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Christopher N. Ruskowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

| | |
|-------------------------------------|-------------------------------------|
| SFA Name: | Saint Teresa Avila School |
| SFA Code/ ID Number: | 088159 |
| Administrative Review Conducted on: | Thursday, February 15, 2018 |
| SFA Contact Name and Title: | Margie Marez, Food Service Director |
| CNR Reviewer: | Danielle Reidy |

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 15, 2018; an exit conference summarizing the findings took place on the same day.

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency's (LEA's) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. While findings were identified, the two performance standards reviewed were found to be not satisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are menu findings that warrant the termination of the performance based reimbursement. Additional information is still needed for the menu review, which may result in additional corrective action.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Friday, April 20, 2018**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Friday, April 20, 2018**.

Thank you,



Casey O'Neill, RD, SNS, Senior Child Nutrition Specialist

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

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|-------------------------------------|-------------------------------------|
| SFA Name: | Saint Teresa Avila School |
| SFA Code/ID Number: | 088159 |
| Administrative Review Conducted on: | Thursday, February 15, 2018 |
| SFA Contact Name and title: | Margie Marez, Food Service Director |
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Commendations & Suggestions

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|---|
| Storage areas are organized. |
| Cafeteria is inviting and cheerfully decorated. |

Other areas of Technical Assistance (Does NOT require SFA Response)

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|---|
| <p>Certification and Benefit Issuance - During the review, the benefit issuance document was discussed with the SFA. The SFA was informed that the list should identify how the eligibility for each student was determined. This can be through direct certification, application, etc. The list should also indicate the date of approval of the student's benefit status.</p> |
| <p>Meal Counting and Claiming - During the review, training for cashiers and substitute cashiers was discussed. The SFA does not provide training to cashiers and substitute cashiers. It is recommended that the SFA provide training annually or as needed to cashiers and substitute cashiers.</p> |
| <p>Meal Counting and Claiming - To be in compliance, the SFA must ensure that meal counts taken daily at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.</p> |
| <p>Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter.</p> |
| <p>Local School Wellness Policy - During the on-site review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices.</p> |
| <p>Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.</p> |
| <p>Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate.</p> |
| <p>Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.</p> |
| <p>Professional Standards - During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.</p> |

Buy American Provision - During the review, Buy American requirements were discussed with the SFA. SFAs must review products and delivery invoices or receipts to ensure that the domestic food that was solicited and awarded is the food that is received.

Buy American Provision - During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. "Domestic commodity or product" is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the "domestic" standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are:

- The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

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|----------------------------------|------------------------------------|-----------------------|---|
| SFA Name: | Site(s) Selected for Review: | | |
| <i>Saint Teresa Avila School</i> | 1 <i>Saint Teresa Avila School</i> | NSLP Grade Group: K-8 | SBP Grade Group: K-8 <input type="checkbox"/> N/A |
| SFA ID Number: | 2 <i>N/A</i> | NSLP Grade Group: | SBP Grade Group: <input type="checkbox"/> N/A |
| <i>088159</i> | 3 <i>N/A</i> | NSLP Grade Group: | SBP Grade Group: <input type="checkbox"/> N/A |
| Week of Menu Review: | January 8-12, 2018 | | |

Menu Review Findings: Breakfast and Lunch

1. The SFA is not maintaining daily production records
2. Nutrition facts labels are not available and kept on file for all menu items.
3. The SFA is not maintaining Child Nutrition labels or Product Specification Statements for processed menu items.
4. The SFA is not maintaining standardized recipes.
5. We are unable to complete the breakfast and lunch menu review due to missing production records and supporting menu documentation.

Technical Assistance

The SFA was contacted numerous times with requests for menu documentation prior to the onsite visit. Technical assistance was provided while onsite describing the menu documentation that must be maintained, including production records, standardized recipes, nutrition facts labels, and Child Nutrition Labels or Product Formulation Statements. The SFA should maintain a folder or binder with menu documentation that can easily be referenced when determining menu compliance.

