



## NSLP Administrative Review Summary 2017-2018

### Holy Spirit Catholic School

Date of Administrative Review: 5/16/2018

Date Review Closed: 7/20/2018

#### 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

At the salad bar, the teachers serving fruits and vegetables use a measuring cup or a server to ensure that all students are receiving the correct portion size of each item. This is a great practice to continue.



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### Review Findings

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action	Corrective Action Response
100 – Certification and Benefit Issuance	The direct certification website is not currently being utilized and checked each month, records of directly certified students are not available.	In the future, the list of directly certified students (SNAP and foster) enrolled at the school will need to be checked and printed each month and kept on file for three years plus current year. State who will be responsible for checking the direct certification website and maintaining documentation of direct certification status of students.	At the beginning of each month, we will verify with the direct certification website, which students are eligible for SNAP and foster services. We will also call School District #2 for any updates.
100 – Certification and Benefit Issuance	The direct certification website needs to be checked each month to correctly identify eligible students to receive free school meals. Any changes to a child's lunch-eligibility status needs to be made within 3 days.	Each month you need to print the list of students from the direct certification website and make note of the date that you checked it for your students. Any change in lunch status needs to be changed within 3 days and notification needs to be sent to the parent or guardian within the same time frame. State who will be in charge of checking the direct certification website each month.	We have created a table to update monthly based on the Direct Certification Website. As changes occur, families will be informed accordingly. Either Stephanie Current or Dina Stevenson will be doing this.
100-Certification and Benefit Issuance	There was one application that was determined to be Free by income. The student on the application should have been Free - Directly Certified beginning December 2017.	Change the students' status to directly certified free. This eligibility will be valid 30-days into next school year or until the household turns in another application for SY 18-19. Send WDE an updated POS list documenting that these students are now recognized as DC free.  Starting next school year, the website needs to be checked each month for SNAP, Foster and FDPIR. Any children found on the website needs to be identified on the POS list as Directly Certified Free; also include the date their status was determined or changed. Also any other children living in household where	We will check students status monthly, and make changes accordingly. All changes will be documented in a table.



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		<p>someone receives SNAP needs to be identified as Free due to SNAP. Foster students are considered directly certified free but other students' eligibility in the household needs to be determined by income or their own individual DC status.</p>	
<p>100-Certification and Benefit Issuance</p>	<p>The school is not currently checking the direct certification website monthly.</p>	<p>WDE will ensure staff has access to the direct certification website and in the future, staff will need to check the direct certification website each month to see if they have any enrolled children that have been added to SNAP, Foster or FDPIR.</p> <p>State who will be responsible for checking the Direct Cert site monthly.</p>	<p>Either Stephanie Current or Dina Stevenson will be responsible for checking the direct certification website monthly.</p>
<p>100-Certification and Benefit Issuance</p>	<p>None of the free and reduced applications are signed by the determining official. One of the applications should be free based on direct certification instead of income.</p>	<p>For next school year, the school's procedure needs to change to ensure that the direct certification website is checked each month for all enrolled students and for each free and reduced application that provides a case number or indicates a foster student. Each application must be signed by at least one person after students' eligibility is determined.</p> <p>State who will be the determining official for the school for SY18-19. State the training the determining official will receive to ensure that all certification and benefit issuance requirements are met.</p>	<p>Linda Marcos, as the determining official, will get with Sweetwater School Distilled. #1 for training opportunities for the future.</p>
<p>200-Verification</p>	<p>The school was unable to produce any documentation for verification, so the SA cannot verify if the letter to households contains the required information and if follow-up requirements were met.</p>	<p>Review the verification requirements in the Eligibility Manual. State who will act as the verifying and confirming official. Include copies of the documents (letters to households, verification tracker, etc.) you would use for verification next school year.</p>	<p>We will review the eligibility manual and ensure the current verification forms are used for the school year 2018-2019. The determining official is Stephanie Current. The verification and confirming official is Linda Marcos.</p>



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200-Verification	The school was unable to produce copies of the letters sent to households, so we cannot verify if letters were sent and if the documents included the required information.	<p>Refer to download forms prior to the verification process next year to ensure the school is using the correct and current documents. Ensure the school is keeping documentation of the letters sent to households, any correspondence the school has with the households (letters, phone calls, e-mails, etc.).</p> <p>State who will act as the verifying official next school year. State how the verifying official will ensure the correct procedures are followed and the correct documents are used.</p>	We have updated the original documents file to ensure older forms were destroyed. The verifying official will review the verification process and keep documentation of any and all correspondences with families.
200-Verification	Because the original application was not signed by the confirming official, we cannot verify a confirmation review of the application took place.	A procedure needs to be developed for verification. That procedure will need to include that once the application(s) have been chosen for verification that another official will need to recalculate the income provided and match it against the Income Eligibility Guidelines for the current year, and verify that the person who did the original status determination, classified the children correctly (confirmation review). This person also need to verify the children are not listed on the direct certification website, which if they are, that application would be ineligible for verification. Upload the verification procedure to this corrective action, as a response to the corrective action.	We will follow our "Verification Procedure"
300-Meal Counting and Claiming	The school does not have an unpaid meal charge policy as required by USDA.	While it has not been an issue in the past, the USDA requires that all NSLP participants have an unpaid meal policy in place. Please create this policy and	We will follow our Unpaid Meal Policy (policy attached to finding).



