



## NSLP Administrative Review Summary 2016-2017

### Big Horn CSD #3

Date of Administrative Review: 9/21/2016

Date Review Closed: 11/25/2016

#### 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

The district staff works hard to provide all students healthy and delicious school meals that meet requirements.

The district does a great job of providing multiple meals for students. The schools provide healthy meals to students for breakfast and lunch. Additionally, elementary students have the opportunity to try different fruits and vegetables through the Fresh Fruit and Vegetable Program. The students definitely benefit from the programs the schools offer.

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
100 - Certification and Benefit Issuance	Eleven students' eligibility was determined incorrectly: Free Should Be Reduced (7 students) Reduced Should Be Free (2 students) Paid Should Be Reduced (2 students)	Eleven students' eligibility was determined incorrectly: Free Should Be Reduced (7 students) Reduced Should Be Free (2 students) Paid Should Be Reduced (2 students) Update the students' status to accurately reflect their free/reduced status based on their households'



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	<p>Update the students' status to accurately reflect their free/reduced status based on their households' application. Notify the households of their students' change of status. Send the WDE an updated Point-of-Service list with the correct status. Additionally, send the WDE a copy of the letter sent to households informing them of their change in status.</p>	<p>application. Notify the households of their students' change of status. Send the WDE an updated Point-of-Service list with the correct status. Additionally, send the WDE a copy of the letter sent to households informing them of their change in status.</p>
<p>100 - Certification and Benefit Issuance</p>	<p>When multiple income frequencies are provided on applications, the income must be annualized. On many applications, the multiple income frequencies were calculated to monthly. Train the staff that calculates students' free and reduced-lunch eligibility that multiple income frequencies must be annualized. State to the WDE the training that was provided, who it was provided to, and how the district will ensure that income provided on applications will be annualized.</p>	<p>When multiple income frequencies are provided on applications, the income must be annualized. On many applications, the multiple income frequencies were calculated to monthly. Train the staff that calculates students' free and reduced-lunch eligibility that multiple income frequencies must be annualized. State to the WDE the training that was provided, who it was provided to, and how the district will ensure that income provided on applications will be annualized.</p>
<p>100 - Certification and Benefit Issuance</p>	<p>One application with two students was denied incorrectly. The two students should have been reduced based on the household income provided. Update the students' status to reduced. Inform the families of the students' new eligibility for school lunches. Provide the WDE an updated list of students with this change. Send WDE a copy of the letter sent to the household informing them of the change in eligibility.</p>	<p>One application with two students was denied incorrectly. The two students should have been reduced based on the household income provided. Update the students' status to reduced. Inform the families of the students' new eligibility for school lunches. Provide the WDE an updated list of students with this change. Send WDE a copy of the letter sent to the household informing them of the change in eligibility.</p>
<p>100 - Certification and Benefit Issuance</p>	<p>One student was correctly directly certified. However, the other students living in the household were not directly certified for free meals. All students living in a household where an individual receives free school meals due to SNAP direct certification should also receive free school meals. Update all students' status to directly certified free due to</p>	<p>One student was correctly directly certified. However, the other students living in the household were not directly certified for free meals. All students living in a household where an individual receives free school meals due to SNAP direct certification should also receive free school meals. Update all students' status to directly certified free due to SNAP in the household where the student is directly certified. Send WDE a copy of the updated POS list and the letter to households informing them of their change in status.</p>