For detailed regulations see: 7 CFR 210.10

| Required Criteria for Response to Findings | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. For corrective action a menu review will be completed for a new review week. The week selected will be February 12-16, 2018. Please submit breakfast and lunch calendar menus for the month of February 2018. | | | |
| 2. Please submit completed production records for breakfast and lunch for the week of February 12-16, 2018. | | | |
| 3. Please submit standardized recipes for breakfast and lunch for the week of February 12-16, 2018. | | | |
| 4. Please submit all nutrition facts labels for breakfast and lunch, for menu items pertaining to the week of February 12-16, 2018. | | | |
| 5. Please submit Child Nutrition Labels or Product Formulation Statements for breakfast and lunch, for menu items pertaining to the week of February 12-16, 2018. | | | |
| 6. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance. | | | |



Required Corrective Actions- Review Areas
New Mexico Public Education
Coordinated School Health & Wellness
Administrative Review Corrective Action Plan

SFA Name: Saint Teresa Avila School
 SFA Code/ID: 088159

Administrative Review Conducted: Thursday, February 15, 2018
 Site(s) Selected for Review: Saint Teresa Avila School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 3/21/2018 Due Date for Corrective Action Plan: 4/20/2018

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.
Please enter the detailed response for each in the spaces provided .

| Finding #1: Certification and Benefit Issuance | | | |
|---|--------------|--|------------------|
| Changes are not being made to the point of service benefit issuance document in a correct manner regarding the 30 days of carryover eligibility. When a new eligibility is established (either through direct certification or a meal benefit application), the new status takes precedence over the status of the prior year's eligibility. The SFA is not updating the eligibility on the 30th operating day. | | | |
| Technical Assistance | | | |
| During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a child has not submitted and application or is not on the Direct Certification list the student will either receive carryover status from the previous year if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year. | | | |
| During the review, updating the point of service and allowing a full 30 days of prior eligibility was discussed with the SFA. Students must be allowed a full 30 operating days of prior eligibility, and when this expires, the SFA must make the appropriate updates at the point of service. | | | |
| For detailed regulation see: 245.6(c) Application, eligibility and certification | | | |
| Required SFA Response | SFA Response | | CNR Internal Use |
| | | | Appv. Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |

| | | | |
|---|--|--|--|
| 3. Provide a written plan to ensure that changes to the point of service will be made when new current school year meal benefit information is obtained and if nothing is received, the status will be changed to paid after the 30 day carryover period expires. | | | |
|---|--|--|--|

Finding #2: Certification and Benefit Issuance

The SFA is not maintaining documentation for students receiving extended eligibility benefits.

Technical Assistance

During the review, documenting extended eligibility was discussed with the SFA. Per USDA the SFA must make an effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added. The list should have the name of the SFA representative that determined the extended eligibility.

For detailed regulation see: SP 25-2010: Q&A on Extending Categorical Eligibility

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA will maintain documentation of extended eligibility that includes: name of student, name of student who benefits are extended by, date, initials or signature of SFA official. | | | |

Finding #3: Certification and Benefit Issuance

The eligibility status on the benefit issuance list does not match the eligibility documents on file.

Technical Assistance

During the review, accurately transferring eligibility status from the eligibility documents to the benefit issuance list was discussed with the SFA. In order to ensure accurate counting and claiming, it is critical that this status is transferred accurately. The SFA should develop a system to check to ensure that eligibility on the benefit issuance document are accurate based on the eligibility documents on file.

For detailed regulation see: 210.8(a) Internal controls.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |

| | | | |
|---|--|--|--|
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement of understanding that the benefit issuance list must always match the eligibility documents on file. | | | |

Finding #4: Certification and Benefit Issuance

Updates are not made to the point of service benefit issuance document(s) in a timely manner.

Technical Assistance

During the review, updating the point of service benefit issuance document was discussed with the SFA. When eligibility changes, the SFA must make these updates in a timely manner. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.

For detailed regulation see: 245.6(c)(6) Application, eligibility and certification

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA will always update the point of service document/system when there is a change in eligibility status. | | | |

Finding #5: Certification and Benefit Issuance

As neither the benefit issuance document nor any other documentation indicates the date changes were made in the system, the SFA is not in compliance with recordkeeping requirements.

