

## 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:** Wolsey-Wessington School District

**Date of Administrative Review (Entrance Conference Date):** 3/21/17

**Date review results were provided to the School Food Authority:** 4/20/17

**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?  
 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
		X	<input type="checkbox"/>	Verification
		<input type="checkbox"/>	X	Meal Counting and Claiming
Finding(s) Details:				
<p>1) Finding #1 (Offsite 120): School Food Authority (SFA) is providing eligibility benefits as of the date an application is received, however, a date stamp when application received date is not completed. The Eligibility Manual, Part 7, allows for the date of application submission to be used as the date of eligibility, however, a method to document the date of household application submission must be used.</p> <p>2) Finding #2 (Onsite 140): 6 students were approved as free-income, but should have been superseded to free based on direct certification. Level of benefits issued to the students does not change. Direct certification for free meals supersedes all other methods of free meal certification.</p> <p>3) Finding #3 (Offsite 202): The School Food Authority (SFA) the Secretary as the confirming official in the annual agreement with Child &amp; Adult Nutrition Services (CANS), however the Business Manager conducts confirmation review activities. Program practice must be accurately identified in the annual agreement with CANS.</p> <p>4) Finding #4 (Onsite 211, Onsite 213, Onsite 214): Verification notification letter appears to be an older version of the State-issued prototype, featuring an outdated version of non-discrimination statement. Verification notification letters must contain all required information, including the up-to-date non-discrimination statement. Additionally, the verification notification letter used by the SFA for adverse action did not include appeal rights, or 10 calendar days of notice prior to eligibility change.</p>				
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:				
<p>1) Finding #5 (Onsite 401): The reviewer observed 2 incomplete breakfast meals under Offer Versus Serve (OVS) requirements, and 3 incomplete lunches under OVS requirements.</p> <p>When OVS is utilized at breakfast, selected meals counted for reimbursement must meet breakfast OVS requirements of at least 3 food items – 2 items taken in full quantity, and 1 item must be at least ½ cup fruit. When OVS is utilized at lunch, selected meals counted for reimbursement must meet lunch OVS requirements of at least 3 food components – 2 components in full quantity, and 1 component of fruit</p>				

		<p>and/or vegetables in the quantity of at least ½ cup.</p> <p>2) Finding #6 (Onsite 404): No signage constituting a reimbursable meal was observed for breakfast. Signage indicating what constitutes a reimbursable meal, including language indicating that a complete meal must contain at least ½ cup fruit and/or vegetable must be visible to students for both breakfast and lunch.</p> <p>3) Finding #7 (Onsite 410): Reviewer identified the following quantity issues during the menu review from the review period:</p> <ul style="list-style-type: none"> <li>• Using older version of State prototype production records.</li> <li>• Menu planner does not provide the same items/quantities available across K-8 grade group. <ul style="list-style-type: none"> <li>○ Grades K-2 and 3-8 received different serving sizes during menu review</li> </ul> </li> <li>• Some recipes do not include a recipe yield.</li> <li>• Planned servings per item on the production record are not consistently filled out.</li> </ul> <p><b>Lunch:</b></p> <ul style="list-style-type: none"> <li>• Chef Salad daily option (.5 oz eq grain) does not contain enough grain (1.0 oz eq grain needed for grades K-8, 2.0 oz eq grain needed for 9-12). <ul style="list-style-type: none"> <li>○ Chef Salad total count recorded at top of production record – needs to be recorded in crediting component sections.</li> </ul> </li> <li>• Weekly minimum grain requirement for grades K-8 not met (6.5 oz eq offered, need 7 oz eq).</li> <li>• Not enough starchy vegetable is available (1/8c offered, 1/2 c needed).</li> <li>• ½ cup fruit (orange credits as ½ c fruit) offered to HS – need 1 c fruit offered.</li> <li>• Chili recipe not standardized – missing yield.</li> <li>• Ham and cheese sub recipe does not reflect actual crediting – lists 2.5 oz eq meat/meat alternate, should be 2.0 oz eq meat/meat alternate.</li> </ul> <p><b>Breakfast:</b></p> <ul style="list-style-type: none"> <li>• Honey Nut Scooters (.75 c) not large enough to credit as 1 item.</li> <li>• Sausage (.75 oz eq) not large enough to credit as 1 item.</li> <li>• Muffin not whole grain-rich.</li> <li>• Juice offered at breakfast is exceeding the weekly maximum of 50% of fruit offering.</li> <li>• Au Gratin recipe (3/20) did not contain enough meat/meat alternate, and had noticeably high saturated fat and sodium levels.</li> </ul> <p>4) Finding #8 (Onsite 605): Results of the nutrient analysis identify the provided grades K-12 breakfast calorie average was determined as 505 calories (400-500 range); the grades K-8 lunch calorie average was determined as 696 (600-650 range) and Saturated Fat was determined as 10.12% (10% maximum).</p>		
X	<input type="checkbox"/>	<p><b>C. School Nutrition Environment</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">YES</td> <td style="width: 50%; text-align: center;">NO</td> </tr> </table>	YES	NO
YES	NO			