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	SNAP in the household where the student is directly certified. Send WDE a copy of the updated POS list and the letter to households informing them of their change in status.	
100 - Certification and Benefit Issuance	When students' eligibility was determined on household applications, the POS list was not updated. Update all students' status to accurately reflect the correct status determined on their application. Send WDE an updated POS list.	When students' eligibility was determined on household applications, the POS list was not updated. Update all students' status to accurately reflect the correct status determined on their application. Send WDE an updated POS list.
100 - Certification and Benefit Issuance	One student was correctly directly certified. However, the other students living in the household were not directly certified for free meals. All students living in a household where an individual receives free school meals due to SNAP direct certification should also receive free school meals. Update the students' status that is living in the household with the individual receiving free meals due to direct cert SNAP to also receive free school meals (directly certify these students). Send WDE an updated POS list and documentation of household notification.	One student was correctly directly certified. However, the other students living in the household were not directly certified for free meals. All students living in a household where an individual receives free school meals due to SNAP direct certification should also receive free school meals. Update the students' status that is living in the household with the individual receiving free meals due to direct cert SNAP to also receive free school meals (directly certify these students). Send WDE an updated POS list and documentation of household notification.
200 - Verification	There is no documentation showing that a confirmation review took place for applications selected for verification. Ensure that someone besides the determining official double-checks the initial determination of the applications selected for verification. The confirming official should sign the applications selected for verification in the confirming official box. State to the WDE how the SFA is going to ensure that this step occurs during verification. Send WDE copies of the applications selected for verification this school year (16-17) with	There is no documentation showing that a confirmation review took place for applications selected for verification. Ensure that someone besides the determining official double-checks the initial determination of the applications selected for verification. The confirming official should sign the applications selected for verification in the confirming official box. State to the WDE how the SFA is going to ensure that this step occurs during verification. Send WDE copies of the applications selected for verification this school year (16-17) with documentation that a confirmation review was conducted.

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	documentation that a confirmation review was conducted.	
Procurement Review Form	No bids or contracts were in place for the SFA's purchases with Sysco during the 15-16 school year. The district spent \$63,630.83 with Sysco during the school year. If the district is going to purchase food/supplies in an amount that exceeds the formal purchase threshold (outside of the co-op), a formal bid process must be completed as per the district's procurement policy. State the SFA's plan for ensuring that the procurement policy is followed regarding the requirements for micro purchases, small purchases, and formal purchases. WDE recommends that the district use the Child Nutrition co-op to their advantage and purchase products from the co-op when the price is lower for the items needed.	No bids or contracts were in place for the SFA's purchases with Sysco during the 15-16 school year. The district spent \$63,630.83 with Sysco during the school year. If the district is going to purchase food/supplies in an amount that exceeds the formal purchase threshold (outside of the co-op), a formal bid process must be completed as per the district's procurement policy. State the SFA's plan for ensuring that the procurement policy is followed regarding the requirements for micro purchases, small purchases, and formal purchases. WDE recommends that the district use the Child Nutrition co-op to their advantage and purchase products from the co-op when the price is lower for the items needed.

**Site-Level Findings: Greybull Elementary**

Area	Finding Description	Required Corrective Action
400 - Meal Components and Quantities - Breakfast	Juice is served most every day. No more than half of the fruit offering over the week can be juice. Whole fruit was only served twice over the review month as indicated on the production records. Adjust the menu so that no more than half of the fruit offerings over the week are 100% juice. This can be accomplished by serving 1/2 cup whole fruit and 1/2 cup juice every day or offering whole fruit more often during the week than juice. Update the menu, nutrient analysis and component worksheets to reflect this change. Send the WDE the updated menu, nutrient analysis, and component worksheet for the cycle menu (or month of October if the school does not follow a cycle menu).	Juice is served most every day. No more than half of the fruit offering over the week can be juice. Whole fruit was only served twice over the review month as indicated on the production records. Adjust the menu so that no more than half of the fruit offerings over the week are 100% juice. This can be accomplished by serving 1/2 cup whole fruit and 1/2 cup juice every day or offering whole fruit more often during the week than juice. Update the menu, nutrient analysis and component worksheets to reflect this change. Send the WDE the updated menu, nutrient analysis, and component worksheet for the cycle menu (or month of October if the school does not follow a cycle menu).

