



## NSLP Administrative Review Summary 2017-2018

### St. Stephens Indian School

Date of Administrative Review: 4/18/18 - 4/19/18

Date Review Closed: 6/4/18

#### 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)



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### Review Findings

#### Sponsor-Level Findings:

Area	Finding Description	Required Corrective Action
300-Meal Counting and Claiming	At the elementary school and high school, the point-of-service (POS) is not located at the end of the serving line. The milk cooler is after the POS.	<p>All items offered as part of the reimbursable meal must be after the POS. Move the milk cooler to a location prior to the POS so the POS is the very end of the line.</p> <p>Send WDE a picture of the elementary and high school serving line demonstrating that the POS is at the end of the line.</p>
1000-Local School Wellness Policy	<p>The school has not reviewed or updated the wellness policy since the last administrative review. No goals have been set and therefore there has not been any tracking of the implementation of any goals.</p> <p>The policy was implemented in 2006 and not reviewed since then.</p>	<p>Update the wellness policy to meet current USDA requirements set forth in the wellness policy final rule.</p> <p>According to the wellness policy final rule:</p> <ul style="list-style-type: none"> <li>- The policy 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.</li> <li>- 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)</li> <li>- The wellness policy must include goals for nutrition promotion (surveys, taste-tests, providing information to households on nutrition/school lunch, posting nutrition posters, etc) and nutrition education. These goals must be specific and evidence-based.</li> <li>- Reminder: wellness policies must include goals for physical activity and other school-based wellness activities.</li> <li>- The policy must use evidence-based strategies (evaluated, studies and peer-reviewed).</li> </ul> <p>These goals must be specific and measurable.</p> <ul style="list-style-type: none"> <li>- 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).</li> </ul>



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		<p>- Assessment of the policy must occur at a minimum of every 3 years. The results of the assessment must be made public.</p> <p>WDE recommends annual assessment of the Wellness Policy.</p> <p>Establish a committee to review and update the policy and set goals that will be implemented and tracked.</p> <p>Upload the updated policy to the review and state how the school will ensure that the requirements of the wellness policy are met and will continue to be monitored. Include who will be in charge of the policy, how the school will advertise the policy to the public and encourage involvement of community members.</p>
1400-Food Safety	The school had plums from Chile but did not have any documentation of exemptions from the Buy American Provision.	<p>Schools participating in the federal school meal programs are required to purchase domestic commodities and products for school meals to the maximum extent practicable. The “Buy American” requirement (7 CFR Part 210.21(d)) specifies that the SFA should purchase domestically produced food and food products. Domestic commodity or product means an agricultural commodity that is produced in the US and a food product that is processed in the US substantially (at least 51 percent) using agricultural commodities that are produced in the US.</p> <p>Federal regulations require that all foods purchased for Child Nutrition Programs be of domestic origin to the maximum extent practicable.</p> <p>ALL products that are normally purchased by Distributor(s) as non-domestic and proposed as part of this solicitation must be identified with the country of origin. Distributor(s) shall outline their procedures to notify the SFA when products are purchased as non-domestic.</p> <p>Schools must document any items that they purchase that doesn't meet Buy American requirements.</p> <p>Begin documenting exemptions to the Buy American provision and send WDE an example of the</p>



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		documentation that will be kept to meet this requirement.
1500-Reporting and Record Keeping	Claim for March 2018 not submitted by the deadline (claims for reimbursement are due by the 10th of the month for the previous month so the claim for March was due by April 10th). Month of review is March 2018 but claim for the month has not been submitted as of day of review (April 18th). It is common that claims are submitted past the due date.	State who is responsible for submitting the claims for the school and how they will ensure claims are submitted by the 10th of the following month.
1200-Professional Standards	St. Stephens does not track school lunch employee training hours as required by Professional Standards regulations. All food service employee training hours must be documented on a document that includes employee name, title, training title, training category, training time, and total hours of training achieved.	Begin tracking food service employee training hours with the required information. Complete the training tracker for this school year for all employees and upload to the review for WDE approval.
Resource Management	The SFA does not assess nonprogram food prices to ensure they are priced according to nonprogram food requirements.	Complete the nonprogram food pricing tool for all foods sold outside of the reimbursable meal (extra milk, catering, vending machines, etc.). Upload the completed tool to the review and state how the SFA will adjust prices if needed. This tool must be attached to the 2018-2019 NSLP application as well.
Procurement Review	The SFA is a member of a co-op but is not an active member. There is no documentation that the SFA attended any meetings to ensure the co-op acted in compliance on behalf of the SFA. The SFA did not have a copy of the co-op contract or any other related documents onsite.	The co-op acts on behalf of the member SFAs. To ensure that the co-op is acting according the USDA guidelines and that the school is receiving the items that they need, the SFA is required to act as an active member. This includes attending co-op meetings and calls, monitoring the operation of the co-op for compliance, and maintaining documentation of co-op participation. Obtain a copy of the co-op contract and upload to the review. State how the school will be an active member of the co-op in the future and who will be responsible for ensuring compliance with co-op membership.
Procurement Review	The NSLP procurement policy needs to be updated to meet USDA requirements.	Update the NSLP procurement policy to meet USDA requirements. For example, the current policy does not reference the updated Buy American requirement or the Women's and Minority Business clause. Update the procurement policy and attach to the review for WDE review and approval.
Procurement Review	The school is not making purchases on a competitive basis and does not follow USDA NSLP procurement guidelines. Additionally, the SFA has a procurement policy that does not meet requirements.	Update the procurement policy to meet USDA requirements. Any purchases made for the school lunch program must follow federal procurement guidelines. In general:



