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December 31, 2015

Ken Schroeder Superintendent Ravenna Public School PO Box 8400 Ravenna NE 68869

Agreement Number: 100069

Dear Mr. Schroeder:

I want to thank Hillary and Lynda for their cooperation during the Administrative Review (AR) of the school meals program on December 9, 2015. The purpose of this review is to confirm that all regulatory areas of the National School Lunch Program are being met. November of 2015 was the review month.

The results of the AR will be reported by category with any required Corrective Action listed at end of each section.

## PERFORMANCE STANDARD ONE - MEAL ACCESS and REIMBURSEMENT

All free, reduced and paid lunches claimed for reimbursement are served only to children eligible for free, reduced and paid lunches, respectively; and counted, recorded, consolidated and reported through a system which consistently yields correct claims.

**Applications**: All free and reduced price meal applications were reviewed; there were no errors. Denied applications were reviewed; there were no errors.

**Daily Meal Count Sheet and Edit Check Worksheet:** USDA requires the meal count to be taken at the end of the serving line or at that point in the line where all reimbursable meal components have been offered. This is referred to as a Point of Service (POS) meal count. An Edit Check Worksheet that compiles monthly meal counts by eligibility category and compares attendance-adjusted eligible figures to daily meal counts must be completed for each feeding site.

An accurate POS meal count is recorded daily. *LCS 1000 Mayflower* is the program used by the district; the POS is at the end of the serving lining, pin numbers are entered by the students, a list of students by grade and alphabetized is used for students who forget their numbers. Monthly meal counts and required edit checks for each feeding site are on file. Correct meal counts were reported on the Claim for Reimbursement.

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PERFORMANCE STANDARD TWO - NUTRITIONAL QUALITY and MEAL PATTERN

Meals claimed for reimbursement contain the required number of food components/items for the grade group(s) served and comply with USDA nutrient standards. For SFAs implementing Offer Versus Serve, adequate quantities of food are prepared and staff accurately recognizes a reimbursable meal.

**Menus**: All menus for the review month were reviewed. A nice variety of fruits and vegetables are offered daily. Hot vegetables are served by staff but the majority of fruits/vegetables are on the fruit and vegetable self-services bar.

Menus met requirements in terms of meal components and portion sizes, all vegetable sub – groups are met.

Offer Versus Serve is correctly implemented. During meal service, all students left the serving line with a reimbursable meal.

USDA's Dietary Specification Tool evaluates a district's purchasing and production practices. Lynda had completed this prior to the review. The dietary specification tool indicated a low risk result; based on the low risk results, a nutrient analysis of the district's menus was not required.

## **GENERAL AREAS:**

## RESOURCE MANAGEMENT

The SFA demonstrates financial responsibility in maintaining a nonprofit school food service account. This section addresses maintenance of the nonprofit school food service account, paid lunch equity, revenue from non-program foods and indirect costs.

USDA's Resource Management Risk Indicator Tool was completed prior to the review. Based on the results, a comprehensive financial review of the district's school meals program was not required.

USDA's Paid Lunch Equity (PLE) Tool is required to be completed on an annual basis. This tool calculates the average price a district should charge for a "paid" student lunch. The weighted meal prices are \$2.71 which meets the targeted USDA lunch price.



Technical Assistance (TA): Since you are within the USDA target lunch price we are not implementing corrective action but technical assistance. TA is to fill out the PLE for the 2016 – 2017 school year and every school year going forward. Please send me a copy for our records. When setting meal prices for next year, evaluate the prices charged for a second entrée and a carton of milk to ensure you are making a profit on the second entrees and second milk.

Indirect costs are not charged to the school food service account.

## GENERAL PROGRAM COMPLIANCE

This section addresses Verification, Civil Rights, On-Site Monitoring, Wellness Policy, Competitive Foods, Water Availability, Food Safety, Professional Standards, Reporting and Recordkeeping and School Breakfast Program Outreach.

**Verification**: The district was required to verify two households this year; the process has been completed correctly and the online verification report submitted to Nutrition Services.

**Civil Rights:** The USDA Civil Rights poster, "And Justice for All" is displayed in the serving/dining area in a location visible to all.