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		attach it to this corrective action as the response to this finding.	
800-Civil Rights	The school does not have a form to document potential meal accommodation or substitution requests. This is required by USDA for all NSLP participants.	<p>Obtain the WDE Special Dietary Needs Accommodation Request form. Keep this form on file in case there is a student that requires a meal accommodation or substitution due to an allergy or medical need.</p> <p>Review requirements and train staff on food allergies and accommodating students with an accommodation or substitution.</p> <p>Ensure food service staff is aware of the food allergy and approved replacement as well as Sweetwater 1. State training that will occur on special dietary needs.</p>	We will follow our Meal Accommodation and Substitutions policy. We are coordinating with School District #1 for upcoming training opportunities.
800-Civil Rights	The school does not have a civil rights complaint procedure that meets USDA requirements.	All NSLP participants must have a written civil rights complaint procedure that meets USDA FNS requirements. Please provide a copy of your procedure to this corrective action as a response	We will follow our new CIVIL RIGHTS COMPLAINT PROCEDURE
800-Civil Rights	The school does not submit a public release to the local paper informing the public of the availability of NSLP.	The school can work with Sweetwater #1 to submit a public release together or the school can submit their own release. State the school's plan for ensuring a public release is submitted to the paper for next school year. Upload a draft of the public release that meets USDA requirements.	We have spoken with School District #1, and they will include HSCS in their public release. School District #1 is in the process of writing a public release meeting the USDA requirements.
1000-Wellness Policy	<p>The wellness policy does not meet requirements of the Wellness Policy Final Rule.</p> <p>At a minimum, policies are required to include:</p> <ul style="list-style-type: none"> <li>• Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and</li> </ul>	Update the school's wellness policy so it meets the requirements of the final rule. Upload the policy to the review. State how the wellness policy will be made available to the public, how often the wellness policy will be reviewed, and who will act as the wellness policy committee.	We have updated our Wellness Policy, please see attachment.



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	<p>consider evidence-based strategies in determining these goals.</p> <ul style="list-style-type: none"> <li>• Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for:               <ul style="list-style-type: none"> <li>- School meal nutrition standards and Smart Snacks in School nutrition standards.</li> <li>- Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).</li> <li>- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.</li> <li>- Description of public involvement, public updates, policy leadership, and evaluation plan.</li> </ul> </li> </ul> <p>LEAs must establish wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy. LEAs must permit participation by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process.</p> <p>The final rule requires State agencies to assess compliance with the wellness policy requirements as a part</p>		



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	<p>of the general areas of the administrative review every 3 years. This assessment will determine:</p> <ul style="list-style-type: none"> <li>· Compliance with the wellness policy</li> <li>· How the wellness policy compares to model wellness policies, and</li> <li>· Progress made in attaining the goals of the wellness policy.</li> </ul> <p>The rule requires that LEAs must make available to the public:</p> <ul style="list-style-type: none"> <li>· The wellness policy, including any updates to and about the wellness policy, on an annual basis, at a minimum, and</li> <li>· The Triennial Assessment, including progress toward meeting the goals of the policy.</li> </ul>		
1400-Food Safety	<p>The school does not ensure that products being purchased for NSLP meet the Buy American provision.</p>	<p>The Buy American Provision states that school food authorities (SFAs) purchase, to the maximum extent practicable, domestic commodities or products. For all procurement transactions for food when funds are used from the nonprofit food service account, whether directly by an SFA or on its behalf, procurement transactions must comply with the Buy American provision. Implementation of the Buy American provision should be done by including Buy American requirements in documented procurement procedures and all procurement solicitations and contracts; including domestic requirements in bid specifications and contract monitoring.</p> <p>The school should work with the school district to ensure that the products they are receiving meet the Buy American provision and if there are exemptions, the school receives notice and documentation of these exemptions.</p>	<p>The contract between HSCS and School District #1, is currently being revised to include Buy American Provision.</p>



