



NSLP Administrative Review Summary 2016-2017

Uinta CSD #1

Date of Administrative Review: 5/3/17

Date Review Closed: 6/6/17

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

- FANTASTIC Job on the Income Applications. I reviewed 290 applications and did not find one error. Great job of completing the eligibility determination within 10 days and having a second reviewer looking at the forms. Also great job of converting the applications that have multiple frequencies of income to annual income. Thanks also for sending a completely different list of students due to Tamra creating a different list than was originally created for WDE. Your patience was greatly appreciated.
- Thank you for having all of the files organized and easily accessible for my review. We also appreciate your willingness to allow us to check the F&R applications off-site. This helped the review go smoothly and efficiently.
- It is impressive that the district makes most of their grain products from scratch! The students are very lucky. We would like to include your recipes in our WY NSLP cookbook!
- The ASCP is very well organized. The food service employees and teachers have figured out a system for snack delivery and counting and claiming that works well for all involved.
- The staff in the Aspen Elementary lunchroom is very welcoming and friendly. It is very obvious that they care a lot about the students and feeding them healthy and delicious foods.



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- The cafeteria at Clark Elementary was decorated festively for spring. Great job making the cafeteria inviting and fun!

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
V-0700	The district's procurement policy needs to be updated to meet current USDA requirements.	The procurement policy must include these items: - a clause assuring small, minority, and women's business enterprises and labor surplus firms are used when possible See attached template for items required in procurement policy
V-0700	Unallowable purchases (flowers) were made with food service funds.	Flowers can only be purchased with food service funds if they are going to be used for table decorations or if they are edible flowers. They cannot be purchased for gifts or awards. State to the WDE how the SFA is going to ensure that only allowable purchases are made with food service funds.
1200 - Professional Standards	Professional standards training hours for all employees are not being tracked in a training tracker with the required information.	Begin tracking all employee training hours in a training tracker that contains the required information. For example, the training tracker must contain the employee name, job title, PT or FT status, name of the training, number of credit hours per training, category/topic of training, and total number of hours completed annually. See the WDE training tracker template for an example. Transfer all employee training hours for the 16-17 school year into a training tracker. Send WDE a copy of the completed training tracker that the district will use for review and approval.
1400 - Food Safe	Many grain items stored and used in the school meals are not whole grain-rich. These include: yellow cake mix, pop tarts, Frosted Flakes, French toast sticks, fortune cookies, lasagna noodles, elbow macaroni, flour (and therefore all recipes using flour), biscuits, Berry cereal, Cocoa cereal, egg noodles, muffins, and tortilla strips.	All grains served at breakfast and lunch must be whole grain-rich. This means the first ingredient must be whole grain, whole wheat, whole oats, whole corn, brown rice, etc. All recipes made from scratch must be made with at least 50% whole wheat flour. Send to the WDE the labels and recipes for all grains that will replace the items that were observed onsite to be non-whole grain-rich (yellow cake mix, pop tarts, Frosted Flakes, French toast sticks, fortune cookies, lasagna noodles, elbow macaroni, flour (all recipes using flour), biscuits, Berry cereal, Cocoa cereal, egg noodles, muffins, tortilla strips). State to the WDE how the SFA will ensure that only compliant grains are ordered and served.
800 - Civil Rights	The letters sent to households selected for verification do not contain the full nondiscrimination statement	All NSLP materials must contain the full non-discrimination statement if the document is more than one page. Send WDE a copy of the verification documents that will be used for the 17-18 school year that contains the full non-discrimination statement.
Procurement Review Form	The dairy, pizza, and food bids/solicitations and resulting agreements do not meet federal	Prior to advertising the solicitation documents for the 17-18 school year, send WDE the IFB or RFP for dairy, pizza, and food to ensure that it meets USDA requirements.



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	<p>requirements. It is unclear if this was done by RFP or IFB? Request for Bidis not a recognized solicitation method. There is no resulting agreement that is signed by both the vendor and district. Additionally, Meadow Gold changed the solicitation which is unallowable (escalation/de-escalation clause). If a bidder changes the solicitation, the district is required to re-start the bidding process. Missing Buy American, Termination, and other required clauses. Pizza: Again, unclear if this is an RFP or IFB. WDE recommends IFB (based solely on price) that can be used as an agreement/contract. Also need to add Termination, Buy American requirement clauses. There is no signed agreement between the winning vendor and district. Food: There is no written contract or agreement signed by the vendor/district. Missing Buy American, termination, and out of condition clauses. Nicholas' response included a fuel surcharge but it is unclear if the other bidders also included this extra charge. Therefore, Nicholas may not have been the cheapest option.</p>	<p>After the bids are awarded, send WDE the resulting contracts and agreements for all three bids. State how the district will ensure the solicitations/bids meet requirements.</p>

Site-Level Findings: Aspen Elementary

Area	Finding Description	Required Corrective Action
<p>1700 - Afterschool Snack</p>	<p>According to the production records, there were multiple days where the snacks served did not meet the component requirements or a non-creditable item was served. The requirement is that at least two components are offered to students from two different food groups. Non-creditable items served include fruit roll-ups and fruit snacks. Examples of non-compliant snacks include: juice +</p>	<p>Serve afterschool snacks that meet the meal pattern requirements. Students must be served a complete serving of any two of the following four components: milk, fruit/vegetable, grain/bread, and meat/meal-alternate. Review the ASCP manual for meal pattern requirements and creditable items. Send WDE a two-week menu for afterschool snacks that meets meal pattern requirements.</p>

