



NSLP Administrative Review Summary 2017-2018

Natrona County School District #1

Date of Administrative Review: 11/27/2017

Date Review Closed: 1/22/2018

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

Almost all necessary review documents were collected, labeled and easy to find! Thank you! This makes the reviews go so much faster and easier.

Mountain View Elementary: The cashier knew all the kids by name on sight and talked and had fun with them while they waited in line. Great to see such an engaged cashier.

Mountain View Elementary: The staff assisting students at the salad bar was very helpful and patient with the students. She ensured they all had a reimbursable meal and encouraged them to take a variety of fruits and vegetables.



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Lincoln Elementary: The atmosphere is extremely positive with all staff attentive to the students. Mrs. Kunkel is amazing and has great rapport with ALL of the students and knows each by name. It was apparent that many students ask for more or don't want to take an item on a daily basis, and all staff know the requirements and students are responded to in a polite and firm manner. By the student reaction, you can see the respect they have for the staff. Really nice job!

Willard Elementary: The cashier knew all the kids by name and talked to them while in line. It is great to see a cashier engaging with the kids.

Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
100-Certification and Benefit Issuance	From the sample of students reviewed, seven students were incorrectly identified as foster. To be considered categorically eligible foster and eligible for free meals, students must be under legal custody of the state. A student cannot be considered foster due to informal arrangements or permanent guardianship placements that may exist outside of State or court-based systems. To be considered directly certified foster, the student must have a letter on the WDE Direct Certification site.	Review the USDA Eligibility Manual for the definition of "foster" for NSLP meal eligibility. For the seven students listed that are not under guardianship of the state, obtain a free and reduced application from their respective households to determine if they are eligible for free or reduced meals. Send WDE a copy of the submitted applications and POS list that reflects their new eligibility.
1000-Wellness Policy	The wellness policy has not been updated or reviewed since June 2014. There is no documentation that goals have been implemented or tracked. According to the Wellness Policy Final Rule that went into effect July 1, 2017, the following items must be included: - 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.	Update the district's wellness policy to comply with the requirements of the wellness policy final rule. State when the wellness policy will be reviewed by the wellness policy committee and who will be in charge of implementing the wellness policy for the district. Send WDE a copy of the updated wellness policy. This is a repeat finding from the 14-15 review.



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Area	Finding Description	Required Corrective Action
	<ul style="list-style-type: none"> - 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.) - 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. 	
300-Meal Counting and Claiming	All schools have their POS is at the beginning of the line and an exemption was not requested from the WDE.	Submit a POS exemption request to move the POS to the beginning of the line. Include the district's unpaid meal charge policy demonstrating the reasoning behind the exemption request.
Procurement	<p>Procurement practices do not meet federal requirements. In the food service solicitation for the 16-17 school year, the following were some instances on non-compliance:</p> <ul style="list-style-type: none"> - The solicitation is labeled an "Invitation for Bid" (IFB). An IFB is based on price only. However, there are many instances where the district is basing selection of vendors on arbitrary or random criteria. - The solicitation does not include any reference to the Buy American requirement. - The solicitation includes a geographic preference which is not allowed (in reference to tie bids). - The winning bid must result in a contract that includes specific contract terms. - The protest procedures written in the bidding conditions must match the procedure written in the food service procurement policy. <p>This is a repeat finding.</p>	All food service solicitations must be re-bid for next year and include all federal requirements. Prior to advertising the final IFB, the SFA will send WDE all solicitation documents for approval. The SFA will also send WDE the contract documents to ensure compliance. State when the SFA will begin the solicitation process for next school year and when they will send WDE the draft documents.



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Site-Level Findings: Evansville Elementary

Area	Finding Description	Required Corrective Action
1400-Food Safety	No temperature recorded for 11/21/17. For food safety purposes WDE suggests logs are double checked ensure all temperatures are recorded. Additionally, temperatures are only taken when the food arrives at the school. Temperatures must be taken prior to service to ensure that students are served food that is at a safe temperature.	Train school staff serving meals to take and record multiple temperatures of the food prior to each meal service. Send WDE one week's worth of documentation demonstrating that this is being completed at Evansville Elementary. This requirement must also be implemented at each site. WDE recommends that this be added to each schools' HACCP plan and training.
400-Meal Components and Quantities	During the week of 10/9, the dark green vegetable requirement was not met. For all grades, 1/2 cup of dark green vegetables must be served each week.	Update the cycle menu for the week of 10/2 to include a dark green vegetable. Send WDE the updated menu, component worksheets, production records and nutrient analysis for this week to show that this requirement is met.
500-Offer vs. Serve	There is a MyPlate sign indicating which breakfast/lunch components each item meets. However, there is no signage informing students that they must take 1/2 cup of fruit/vegetable and that they must take 3 of the 5 components for lunch and 3 items for breakfast.	Post a sign for breakfast and lunch informing students that they must take 1/2 cup of fruit and/or vegetable at each meal, and they must have 3 of the 5 components and lunch and 3 components at breakfast to make a reimbursable meal. Send WDE a photo or an example of what sign will be used to meet this requirement.

