



NSLP Administrative Review Summary 2016-2017

Lincoln Co. School District #1

Date of Administrative Review: 5/4/2017

Date Review Closed: 1/10/2018

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

All staff at the elementary school support the operation of the school lunch program. The custodian was very helpful to breakfast service when there is limited staff. It is obvious that all staff care that students get healthy and delicious meals.



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Review Findings

Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
Procurement	The food service procurement policy does not meet requirements for federal funds as outlined by USDA regulations.	Update the district's food service procurement policy so it complies with regulations. See the WDE procurement policy template for required clauses. Use the approved policy when purchasing items with federal food service funds. Send the updated procurement policy to WDE for review and approval.
Procurement	<p>The total amount for purchases made with Nicholas from the 15-16 school year was over the formal purchase threshold; however, formal procurement procedures were not followed. In general, requirements for formal purchases not met:</p> <ul style="list-style-type: none"> - Contract not obtained competitively; only sent email to one vendor - Bid specifications not included. - Copy of the contract was not onsite. <p>Therefore, contract administration/monitoring/documentation requirements not met.</p>	<p>Follow USDA requirements for purchases over the formal purchase threshold. Purchases over \$25,000 (or more restrictive amount set by SFA as stated in their procurement policy) are considered formal purchases and a contract must be awarded through a formal bid process - either through an IFB (invitation for bid) or RFP (Request for Proposals). Bids or proposals must be advertised to as many bidders as possible. All steps of the bidding and contract process must be documented and be onsite so contract terms can be monitored by the SFA. Prepare bid/solicitation documents for the 17-18 school year.</p> <p>Send WDE a copy of these bid documents and how/where the SFA will advertise the solicitation. Once the contract has been awarded, send WDE a copy of the final contract. The SFA must also update their procurement policy so that these proper procurement procedures are outlined and followed for all procurement practices</p>
100-Certification and Benefit Issuance	Five applications were found without a household signature. Three applications were without a social security number. Determination errors included one application with three students determined to be free should be reduced. One other application with two students was determined to be free but should be reduced.	<p>When printing free and reduced applications for parents to complete, ensure the entire application is printed so parents understand that they must sign. Household signature and SSN or indication they don't have a SSN are required on applications. If applications don't contain this information, the application is considered incomplete.</p> <p>Update the status for the students on the applications that were determined incorrectly. State to the WDE the SFAs plan for ensuring that all applications are complete and how they are going to prevent application errors.</p>
100-Certification and Benefit Issuance	The SFA is not annualizing income for all applications when multiple income frequencies are provided by the household.	If a household provides incomes using multiple income frequencies, the incomes should be annualized, added together, then compare to



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		<p>the IEG chart to determine student eligibility. If a household only provides one income frequency, the multiple incomes are added together or one income can be compared directly to the chart to determine eligibility. State how the SFA will ensure that this will be done for the next school year.</p>
<p>100-Certification and Benefit Issuance</p>	<p>Seven students were identified by the reviewer to be directly certified but they were only listed as "Free" on the point-of-service list of student eligibility. A copy of the direct certification letters were not available on site.</p>	<p>When the direct certification letters for SNAP and foster students are available each month, student who are listed on the letters should be changed to directly certified (DC) in NutriKids even if they are already receiving free school lunch. This is important for reporting purposes. The district must print out the letters to send to households plus keep a copy for documentation on site. If a household provides a case number on their application, the SFA must contact the local DFS office to ensure the household is receiving SNAP benefits or the student is a foster child. These students are categorically eligible for free meals, not directly certified. Students only become DC when they have a letter appear on the DC website. The SFA should check the Direct Certification site for each month of the 16-17 school year and correctly identify direct cert students. Update the POS list for those students who are directly certified. Send WDE a copy of the updated POS list with the identified DC students.</p>
<p>1000-Wellness Policy</p>	<p>There is not documentation that the district has a wellness policy in place for the schools participating in NSLP.</p>	<p>Create a wellness policy for the schools participating in NSLP. A compliant wellness policy must be in place by July 1st, 2017 and comply with the requirements in the USDA Wellness Policy Final Rule. Send WDE a copy of the wellness policy that will be implemented. Here is an overview of some of the final rule requirements (see final rule for all requirements):</p> <ul style="list-style-type: none"> - Policies must designate one or more LEA officials or school officials to ensure that each school complies with the wellness policy. Must identify the position title of the official responsible for oversight. - The Wellness Policy must permit the public to participate in policy development, implementation, review and updates (parents, students, teachers, school nurses, school board, school admin, and general public) - The wellness policy must include goals for



