



## NSLP Administrative Review Summary 2018-2019

### Park County School District #6

Date of Administrative and Procurement Review Date: September 26-28, 2018

Review closed: November 21, 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)
- Procurement Review

#### Commendations:

Absolutely excellent job on your income eligibility applications. They were all correct and it was so helpful to have the applications and the reports divided by free, reduced, directly certified and denied

Excellent job moving breakfast at the high school into the commons area of the high school and increasing participation because of it. Innovative idea.

#### Findings and Corrective Actions:

600 - Dietary Specifications and Nutrition Analysis

##### Finding #1

Proper production record not provided. Please show production records with quantity prepared by lb, #10 cans recipe # x number of batches or individual servings. Components are not identified on production records. Please provide a weekly certification worksheet for the week of the review

##### Required Corrective Action:

Product formulation statements need to be provided to ensure that products are credited correctly. September 7th breakfast is short 1/2 grain credit. Please add a grain.



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Accepted Corrective Action:

SFA has sent PFS and documentation necessary to show nutrient data. All recipes and 6 cent documentation has been updated to show correct crediting daily. SFA has satisfied the CA for NA.

800 - Civil Rights

Finding # 2

The existing Civil Rights District Policy does not include Food Service Discrimination Complaint Procedures..

Required Corrective Action:

The existing policy needs to either be amended or a new policy be put in place as it relates to food service discrimination complaints.

Accepted Corrective Action:

The proposed changes attached to the review and are accepted. Please send documentation when the board approves the updated policy. Required by March 2019.

700 - Resource Management (2018)

Finding #3

Park #6 Does not have a copy of the Coop Contract for FSA, the Buy American Provision in the IFB is not current for policy and needs to be updated. The current Market basket language was also absent for the IFB from SWMSS. Additionally, the Coop IFB did not have a prescribed bid open time and place as part of the solicitation.

Required Corrective Action:

SFA is to make sure that all contracts and solicitations performed on it's behalf are compliant with federal procurement rules and to make that a copy of all procurement documents are provided to the SFA.

Accepted Corrective Action:

WDE was contacted by WWSMSS and Park 6 FSD. A website will be set up for access to all coop procurement documents. To include, solicitations, responses and contracts. Also language was updated for findings addressed by WDE. To include the market basket language.

700 - Resource Management (2018)

Finding #4

The Nonprofit school food service can be used only of the operation or improvement of school food service. Any other food service activities that are operated by the SFA must be fully accounted for and all costs must invoiced. The nonprofit food service account cannot pay for (support) any "other" expenses such as for catering. All food, supply and labor costs for catering must be fully recovered by food service.

The nonprofit food service account revenues (meal revenues, USDA reimbursements, and general funds transfers) can only be used for allowable program costs and cannot be used to support other activities such as catering. This includes labor expenses.

Required Corrective Action:

All catering invoices must include, at a minimum, the cost of food, food service supplies, and food service labor used for the catering activity. This amount must then be deposited into the nonprofit food service account to reimburse this account in full.

Accepted Corrective Action:

Invoices all include labor change now per CA requested in this finding. See two closed sales and two pending/scheduled events. All invoices attached and corrective action is approved.



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### 1100 - Smart Snacks

#### Finding #5

Two items in the vending machine do not meet the smart snack requirements.

#### Required Corrective Action:

The 20 oz G2 bottles are too large as are the juice bottles at 15.2 ounces. G2 must be the 12 ounce size and the Juice must be 12 oz size.

#### Accepted Corrective Action:

Sent an email to admin at the vending locations. Told them to have the companies buy back non compliant and restock with compliant products. I received an email with the attached images today from the GM of Pepsi. Pictures sent and approved.

### 300 - Meal Counting and Claiming - Breakfast

#### Finding #6

The secretary was on vacation in September and there was no back up person to take the meal counts. Point of Service was taken September 5 and 6. The rest of the month until today the 26th was blank. No meals from September 7 to 25 can be claimed because there is not accurate point of service.

#### Required Corrective Action:

Someone must watch all the kids take the food items, ensure they are taking a reimbursable meal, and mark them on the class roster at the time they take the meal. This cannot be done in a passive way. Someone must be standing there monitoring the meal service the entire time and someone must be trained as a backup when the main person is out of the office. Develop a system for Point of Service Monitoring.

#### Accepted Corrective Action:

Attached documentation of roster tracking plan of action is approved and proof that September days with no documentation were not claimed for reimbursement. CA approved.

### 400 - Meal Components and Quantities – Breakfast

#### Finding #7

Need CN labels or PFS to verify components. They were not available on the day of review.

#### Required Corrective Action:

Send CN Labels or PFS on the products that have been requested.

#### Accepted Corrective Action:

All Sent through email with Tammie Rempe. Attached to review. Finding is closed and approved.

### 800 - Civil Rights

#### Finding #8

Since the meal service is taking place at HMA and not in the main high school cafeteria, there needs to be a Justice for All Poster posted in HMA as well.

#### Required Corrective Action:

Send documentation (picture) that Justice for All Poster is posted in the HMA.

#### Accepted Corrective Action:

Picture sent of Justice for All Poster. Finding is closed and approved.

### 1400 - Food Safety

#### Finding # 9

Leftover items are not being handled correctly. They do not need to be returned to the main kitchen (except for hot items which do need to be returned) but they do need to be handled differently.

#### Required Corrective Action:

At 9:00 am (or whatever time breakfast is officially over) all the leftover food from breakfast needs to be pulled and put away in the kitchen or a share table. Milk and other cold items need to be put in the HMA kitchen refrigerator or in an ice bath on a share



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table. Shelf stable need to be moved to the kitchen or a share table.

Accepted Corrective Action:

Food Safety plan of action that is attached to the review finding is accepted as approved corrective action.



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