Technical Assistance

During the review, maintaining documentation of the date changes were made was discussed with the SFA. When eligibility changes, the SFA must make record the dates these changes were made.

For detailed regulation see: 245.6(e) Application, eligibility and certification

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that there will be a record of when there is a change in benefit status for each student that is maintained manually or within the point of service software system. | | | |

Finding #6: Certification and Benefit Issuance

Not all selected applications were approved correctly. The SFA approved an application that was missing a case number.
 Not all selected applications were approved correctly. The SFA approved an application with a case number that was not consistent with the format used in the state.
 Not all selected applications were approved correctly. The SFA approved an application that was inconsistent/unclear.
 Not all selected applications were approved correctly. The SFA did not calculate the income and household size correctly.

Technical Assistance

Complete applications must include the appropriate documentation. 245.2 Documentation means:(1) The completion of a free and reduced price school meal or free milk application which includes:(ii) For a child who is receiving assistance under SNAP, FDPIR or TANF, as defined in this section, the child's name and appropriate SNAP or TANF case number or FDPIR case number or other FDPIR identifier and signature of an adult household member.
 During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA may approve an Assistance Program application only if it contains a valid case number, consistent with the format used in that state. For more information, see the Eligibility Manual for School Meals, Chapter 2.
 During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA may not approve applications that are inconsistent or unclear. For more information, see the Eligibility Manual for School Meals, Chapter 3.
 During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.

For detailed regulation see: Eligibility Manual, Chapter 2: The Basis of Eligibility; Eligibility Manual, Chapter 3: Establishing Eligibility; 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the staff approving applications understand the requirements. | | | |
| 4. Describe how all applications will be determined correctly moving forward. | | | |
| 5. Provide copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status. | | | |

Finding #7: Certification and Benefit Issuance

The correct income eligibility guidelines were not used to certify applications.

Technical Assistance

During the review, the Income Eligibility Guidelines were discussed with the SFA. When determining eligibility, the SFA must utilize the current Income Eligibility Guidelines. New eligibility guidelines are released by USDA annually, the SFA can obtain the new guidelines by visiting the USDA website or contacting the state

agency.

For detailed regulation see: 245.6(c)(4) Application, eligibility and certification

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the current year's eligibility guidelines will be used to determine applications. | | | |

Finding #8: Certification and Benefit Issuance

Not all Direct Certification lists have been retained on file by the SFA. The SFA did not perform Direct Certification matches according to the required timeframes.

Technical Assistance

During the review, retaining records was discussed with the SFA. The SFA must maintain Direct Certification lists on file or 3 years after the date of the fiscal year to which they pertain, except that if audit findings have not been resolved, the documentation must be maintained as long as required for resolution of the issues raised by the audit.

During the review, Direct Certification matches were discussed with the SFA. The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe.

For detailed regulation see: 246.6(e) Application, eligibility and certification; 245.6(b)(3) Application, eligibility and certification

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA will perform Direct Certification matches according to the required timeframes moving forward. | | | |
| 4. Provide a statement of understanding that all Direct Certification lists will be maintained on file. | | | |

Finding #9: Certification and Benefit Issuance

The SFA did not update benefit issuance documents accurately upon receipt of Direct Certification updates.

Technical Assistance

During the review, updating benefit issuance documents was discussed with the SFA. The SFA must update benefit issuance documents accurately upon receipt of Direct Certification updates, as soon as possible but no later than three operating days after the date the local educational agency receives the direct certification documentation.

| <i>For detailed regulation see: 245.6(b)(6)(ii) Application, eligibility and certification</i> | | | |
|--|--------------|------------------|--------|
| Required SFA Response | SFA Response | CNR Internal Use | |
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a plan for how the point of service will always have the correct benefit information when there are updates through Direct Certification. | | | |

Finding #10: Verification

The most recently submitted FNS 742 was not submitted by the established due date.

