

## OSPI Child Nutrition Administrative Review - Exit Conference Summary Sheet

<b>LEA: Richland School District</b>	<b>Agreement No.:</b>		
Sites selected for review	Breakfast	Lunch	Corrective Action Required for this site
White Bluffs Elementary School	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Due: 6/1/18
Lewis & Clark Elementary School	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Hanford Secondary School	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Due: 6/1/18

Site of Nutritional Analysis: N/A

### Administrative Review Critical Area - Performance Standard 1

All free, reduced-price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced-price, and paid meals respectively, and are counted, recorded, consolidated and reported through a system that consistently yields correct claims. (7CFR 210.18)

- **Certification Benefit Issuance:** (LEA Questions 124-142)  
**Comments/Corrective Action:**  
**Q126: Were all selected applications correctly approved? Yes**  
 Comments: A total of 564 certification/benefit issuance documents were reviewed without error. This documentation is well organized and processed systematically and with attention to detail - nicely done.
- **Verification:** (LEA Questions 207-215)  
**Comments/Corrective Action:** The verification process was completed in a timely manner in which 7 applications were accurately selected using the "1% Plus ½% Focused" sample size option. Direct Verification was used as a part of this process in which all applications were verified correctly. In addition, the Verification Summary Report was completed accurately and submitted within the requested timelines. Nicely done - thank you.
- **Meal Counting and Claiming:** (LEA Questions 314-316 / Site Questions 317-325)  
**Comments/Corrective Action:** Meals were counted correctly at the point of service and the April 2018 claim for reimbursement was submitted accurately.

### Administrative Review Critical Area - Performance Standard 2

Reimbursable lunches must meet the meal requirements in 210.10, as applicable to the age/grade group reviewed. Reimbursable breakfast must meet the meal requirements in 220.8 and 220.23, as applicable to the age/grade group reviewed. (7 CFR 210.10 and 220.8)

- **Meal Components and Quantities:** (Site Questions 400-412)  
**Comments/Corrective Action:**  
[HANFORD SECONDARY SCHOOL](#)  
**DAY OF REVIEW - (5/16/18)**  
**Q402: Are the minimum daily quantity requirements met for the age / grade group being offered? No**  
 Comments: Interview with the staff member who made the sandwiches identified that the Egg Salad Sandwiches were prepared by using a #30 scoop for the egg salad (vs. the #12 scoop per recipes 1140; 1069) and the Meat & Cheese Sandwiches were made with 4 slices of meat and 1 slice of cheese (vs. 2 slices of cheese per recipes 1097;

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1060; 1203; 1031). A #30 scoop of egg salad provides 0.75 oz Meat/Meat Alternate and the meat and cheese deli sandwiches as prepared provides 1.75 oz Meat/Meat Alternate vs. the minimum 2 oz daily requirement. As a result, all egg salad and meat and cheese sandwiches served (25) will be disallowed.

Resources: CNS NSLP Menu Planning and Meal Patterns Toolkit website

<http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/NewMealPatterns.aspx>

**Corrective Action Due 6/1/18:** Please provide your CNS Program Specialist with a written description that explains the staff training plan to ensure that recipes are followed as written. *Received 5/31/18 PMahre*

#### **REVIEW PERIOD - APRIL 16 – 20, 2018**

#### **Q410: Do planned menu quantities meet meal pattern requirements for the review period? No**

Comments: Based on observation and staff interview, the focus week of review lunch menu did not provide the minimum daily requirement for Meat/Meat Alternate for the egg salad; tuna salad or deli meat and cheese sandwiches due to staff not following recipes. This is a systemic issue and repeat finding from the SY14-15 Administrative Review, and as a result, all sandwich meals served during the focus week (112) will be reclaimed through the Administrative Review process. Please note that repeat findings on future reviews will result in fiscal action.

Program Specialists' discussion with food service administrative team included recognition and positive feedback on the food service systems in place (well documented production records; accurate written recipes, etc.) that support the school meal programs. Discussed strategies for staff training to ensure that these systems are followed consistently throughout the district.

Corrective Action - refer to CA listed in Question 402 above.

#### **LEWIS & CLARK ELEMENTARY SCHOOL**

#### **DAY OF REVIEW - 5/16/18**

On the day of observation an A.M. preschool student came through the line with their parents. The adults purchased two meals and the preschool student was claimed. This meal will be disallowed from the day of observation. Meals can only be served and claimed during the normal school hours for all students.

