



NSLP Administrative Review Summary 2017-2018

St. Margaret's Catholic School

Date of Administrative Review: 4/16/18

Date Review Closed: 6/12/18

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)

Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
200-Verification	A confirmation review was not documented on the verified application. When verifying applications, a confirmation review ensures that the initial determination of Free/reduced meal eligibility was correct prior to informing the household they were selected for	Review the requirements and steps of the verification review. Determine who will act as the confirming official. Use the verification checklist when completing verification for the 2018-2019 school year.



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Area	Finding Description	Required Corrective Action
	verification. The confirming official must sign the back of the application documenting that this step was completed.	For the corrective action response, state who will act as the confirming official for the upcoming school year.
300-Meal Counting and Claiming	One paid student inadvertently claimed on March, 4th (Sunday). This error likely occurred due to a misplaced keystroke.	Submit a claim adjustment for March 2018 to correctly claim 374 paid students (not 375). Ensure that a system is in place so the count of students is double-checked prior to submitting a claim for reimbursement.
Resource Management	The school did not ensure it was pricing nonprogram foods (extra milk) to meet Revenue from Nonprogram Foods requirements.	Complete the nonprogram food pricing tool for extra milk. Attach the tool to the review and explain how extra milk will be priced to meet requirements.
Procurement	The contract St. Margaret's has with Fremont #25 for meals does not meet USDA requirements and is not regularly reviewed to ensure contract terms are followed by both parties. The contract should be improved for next school year to clearly define each parties' roles and to ensure that requirements are met. In particular, the contract needs to reference the Buy American requirement and more clearly state the role of the district in providing nutrient analysis and component information for the meals provided. The school should regularly review the meals and documents provided by the district to ensure they meet requirements so the school is claiming and serving reimbursable meals.	Draft a vended meals contract for the 18-19 school year between the school and Fremont #25. Upload the draft contract to the review for WDE review and approval.
Procurement	Total Meadowgold purchases exceed the micropurchase threshold. There should be a contract in place since the school only purchases milk from one vendor and does not spread purchases equitably. As a small purchase, at least 2-3 quotes should be obtained and documented demonstrating that the best price is achieved for the product needed.	Follow the school's updated procurement policy when purchasing items for NSLP. State how St. Margaret's will meet the requirements of micropurchases/small purchases for milk in the 2018-2019 school year.
Procurement	The procurement policy needs to be updated to more clearly define a small purchase.	Update the procurement policy as follows: The issue is within the underlined section: "Any purchase between \$3499 - \$149,999 is considered a small purchase and will not require a formal bid process. All small purchases shall be competitive; however small purchases above \$25,000 shall be made on a



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		<p>competitive basis with at least three written quotes being obtained."</p> <p>Small purchases that are greater than the micro require a competitive processes. Therefore, this need to be updated. Perhaps reword the paragraph to say:</p> <p>Any purchase between \$3499 and \$149,999 is considered a small purchase and all small purchases shall be competitive; however small purchases above \$25,000 shall be made on a competitive basis with at least three written quotes being obtained."</p> <p>Update the procurement policy with the updated information regarding small purchases. Upload the updated policy to the review.</p>

Site-Level Findings: St. Margaret's

Area	Finding Description	Required Corrective Action
300-Meal Counting and Claiming	One paid student was inadvertently counted on March 4th (Sunday) and added to the total and claimed for reimbursement. This looks like it was a keystroke mistake. However, the mistake was transferred to the claim for reimbursement which will have to be adjusted to accurately claim the correct number of paid students who during March.	<p>Submit a readjustment to the March 2018 claim to reflect 374 paid students eating school lunch (not 375).</p> <p>In the future, double-check the count of students to ensure that only students who eat on school days are claimed.</p>
400-Meal Components and Quantities (Lunch)	<p>There are discrepancies between the planned production records, component worksheets and completed production records:</p> <p>For the week and month of review, legumes are not credited or documented correctly. The Component worksheet states they are being offered but menu does not reflect this. For example during the week of review:</p> <p>4/17: 1/4 cup legumes, no beans/legumes on menu</p> <p>4/18: 3/4 cup of legumes are noted on component worksheet from the chili.</p> <p>However, the serving size of chili is 3/4 cup.</p>	Work with Fremont #25 to ensure that all components are being offered and served daily and weekly. The planned production records should match what is being sent from the district each day. Any changes to the menu need to be documented on completed production records. It is the responsibility of the school to ensure that the district is providing what is required and the meals being served and claimed for reimbursement meet requirements.



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	<p>The correct amount of legumes is not being credited. 4/19: 1/4 cup legumes, no beans/legumes on menu</p> <p>On the month of review completed production records, on days where legumes are planned on being served, no legumes were noted on the completed production records. For example, on 3/2, the component worksheet indicates 1/4 cup of legumes is being served when the completed production record does not indicates beans/legumes were served.</p> <p>There is also an issue with the correct amount of fruit being documented on most days. The planned production records for 3/1 state that 1 cup of fruit (1/2 cup of canned and 1 serving of fresh) will be offered. However, only fresh fruit was offered (1/2 cup serving for each student of apples or oranges). Again on 3/2, the component worksheet indicates that 1.5 cups of fruit is offered but the completed worksheet only indicates 3/4 cup of fruit was offered (1/2 of an apple, 1/4 cup canned).</p> <p>The minimum components are being met daily and weekly despite the crediting errors.</p> <p>In general, the vegetable components need to be corrected. If the same amounts and types of vegetables are offered on the salad bar, any additional hot vegetables need to be accounted for. For example, the planned salad bar offers 2.5 cups of vegetables. However, on 4/17 only 1.75 cups are noted on the component worksheet.</p>	<p>Send WDE the planned production records, nutrient analysis and component worksheets and the corresponding completed production records for at least two weeks.</p>
<p>Meal Components and Quantities (Lunch)</p>	<p>The planned menu for the day of review provides 1/2 cup of canned fruit plus 1 serving of fresh fruit. Only fresh fruit was served. The minimum amount of fruit was offered with the fresh fruit (1/2 to 1 apple).</p>	<p>St. Margaret's should ensure that the planned menu is offered and served to students to ensure daily and weekly requirements are met for all components. Any changes should be noted on the production records and the nutrient analysis updated as needed.</p>



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		State how the school will ensure that the planned menu is offered and component requirements are met each week.
Offer vs. Serve	There is not a sign posted informing students what makes up a reimbursable meal and that they must take 1/2 cup of fruit/vegetable with their meal.	Post a sign in the serving area that indicates to students what they must take to make up a reimbursable meal each day and that they must take at least 1/2 cup of fruit/vegetable with their meal. Send WDE a picture of the poster that will be posted to meet this requirement.