Technical Assistance

The FNS 742 was not submitted by the established due date. As part of the SFA agreement with the state they must submit all reports as required by the state agency. During the review, the due date for the FNS 742 was discussed with the SFA. The SFA was informed that they must submit the FSN 742 annually by the date announced by the State Agency.

| <i>For detailed regulation see: 245.6a(h) Verification reporting and recordkeeping requirements.</i> | | | |
|--|--------------|------------------|--------|
| Required SFA Response | SFA Response | CNR Internal Use | |
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA will submit the FNS 742 annually by the date announced by the State Agency. | | | |

Finding #11: Verification

The SFA’s verification process is not being conducted according to USDA guidelines. The SFA’s verification efforts did not include all of the required information. The SFA’s verification process is not being conducted according to USDA guidelines. The SFA did not maintain documentation to demonstrate compliance with the verification requirements.

Technical Assistance

During the review, maintaining a description of the verification efforts was discussed with the SFA. The SFA was referred to the Eligibility Manual for School Meals, Chapter 6 for instructions on completing verification.

During the review, maintaining documentation to demonstrate compliance with the verification requirements was discussed with the SFA. The SFA must maintain on file documentation for each household as described in the Eligibility Manual for School Meals, Chapter 6.

| <i>For detailed regulation see: Eligibility Manual Chapter 6B</i> | | | |
|---|--------------|------------------|--------|
| Required SFA Response | SFA Response | CNR Internal Use | |
| | | Appv. | Intls. |
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|---|--|--|--|
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. List the steps the SFA will take to complete verification according to program regulations. | | | |
| 4. Provide a statement of understanding that the SFA must maintain records to demonstrate compliance with the verification requirements for each household. | | | |

Finding #12: Meal Counting and Claiming

The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service.

Technical Assistance

During the review, claiming meals during field trips was discussed with the SFA. The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service. To be in compliance, the SFA must ensure that meals served during field trips are claimed based on accurate counts taken at the point of service.

For detailed regulation see: 210.7(c)(1) Lunch count system.

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that includes: a statement that the SFA will properly claim field trips meals based on the point of service and a description of the process that will be used as the point of service for all field trips. | | | |

Finding #13: Meal Counting and Claiming

The SFA does not conduct a daily edit check for each meal service.

Technical Assistance

During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see: 210.8(a)(3) Edit checks.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |

| | | | |
|--|--|--|--|
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the SFA will complete a daily edit check and will maintain edit check records for a minimum of 3 years plus the current school year. | | | |
| 4. Provide one month of completed edit checks for the site(s) selected for review as supporting documentation for this finding. | | | |

Finding #14: Meal Components and Quantities

On the day of review, meals that were claimed at the point of service for reimbursement did not contain all required components for breakfast and lunch. All required components were not available and students were not able not select the minimum number of components required. This finding may result in fiscal action due to incomplete meals claimed for reimbursement.

Technical Assistance

During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should consider providing additional signage and training to students to make sure they know what is required for a reimbursable meal. The SFA should also provide additional training to the point of service staff on the requirements of a reimbursable meal. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.
<http://healthymeals.nal.usda.gov/>

For detailed regulation see: 220.8(b) Meal Requirements for School Breakfast; 210.10(c)(2) Food components

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the SFA will ensure that all meals claimed for reimbursement contain at least the minimum number of required components in the minimum portion size for the specific grade group. | | | |
| 4. Provide a step by step process that will be implemented at the point of service to ensure that all meals claimed for reimbursement contain the minimum components in the minimum portion size for the specific grade group. | | | |
| 5. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available. | | | |

Finding #15: Meal Components and Quantities

On the day of review, the lunch menu did not meet the 1/2 cup daily fruit requirement. A fruit was provided, however the minimum required portion size was not met.

Technical Assistance

All menus served within the SFA for the National School Lunch Program and the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulation see: 7 CFR 210.10

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the minimum fruit requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance. | | | |

Finding #16: Meal Components and Quantities

On the day of review, fluid milk was not available in at least two varieties on all serving lines for breakfast and lunch. There was milk available throughout the meal, however there was only one option.

On the day of review, fluid milk was offered at breakfast that was not 1% white or nonfat white/flavored.

