

## STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

Section 207 of the HHFKA amended section 22 of the NSLA (42 U.S.C. 1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website no later than 30 days after the SA provides the final results of the administrative review to the SFA. The SA must also make a copy of the final administrative review report available to the public upon request.

**School Food Authority Name:** Willow Lake School District

**Date of Administrative Review (Entrance Conference Date):** 1/18/17

**Date review results were provided to the School Food Authority:** 2/10/17

**Date review summary was publicly posted:** 7/7/2017

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The review summary must cover access and reimbursement (including eligibility and certification review results), an SFA's compliance with the meal patterns and the nutritional quality of school meals, the results of the review of the school nutrition environment (including food safety, local school wellness policy, and competitive foods), compliance related to civil rights, and general program participation. At a minimum, this would include the written notification of review findings provided to the SFAs Superintendent or equivalent as required at 7 CFR 210.18(i)(3).

### General Program Participation

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)

- School Breakfast Program
- National School Lunch Program
- Fresh Fruit and Vegetable Program
- Afterschool Snack
- Special Milk Program
- Seamless Summer Option

2. Does the School Food Authority operate under any Special Provisions? (Select all that apply)

- Community Eligibility Provision
- Special Provision 1
- Special Provision 2
- Special Provision 3

### Review Findings

3. Were any findings identified during the review of this School Food Authority?

- X Yes       No

This institution is an equal opportunity provider.

If yes, please indicate the areas and what issues were identified in the table below.

YES	NO	REVIEW FINDINGS		
X	<input type="checkbox"/>	<b>A. Program Access and Reimbursement</b>		
		<b>YES</b>	<b>NO</b>	
		X	<input type="checkbox"/>	Certification and Benefit Issuance
		<input type="checkbox"/>	X	Verification
		<input type="checkbox"/>	X	Meal Counting and Claiming
Finding(s) Details:				
1) Finding 1: Onsite #126: Multiple free and reduced price applications were determined incorrectly. <ul style="list-style-type: none"> <li>○ Two applications with seven students were approved free based on Medicaid numbers. Medicaid is not an allowed source for a free determination.</li> <li>○ One application with one student was approved as reduced and should have been denied.</li> <li>○ Three applications with seven students were approved free but should have been reduced.</li> </ul>				
X	<input type="checkbox"/>	<b>B. Meal Patterns and Nutritional Quality</b>		
		<b>YES</b>	<b>NO</b>	
		X	<input type="checkbox"/>	Meal Components and Quantities
		<input type="checkbox"/>	X	Offer versus Serve
		X	<input type="checkbox"/>	Dietary Specifications and Nutrient Analysis
Finding(s) Details:				
1) Finding 2: Onsite #409: The production record submitted for Wednesday 12/14 does not have the fruit that was served listed on it. As per 7 CFR 210.10(a)(3) <i>schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day.</i>				
2) Finding 3: Onsite #410: The vegetable subgroup requirement is not being met. 7 CFR 210.10(c)(2)(iii) states that all vegetable subgroups; dark green, red/orange, beans and peas (legumes), starchy, and other must be offered during the week in the quantities specified by the meal pattern.				
The minimum grain serving was not met on Tuesday 12/13. As stated in 2 CFR 210.10 (c) the minimum grain quantities per day are 1 ounce equivalent (oz eq) for grades K-8 and 2 oz eq for grades 9-12.				
Standardized recipes are not being followed or used correctly. Standardized recipes are necessary to determine the quantity of creditable components in a recipe and are a requirement as stated in 2 CFR 210.10(c)(5): All schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods. Standardized recipes developed by USDA/FNS are in the Child Nutrition Database. If a school has its own recipes, they may seek assistance from the State agency or school food				

