



## NSLP Administrative Review Summary 2017-2018

### Teton County School District #1

Date of Administrative Review: 5/22-5/24

Date Review Closed: 11/1/18

#### 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)
- Procurement Review



## NSLP Administrative Review Summary 2017-2018

### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
<p>100-Certification and Benefit Issuance</p>	<p>There were two errors found based on review of directly certified students:</p> <p>1. One student has no documentation of foster status. Only one student on the application should have been foster. Foster status does not transfer to all students in the household. If one student is foster, the other students' eligibility needs to be determined individually. The software system automatically adjusts all students in the household as one eligibility determination. This is a fix that needs to be done by the application software (Mosaic). The non-foster student's status should be determined by income and will remain free but the POS list needs to reflect this.</p> <p>2. Another student has no documentation of homeless status. Student will remain free based on household income. This status determination will need to be updated on the POS list.</p>	<p>. Update the two students' eligibility to free based on income in the POS system. Determine if the district can override these students' eligibility or contact the software company to ensure that students' eligibility can be noted individually and not by household. This change by the software is required in order to reflect USDA regulations.</p> <p>Send WDE and updated POS list that correctly identifies students' eligibility. Upload documentation that the district notified the software of the requirements for individually documenting students' meal eligibility.</p> <p>Corrective Action Response Accepted</p>
<p>100-Certification and Benefit Issuance</p>	<p>There was one error during the review of free and reduced students: Two students on one application should be reduced instead of denied.</p>	<p>Change the eligibility status of the two students from denied to reduced. This change will be in effect for the remainder of the school year and into the 30-day carry-over into next school year or until the household turns in a new application.</p> <p>Send the household a letter informing them of the status change. Update the POS list to reflect the students' reduced status. Send WDE a copy of the letter sent to households and the updated POS list.</p> <p>Corrective Action Response approved</p>



**NSLP Administrative Review Summary 2017-2018**

<p>200-Verification</p>	<p>The District does not have a waiver from WDE to use Mosaic in place of a confirming official during the process of verification. As stated in the Eligibility Manual:</p> <p><i>Prior to any other verification activity, a determining official must review each approved application selected for verification to ensure the initial determination was accurate. Any LEA that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification. The confirmation review must be done by an individual other than the individual who made the initial eligibility determination [7 CFR 245.6a(e)(1)]. 104 This requirement is waived if the LEA uses a technology-based system with a high level of accuracy in processing an initial eligibility determination. The LEA must contact the State agency to determine if its system qualifies them for this waiver. The State agency may request documentation to support the accuracy of the LEA's system. If the State agency determines the technology-based system is inadequate, it may require the LEA to conduct a confirmation review of each application selected for verification.</i></p>	<p>If the district wishes to continue to use Mosaic in place of the confirmation review, request the electronic confirmation process from WDE. Upload this waiver request to the finding for WDE review.</p> <p>Waiver approved Corrective Action response approved</p>
<p>200-Verification</p>	<p>One student selected for verification was incorrectly determined to be reduced during the initial determination. After verification, the student was incorrectly verified to remain at reduced. This student should have been denied based on household income.</p>	<p>Update the student's status to denied. Send the required documentation to the family notifying them of the change. Send WDE the documentation that was sent to the household and the updated POS list reflecting the change in status.</p> <p>Corrective Action Response is approved</p>



**NSLP Administrative Review Summary 2017-2018**

<b>Area</b>	<b>Finding Description</b>	<b>Required Corrective Action</b>
200-Verification	During verification, there was no documentation of a follow-up attempt to households if they did not respond to the initial request for income documents.	<p>. Review the verification process and follow as required. Use the WDE templates for verification tracking and verification process overview as resources. State who will ensure the verification process is followed according to guidelines.</p> <p>Follow up was done on all just not documented.</p> <p>Corrective Action Response was accepted.</p>



**NSLP Administrative Review Summary 2017-2018**

1000 - Local School  
Wellness Policy

The Wellness Policy does not meet the requirements stated in the Wellness Policy Final Rule released in July 2017: At a minimum, policies are required to include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- 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:
  - o School meal nutrition standards and
  - o Smart Snacks in School nutrition standards.
- 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).
- 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.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

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.

The final rule requires State agencies to assess compliance with the wellness policy requirements as a part of the general areas of the administrative review every 3 years. This assessment will determine:

- Compliance with the wellness policy
- How the wellness policy compares to model wellness policies, and
- Progress made in attaining the goals of the wellness policy.

The rule requires that LEAs must make available to the public:

. Update the wellness policy to comply with the Wellness Policy Final Rule. Upload the updated policy to the review for WDE approval.

