Goshen #1
Date of Administrative and Procurement Review Date: December 10-11 2019
Review closed: February 22 2019

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

Commendations:
All staffs were well trained and managed programs very well.

Patty was very helpful during the review. Thank you!

Patty was well prepared for the review with documents readily available for viewing.

The lunch menu was very good. In addition, the salad bar was very colorful. Reviewer enjoyed watching the children go through the salad bar prior to picking up the hot items. Thank you for implementing this best practice.

Kitchen was very clean and sanitary.

Staffs were very friendly when students arrived. They knew children's names and exchanged many smiles for both breakfast and lunch.

Lunch was very tasty. Salad bar was very colorful and looked very appetizing. Children seemed to enjoy the offerings.

Staffs keep the kitchen very clean and sanitary. All open food was dated prior to placing in cooler and/or freezer.
Findings and Corrective Actions:

300 – Meal Counting and Claiming

Finding #1
District is not utilizing the Edit Check on a daily and/or monthly basis.

Required Corrective Action:
District needs to implement edit check process to ensure that over-claiming does not occur. Send WDE documentation that this has been implemented.

Accepted Corrective Action:
Sponsor has printed an edit check for each location and designated a binder to store documents which is stored in the director’s office. Sponsor has uploaded January 2019 edit check. Corrective Action is approved.

700 – Resource Management

Finding #2
Cash-Wa Distributing missing items required for a federal procurement. No compliant solicitation or contract. FSA did not complete solicitation and is referenced as “back up vendor” for food and supply award to Cash-Wa.

Required Corrective Action:
All purchases must be compliant as a micro, small, or formal. Formal purchases should be performed for Cash-Wa and FSA for SY19-20. Provide WDE a copy of all solicitation documents to be used for next school year. Consider joining CNC Co-op.

Accepted Corrective Action:
SFA has joined a CNC Co-op as of December 2018. SFA will update procurement procedure policy for federal funds to reflect new guidelines for micro purchases and reflect regulation 2 CFR 200.321. Corrective Action is approved.

Finding #3
Written federal procurement policy is outdated.

Required Corrective Action:
Document will need to be updated for current “Buy American” and needs to reference preference on minority and women-owned businesses. WDE strongly suggests increasing the micro purchase to the current $10,000 threshold.

Accepted Corrective Action:
SFA will updated policy to reflect new guidelines for micro purchases and reflect regulation 2 CFS 200.321. Corrective Action is approved.

1400 – Food Safety

Finding #4
SFA is not following the Buy American provision.

Required Corrective Action:
SFA needs to implement Buy American provision exemption form. Provide documentation showing how provision is being met and implemented.

Accepted Corrective Action:
Sponsor has created a binder listing all non-domestic food that is regularly purchased and implements exemption form. Corrective Action is approved.

RMCR – Nonprofit School Food Srvc Acct

Finding #5
SFA has net cash resources in excess of 3 months average of expenditures.

Required Corrective Action:
Please provide a very specific spending plan for the excess funds to WDE. Please provide WDE with how funding will be monitored to verify that funds are in compliance moving forward.

Accepted Corrective Action:
Sponsor provided detailed spending plan and monitoring plan to WDE. Sponsor will need to provide WDE with school board meeting minutes authorizing all equipment purchases. Corrective Action is approved.
Finding #6
Bad debts are unallowable cost for federal funds per 2 CFR.246 and any general fund transfers would be considered income to the program and this cost would still be unallowable.

Required Corrective Action:
Please provide a narrative or policy for bad debts in the food service program and how they will be addressed in the future.

Accepted Corrective Action:
SFA uploaded bad debt policy. The district writes a separate check from the General Fund to Food Service account to cover bad debts and is treated as payment for only those balances, is not included in the permanent board approved large transfers. Corrective Action is approved.

600 – Dietary Specifications and Nutrient Analysis
Finding #7
Complete product formulation statements (PFS) and/or CN labels were not provided for all products.

Required Corrective Action:
Sponsors needs to upload all PFS, revise recipes to reflect proper components, and upload new 6 cent certification forms. Please provide an updated nutrient analysis and certification information showing compliance.

Accepted Corrective Action:
Sponsor uploaded PFS and CN labels, recipes, nutrient analysis and 6 cent certification forms. SFA needs to work to update recipes, components, and simplified nutrient analysis to reflect correct crediting of components and use Nutrikids software to simplify work. Corrective Action is approved.

1400 – Food Safety
Finding #8
District needs to implement the Buy American exemption forms.

Required Corrective Action:
No action required. Corrective Action covered under district level Buy American finding.