**Corrective Action Due 6/1/18:** Please provide your CNS Program Specialist with a written procedure that identifies how meals will only be served/claimed for eligible students. *Received 5/31/18 PMahre*

#### **Pre-K**

#### **Q2: Is the SFA using the meal pattern flexibility and offering one menu when Pre-K students are co-mingled in the meal service area? – YES/NO – NSLP/SBP**

Comments: Separate production records are not being kept; the same menu and portion sizes are used in the Pre-K classroom as are for the SPB and NSLP. The meal pattern co-mingling flexibility is not allowed when preschool meals are served separately. Interview with the FSD and Assistant FSD revealed that they were serving the same food and planned menu as the rest of the school, given that there are no maximum serving sizes. Lunch observation occurred on 5/16/18 and turkey gravy, mashed potatoes, cucumbers, pineapple, a roll and milk were served. The planned portion size for the turkey gravy was 3/8 cup = 2 oz. MMA; the serving utensil used was approximately 2 Tablespoons and the teaching staff were instructing the students to take 1 scoop, which would not meet the minimum serving size of 1.5 oz. MMA. Technical assistance was provided at the time of the review regarding planned portion sizes being indicated on the menus provided for the preschool classrooms to support the CACFP meal pattern is being planned

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and served to the students. The FSD will start adding the planned portion sizes to the menu to support compliance. No further corrective action is requested at this time.

#### WHITE BLUFFS ELEMENTARY SCHOOL

##### **DAY OF REVIEW - 5/17/18**

##### **Q407: Has the school offered the planned menu for the day of review? Yes/No**

Comments: A special dietary accommodation was made at lunch for a student in which a cheese sandwich was documented on the production record and served. Currently, there isn't supportive documentation on file to substantiate this menu substitution. Please contact the Section 504 Coordinator and develop a plan to accommodate those students with an Individual Education Plan to include notifying the Food Service Director and include this process in the current written procedure for special dietary needs. Thank you.

Resource: [Special Dietary Needs](#)

**Corrective Action Due June 1, 2018:** Please provide your CNS Program Specialist with a revised written procedure for accommodating special dietary needs. *Received 5/31/18 PMahre*

- **Offer vs. Serve:** (Site Questions 500-502)

**Comments/Corrective Action:**

- **Dietary Specifications and Nutrient Analysis:** (Site Questions 603-605)

**Comments/Corrective Action:**

#### HANFORD SECONDARY SCHOOL

The Off-Site and On-Site portions of the Dietary Specification Assessment Tool was assessed at "low risk", therefore the Dietary Specifications are considered to be within the required range. School meal program recipe and menu resources that provide continued support with Dietary Specification compliance can be found at:

<http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/Resources.aspx>

### Administrative Review General Areas

- **Resource Management: (Was a Comprehensive Review Conducted? Yes  No )**

**Comments/Corrective Action:**

**A Comprehensive Resource Management Review was conducted for the area of "Nonprogram Food Revenue".**

**Q4: Were breakfasts and lunches served to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the lunch? NO**

Comments: Adult meals are currently priced at \$3.50. Per USDA requirements the district must charge at least what they are receiving in federal funds for a free student meal. Currently that is \$3.54; technical assistance was provided

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at the time of the review. Per FSD, the school board has been presented with a price increase packet that includes raising the prices of the adult meals to \$3.75.

### Q8: Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio? – NO

Comments: The base numbers were not accurately determined. The reviewer and the FSD went through the NPFT and could not validate the numbers submitted for SY16-17. Technical assistance was provided at the time of the review with regards to using the total program revenue (Federal/State/Student Charges P/RP; and the snack/supper program charges) and the revenue received from nonprogram foods, and the total food costs to obtain the costs of the program foods and nonprogram foods. A new tool was completed using April 2018 as the reference period, and was validated at the time of the review. Thank you.

- **General Program Compliance:** (Questions 809-1503)

Includes civil rights, SFA on-site monitoring, Smart Snacks, professional standards, water, food safety/storage/Buy American, reporting and recordkeeping, school meals environment, school breakfast program and summer food service program outreach

**Comments/Corrective Action:**

### WHITE BLUFFS ELEMENTARY SCHOOL

### Q1300: Is free potable water available to all students for lunch (in each location where lunches are served during meal service) and for breakfast when breakfast is served in the cafeteria? No

Comments: The Healthy, Hunger Free Act of 2010 established the requirement to make potable water available to students in the National School Lunch Program. Water is not available to those fourth grade students eating on the stage each day. Technical assistance was provided and corrective action completed at the time of review – thank you.

- **Other Federal Program Reviews** (Site Questions 1700-1910)

Includes Afterschool Snacks, Seamless Summer Option, Fresh Fruit and Vegetable Program, Special Milk Program; At Risk Supper Program

**Comments/Corrective Action:**

### HANFORD SECONDARY SCHOOL

#### At Risk Supper Program

Q3: Supper Menu, Production Record and meal service:

Comments: Production records on the day of review (5/16/18) and during the review period (April 2018) demonstrate that students have a choice between two supper menu options. The second option is listed on the menu as a "Back Up Entrée" which is prepared and served each day. Meal observation on the day of review revealed that the burrito menu was offered during the first part of the supper program meal service. During this time, two students requested and were served the "Back Up Entrée" (Sun Chips and String Cheese) - these supper **2 meals will be disallowed** because the "Back Up Entrée" was not offered to all students at the same time. Technical assistance was provided at the time of review to discuss meal service options. Effective immediately, the FS administrative team plan to offer both supper menu options to all students throughout the supper meal service time. No further corrective action needed.