		X	<input type="checkbox"/>	Food Safety
		X	<input type="checkbox"/>	Local School Wellness Policy
		X	<input type="checkbox"/>	Competitive Foods
		X	<input type="checkbox"/>	Other
	<p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1) Finding #12 (Onsite 1407): Thermometer calibration logs and cooking temperature logs were not consistently maintained. Temperature logs must be recorded daily and thermometer calibration must be completed at least weekly, and kept on file for at least 6 months.</li> <li>2) Finding #13 (Onsite 1408): Reviewer observed storage violations with food product being stored on the floor in the freezer. Food products must be stored on a shelf and not directly on the floor.</li> <li>3) Finding #14 (Onsite 1410): Reviewer observed product with a country of origin outside of the US (cucumbers from Mexico). The Buy American requirement states that a food or food product is grown and/processed in the US. At least 51% of the final processed product must be made up of domestically grown commodities. For products that are not US grown and processed, the SFA needs to have a documentation indicating that domestic products are truly unavailable or unreasonably priced.</li> <li>4) Finding #10 : The following areas of the Local Wellness Policy (LWP) are identified as out of compliance with the Wellness Policy Final Rule (implantation date 7/1/17):             <ul style="list-style-type: none"> <li>• LWP does not identify a stance on marketing of foods and beverages that meet lunch nutrition standards (Offsite 1000).</li> <li>• LWP indicates an official will be designated for implantation and oversight of the policy, but does not identify the position of official (such as superintendent) (Offsite 1000).</li> <li>• Documentation of last update/policy meeting not maintained (such as meeting minutes or attendance sheet) (Offsite 1002).</li> <li>• Documentation not maintained demonstrating how potential stakeholders (at minimum: parents, students, representatives of the SFA, teachers of PE, school health professionals, school board, school administration, and general public) are made aware of their ability to participate in the development, review, update, and implementation of the policy (Offsite 1004).</li> <li>• Assessment of policy not completed at time of review. Assessment must be completed triennially, with first assessment to be completed by June 30, 2020 (Offsite 1005).</li> <li>• Triennial assessment results must be made available to the public (Offsite 1006).</li> </ul> </li> <li>5) Finding #11 (Onsite 1105): Reviewer observed products in vending machine which do not meet Smart Snack requirements. Products include:             <ol style="list-style-type: none"> <li>a. Teddy Bear cookies – calories from fat exceed 35%; calories from saturated fat are not less than 10%</li> <li>b. Tru Moo Chocolate &amp; Strawberry milk – too high in calories</li> <li>c. Old Dutch Pretzels – Sodium exceeds 200 mg</li> </ol> </li> <li>6) Finding #15 (Offsite 1601): SFA did not provide documentation demonstrating Summer Food Service Program outreach. All SFAs</li> </ol>			

		participating in the school lunch program must provide outreach/communication regarding availability of summer meals in the area.
X	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1) Finding #9 (Offsite 803): SFA does not have a formal or informal policy to handle complaints of discrimination within the school meals program.</p>