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		Upload the contract between Holy Spirit and Sweetwater #1 that contains the Buy American provision. Also upload the documentation that Holy Spirit will use to document exemptions to the provision.	
1200-Professional Standards	Professional standards training hours are not being tracked or documented for employees involved with NSLP.	Review the professional standards training requirements for NSLP employees. Begin tracking professional standard/continuing education training hours for food service employees and ensure annual training requirements are met each school year. Use the WDE professional standards training tracker to ensure required information is recorded. Upload the training tracker the school plans to use for documenting training hours for SY 18-19.	We will document on our new Hot Lunch Training Log.
1200-Professional Standards	The food service staff at Holy Spirit is not completing annual required training hours. The food service staff who is not the director must complete professional standards training hours based on their position. Program managers must complete 10 hours of training, full-time staff must complete 6 hours, and part-time staff must complete 4 hours of training.	State the roles of each food service staff. State how the required training hours will be completed for SY 18-19.	We are interviewing new food service staff. School District #1 is gathering training information for us.
1200-Professional Standards	NSLP requires that one individual be named food service director. This person completes a majority of the food service director roles and must complete 12 hours of professional standards training each school year. Holy Spirit does not name someone specifically as the food service director and training requirements are not met.	State who will be named the food service director at Holy Spirit. State the plan for the food service director to complete 12 hours of professional standard training hours for SY 18-19.	We are interviewing new food service professionals. We are coordinating with School District #1 for future trainings.
1200-Professional Standards	The food service director has not completed the required 8 hours of food safety training.	The food service director is required to complete 8 hours of food safety training every five years. This training must be documented and recorded in the	We are currently interviewing for new food staff employees. We are coordinating with School District #1 for upcoming trainings.



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		<p>school's professional standards training tracker.</p> <p>Upload documentation that the food service director completed the food safety training or state the date that the director will take the training.</p>	
Procurement	The school's food service procurement policy needs to be updated to reflect current USDA requirements. This includes the Buy American and Women's and Minority Business clauses.	Update the school's procurement policy to meet USDA requirements. Use the WDE template as a resource. Send WDE the updated policy for review and approval.	We have updated our Procurement Policy.

### Site-Level Findings: Holy Spirit Catholic School

Area	Finding Description	Required Corrective Action	Corrective Action Response
400-Meal Components and Quantities (lunch)	This school serves K-6 grades but the meals provided are planned for the K-5 grade group.	<p>The school needs to notify their vendor (Sweetwater #1) that they must make changes to the meals to accommodate the K-5 and 6-8 grades and the corresponding meal pattern requirements. This will require a change in the meal planning so meals provided to all grades are in compliance for grades K-8:</p> <ul style="list-style-type: none"> <li>- Calories: 600-650</li> <li>- Grain min and max of 8-9 oz/eq per week</li> <li>- Meat/Meat Alternate min and max 9-10 oz/eq per week</li> </ul>	We have notified School District #1 that our meals must accommodate K-6. School District #1 is currently working to revise their meal pattern requirements and dietary specifications.
400-Meal Components and Quantities (lunch)	<p>Most weeks were missing at least some days of production records, so meal compliance could not be verified.</p> <p>The school is not ensuring the meal provided by Sweetwater #1 meet meal pattern requirements and dietary specifications for the appropriate grade groups.</p> <p>There was one issue found in crediting leafy greens on the component worksheets from the school district. Leafy greens can only be credited for half the amount served (1 cup served leafy greens 1/2 cup dark green vegetable).</p>	<p>By receiving vended meals, it is the school's responsibility to verify that the school is receiving and serving meals that comply with the required meal pattern to ensure compliance with the federal requirements. Check the daily production record against the Weekly Certification Worksheet and Nutrient Breakdown received from Sweetwater #1. Verify the quantity of each vegetable, fruit, M/MA and grain shown on the production record matches the amount shown on the Weekly Certification Worksheet. Sweetwater #1 needs to adjust the meals they are preparing for the school to accommodate the K-8 meal pattern. State who will be responsible for ensuring meals meet meal pattern requirements.</p>	We are currently seeking new food service staff and collaborating with School District #1 for trainings.