### LEWIS & CLARK ELEMENTARY SCHOOL

#### Afterschool Snack Program

### Q 4: a) Are snacks being properly counted and claimed? – No

Comments: 35 snacks are consistently claimed for the Girls on the Run program. Review of the attendance records revealed that block claiming is occurring with this program; 35 snacks are claimed every Monday and Wednesday, attendance records show 29; 30 or 33 in attendance on 4/9; 4/11 and 4/23/18; no other attendance records were available at the time of the review. All snacks not supported by attendance records will be reclaimed for a total of **153 snacks**. Interview with the coach in charge of the afterschool program said she had been informed years prior

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that she was to claim all snacks provided and not return any snacks to the kitchen. Interview with the Assistant FSD revealed that twice a year this program is provided training (fall and spring) with each session, and that she personally conducted the training this year. Interview with the Assistant FSD revealed that an email string was sent amongst the coaches and the food service department that confirms miscommunication and inconsistent understanding of the program staff on how snacks are to be claimed. Observation of the snack service revealed that snacks were claimed at the point of service. See also technical assistance and corrective action in Question 7; program monitoring.

**Corrective Action Due 6/1/18:** Please provide your CNS Program Specialist with a written edit check procedure for snacks at area eligible sites to identify potential block claims. This procedure must include a reconciliation against attendance records when potential block claims are identified. *Received 5/31/18 PMahre*

### **Q7: a) Has the program been monitored within the first 4 weeks of operation each year? – YES/NO**

Comments: There are two ASP offered at Lewis & Clark Elementary School: "Science Club" (Start Date = 10/27/17) and "Girls on the Run" (Start Date = 3/5/18).

**Girls on the Run:** The LEA site visits did not include observing this program. Per the FSD and Field Supervisor, the FS is frequently out visiting the programs, and could have completed one however did not. An incomplete site monitoring visit was provided later with a date of 3/14/18.

Technical assistance was provided at the time of the review regarding visiting the different programs at each site to ensure each program is operating within the regulations. Had a site monitoring visit been completed accurately and thorough, the block claims finding in Question 4 may have been identified with corrective action required and a follow-up visit conducted to ensure proper snack claims prior to this Administrative Review. No corrective action is requested at this time.

## Additional Comments/Corrective Action

*Thank you for the hospitality and assistance you've extended during the Administrative Review of the school breakfast and lunch programs.*

*The presentation of all food service documentation compiled in preparation for the Administrative Review is well organized; detailed; comprehensive and is reflective of the effective and efficient systems in place that support the school meal programs – nicely done! It is evident that the school meal program provides students with balanced and nutritious meals that they look forward to. This is exciting to see and a lot to be proud of.*

*Please continue to read the Child Nutrition email notifications along with OSPI Bulletins and Memorandums for important information. The food service and administrative support staff's attendance is strongly encouraged at as many upcoming OSPI training workshops as time and resources permit. We look forward to working together with you and your staff in the future.*

**\*NOTE: It is the expectation of OSPI and USDA that changes made as a result of the Administrative Review Corrective Action Plan will be carried throughout the program.**

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### SUMMARY

- This report has been discussed with me and a full copy of the on-site review form was provided and/or emailed to me. I understand from the findings a corrective action plan does not need to be submitted.
- This report has been discussed with me and a full copy of the on-site review form was provided and/or emailed to me. I understand that a corrective action plan must be submitted which addresses the corrective action area required, to the address below.

**Corrective Action Due Date: June 1, 2018**

Pam Mahre, MS, RD  
OSPI Child Nutrition Program Specialist  
PO Box 2369 Yakima WA 98907  
Email Address: [pam.mahre@k12.wa.us](mailto:pam.mahre@k12.wa.us)

**\*Please send electronically if possible**

### Administrative Review Fiscal Action

The potential overclaim will be calculated once all corrective action has been received. USDA allows a \$600.00 disregard per program (closed claim period) for overclaims. You will be notified of the dollar amount of fiscal action and given the opportunity to appeal this action. Appeal procedures are in accordance with 7 CFR 210.18(q) and WAC 392-101-010.

I understand that the program payments will be withheld if corrective action for Performance Standard 1 & 2 errors are not postmarked or submitted to OSPI within 30 days of the established due date on this form. OSPI may also withhold payments for failure to submit corrective action for general area or critical area violations that did not exceed the review threshold. Note: under extraordinary circumstances, OSPI may extend timeframes upon written request of the LEA.

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EXIT CONFERENCE PARTICIPANTS:		
<i>OSPI CNS Program Specialist</i>		
Signature of Review Official	Title	Date
Signature of Authorized LEA Official	Title	Date
Name	Title	Date
Name	Title	Date
Name	Title	Date
Name	Title	Date
Name	Title	Date
Name	Title	Date
Name	Title	Date