



## NSLP Administrative Review Summary 2017-2018

### Hot Springs County School District #1

Date of Administrative Review: 10/30/2017

Date Review Closed: 2/2/2018

#### 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)



## NSLP Administrative Review Summary 2017-2018

### Review Findings

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
100-Certification and Benefit Issuance	The SFA did not determine student eligibility for free or reduced meals within 10 days of the date that the parent or guardians signed the income form.	Create a system to ensure that applications will be determined with 10 days of the signature of the parent or guardian. In the corrective action response, state how the SFA will ensure this is done.
100-Certification and Benefit Issuance	The benefit issuance applications were determined correctly as free and reduced. There is a systemic issue with Social Security Numbers being left blank. This affected 51 students. There was one application affecting two students who were determined to be foster. There is a guardianship and these students are not foster students. There was one application affecting 2 students that was determined reduced but listed on the list as free.	<ol style="list-style-type: none"> <li>1. Create a system to ensure that all applications moving forward will include the last four digits of the social security number on the applications.</li> <li>2. Obtain the SSN on all applications that are currently missing a social security number (or indicate no SSN).</li> <li>3. Update the one application affecting two foster children from free to denied based on family income.</li> <li>4. Update the list for the two students determined reduced but listed as free---update to reduced.</li> </ol> <p>Attach documentation showing that all of the students listed have complete applications and also attach the master list from your system documenting correct determinations.</p>
300-Meal Counting and Claiming	The Point of Service at the Elementary School is at the beginning of the service line. The cooks do make sure that each student has a reimbursable meal. At breakfast the Point of Service is at the end of the line. The SA agreement does not document an alternate placement of the POS at lunch.	Move the POS to the end of the service line to ensure that students are taking and being claimed for a reimbursable meal. Either state where the POS will be moved or upload a picture of the placement of the POS. If it is not possible to move the POS, obtain an exemption from the WDE and explain the valid reason for the request.
800-Civil Rights	The non-discrimination statement is not listed in the parent handbook.	Add the current non-discrimination statement to parent handbook. Upload a copy of the page of the handbook for WDE review and approval.
800-Civil Rights	The school district is using the old special dietary needs form for parents and doctors to document special dietary needs.	Start using the current special dietary needs form for new special dietary needs requests. Distribute to schools and make available to parents. Provide evidence that this has been done to the WDE.



## NSLP Administrative Review Summary 2017-2018

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800-Civil Rights	Hot Springs County SD #1 does not have a written civil rights complaint procedure.	Create a Civil Rights Complaint Procedure. A template is located in download forms and the finding to assist you. Once the procedure is created, submit to WDE for approval.
1000-Wellness Policy	There is a good wellness policy in place but the implementation and documentation of meetings, measurable goals and progress toward goals and objectives does not meet requirements.	Develop a plan for meeting the implementation and tracking requirement of the wellness policy; Including setting a meeting of the administrative team and reporting to Curriculum Team. Set a meeting date for the required 3 year, in-depth review of the policy. Submit documentation to WDE of the Administrative Team meeting and Curriculum Team discussing the wellness policy. Include date for in depth meeting of the Wellness Team (as stated in the policy). This meeting should take place in the spring of 2018. Keep documentation of the wellness committee meeting and submit to Tamra Jackson via email after the meeting takes place.
1200-Professional Standards	It is evident that training hours were met for the managers, workers and part time workers but there is no documentation to support this.	Documentation must be kept of training that is conducted for NSLP staff. Documentation must include: Dates of training, Staff signatures on attendance forms, Detailed agendas, training category/topic of training, length of training, and total number of hours of the training achieved per year. Documentation must be kept of training that is attended outside of the district as well(Wyoming SNA Conference in Casper). Use the WDE or USDA-approved training tracker to document all training. Provide documentation that this is being done to WDE as corrective action.
1200-Professional Standards	The food service director has not completed the required food safety training. Food Service Directors must complete eight hours of food safety training every five years.	The food service director must attend an 8-hour Food Safety Training as soon as possible. This training must be documented on the training tracker. Keep the certificate of training as back-up documentation that this training occurred. 1. Send WDE confirmation of registration for the training. 2. Send WDE documentation of completing the training.
Procurement	All food service purchases made in 16-17 between the micropurchase and formal purchase threshold should have been competitive. However, the district did not	The district should follow the procedures outlined in the policy to ensure that they follow requirements for purchasing items with federal funds for food service. For purchases between



## NSLP Administrative Review Summary 2017-2018

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	obtain quotes for food services purchases for small purchases.	the micropurchase threshold and the formal purchase threshold, the district must obtain quotes from at least two qualified sources to ensure competition. State in the finding response how the district will ensure it is making purchases according to federal guidelines.