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		<p>School Food service staff should receive training on meal pattern requirements and dietary specifications to ensure that all meals claimed are reimbursable. State the training that will occur to meet this requirement.</p> <p>Please ensure that leafy greens can only be credited for half the amount served (1 cup served leafy greens 1/2 cup dark green vegetable). State who will be responsible for ensuring vegetable component requirements are met each day and week.</p>	
400-Meal Components and Quantities (lunch)	There is no signage posted in the serving area communicating to students how the day's meal meets meal pattern requirements.	<p>There needs to be a sign posted in the serving area that shows students how the meal that day fits the meal pattern. The sign must also state that students must take at least 1/2 cup of fruit/vegetable at each meal. Take a picture of the sign in the cafeteria and attach it to this corrective action as a response.</p> <p><a href="https://www.learningzonexpress.com/1-terrific-tray-dry-erase-menu-poster.html">https://www.learningzonexpress.com/1-terrific-tray-dry-erase-menu-poster.html</a></p>	Attached is the sign that will be put out each day reflecting the daily meal.
500-Offer vs. Serve	There is no signage explaining a reimbursable meal to students.	<p>If you are going to continue offer vs serve, you need to have a sign explaining what a reimbursable meal is to the students. You can make your own, or purchase one. Take a picture of the sign hanging in the cafeteria and attach it to this correcting action as a response.</p> <p><a href="https://www.learningzonexpress.com/build-your-tray-poster.html">https://www.learningzonexpress.com/build-your-tray-poster.html</a></p>	Please see picture of poster. Hung up by serving area.
500-Offer vs. Serve	The food service staff has not been trained in offer vs. serve or meal pattern requirements.	All kitchen staff needs to be trained on offer vs serve and meal pattern requirements. Conduct this training, have a sign in sheet that all staff sign showing they were trained and show the date and length of time the training took. It might be advisable to attend Sweetwater 1's district training on OVS, meal pattern requirements and anything related to NSLP.	We are in the process of hiring new kitchen staff. As soon as they are hired, we will work with School District #1 to find appropriate training.
500-Offer vs. Serve	The school application states they are doing offer vs serve, however they are serving students all components except for the items on the salad bar.	The school either needs to change their application to show that they are doing "serve" only or they need to change their method for doing offer vs serve to where they are offering all 5 components to the children and letting them decline up to two	We are currently working with School District #1. They are changing the structure of the menus to fit our needs. Once we receive the new menus we



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		<p>items. Students must take at least three components (one of the three components must be 1/2 cup fruit and/or vegetable). After children have gone through the lunch line, milk and salad bar someone needs to look at each child's tray and verify that they have three components on their tray, in correct serving amounts, and that one of the items is a fruit or vegetable or combination of both to equal 1/2 cup.</p> <p>State if the school will implement offer vs. serve next school year or just "serve". If implementing OVS, state how meal service will be organized for this type of meal service and the training that staff will undergo to learn OVS and meal pattern requirements.</p>	<p>can plan accordingly and change our procedures.</p>
<p>600-Dietary Specifications and Nutrient Analysis</p>	<p>There are different meal pattern component and nutrient requirements for grades K-5 and 6-8.</p> <p>The school is grades K-6. Dietary specifications are components of the planned menu are only for grades K-5.</p>	<p>Adjust planned menu so meal components and nutrients meet the meal pattern requirements for the K-8 grade group. Inform Sweetwater CSD #1 of the grade groups attending Holy Spirit and that meals provided need to reflect the grade groups served. Holy Spirit must periodically check these menus to ensure meals provided and claimed are reimbursable.</p>	<p>After speaking with School District #1, they agreed to change the meal pattern requirements to fit our K-6 school.</p>
<p>600-Dietary Specifications and Nutrient Analysis</p>	<p>Dietary Specifications were not meet for two weeks during the review month:            Week of April 4th: Average calories 714 (110% of requirements)            Week of April 9th: Average calories 664 (102% of requirements)            Menus are based on K-5 calories 550-650 when the school is serving K-6 students (range 600-650 calories).</p>	<p>Ensure that planned meals meet dietary specifications for the K-8 grade group (overlap between K-5 and 6-8). Inform Sweetwater CSD #1 of the grade groups served at Holy Spirit so planned meals meet meal pattern requirements.</p>	<p>School District #1 is currently creating monthly menus that will accommodate our school population of K-6.</p>
<p>1400-Food Safety</p>	<p>None of the open containers in the refrigerator are dated.</p>	<p>All open containers in the refrigerator need to be marked with the date they were opened. It is a good practice to note the date they were purchased as well. The best if used by dates need to be periodically checked to ensure food is not outdated. State who will ensure that this will be completed.</p>	<p>We are seeking new food service staff. We will implement, when a container is opened, we will write the date on that specific container.</p>



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<b>Area</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>	<b>Corrective Action Response</b>
1400 – Food Safety	Temperature logs are not being kept at the school.	<p>Temperature logs for food, freezers, fridges and coolers must be completed daily and kept on file for three years plus the current year. Food temperature logs can be kept on the daily production records or another document.</p> <p>State who will ensure temperature logs are maintained as required. State when food temperatures will be taken and how they will be documented.</p>	We will implement our new temperature log.