Site-Level Findings: Mountain View Elementary

Area	Finding Description	Required Corrective Action
1400-Food Safety	The most recent food safety inspection report was not posted in the lunchroom at breakfast.	Ensure that the most recent food safety inspection report is posted in the serving area during all meals where it is visible to the public. Send WDE a picture of the displayed food safety inspection report to show that this requirement is met.
1400-Food Safety	Food temperatures are only taken when the food arrives at the school (about 9am). Temperatures must be taken prior to each lunch service to ensure that students are served food that is at a safe temperature.	Train school staff serving meals to take and record multiple temperatures of the food prior to each lunch service. Send WDE one week's worth of documentation demonstrating that this is being completed at Mountain View Elementary. This requirement must also be implemented at each site in the district. WDE recommends that this be added to each schools' HACCP plan and training.
1400-Food Safety	Reviewed food storage at Kelly Walsh High School for food safety and Buy American. Black olives (from Spain) and baby corn (Thailand) were not documented for a Buy American exemption.	Begin documenting foods that do not meet the Buy American requirements. This includes all food, not just canned produce. Send WDE the document the SFA will use to meet this requirement.



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Area	Finding Description	Required Corrective Action
	<p>Schools participating in the federal school meal programs are required to purchase domestic commodities and products for school meals to the maximum extent practicable. The Buy American requirement (7 CFR Part 210.21(d)) specifies that the SFA should purchase domestically produced food and food products. Domestic commodity or product means an agricultural commodity that is produced in the US and a food product that is processed in the US substantially (at least 51 percent) using agricultural commodities that are produced in the US.</p>	
<p>400-Meal Components and Quantities (Lunch)</p>	<p>During the week of 10/9, the dark green vegetable requirement was not met. For all grades, 1/2 cup of dark green vegetables must be served.</p>	<p>Update the cycle menu for the week of 10/2 to include a dark green vegetable. Send WDE the updated menu, component worksheets, production records and nutrient analysis for this week to show that this requirement is met.</p>
<p>500-Offer vs. Serve</p>	<p>There is a MyPlate sign indicating which breakfast/lunch components each item meets. However, there is no signage informing students that they must take 1/2 cup of fruit/vegetable and that they must take 3 of the 5 components for lunch and 3 items for breakfast.</p>	<p>Post a sign for breakfast and lunch informing students that they must take 1/2 cup of fruit and/or vegetable at each meal, and they must have 3 of the 5 components and lunch and 3 items at breakfast to make a reimbursable meal. Send WDE a photo or an example of what sign will be used to meet this requirement.</p>
<p>800-Civil Rights</p>	<p>The "And Justice for All" poster on display at Mountain View elementary is not the full size poster.</p>	<p>Obtain the "And Justice for All" poster is the required full size (11"x17") and display it in the lunch room where it is visible to students. Send WDE a picture of the full-size poster that is displayed in the service area.</p>

Site-Level Findings: Willard Elementary

Area	Finding Description	Required Corrective Action
<p>1400-Food Safety</p>	<p>Temperatures are only taken when the food arrives at the school (about 9am). Temperatures must be taken prior to service to ensure that students are served food that is at a safe temperature.</p>	<p>Train school staff serving meals to take and record multiple temperatures of the food prior to each meal service. Send WDE one week's worth of documentation demonstrating that this is being completed at Willard Elementary. This requirement must also be implemented at each site. WDE recommends that this be added to each schools' HACCP plan and training.</p>
<p>1700-Afterschool Snack</p>	<p>The afterschool snack program was not monitored within the first four weeks of</p>	<p>Ensure that when a new ASCP begins that it is monitored within the first four weeks of operation. State who will ensure this is done. Make sure that the snack service is</p>



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Area	Finding Description	Required Corrective Action
	operation. Snack service started on 10/2 but was not monitored until 11/10.	monitored again before the end of the school year. State when this second review will occur.
1700-Afterschool Snack	The non-discrimination poster is not displayed in the snack service area.	Post the USDA non-discrimination poster in the snack service area. Either post the sign on the classroom wall or attach the poster to the snack containers so it is visible to students during snack time. In the review finding response, state where the poster will be displayed to meet this requirement.
500-Offer vs. Serve	There is a MyPlate sign indicating which breakfast/lunch components each item meets. However, there is no signage informing students that they must take 1/2 cup of fruit/vegetable and that they must take 3 of the 5 components for lunch and 3 items for breakfast.	Post a sign for breakfast and lunch informing students that they must take 1/2 cup of fruit and/or vegetable at each meal, and they must have 3 of the 5 components and lunch and 3 items at breakfast to make a reimbursable meal. Send WDE a photo or an example of what sign will be used to meet this requirement.

Site-Level Findings: Lincoln Elementary

Area	Finding Description	Required Corrective Action
1400-Food Safety	Temperatures are only taken when the food arrives at the school (about 9am). Temperatures must be taken prior to each lunch service to ensure that students are served food that is at a safe temperature.	Train school staff serving meals to take and record multiple temperatures of the food prior to each meal service. Send WDE one week's worth of documentation demonstrating that this is being completed at Lincoln Elementary. This requirement must also be implemented at each site. WDE recommends that this be added to each schools' HACCP plan and training.
400-Meal Components and Quantities	During the week of 10/9, the dark green vegetable requirement was not met. For all grades, 1/2 cup of dark green vegetables must be served each week.	Update the cycle menu for the week of 10/2 to include a dark green vegetable. Send WDE the updated menu, component worksheets, production records and nutrient analysis for this week to show that this requirement is met.
500-Offer vs. Serve	There is a MyPlate sign indicating which breakfast/lunch components each item meets. However, there is no signage informing students that they must take 1/2 cup of fruit/vegetable and that they must take 3 of the 5 components for lunch and 3 items for breakfast.	Post a sign for breakfast and lunch informing students that they must take 1/2 cup of fruit and/or vegetable at each meal, and they must have 3 of the 5 components and lunch and 3 components at breakfast to make a reimbursable meal. Send WDE a photo or an example of what sign will be used to meet this requirement.