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	<p>The individuals in charge of procurement/resource management for NSLP have not had any training on proper procurement practices for NSLP funds.</p>	<ul style="list-style-type: none"> <li>• Purchase or contract value greater than \$25,000: If the amount exceeds twenty-five thousand dollars (\$25,000.00) this is considered a formal purchase, and contract must be awarded through a formal procurement process and a call for bids or request for proposals shall be published at least once in a newspaper of general circulation in the district, as well as published in a newspaper generally circulated state-wide and posted on the district's website. The call for bids or proposals may also be published in a regional newspaper. No contract shall be divided for the purpose of avoiding this paragraph.</li> <li>• Purchase greater than \$10,000 and less than \$25,000: The school will obtain competitive bids (quotes) when any purchase will cost more than ten thousand dollars (\$10,000.00) and less than twenty-five thousand dollars (\$25,000.00).</li> <li>• Purchase less than \$10,000: Any purchase greater than the micro-purchase threshold but less than ten thousand dollars (\$10,000.00) is considered a small purchase and does not require a bid process, however, the small purchase shall be made on a competitive basis.</li> <li>• Any purchase below three thousand five hundred dollars (\$3,500.00) or as currently defined by 2 CFR 200.67 is considered a micro-purchase. Micro-purchases may be awarded without soliciting competitive quotes if the price is considered reasonable. To the extent feasible, however, the school must distribute micro-purchases equitably among qualified suppliers. The micro-purchase threshold will periodically be adjusted for inflation, therefore, the school shall follow the most current threshold as defined at 2 CFR 200.67.</li> </ul> <p>The individuals in charge of procurement should take training on proper management of NSLP funds. See Special Instructions and attachments for training opportunities. Become familiar with "Procurement in the 21st Century". Documentation</p>



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		of this training or planned dates of training should be attached to the review.

### Site-Level Findings: St. Stephens Indian School

Area	Finding Description	Required Corrective Action
400-Meal Components and Quantities - Breakfast	The school does not complete production records for any meals served. The school uses the planned production records when preparing food but does not complete the required information to document what and how much was actually served during meal service.	<p>Train all food service staff on how to complete production records. Provide WDE documentation of this training, including agenda and employee sign-in.</p> <p>Send WDE two weeks of completed breakfast production records to demonstrate that staff are completing production records as required.</p> <p>If WDE finds that production records are not being completed during future administrative reviews, WDE is required to take fiscal action based on non-compliance with regulations regarding documentation requirements for reimbursable meals.</p>
400-Meal Components and Quantities – Breakfast	Cereal was not whole-grain rich and was counted towards the daily and weekly grain requirements. The toast was whole grain and thus met the minimum requirement for creditable grain.	<p>All grains credited must be whole grain rich. Replace non-whole grain items with whole grain items. Specifically, all cereals served at breakfast. Send WDE a copy of all cereal labels to verify they are whole grain-rich. Train the person responsible for ordering food how to identify a whole grain-rich product.</p>
400-Meal Components and Quantities - Lunch	The school is offering one student a juice in place of milk. The student does not have a completed accommodation request from a physician requesting this substitution. Juice is not an acceptable substitute for milk and therefore this student's meal is non-reimbursable.	<p>Begin using the Meal Accommodation Request form for students who require an accommodation or substitution to meals.</p> <p>If a student requires an accommodation outside of the meal pattern, the form must be completed by a physician. If a student can be accommodated with a substitution inside the meal pattern, the form can be completed by a guardian. In this case, use the USDA-approved milk substitute list.</p> <p>Upload a copy of the meal accommodation form the school will use to document accommodation/substitution requests for school meals. State who will be responsible for maintaining these forms for the school. State which approved milk substitute the school will use when needed.</p>
400-Meal Components and Quantities – Lunch	At the high school, milk was after the point-of-service. All items offered as part of the reimbursable meal must be before the POS.	<p>Arrange the lunch room so all items offered as part of the reimbursable meal are before the POS. Explain how the site will arrange the lunch room so that the milk is before the POS. Send pictures of the new arrangement to meet the requirements.</p>



