on the production sheets, but there is not a HACCP plan on site.	Each site must have a site specific HACCP plan stored in each kitchen.
1400 – Food Safety	Most items in the refrigerator were dated, but the salad dressings were not. There was not a thermometer in the dry storage.	All items in storage must be dated. All storage areas must have a thermometer, even dry storage. State how the SFA will ensure that all items in the refrigerator are dated and the plan for obtaining a thermometer for the dry storage area.
600 – Dietary Specifications and Nutrient Analysis	Review of month of review and week of review nutrient analysis indicates the following issues: - <i>Trans fat</i> not listed on nutrient summary - - - Week of 10/2: saturated fat 10.78% calories - Week of 10/23: calories 676.88 (short week); saturated fat 11% of calories - Week of 10/30: sat fat 10.78% of calories - Week of 11/13: saturated fat 10.7% of calories	For the weeks noted in the finding, update the menu so that the calories and saturated fat are within the guidelines. Upload the corrected menus, planned production records, nutrient analysis, and component worksheet to indicate the changes made to make the weeks compliant with regulations for calories and saturated fat. (This finding was corrected onsite)