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<p>400 - Meal Components and Quantities - Lunch</p>	<p>There is no documentation that all of the component requirements are being met for the planned menu. Of particular concern are the vegetable sub-group requirements. The SFA is not using component worksheets for the menus to ensure compliance with component requirements. Begin using component worksheets (through NutriKids or USDA) to ensure all meals meet component requirements. The Food Service Manager will provide each weeks' component worksheets and nutrient analysis to her supervisor on a monthly or weekly basis to ensure compliance. Forward October's menu, nutrient analysis, and component worksheets to the WDE for review and approval. The SFA has the option to adopt developed menus (like those from WI or KS) that are already in compliance with nutrient and component requirements. Inform the WDE which menus the district is adopting and provide October's menus, nutrient analysis, and component requirements.</p>	<p>There is no documentation that all of the component requirements are being met for the planned menu. Of particular concern are the vegetable sub-group requirements. The SFA is not using component worksheets for the menus to ensure compliance with component requirements. Begin using component worksheets (through NutriKids or USDA) to ensure all meals meet component requirements. The Food Service Manager will provide each weeks' component worksheets and nutrient analysis to her supervisor on a monthly or weekly basis to ensure compliance. Forward October's menu, nutrient analysis, and component worksheets to the WDE for review and approval. The SFA has the option to adopt developed menus (like those from WI or KS) that are already in compliance with nutrient and component requirements. Inform the WDE which menus the district is adopting and provide October's menus, nutrient analysis, and component requirements.</p>
<p>600 - Dietary Specifications and Nutrient Analysis</p>	<p>The average calories for breakfast over the month and week of review are over the required range of 350-500 calories. The average sodium for breakfast over the month and week of review is over the requirement of no more than 430 mg The average calories for lunch over the month and week of review are below the range of 550-650 calories. The average sodium for lunch for the month and week of review is over the requirement of no more than 640 mg. Additionally, all items offered to students are not included in the nutrient analysis. For example, for breakfast on 9/20, the menu didn't match the nutrient analysis. The menu served was breakfast sliders,</p>	<p>The average calories for breakfast over the month and week of review are over the required range of 350-500 calories. The average sodium for breakfast over the month and week of review is over the requirement of no more than 430 mg The average calories for lunch over the month and week of review are below the range of 550-650 calories. The average sodium for lunch for the month and week of review is over the requirement of no more than 640 mg. Additionally, all items offered to students are not included in the nutrient analysis. For example, for breakfast on 9/20, the menu didn't match the nutrient analysis. The menu served was breakfast sliders, bagels, cream cheese, toast, peanut butter, jelly, margarine, apple juice, and milk. For lunch, items that were not included in the nutrient analysis include the salad and watermelon provided to 3-5 graders, croutons, and the peanut butter and jelly offered as a second entree. During the district's last administrative review, the district was serving peanut butter and jelly but not including it in their</p>



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	<p>bagels, cream cheese, toast, peanut butter, jelly, margarine, apple juice, and milk. For lunch, items that were not included in the nutrient analysis include the salad and watermelon provided to 3-5 graders, croutons, and the peanut butter and jelly offered as a second entree. During the district's last administrative review, the district was serving peanut butter and jelly but not including it in their nutrient analysis so this is a repeat finding. Adjust the menu as needed to comply with the calorie and sodium requirements for K-5 for breakfast and lunch. Ensure that all food and condiments are included in the nutrient analysis. Provide the WDE with the updated menu and nutrient analysis for the cycle menu. Or, as stated in the component finding, use developed menus from KS or WI that have set nutrients and components that meet requirements. See the link below for the nutrient requirements. Additional resources are in the review attachments.</p>	<p>nutrient analysis so this is a repeat finding. Adjust the menu as needed to comply with the calorie and sodium requirements for K-5 for breakfast and lunch. Ensure that all food and condiments are included in the nutrient analysis. Provide the WDE with the updated menu and nutrient analysis for the cycle menu. Or, as stated in the component finding, use developed menus from KS or WI that have set nutrients and components that meet requirements. See the link below for the nutrient requirements. Additional resources are in the review attachments.</p>
<p>900 - SFA On Site Monitoring</p>	<p>On-site monitoring was not completed last school year. On-site monitoring of each lunch site must be done by February 1st of each school year using the monitoring form provided by WDE. Beginning SY16-17, 50% of breakfast sites must be reviewed every other year. Complete on-site monitoring of each site and 50% of each breakfast site by February 1st of this school year. Send WDE a copy of the completed on site monitoring forms. State who in the district will complete on site monitoring of NSLP serving sites.</p>	<p>On-site monitoring was not completed last school year. On-site monitoring of each lunch site must be done by February 1st of each school year using the monitoring form provided by WDE. Beginning SY16-17, 50% of breakfast sites must be reviewed every other year. Complete on-site monitoring of each site and 50% of each breakfast site by February 1st of this school year. Send WDE a copy of the completed on site monitoring forms. State who in the district will complete on site monitoring of NSLP serving sites.</p>