Technical Assistance

All menus served within the SFA for the National School Lunch Program and the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulation see: 7 CFR 210.10; 7 CFR 220.10

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that two varieties of milk will be offered with both breakfast and lunch. | | | |
| 4. Provide the types of milk that will be offered, including flavor(s) and milk fat percentage(s). Ex. 1% white. | | | |

Finding #17: Meal Components and Quantities

The SFA is not maintaining daily production records. This finding may result in fiscal action.

Technical Assistance

During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing production records so that everyone can complete the records.

For detailed regulation see: 210.10(a)(3) Production and menu records.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the SFA will maintain completed production records for all meal services. The records must be kept on file for a minimum of 3 years plus the current school year. | | | |
| 4. Provide 1 week of completed production records for all meal services at the reviewed site(s). | | | |

Finding #18: Meal Components and Quantities

The SFA is not maintaining standardized recipes.

Technical Assistance

During the review, standardized recipes were discussed with the SFA. The SFA must ensure that all sites are using standardized recipes for the meals they produce. If the SFA is using USDA recipes, they are already standardized, however if they make any modifications to the recipe it must be documented. If the SFA creates their own recipes it is recommended that they use the USDA template for standardized recipes to ensure that they include all required areas.

For detailed regulation see: 210.10(c)(5) Standardized recipes.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the SFA will create and/or maintain standardized recipes for all menu items. | | | |
| 4. Provide 1 week of menus with the corresponding standardized recipes for all meal services at the reviewed site(s). | | | |

Finding #19: Meal Components and Quantities

The SFA is not maintaining Child Nutrition labels or Product Specification Statements for processed menu items. Nutrition facts labels are not available and kept on file for all menu items.

Technical Assistance

During the on-site review, nutrition facts labels were discussed with the SFA. The SFA must ensure that nutrition facts labels are being maintained in order to document an item's compliance with the meal pattern. The SFA should have a folder or a binder to keep labels for all menu items, that way they are easy to find and can be referenced when determining menu compliance.

For detailed regulation see: 210.7(d)(2) School Food Authority Requirements

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement that the SFA will maintain Nutrition Facts Labels for all food and beverage items available. | | | |
| 3. Provide a statement that the SFA will maintain Child Nutrition Labels or Product Specification Statements for all processed menu items. | | | |

Finding #20: Offer versus Serve

Offer versus Serve is not being implemented correctly. All meals were incomplete due to insufficient quantities and components offered to students.

Technical Assistance

During the review, the meal pattern requirements for Offer versus Serve were reviewed with the SFA. Requirements include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable.

For detailed regulation see: 210.10 (e) Offer versus serve.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of assurance that Offer vs Serve has been reviewed and that all meals counted for reimbursement will have the required components. | | | |

Finding #21: Offer versus Serve

The cafeteria staff and point of service staff have not been trained on Offer versus Serve.

Technical Assistance

During the review, the training requirement for Offer versus Serve was discussed. If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures.

For detailed regulation see: Offer vs. Serve Guidance Manual (Page 4)

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. List the steps the SFA will take to ensure that all staff will be trained annually on Offer versus Serve. | | | |

Finding #22: Offer versus Serve

Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance

During the review, the requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component.

For detailed regulation see: 210.10 (a)(2) Unit pricing.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that Offer versus Serve reimbursable meal signage is now posted. In the statement provide the location where signage was posted. | | | |

Finding #23: Civil Rights

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement.

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on the monthly menu.

Technical Assistance

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.

| Required SFA Response | SFA Response | CNR Internal Use | |
|-----------------------|--------------|------------------|--------|
| | | Appv. | Intls. |

| | | | |
|---|--|--|--|
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the non-discrimination statement has been added to all nutrition program materials. | | | |
| 4. Provide an a copy of a letter to household and a menu to show that the non-discrimination statement has been added. | | | |

Finding #24: Civil Rights

The SFA did not submit a public release.

Technical Assistance

During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.

For detailed regulation see: §245.5(a)(1) Public Release

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of assurance that a public release will be submitted for publishing at or near the beginning of each school year. | | | |

Finding #25: Civil Rights

The SFA does not have a procedure in place for handling civil rights complaints.