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		<p>nutrition promotion (surveys, taste-tests, providing information to households on nutrition/school lunch, posting nutrition posters, etc) and nutrition education</p> <ul style="list-style-type: none"> - Reminder: wellness policies must include goals for physical activity and other school-based wellness activities. - The policy must use evidence-based strategies (evaluated, studies and peer-reviewed). These goals must be specific and measurable. - The policy must include policies for permitting marketing of only foods/beverages that meet Smart Snack standards (does not apply to marketing after school hours). - Assessment of the policy must occur at a minimum of every 3 years. The results of the assessment must be made public. - WDE recommends annual assessment of the Wellness Policy. - The public must be informed of the content, implementation, and updates of the wellness policy (annually). - Wellness policy requirements will be monitored during Administrative Reviews.
1200-Professional Standards	The food service director has not completed food safety training in the last five years.	Food service directors are required to complete 8 hours of food safety training every five years. State when the food service director will take this training. Send documentation of training registration. When training is completed, send WDE a certificate to demonstrate the training was completed.
1200-Professional Standards	NSLP food service employee training hours are not be tracked or recorded.	All NSLP employees are required to have documented training related to their position. All staff working less than 20 hours per week are required to have at least 4 hours of training per year. Program directors are required to have 12 hours per year and managers 10 hours per year. All employee training hours must be tracked on a document that contains the required information. Begin tracking NSLP employees training hours. Fill in the training employees have completed for the 16-17 year and state how the SFA will ensure training hours are going to be tracked in the future. Send WDE a copy of the training record that the district will use. See the WDE training tracker tool template for guidance.
1400-Food Safety	A written food safety plan is not in place at the central kitchen. Since the central kitchen	Each NSLP prep and serving site must have a written HACCP plan in place. The HACCP plan at



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	prepares foods for the NSLP serving sites, a HACCP plan should be in place and followed.	each location should be specific to the site and reflect the procedures performed to reduce food safety risk. Each HACCP plan must be reviewed annually and updated as needed. Employees should be trained on the contents of the HACCP plan and understand how to implement it. Send WDE a copy of the central kitchen and prep sites' HACCP plan. State who will be in charge of ensuring it is implemented, updated, and reviewed with the employees.
200-Verification	The SFA verified three applications when they should have only verified two applications.	The SFA should only verify the amount of applications as indicated by the regulations. Before conducting verification for the 17-18 school year, contact WDE to ensure the correct number of applications are being verified. State who will be responsible for verification next school year and who will contact WDE. Please refer to the Eligibility Manual for verification instructions. This document is updated annually.
200-Verification	There is no documentation that a confirmation review took place prior to notifying the households that they were selected for verification.	Every application selected for verification must undergo a confirmation review to determine if the initial determination was correct before sending the notification letter to households. Determine who will be the confirmation official in the district. The confirming official must initial or sign the application demonstrating they reviewed the application. State to the WDE who the confirmation official is and how the SFA will ensure the confirmation review is done for verification next school year.
200-Verification	One application selected for verification was verified incorrectly. Based on household reported income on the original application, one student was reduced-price. However, after verification, the student should have become paid.	Update the student's status from reduced to paid. Send the household a letter informing them of this change. Update the POS list. Send WDE a copy of the letter sent to the household as well as the updated POS list with the updated status.
200-Verification	The letter sent to households notifying them that they were selected for verification was from the 14-15 school year. Additionally, the non-discrimination statement was not up-to-date. The SFA does not have documentation of the letters sent to households notifying them of the results of the verification process. Overall, the SFA had limited documentation of the verification process.	Ensure proper and complete documentation is kept onsite for all steps of the verification process. This includes sending the notification of verification by certified mail, keeping a copy of the follow-up letter if it is sent, copy of the letter informing the household of results of verification. Each verified application must also be signed by the confirming official and the verifying official. State to the WDE the SFA's plan for ensuring verification is done correctly and documentation is complete. Please provide as much detail as possible in the corrective action response. Send



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		WDE a copy of the letters that will be sent to households for all steps in the verification process.
800-Civil Rights	The press release in the local paper at the beginning of the 16-17 school year did not contain the required information and the income eligibility guidelines printed were for the previous school year.	See the template provided by WDE for the NSLP press release. Each year, prior to the start of school, WDE sends out a template for SFAs to use that contains the required information plus the updated IEGs. Send WDE a draft press release that the SFA will send to the local paper at the beginning of the 17-18 school year that contains the required information.
800-Civil Rights	The SFA must have a written civil rights complaint procedure that contains the required information per the USDA.	Create a civil rights complaint procedure that meets USDA requirements. Civil rights complaints must be accepted in all forms (written, verbal, email, phone, etc.). The procedure must also designate a hearing official. See the WDE documents regarding the civil rights complaint procedure requirements. Send WDE a copy of the civil rights complaint procedure that will be adopted by the district.
800-Civil Rights	The press release sent to the local paper did not contain the non-discrimination statement.	All documents related to NSLP must contain the updated non-discrimination statement (menus, website, verification notices, application instructions, press release, etc.). If the document is only one page, the shortened statement can be used. Send WDE a draft of the press release that will be submitted to the local paper that contains the updated non-discrimination statement.
900-On-site Monitoring	There was no documentation that breakfast was monitored prior to the February 1st deadline.	Beginning the 16-17 school year, 50% of the breakfast sites must be monitored every other year by February 1st. There is no documentation that this is occurring. There is only documentation indicating that lunch service was monitored. Complete the onsite monitoring form for breakfast for this school year. Send the completed form to WDE. State how the SFA will ensure that breakfast service will be monitored according to the guidelines each year.