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	Fruit-by the-Foot; apple slices + juice; fruit snacks + juice.	
1700 - Afterschool Snack	The “And Justice For All” poster was not displayed during snack service in all serving areas. The cafeteria had the poster displayed for students served snack in the cafeteria but students served in individual classrooms did not have the poster visible during snack service.	Ensure that all students being served afterschool snack have the “And Justice For All” poster visible during snack service in all serving areas. State to the WDE how the school will ensure that this requirement is met.
400 - Meal Components and Quantities - Breakfast	The mini-Danishes served for breakfast are not whole grain-rich.	Obtain a whole grain-rich product to replace the mini-Danishes. Send WDE a food label, ingredient list, and CN label for the item the school will use in place of the mini-Danishes. Also send WDE an updated component worksheet and menu for the week this item is served.
400 - Meal Components and Quantities - Breakfast	Not all grain items are whole grain-rich. - Frosted Flakes - Rice Krispies - pop-tarts - biscuits - French toast sticks - Coco cereal - berry cereal - mini-Danishes. Additionally, not all items have a child nutrition label or product formulation statement so items are credited correctly on component worksheets.	Obtain grain items that meet the whole grain-rich requirement (100% of grains must be 50% whole grain). The first ingredient should be a whole grain (whole wheat, whole grain, whole oats, whole corn, brown rice, etc.). Since the FSD orders all food for the schools, only whole grain-rich foods should be ordered so schools serve only compliant grains. Send WDE a copy of all grains served at breakfast to show that they are whole grain-rich. Begin gathering CN labels/PFSs for all items to document that they are credited correctly toward meal pattern requirements. State to the WDE the district's plan for ensuring that all grains served are whole grain rich and the process for obtaining CN labels.
400 - Meal Components and Quantities - Lunch	There was not a sign in the cafeteria indicating to students how the meal components contributed to a reimbursable lunch	For each meal, post a sign in the serving area indicating to students how that day's meal contributes to a reimbursable meal. This sign must also communicate that they must take at least 1/2 cup of fruit and/or vegetable at each meal. Post this sign in the cafeteria each day and each so it is visible to students. State to WDE and/or send a photo of the poster that will be posted.
400 - Meal Components and Quantities - Lunch	The corn bread recipe is not whole grain-rich. Per the recipe, some flour called for is whole grain-rich; however, since yellow cake mix is used, 50% of the flour is not whole grain. However, the flour being purchased as whole grain was not whole grain flour so all recipes using this flour did not meet the whole grain rich requirement.	Update the cornbread recipe so that 50% of the flour used is whole grain. Submit to WDE the updated cornbread recipe for review and approval. Send WDE a copy of the flour label so WDE can verify that it is whole grain
500 - Offer versus Serve	At breakfast, there was not a sign in the cafeteria explaining to students	At both breakfast and lunch, post a sign indicating to students what they must take to make a reimbursable



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	<p>what they needed to take for a reimbursable meal. This signage needs to be posted at each meal; including the statement that students must take at least 1/2 cup of fruit and/or vegetable.</p>	<p>meal and how each item contributes to the food groups. For example, the cereal and cinnamon rolls in the grain group, banana and orange in the fruit group, and milk in the milk section. This signage must also communicate that students must take at least 1/2 cup of fruit and/or vegetable at each meal. State to WDE how the school will meet this requirement for each meal. Send a picture if possible to show where this poster is posted so it is visible to students as they go through the serving line.</p>
<p>Clark Elementary</p>		
<p>400 - Meal Components and Quantities - Lunch</p>	<p>Not all of the grains offered are whole grain rich. The blueberry muffins are made with only white flour. Recipe indicated they are whole grain-rich but the flour actually used to make the muffins is enriched, not white whole wheat.</p>	<p>All grains offered must be whole grain-rich. Recipes made from scratch must use at least 50% whole wheat flour. Begin purchasing and using whole wheat flour in scratch grain recipes, including in the blueberry muffins. Send WDE a copy of the food label and ingredients for the whole wheat flour that will be used in all scratch recipes.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>Juice is given to students as a milk substitute. This finding also applies to Aspen Elementary.</p>	<p>Juice is not an acceptable substitute for milk unless the physician specifically states that juice must be the substitute for a milk allergy. The district must provide a milk substitute for students that meets the USDA requirements for a milk substitute. Send WDE the label of the milk substitute the district will begin using. See the document for the milk substitute nutrient requirements.</p>
<p>400 - Meal Components and Quantities - Lunch</p>	<p>Many grain items served are not whole grain rich. These items include: hamburger buns, noodles, biscuits, cornbread, and all recipes made from scratch.</p>	<p>Begin serving and preparing whole grain-rich items. Send WDE a copy of the food labels and ingredient lists for all grains so WDE can verify that they are whole grain-rich.</p>