Technical Assistance

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |

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| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written procedure for how the SFA will handle any alleged civil rights complaints. | | | |

Finding #26: Civil Rights

The SFA is not maintaining a medical statement on file for students with special dietary needs that do not rise to the level of a disability.

Technical Assistance

During the review, medical statements were discussed with the SFA. The medical statement for students with special dietary needs that do not rise to the level of a disability must be signed by a physician, physician assistant, nurse practitioner, or other professional specified by the State agency.

For detailed regulation see: 7 CFR Part 15b.3(i), Accommodating Children With Special Dietary Needs

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide written assurance that medical statements will be kept on file for all students with special dietary needs. | | | |

Finding #27: Civil Rights

The SFA did not provide the yearly civil rights training for the appropriate staff. The SFA did not maintain documentation of civil rights training.

Technical Assistance

During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

For detailed regulation see: FNS Instruction 113-1 Section XI Training

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide civil rights training to all appropriate staff. | | | |
| 4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff. | | | |
| 5. Provide a copy of the sign in sheet for the training. | | | |

Finding #28: Professional Standards

The School Nutrition Program Director and school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director and school nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(b)(3) Continuing education/training standards for directors; 210.30(d) Continuing education/training standards for all staff

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. List the names, length, and date of trainings that have been completed/planned for the Nutrition Program Director to meet the required training hours. | | | |
| 4. List the names, length, and date of trainings that have been completed/planned for the full-time staff to meet the required training hours. | | | |

Finding #29: Food Safety

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.

For detailed regulation see: 210.13(b) Food safety inspections.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the most recent food safety inspection is posted in a visible location. | | | |

Finding #30: Food Safety

The SFA did not have documentation of two health inspections for each school year and did not have documentation requesting two inspections from the applicable agency per school year.

Technical Assistance

| During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request. | | | |
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| <i>For detailed regulation see: 210.13(b) Food safety inspections.</i> | | | |
| Required SFA Response | SFA Response | CNR Internal Use | |
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the SFA has requested two health inspections for the current school year and will annually request two inspections be completed moving forward. | | | |
| 4. Provide a copy of the inspection request. | | | |

Finding #31: Food Safety

Temperature logs are not being maintained for all food storage areas. Temperature logs were not available for the month of February.

Technical Assistance

During the review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of six (6) months.

For detailed regulation see: 210.15(b)(5) Records from the food safety program

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the SFA understands the requirements for food safety documentation, including that all temperature documents must be maintained for a minimum of six (6) months. | | | |

Finding #32: Reporting and Record Keeping

Records were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

Technical Assistance

Records must be retained for three (3) years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. It was determined that the SFA was not retaining records for 3 years after the final Claim for Reimbursement. The requirement for the SFA to retain records for the required time period was discussed with the SFA.

For detailed regulation see: 210.23 (c) Retention of records.

| Required SFA Response | SFA Response | CNR Internal Use | |
|-----------------------|--------------|------------------|--------|
| | | Appv. | Intls. |

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| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that includes: an indication that records will now be maintained for required time period and that a process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit. | | | |

Finding #33: Summer Food Service Program Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA. Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites. Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

For detailed regulation see: 210.12(d) Outreach activities. (2)

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a written statement that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. | | | |

Finding #34: Afterschool Snack Program

Point-of-service snack counts by student/benefit category have not been maintained.

Technical Assistance

During the review, the requirements for maintaining point-of-service snack counts by student/benefit category were discussed with the SFA. The SFA must maintain documentation of point-of-service snack counts by student and benefit category. This finding may result in fiscal action.

For detailed regulation see:

| Required SFA Response | SFA Response | Appv. | Intls. |
|--|--------------|-------|--------|
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA must maintain documentation of point-of-service snack counts by student and benefit category. | | | |
| 4. Provide meal count sheets for the month of March. | | | |

Finding #35: Afterschool Snack Program

Snacks have not been properly counted and claimed. Not all snacks counted/claimed were reimbursable. Not all students received two components or were served were compliant with the snack meal pattern. This may result in fiscal action.

