

NH DOE, Office of Nutrition Programs and Services  
NSLP/SBP Administrative Review and Procurement Review Report for SAU #95  
(Windham High School)  
Conducted on December 18, 2019

This report addresses areas of the USDA Administrative Review (AR) and Procurement Review (PR) for the **National School Lunch Program (NSLP)**, and **School Breakfast Program (SBP)**, that had Findings of noncompliance requiring a Plan of Corrective Action (CA) with potential Fiscal Action (FA) or Technical Assistance (TA) provided to strengthen current systems and understanding of USDA regulations. FA is the recovery of overpayment due to errors in critical review areas associated with federal dollars or repeat Findings. The School Food Authority (SFA) is responsible for overseeing all aspects of the administration of the USDA Child Nutrition Programs. Findings must be corrected system wide.

At the exit conference held on December 18, 2019, a copy of the Draft Action Summary Plan of the AR/PR outcome was provided to Rhonda Peckham, Nutrition Services Director. Copies were left for William Hickey, Business Administrator, and Dalisa Greenleaf, Assistant Business Administrator.

The 7 cents per lunch meal claimed will be maintained.

### **Review Areas:**

#### **Meal Access and Reimbursement**

##### **Certification and Benefit Issuance**

*No Findings*

##### **Observations:**

- All income applications were complete, determined correctly by the Determining Official, and confirmed by Nutrition Services Director (Confirming Official). Follow-up by Determining Official for missing information on applications was documented thoroughly.
- Application calculations were correctly determined but then converted to annual by Determining Official. Application information is subsequently entered into POS application eligibility determination program. No change in benefits was found.
- Direct Certification list is downloaded every month and retained.

##### **Technical Assistance:**

- Only convert to annual income if mixed income frequencies are on application.
- Confirm electronic income conversion of applications with software company.

#### **Verification**

##### **Observations:**

- Verification was conducted properly.

##### **Technical Assistance:**

- Copies of applications are to be kept in verification file with all supporting documentation.

#### **Meal Counting and Claiming**

*No Findings*

#### **Meal Pattern and Nutritional Quality**

##### **Meal Components and Quantities**

*No Findings*

##### **Observations:**

- Meals were nicely presented with a variety of tasty and colorful menu choices.

- Some school board members believe that more food quantities should be allowed in a reimbursable meal. Nutrition Services Director has explained USDA reimbursable meal requirements for age/grade groups.

### **Menu and Meal Pattern**

*No findings*

### **Production Records (PRs)**

*No Findings*

#### **Observations:**

- SAU 95 uses the Mosaic software program for menu creation that generates production records with all required fields.
- Recipes are printed and kept in a binder in each kitchen.

### **OVS (Offer vs Serve)**

*No Findings*

#### **Observation:**

- Servers and cashiers are well trained in OVS and customer service.

### **Signage:**

*No Findings*

#### **Observation:**

- Colorful and informative digital and printed signage is posted in strategic areas. Best practice!

## **Resource Management**

### **Maintenance of the Nonprofit School Food Service Account**

*Low-risk*

### **Paid Lunch Equity (PLE)**

*Low-risk*

### **Revenue from Non-Program Foods**

*Comprehensive Review required. No Findings.*

### **Indirect Costs**

*N/A*

### **Meal Charging Policy**

*No Findings*

#### **Observations:**

- A new 9-page meal charging policy, adopted by the school board in June 2019, allows charging of meals and a la carte items.
- Food service and administrative staff is working toward balancing policy with practice.
- Policy defines charge limits and that end of year debt will be paid to food service by District funds.
- Due to charging policy, student debt is increasing quickly.
- SAU Administration is responsible for collecting debt.

## **General Program Compliance**

### **Civil Rights**

*No Findings*

**Technical Assistance:**

- Updated *And Justice for All* posters were provided to SAU 95.

**On-site Monitoring**

*No Findings*

**Observation:**

- Any Corrective Actions noted were addressed and completed immediately. Best practice.

**School Wellness Policy (LWP)**

**Observation:**

- LWP does not contain all required elements. Missing are measurable goals for: nutrition education, nutrition promotion, marketing of food and Smart Snacks, guidelines for all food available during the school day, physical activity, and other school-based wellness activities. In addition, the LWP is missing identification of the person responsible for policy compliance, how the SAU permits and encourages participation, how the public will be informed and updated, and a triennial assessment of the LWP.
- The LWP has not had triennial assessment completed to date.

**Technical Assistance:**

- Each Local Educational Agency that participates in the National School Lunch Program or other federal Child Nutrition programs is required by federal law to establish a local school wellness policy for all schools under its jurisdiction.
- The LWP is tied to breakfast reimbursement funding in NH.
- UNH Cooperative Extension is a good resource: <https://extension.unh.edu/resource/local-school-wellness-policy-checklist>

**Finding:**

- Healthy, Hunger-Free Kids Act (HHFKA) of 2010 requires that the Wellness Policy must be updated and adopted to include the missing minimum requirements regarding measurable goals.
- Triennial assessment has not been completed.

**Corrective Action:** By **February 6, 2020**, please submit: **Plan for Corrective Action** that will ensure that the Wellness Policy 1) will be updated to meet measurable goals and be adopted by the district; and 2) that an assessment of the policy is completed. Please provide a copy of the revised Wellness Policy and assessment.

**Smart Snacks**

*No Findings*

**Observation:**

- Vending machines are managed by food service and all foods are Smart Snacks compliant.
- All foods in the school store are Smart Snack compliant.
- Non-compliant food-based fundraisers are tracked and monitored by Principals.

**Professional Standards**

*No Findings*

**Water**

*No Findings*

**Food Safety and Buy American**

**Observations:**

- Most foods were Buy American compliant. Any food items that were not had exception documentation on-site. Best practice.
- Food safety plan is missing Standard Operating Procedures (SOPs) implementation and review documentation.
- Cafeteria tables at the high school are not cleaned or sanitized between lunches. There is a shortage of maintenance staff to clean the tables.

## **Findings:**

- 7CFR 210.13(c) requires compliance to a food safety plan. Sanitation is key to keeping students and food safe to eat.

**Corrective Action:** By **February 6, 2020**, please submit: A **Plan for Corrective Action** that will include required updates to the Food Safety Plan for 1) documentation of implementation and review of SOPs; and 2) a plan for cleaning and sanitizing cafeteria tables between lunches. Please submit site-specific examples.

## **Reporting and Recordkeeping**

*No Findings*

## **Other Federal Program Reviews**

### **School Breakfast Program**

*No Findings*

#### **Observation:**

- Promotion of the School Breakfast Program is ongoing, including highlighting School Breakfast Week in March through signage and communications to the community.

### **Summer Food Service Program (SFSP)**

*No Findings*

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*Remember: There are no appeals for the identification of Findings requiring plans of Corrective Action. However, if this review includes a financial finding you may appeal the financial amount, 7 CFR 210.18(q). Financial findings will be determined upon receipt of all plans of Corrective Action.*

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## **Procurement Review**

### **Procurement Procedures**

*No Findings*

#### **Technical Assistance:**

- Clarification on micropurchases and small purchases was provided.

State Agency Reviewers: Marty Davis and Tam Feener

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