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Site-Level Findings: Kemmerer Elementary School

Area	Finding Description	Required Corrective Action
1400-Food Safety	The elementary school does not have a written HACCP plan on site.	Each serving site must have a written HACCP plan on site. The HACCP plan contents must apply to the site and procedures that occur. The HACCP plan must be reviewed and updated as needed yearly. The food service staff must be train on the HACCP procedures yearly. Create a HACCP plan for each serving site. Send WDE a copy of the HACCP plan and plan for review each year. State the individual who will be responsible for ensuring these requirements are met.
300-Meal Counting and Claiming (Lunch)	Meal counts are taken using a combination of classrooms counts and a count of trays in the service line. This is unallowable since it doesn't provide an accurate count of students by eligibility for claiming purposes.	The meal counts must be taken at the point-of-service (POS) at the end of the service line after students have received all of their food. There must be an individual at the end of the line taking an actual count of students eating reimbursable meals so they can be correctly counted and claimed based on their eligibility. The students can be checked off of a roster, put their PINs into the computer, or any other acceptable option described in the USDA Counting and Claiming document. State to the WDE how the school will implement a counting and claiming system at the end of the line. Who will be at the POS and how will an accurate count by eligibility be achieved?
400-Meal Components and Quantities (Breakfast)	The biscuit being served at breakfast is not whole grain-rich.	All grains must be whole grain-rich. This means that all grains must be made with 50% whole grains and the remaining grains must be enriched. Obtain a whole grain-rich biscuit. Send WDE a copy of the label and ingredient list for approval. Update the nutrient analysis and component worksheet as needed.
400-Meal Components and Quantities (Breakfast)	Production records are not being kept at each school. Production records were available to the reviewer printed out from NutriKids onsite but they are not being used for documentation by school food service employees during food preparation, meal service or after meal service.	Begin using production records at each school during meal prep and during and after meal service. Train staff how to properly keep production records. Prior to using the production records, ensure that the menu and components are correct and meet meal pattern requirements for each grade group. Send WDE the planned production records for the first month of school (2017-2018 SY) or for the first menu cycle. State the training that will be provided to staff on proper documentation on production records.
400- Meal Components and Quantities (Breakfast)	According to records from NutriKids, the minimum required amount of fruit is not being planned and offered to students at breakfast. Also, not all items being served are included in	Students must be offered at least 1 cup of fruit/vegetables at breakfast and are required to take at least 1/2 cup of fruit and/or vegetable to make up a reimbursable meal. Update the production records, nutrient analyses, and



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	<p>the nutrient analysis and component worksheets.</p>	<p>component worksheets to meet this requirement and indicate what is actually being served. Send WDE the updated production records, nutrient analyses, and component worksheets to show compliance with meal pattern requirements. Since it is the end of the school year, send WDE the planned breakfast menu materials for the first month of school or first cycle of the planned menu.</p>
<p>400-Meal Components and Quantities (Lunch)</p>	<p>The school is not using production records for documentation. The FSD was able to print off production records from NutriKids but they are not complete since all items served to students are not indicated on the production records and therefore are not included in the nutrient analysis. Production records are required to show that the school is planning and serving reimbursable meals. The bread being served is not whole grain-rich.</p>	<p>Begin using production records for all meals. Train staff how to use production records. Ensure that the production records contain the required information and that all foods are included. Update the menu, nutrient analysis, and food items in NutriKids to reflect what is actually being served so the production records are correct for the serving staff. Send WDE the compliant lunch menu, production records, and nutrient analyses for the first month of school or first menu cycle. State the training that will be provided to staff on correctly using production records. Obtain a whole grain rich bread and whole grain-rich items for all grains. Send WDE a copy of the bread label and all other grain labels to demonstrate all grains are whole grain-rich.</p>
<p>600-Dietary Specifications and Nutrient Analysis</p>	<p>All items served to students are not included in the nutrient analysis. This includes condiments and seconds if students are not charged for seconds.</p>	<p>Include all foods/beverages offered to students at breakfast and lunch in the nutrient analysis. Additionally, the nutrient analysis needs to be updated with compliant whole grain-rich products. Send WDE the updated breakfast and lunch menus, nutrient analysis, component worksheets, production records, etc. for the first month of school/first menu cycle.</p>
<p>900-SFA Onsite Monitoring</p>	<p>There is no documentation that on-site monitoring occurred for breakfast prior to the February 1st deadline.</p>	<p>Conduct onsite monitoring of breakfast prior to the end of school. Send the completed monitoring document to WDE for review and approval. State how the SFA will ensure that 50% of breakfast sites are monitored every other year by February 1st.</p>