		<p>authority to standardize the recipes. Schools must add any local recipes to their local database as outlined in FNS guidance. Following standardized recipes ensures that the minimum component offerings are being met and compliance with the meal patterns.</p> <p>According to the production records not enough fruits and vegetables are being served to meet the requirements. Under offer versus serve (OVS) there must be enough fruits and vegetables available for each student to take the full 1 cup offering of fruits and the full 1 cup offering of vegetables.</p> <p>Production records are incomplete and are not being filled out correctly. Refer to the <a href="#">Food Production Record Handbook</a> on the CANS NSLP website for assistance in completing production records correctly.</p> <ul style="list-style-type: none"> <li>○ Components are not being documented in the correct places. For example: Monday 12/12 pizza was served. Pizza credits as both a meat/meat alternate (M/MA) and a grain. However, the pizza was only documented in the M/MA section.</li> <li>○ The OVS section of the production record must be filled out.</li> <li>○ The ‘total planned servings’ column (column H) is not consistently being filled out. It is also not being filled out correctly.</li> <li>○ The ‘total units prepared’ column (column I) is not being used appropriately.</li> <li>○ If more than one fruit or vegetable is being served, the ‘planned servings’ column for each grade group needs to be completed for each fruit and/or vegetable, similar to how the milk section is filled out.</li> </ul> <p>The following items were found while reviewing the weeks to get a correct week for the nutrient analysis. They have already been corrected and addressed.</p> <ul style="list-style-type: none"> <li>○ Grades that are not OVS (K-2) need to be served the full amount of fruits (1/2 cup) and vegetables (3/4 cup) to have a reimbursable meal.</li> <li>○ Processed products/convenience entrees (such as chicken nuggets) must have a CN label or product formulation statement (PFS) to determine how they credit.</li> <li>○ Yogurt is credited as a M/MA and should be recorded under that section, not the fruit section.</li> <li>○ Juice can be credited as a fruit if it is 100% juice and should be listed in this section on the production record.</li> <li>○ The minimum weekly and daily quantities for M/MA and Grains were not met over the course of several days and weeks. It is important to ensure that these requirements are being met when planning daily and weekly menus.</li> </ul> <p>3) Finding 4: The following products being used are not whole grain rich (WGR);</p> <ul style="list-style-type: none"> <li>○ Pancho Villa Hard Taco Shells</li> <li>○ 6” Heat Pressed Flour Tortillas</li> </ul>
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X	<input type="checkbox"/>	<p><b>C. School Nutrition Environment</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th style="width: 10%;">YES</th> <th style="width: 10%;">NO</th> <th></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;">X</td> <td>Food Safety</td> </tr> <tr> <td style="text-align: center;">X</td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Local School Wellness Policy</td> </tr> <tr> <td style="text-align: center;">X</td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Competitive Foods</td> </tr> <tr> <td style="text-align: center;">X</td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Other</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <p>1) Finding 7: Offsite 1005, 1006: There is no available wellness policy assessment. All local wellness policies require an assessment once every three years. The first assessment must be done by July 1, 2017. This assessment measures the schools' compliance with the local school wellness policy. The assessment results must be made available to the public. The assessment must measure the implementation of the local school wellness policy, and include:</p> <ul style="list-style-type: none"> <li>(i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy;</li> <li>(ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and</li> <li>(iii) A description of the progress made in attaining the goals of the local school wellness policy.</li> </ul> <p>Make appropriate updates or modifications to the local school wellness policy, based on the 3 year assessment.</p> <p>2) Finding 8: Onsite 1105: Some items in the beverage vending machine do not meet the most restrictive requirements for all students. Smart Snacks rules state that the most restrictive requirements for items in vending machines must be followed. Since the vending machine is in an area that all students (grades K-12) have access to, the elementary requirements would be the most restrictive. Noncompliant items include:</p> <ul style="list-style-type: none"> <li>a. All varieties of pop</li> <li>b. Gold Peak Tea</li> <li>c. Sno-berry Peace Tea</li> <li>d. Razzleberry Peace Tea</li> </ul>	YES	NO		<input type="checkbox"/>	X	Food Safety	X	<input type="checkbox"/>	Local School Wellness Policy	X	<input type="checkbox"/>	Competitive Foods	X	<input type="checkbox"/>	Other
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		3) Finding 9: Offsite 1601: The SFA did not notify eligible households of the availability and location of free meals for students via the Summer Food Service Program. Notifying families of the availability of free meals during the summer is a requirement of the National School Lunch Program.
X	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1) Finding 6: Offsite 803: SFA does not have a formal or informal policy for receiving and processing civil rights discrimination complaints within the school meal program.</p>