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400-Meal Components and Quantities - Lunch	The school does not complete production records for meals served. The school uses the planned production records when preparing food but does not complete the required information to document what and how much was actually served during meal service.	<p>Train all food service staff on how to complete production records. Provide WDE documentation of this training, including agenda and employee sign-in.</p> <p>Send WDE two weeks of completed lunch production records from the elementary and high school to demonstrate that staff are completing production records as required.</p> <p>If WDE finds that production records are not being completed during future administrative reviews, WDE is required to take fiscal action based on non-compliance with regulations regarding documentation requirements for reimbursable meals.</p>
500-Offer vs. Serve	At the 9-12 school they had a sign telling students they had to take 1/2 cup of fruit/vegetable. However, there was not a sign showing them how the day's meal fit into the components.	At this high school, post a sign (like MyPlate) in the lunch line that shows students how the day's meal fits into each food group at both breakfast and lunch. Send WDE a photo of the poster that will be posted for this purpose.
600-Dietary Specifications and Nutrient Analysis	<p>Component and calorie ranges were not met for the week and month of review:</p> <p>Week of 4/16-19 HS Lunch: Total Grains = 6, Total Whole Grains = 5, Range: 8-9.5 oz, Min. 2 oz/day. 1oz on 4/18 and 4/19</p> <p>Wk of 3/5-8 HS Lunch: Over calories by 9 (859: Range 750-850)</p> <p>Wk of 3/19-22 HS Lunch: Under calories by 81 (669: Range 750-850)</p> <p>Wk of 3/5-8 Elem. Lunch: Under calories for 6-8 but ok by K-5 (515: Range K-5=550-650, Range 6-8=600-700. 85 calories under for 6-8)</p> <p>Wk. of 3/12-15 Elem. Lunch: Under calories for 6-8 but ok by K-5 (575: Range K-5=550-650, Range 6-8=600-700. 25 calories under for 6-8)</p> <p>Wk. of 3/19-22 Elem. Lunch: Under calories for both K-5 and 6-8 (454: Range K-5=550-650, Range 6-8=600-700.</p> <p>Wk. of 4/16-19 Elem Lunch: Over calories for K-5 (668: Range K-5=550-650, Range 6-8=600-700.</p>	<p>Adjust all menus as needed to ensure they meet nutrient and component requirements for the appropriate grade groups.</p> <p>Upload the lunch cycle menu for all grade groups and upload to the review for WDE approval.</p>



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1400-Food Safety	At the elementary school, food temperatures are not recorded and kept at any meal or at any point during meal preparation or service.	<p>Food temperatures need to be taken and recorded on each meal. Temperatures should be taken to verify food has reached temperature, immediately prior to serving and after serving has end to ensure food is staying at a safe temperature while being served.</p> <p>Temperature logs can be kept separately or included on the production records. Temperatures will need to be taken for all foods not served at room temperature.</p> <p>The milk cooler temperature is taken once per day. It is recommended a temp be taken prior to breakfast and prior to lunch to ensure safe temperatures.</p> <p>Train all food service staff on the importance of taking food temperatures and the proper procedures for taking food temperatures. Update the HACCP policy to include this training. Immediately begin taking temperatures of food for all meals. Upload two weeks of completed food temperature logs for breakfast and lunch.</p>
1400-Food Safety	The most recent copy of the Food Safety Inspection is required to be posted in a visible location in the serving area. The site had the Food Safety Certificate posted, but not the inspection report.	Post the most recent food safety inspection report at each site where it is visible to the public. Upload a photo to the review for WDE approval.
1100-Smart Snacks	<p>The vending machine in the K-8 school is on during the school day and contains items that are unallowable for the K-5 grades (Sobe and Propel). Only water and milk is allowable for K-5 grades under Smart Snack guidelines.</p> <p>At the high school, there are unallowable beverages in the vending machine that students can purchase during the school day.</p>	<p>Review Smart Snack/All Food Sold in Schools requirements.</p> <p>If the vending machine is going to be on during the school day and available to students, the items sold must meet Smart Snack guidelines set for each grade group.</p> <p>In a K-8 school, the vending machine must contain items allowable for K-5 grades (water and fat-free flavored or 1% white milk).</p> <p>At the high school, allowable beverages must meet the following requirements:</p> <ol style="list-style-type: none"> <li>1) Plain water or plain carbonated water (no size limit);</li> <li>2) Low fat milk, unflavored (&lt; 12 fl oz);</li> <li>3) Non-fat milk, flavored or unflavored (&lt; 12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements;</li> <li>4) 100% fruit/vegetable juice (&lt; 12 fl oz); and</li> </ol>



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		<p>5) 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (&lt; 12 fl oz).</p> <p>6) Other flavored and/or carbonated beverages (&lt; 20 fl oz) that are labeled to contain &lt; 5 calories per 8 fl oz, or &lt; 10 calories per 20 fl oz; and</p> <p>7) Other flavored and/or carbonated beverages (&lt; 12 fl oz) that are labeled to contain &lt; 40 calories per 8 fl oz, or &lt; 60 calories per 12 fl oz.</p> <p>Communicate Smart Snack requirements to the vendor to ensure only allowable items are sold according the grade groups at each school if the vending machine will be on during the school day. Alternatively, turn the vending machine off during the school day. State to WDE when the vending machines will be on and who will be in charge of ensuring Smart Snack compliance. Send WDE labels or a picture of items sold in the vending machines at each school if it will be on during the school day. Use the Alliance for a Healthier Generation Smart Snack Calculator to determine compliance.</p>