### Site-Level Findings: Ralph Witter Elementary

Area	Finding Description	Required Corrective Action
400-Meal Components and Quantities (Breakfast)	<p>There are crediting and component errors that need to be corrected for breakfast for the week of review:</p> <p>10/30: Muffins (chocolate and blueberry) are not whole grain rich according to recipe            10/31: Obtain a CN label/PFS for yogurt and omelets to ensure they are credited correctly.            11/1: Pancakes not whole grain rich; obtain a CN label/PFS.            11/3: Plain bagels: do not meet whole grain rich requirement</p> <p>There are additional crediting issues for the month of review that need to be corrected:            All weeks: ensure all cereals are whole grain rich; verify crediting by looking at the Food Buying Guide, CN labels or Product Formulation statements            10/3 and 10/24: Pancakes not whole grain rich            10/6 and 10/13: Biscuits not whole grain rich            10/9: Muffins not whole grain rich            10/23: Donut whole grain?</p>	Fix the crediting issues as stated in the finding. Update the menu, component worksheets, nutrient analysis and planned production records to correctly credit components. Send WDE the corrected documentation including the labels, CN labels or PFS, the corrected breakfast menu, planned production records, nutrient analysis and component worksheets for the cycle menu or month of December.
400-Meal Components and Quantities (Lunch)	<p>There are errors on crediting components for the week of review for lunch:</p> <p>10/30            - Broccolini 1 cup should be credited as 1 cup dark green veggies - Tomato slices (2 slices) does not equal .5 cup vegetable. 2 slices equals about 1/8 cup red/orange vegetable.            10/31            - Baked Beans: Production record states 1 cup. Only credited as .5 cup on component worksheet through NutriKids</p>	Obtain CN labels or a product formulation statement for the processed foods to ensure they are credited correctly. Send WDE a copy of the labels. Update the menu, planned production records, nutrient analysis, and component worksheets for the cycle menu or month of December that corrects the issues stated in the finding. Send WDE the corrected documentation for review and approval.



## NSLP Administrative Review Summary 2017-2018

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	<p>- Chicken Strips: obtain a CN label if possible to ensure 3 pieces = 2 oz eq M/MA</p> <p>- Breadsticks: not whole grain rich. First ingredient must be "whole wheat", " whole grain"</p> <p>- Rice Krispies: whole grain? No documentation indicating 1 piece = 1 oz eq grain. 11/1</p> <p>- Fries: component worksheet says you are providing 3 cups of starchy vegetables when the production record says the serving size is 2 oz. Check the CN label/PFS.</p> <p>- M/MA: the component worksheet says you are providing 10 oz eq of M/MA when 1 sloppy joe provides 2 oz eq of M/MA. The components need to be updated. 11/3</p> <p>- corn dog: obtain a CN label or PFS to ensure product is 2 oz eq grains and M/MA</p> <p>- pineapple: 1 3/4 slices = 1/4 cup fruit. Component worksheet states 3 slices = 1 cup. Update component worksheet/serving size to = 1 cup fruit.</p> <p>For the month of review, there are crediting errors that need to be corrected as well: 10/2</p> <p>- Component worksheet indicates 4 oz eq M/MA. Hamburger only provides 2 oz eq. Where is the extra 2 oz coming from? (hamburger bun recipe says it provides 2 oz eq M/MA - this is incorrect) 10/3</p> <p>- Grilled Cheese not whole grain rich 10/4</p> <p>- Egg noodles not whole grain rich</p> <p>- Component worksheet indicates serving 2.5 cup starchy vegetable; only serving 1/2 cup potatoes 10/5</p> <p>- Component worksheet states serving 7 oz eq M/MA. This is not correct. Correct components for mac n' cheese recipe.</p> <p>- Cherry tomatoes: 3 cherry tomatoes = 1/4 cup vegetable. Production record states served 6 =</p>	