Corrective Action Response Accepted. Teton 1 will follow up after the next meeting on updates to the policy



**NSLP Administrative Review Summary 2017-2018**

Area	Finding Description	Required Corrective Action
<p>1000 - Local School Wellness Policy</p>	<p>The district does not make the wellness policy assessment public as required by USDA.</p>	<p>State how the district will make the wellness policy assessment public. This can be done through a newsletter, website, e-mail, etc. Provide documentation that this requirement was met.</p> <p>Corrective Action Response Accepted</p>
<p>1200-Professional Standards</p>	<p>The district is not using an approved training tracker tool to document food service employee annual training hours. USDA requires that all employee training hours are tracked in a tool that provides all required information. The tool must include:</p> <ul style="list-style-type: none"> <li>-employee name, title, and PT/FT status</li> <li>- Training title</li> <li>- Training category/objective</li> <li>- Training length</li> <li>- Total number of training hours completed</li> </ul>	<p>Begin tracking employee training hours on an approved training tracker. Input all training hours in this tracker for the 17-18 school year. Provide this completed training tracker to WDE and if employees have not met annual training requirements, state how the employees will meet annual training requirements in the 18-19 school year.</p> <p>Corrective Action Response Accepted</p>



**NSLP Administrative Review Summary 2017-2018**

<p>Procurement Review Form</p>	<p>Pizza and non-milk beverage solicitations contain unallowable language and do not meet USDA requirements. For example:</p> <ul style="list-style-type: none"> <li>- "The Distributor's Statement of No Proposal" is unallowable</li> <li>- The Buy American Clause needs to be updated</li> <li>- The non-discrimination statement is not current and not necessary</li> <li>- Both solicitations are a mix of and IFB and RFP - the solicitations must be one or the other</li> <li>- The pizza bid does not specify the component or nutrient requirements for the products needed</li> </ul>	<p>Both the pizza and non-milk beverage solicitations must be re-bid for next school year to include all required clauses and to remove unallowable language. Use WDE solicitation templates and Procurement Handbook as references.</p> <p>Submit draft solicitations to the review for WDE approval prior to publishing.</p> <p>Corrective Action Response accepted</p>
<p>Procurement Review form</p>	<p>- The district's procurement policy needs to be updated to reflect current USDA requirements. For example, the Buy American and women's and minority business clauses need to be included.</p>	<p>Update the district procurement policy to adhere with current USDA requirements. Use WDE's procurement policy template as a resource. Attach the updated policy to the review for WDE approval.</p> <p>Corrective Action Response is approved</p>



**NSLP Administrative Review Summary 2017-2018**

<p>400- Meal Components and Quantities-Breakfast and Lunch at Jackson and Colter Elementary</p>	<p>The meal documentation requirements for NSLP are not fully met. To demonstrate compliance with meal pattern requirements, SFAs are required to have the following documentation:</p> <ul style="list-style-type: none"> <li>- menus</li> <li>- production records (that contain all required information)</li> <li>- Receipts/invoices</li> <li>- meal pattern contribution documentation (for grains, M/MA, fruits, vegetables): this can be done on production records, recipes, or a separate document (like USDA contribution reports or a USDA-approved software).</li> <li>- Product information (CN labels, PFS, nutrition fact labels)</li> <li>- standardized recipes</li> </ul> <p>The SFA is missing all required information on the production records for the month and day of review. The specific types of fruits and vegetables and corresponding serving sizes must be stated on the completed production records for each meal. Additionally, the production records do not contain the required information (serving sizes, recipe number or brand name of product, actual number of adults served, a la carte items (planned and served)).</p> <p>However, based on component worksheet and nutrient analysis information, all required components and dietary specifications are met for the cycle menu. However, there are some issues with correctly documenting whole grains and nutrients for the weekly averages (see TA).</p>	<p>Maintain meal pattern documentation requirements for all days of the cycle menu and days of operation. This includes:</p> <ul style="list-style-type: none"> <li>-menus</li> <li>- planned production records (that contain all required information)</li> <li>- meal pattern contribution documentation (for grains, M/MA, fruits, vegetables): this can be done on production records, recipes, or a separate document (like USDA contribution reports or a USDA-approved software).</li> <li>- Product information (CN labels, PFS, nutrition fact labels)</li> <li>- standardized recipes</li> </ul> <p>Train staff on maintaining production records that contain all information. State when this training will occur.</p> <p>WDE will conduct an unannounced visit to the review sites during the next school year to determine that required meal pattern documentation is being kept. If the SFA cannot demonstrate compliance with meal pattern documentation requirements, WDE will be required to enforce fiscal action for the month and day of review.</p> <p>10/31/18 - Reviewed 1 week of September menus and nutrient analysis. Jackson and Colter Elementary is currently completing records properly for breakfast and lunch.TR</p>
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**NSLP Administrative Review Summary 2017-2018**

<p>500- Offer vs Serve</p>	<p>The signage communicating to students how the menu fits into meal pattern requirements must state that students have to take at least 1/2 cup of fruit and/or vegetable as part of their meal.</p>	<p>Ensure signage in the serving line meets requirements. Post a photo of the sign used for WDE approval.</p> <p>Corrective Action Response accepted</p>
<p>1400-Food Safety</p>	<p>Temperature logs for the main entrée are documented on the monthly menu as proof the safe serving temperature has been met during cooking. However, temperatures are not taken again prior to, during or between meals service times. There are no systems in place for taking temperatures of milk, hot or cold sides or salad bar components.</p>	<p>Review requirements and best practices for taking food temperatures in food service. Add the applicable procedures to the HACCP plan and ensure all staff is trained on food safety.</p> <p>Record daily temperatures of all hot and cold foods on a temperature log or production record (include milk, salad bar and any other sides or entrees).</p> <p>Temperatures should be taken during cooking, upon reaching temperature, when set on the line and periodically if any holding period occurs.</p> <p>State the food safety training that will occur, upload any updated HACCP procedures, and provide 1 week of completed temperature logs for the corrective action response.</p> <p>Corrective Action Response is accepted</p>