USDA's Nondiscrimination Statement must be included in program materials when school meal programs are described. Hillary agreed the district's student handbook will be updated to reflect the new Nondiscrimination Statement next school year and updating the district's web site where school meal program is mentioned.

USDA's Civil Rights Summary, Attachment H-1, has been completed for the year.

Annual Civil Rights training has been started for all staff who work directly with the school lunch program. I left an updated Civil Rights Handout that may be used for the training. The training needs to be documented and on file. This requirement does include the authorized representative.



Wellness Policy: All school districts participating in USDA's school meal programs are required to create a Local Wellness Policy. I have enclosed a wellness checklist for the wellness committee to review and update the wellness policy. The next administrative review, we will be looking for measurable goals, rubrics, number of actives and community involvement and how active the wellness committee.

When the school district has revised the Wellness Policy this year please send a copy to Nutrition Services for our files.

Team Nutrition will be holding wellness training this spring.

**Food Safety**: All school districts participating in the National School Lunch Program must implement a Hazardous Analysis and Critical Control Point (HACCP) food safety system established by USDA. This regulation requires each district to create a written HACCP Plan and to review it annually. Lynda will need to update the HACCP Plan yearly; all logs must be done daily, the food safety checklist must be done monthly. Highly recommend that Lynda attend the Food Safety Plan training that will be provided by Nutrition Services this summer.

The district's most recent health inspection was available for review.



Technical Assistance (TA): Lynda will need to send in copies of three HACCP Standard Operating Procedures, and facility description by January 29, 2016.

**Smart Snacks - Competitive Foods**: USDA's Smart Snack criteria went into effect July 1, 2014. These standards apply to all foods and beverages sold to students during the school day in vending machines, stores, snack carts or through fundraising. For purposes of this regulation, the school day is defined as the period from midnight before to 30 minutes after the end of the school day. In addition, Nebraska's Competitive Food Rule states that no food items can be sold in competition with the district's breakfast and lunch program from 1/2 hour before meal service until 1/2 hour after meal service.

With this regulation, student organizations are allowed to have up to two exempt fundraisers per semester not exceeding two days in length (meaning they are allowed to sell food items that do not meet the new criteria). Documentation of any exempt fundraiser must be on file at the school. The form can be found on our web site at <a href="http://www.education.ne.gov/ns/forms/nslpforms/CompetitiveFoods.html">http://www.education.ne.gov/ns/forms/nslpforms/CompetitiveFoods.html</a> It is important to note that this is the last year for exempt fundraisers.

Lynda is responsible for the items in the vending machine next to the cafeteria, the items in the vending machine are smart snack compliant.

I have enclosed the smart snack, beverages and fundraiser information for the wellness committee to use as needed.

Water: Water must be available at no charge for all students at breakfast and lunch. Water is provided with cups.

**Recordkeeping**: I met with Lynda to review a variety of school lunch records including breakfast and lunch production records, recipes and labels. Sarah has the required labels and records on hand.

**Professional Standards:** Professional Standards went into effect July 1, 2015. With this new rule, school food service personnel are required to earn continuing education hours each year based on job responsibilities and the number of hours worked each week. Documentation must be on file to

demonstrate completion of this annual training requirement. Lynda has agreed to ensure that all food service staff will complete the required number of training hours before the end of the school year. Recommend that Lynda and staff attend summer training.



Technical Assistance (TA): Lynda will need to take the ServSafe Class and receive her certification to meet the hiring guidelines. Lynda needs to have the class completed by May 2016. Hall County Extension office (Cami) or Buffalo County Extension office (Carol) teaches the ServSafe Certification classes. Please contact them for information on their class.

Special Milk Program: The special milk program was review with no findings,

I have enclosed the Professional Standards and Wellness and Smart Snack information for you to review

Mr. Schroeder, please thank Hilary and Lynda for their assistance during the review.

If you have any questions, please call me at 800-731-2233. Happy New Years to you and your staff!

Sincerely,

Beth Haas

Program Specialist

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**Nutrition Services** 

cc: Hillary Bolling

Lynda Endecott