## NSLP Administrative Review Summary 2017-2018

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	<p>1/2 cup; not 1 cup as noted in component worksheet.</p> <p>10/6</p> <ul style="list-style-type: none"> <li>- Component worksheet not updated to reflect serving broccoli instead of celery (still meets weekly vegetable subgroup requirement)</li> <li>- Chicken nuggets: recipe says 4 chicken nuggets = 3 oz eq M/MA and 2 oz eq grain. Verify with a CN label/PFS 10/9</li> <li>- Vegetables: menu changed to serve coleslaw instead of carrots; component worksheet not updated.</li> </ul> <p>10/10</p> <ul style="list-style-type: none"> <li>- Lasagna noodles: whole grain rich?</li> <li>- Vegetables: did not update component worksheet (served coleslaw instead of celery)</li> <li>- Served 1 cup lettuce which should have credited to 1/2 cup dark green veggies</li> </ul> <p>10/11</p> <ul style="list-style-type: none"> <li>- Polish sausage on component worksheet as 4 oz eq M/MA. Obtain a CN label/PFS to correctly credit.</li> </ul> <p>10/12</p> <ul style="list-style-type: none"> <li>- Did not serve broccoli, did not update component worksheet (served bell pepper mix)</li> <li>- Served 1 cup lettuce with salad - should credit as 1/2 cup dark green veggie</li> <li>- Cheese recipe states 1/4 cup shredded cheese is 2 oz eq M/MA. 1 oz eq M/MA for cheese = 1/4 cup.</li> <li>- Ham: recipe says 1/4 cup ham = 2 oz eq M/MA. 1 oz ham (1/4 cup) = 1 oz M/MA</li> </ul> <p>10/17</p> <ul style="list-style-type: none"> <li>- Tortillas: whole grain rich?</li> </ul> <p>10/18</p> <ul style="list-style-type: none"> <li>- Green beans: production records state 1 cup; component worksheet says .75 cup.</li> <li>- Carrots: production records say 1 cup; component worksheet says .5 cup</li> <li>- Snap peas: not on component worksheet</li> </ul> <p>10/19</p> <ul style="list-style-type: none"> <li>- Pizza crust: whole grain rich?</li> </ul> <p>10/20</p>	



## NSLP Administrative Review Summary 2017-2018

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	<ul style="list-style-type: none"> <li>- Meatball sandwich: recipe states 3 oz M/MA, 2 oz eq grain. Component worksheet says 5 oz eq M/MA and 4 oz eq grain.</li> <li>- French fries: verify that 3 oz fries = 1 cup starchy vegetable.</li> <li>10/23</li> <li>- Tater tots: serving size of 2 oz does not equal 3 cups of starchy vegetables</li> <li>10/24</li> <li>- Biscuits: check recipe; calories for one biscuit according to recipe = 7,560</li> <li>- Verify grain component contribution for French toast sticks and update component worksheet</li> <li>10/25</li> <li>- Check calories for biscuits; recipe says only 16 calories/bread stick</li> <li>10/26</li> <li>- Verify M/MA oz eq for cheese soup (6 oz eq/serving is not correct)</li> <li>10/27</li> <li>- Broccolini not credited on component worksheet</li> <li>- Component worksheet says 1 cup of legumes when no legumes are served. Weekly legume requirement not met.</li> </ul>	
600-Dietary Specifications and Nutrient Analysis	<p>The breakfast calories for the month of review do not meet requirements:</p> <p>Week of 10/2: Calories 485.6</p> <p>Week of 10/9: Calories 538.2 (within 25 calorie flexibility)</p>	Update the breakfast menu to ensure all weeks meet the calorie requirement (range 350-500 kcal). Send WDE the updated menus and nutrient analysis. Ensure menus meet component requirements as stated in Meal Component finding.
1700-Afterschool Snack	The afterschool care program was not reviewed within the first four weeks of operation.	Develop a written procedure to remember that a review of the after school snack program must take place during the first four weeks of the school year and at another time during the year. Submit the procedure to WDE for documentation of corrective action.
1100-Smart Snacks	High school vending machine products are out of compliance with Smart Snacks requirements. The vending machine contains 15.2 ounce 100% juice Tea Country Time 1/2 and 1/2 with Lemonade and Gatorade 20 oz.	Work with school organizations to update vending machine with correct products that are smart snack compliant. Send WDE picture of vending machine once compliant. Link to Smart Snack Calculator is attached to the review