



NSLP Administrative Review Summary 2017-2018

Fremont County Group Homes

Date of Administrative Review: 9/5/17

Date Review Closed: 1/4/18

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)



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Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Procurement	FCGH's procurement policy needs to be updated to include current USDA requirements. For example, the policy does not contain the most recent Buy American or minority and women's business clauses.	Update FCGH's procurement policy to meet USDA requirements. Submit the updated procurement policy for WDE review and approval. See WDE's procurement policy template for guidance.
1000-School Wellness Policy	<p>The wellness policy must be updated to meet the requirements outlined in the Final Rule that went into effect 7/1/17. At a minimum:</p> <ul style="list-style-type: none"> - 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 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 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 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 minimum of every 3 years. The results of the assessment must be made public. WDE recommends annual assessment of the Wellness Policy. 	Update the wellness policy to meet the requirements of the final rule. The policy must also contain specific and measurable goals that can be easily implemented and tracked. Send WDE the updated wellness policy for review and approval.



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Area	Finding Description	Required Corrective Action
	<ul style="list-style-type: none"> - The public must be informed of the content, implementation, and updates of the wellness policy (annually). - Wellness policy requirements will be monitored during Administrative Reviews. 	
1200-Professional Standards	Professional standard training hours are not documented for NSLP employees.	Begin tracking and keeping documentation of professional standards training for all employees that serve meals. See the WDE professional standards training tracker template for an example. Fill out the training tracker for NSLP employees and attach to the review for WDE review and approval.
1200-Professional Standards	The food service director has not had eight hours of food safety training that is required every 5 years.	The food service director will complete 8 hours of food safety training. Send WDE a copy of the training documentation that this training was completed. If the training cannot be completed by the 30-day deadline, send the WDE the date of the planned training.
800-Civil Rights	The school does not use the WDE special dietary needs form to accommodate students' allergies/medical needs.	Begin using the WDE special dietary needs form for students that require a substitution/omission due to a disability or medical need. If a physician signs the form and indicates a substitution/omission outside the meal pattern, the school is required to make the substitution/omission. Send WDE the form the group home will use to document all special dietary needs requests.

Site-Level Findings: FCGH - Riverton

Area	Finding Description	Required Corrective Action
1400-Food Safety	The school does not have a food safety/HACCP plan.	Develop a food safety/HACCP plan for each serving site (Riverton and Lander). This plan should be specific to the processes in place at each serving site. The staff must be trained on the policies and procedures in the food safety plan each year. WDE requires that the food safety plan/HACCP plan be reviewed annually and updated as needed. This review, any updates, and staff training should be documented. Submit the FCGH's food safety/HACCP plan for WDE review and approval.
1400-Food Safety	There is no documentation that two food safety inspections occurred each year.	Provide documentation that two food safety inspections occurred during the 16-17 school



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		year or documentation that the inspector was informed that the site needed two food safety inspections. Also, state how the facility will ensure that two food safety inspections will occur each school year at each serving site.
300-Meal Counting and Claiming (breakfast)	On the breakfast roster for July, the school counted 127 students as receiving a free breakfast. However, the claim for breakfast and lunch was switched and the school claimed only 120 students.	The claim for breakfast will be adjusted to reflect that 127 students ate a free breakfast and 120 students ate a free lunch for July. Implement a system to ensure that the correct number of students are claimed for each meal. Update the July breakfast and lunch claim to reflect the actual number of students who ate each meal. State how the school will ensure that the roster and claim match each month.
300-Meal Counting and Claiming (lunch)	The school switched the breakfast and lunch counts on the claim for July. The school counted 120 free lunches but 127 were claimed.	The claim will be changed to show that 120 students ate lunch. Implement a system where the roster and claims are double-checked for accuracy. State to the WDE the system the school will implement to ensure this error does not occur again. Update the July breakfast and lunch claim to reflect the actual number of students who ate each meal.
400-Meal Components and Quantities (breakfast)	There is no signage indicating to students what they must take for a reimbursable breakfast.	Each day, post signage that explains to students what they must take for a reimbursable breakfast, including that they must take 1/2 cup of fruit. Indicate in your response how the school will meet this requirement for each day.
400-Meal Components and Quantities (breakfast)	The school does not complete a component worksheet (on the production record or separate worksheet) to ensure that the minimum meal components and nutrient requirements are met for breakfast for the day and week. The school must have this documentation indicating that reimbursable meals are planned and served.	Complete the USDA component worksheets for each week in the breakfast cycle menu to ensure the menu meets the minimum daily and weekly requirements. Send WDE the completed worksheets and corresponding production records for review and approval.
400-Meal Components and Quantities (lunch)	The minimum meat/meat alternate requirement is not being met based on planned production records for the day of review.	The minimum meat/meat alternate requirement for grades 6-8 and 9-12 for lunch on the day of review. Complete the USDA component worksheets for each day of the cycle menu to ensure that all meals meet the minimum component requirements for the day and week. Complete two separate worksheets for lunch; one for 6-8 grades and one for 9-12 grades as each grade group has different component



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Area	Finding Description	Required Corrective Action
		requirements. Send WDE a copy of the completed and correct component worksheets and updated menu and production records.
400-Meal Components and Quantities (lunch)	Separate production records, nutrient analyses, and component worksheets are not completed for each grade group for lunch. There are different component and calorie requirements for 6-8 and 9-12 grades. Additionally, the weekly requirement for dark green and starchy vegetables is not met for each grade group during the week of review.	Complete separate production records, component worksheets and nutrient analyses for lunch for each grade group to ensure that the requirements are met for each grade group. Ensure that the weekly minimum requirements for all vegetable sub-groups are met for each week of the menu cycle. Send WDE the updated USDA component worksheets (link in special instructions) and production records for each grade group that indicates requirements are being met. Note: since the school only serves lunch on weekends, ensure that the weekly requirements are being met over the month. Complete one component worksheet for one month of lunches.
500-Offer vs. Serve	Signage is not posted explaining to students what they must take each meal to make up a reimbursable meal and that they must take 1/2 cup fruit/vegetable.	On the MyPlate poster currently hanging in the service area, write the days' meal components for each meal and state that students must take 1/2 cup fruit and/or vegetable at each meal. State who will be in charge of this each day and ensure that students understand what they must take to make a reimbursable meal.