Technical Assistance

During the review, the requirements for properly counting and claiming snacks were discussed with the SFA. The SFA must count and claim only snacks that are reimbursable. The afterschool snack meal pattern was discussed with the SFA and how to identify reimbursable snacks. This finding may result in fiscal action.

For detailed regulation see: 210.10(o)(2) Afterschool snacks

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA will follow proper counting and claiming methods for snacks. | | | |

Finding #36: Afterschool Snack Program

The meal service operation was not in compliance with all program requirements. Program requirements were not met for civil rights. The USDA/FNS approved non-discrimination poster is not prominently displayed and visible to program participants.

Technical Assistance

During the review, civil rights requirements were discussed with the SFA. The Afterschool Care Snack Program must be in compliance with all civil rights requirements as noted in 7 CFR 210.23.

For detailed regulation see: 210.23 (b) Civil rights.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |

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| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the Afterschool Care Snack Program must be in compliance with all civil rights requirements and the USDA approved non-discrimination poster is prominently displayed. | | | |

Finding #37: Afterschool Snack Program

Production records were not complete for each day of the review period.

Technical Assistance

During the review, production record requirements were discussed with the SFA. The SFA must complete production records as described in 7 CFR 210.10(a)(3). How to complete these records was discussed with the SFA. This finding may result in fiscal action.

For detailed regulation see: 210.10(a)(3) Production and menu records.

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA must complete production records for the snack program that contain all required information. | | | |
| 4. Provide revised production records for each day of the review period. | | | |

Finding #38: Afterschool Snack Program

The milk fat and flavor requirements were not met. 2% milk was served.

Technical Assistance

During the review, milk fat and flavor requirements were discussed with the SFA. The SFA must offer only fat-free and low-fat (unflavored only) milk in the Afterschool Care Snack Program.

For detailed regulation see: SP 10-2012 (v.9)

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA must offer only fat-free and low-fat (unflavored only) milk in the Afterschool Care Snack Program. | | | |

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| 4. Provide revised snack menus for the next time this menu would be offered to show compliance with the snack meal pattern. | | | |
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Finding #39: Afterschool Snack Program

The program is not monitored twice per year.
The program was not monitored within the first 4 weeks of operation.

Technical Assistance

During the review, program monitoring was discussed with the SFA. The SFA must monitor the program twice per year.
During the review, program monitoring was discussed with the SFA. The SFA must monitor the program within the first 4 weeks of operation.

For detailed regulation see: 210.9(c) Afterschool care requirements.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide a statement of understanding that the SFA must monitor the Afterschool Snack Program twice per year, and once within the first 4 weeks of operation. | | | |
| 4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring will occur. | | | |

Finding #40: Afterschool Snack Program

The snack program does not conduct acceptable education or enrichment activities before, during, or after the snack meal service.

Technical Assistance

During the review, the requirement to conduct education or enrichment activities was discussed with the SFA. The snack program must conduct acceptable education or enrichment activities before, during, or after the snack meal service.

For detailed regulation see: Afterschool Snacks in the National School Lunch Program (NSLP) and the At-Risk Component of the Child and Adult Care Food Program (CACFP), Questions and Answers, Edition 3

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |

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| 3. Provide a statement of understanding that the snack program must conduct acceptable education or enrichment activities before, during, or after the snack meal service. | | | |
| 4. The SFA must also submit documentation showing which education or enrichment activities have been incorporated. | | | |

Finding #41: Meal Counting and Claiming

The point of service did not provide an accurate meal count by eligibility status. This is a systemic error. A teacher stands in the cafeteria marking students off a roster as they sit down with food, not at the POS. Students did not have a reimbursable meal when they were checked off.

Technical Assistance

To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see:

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide the date that the finding was brought into compliance or the planned date of completion. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide the new/revised process, in writing, that will be implemented at the point of service to ensure accurate meal counts by category. | | | |

Finding #42: Resource Management

The SFA incorrectly completed the Paid Lunch Equity Tool, therefore the tool did not determine compliance with paid lunch equity requirements.

Technical Assistance

During the review, it was determined that the SFA did not correctly calculate the weighted average paid lunch requirement price (most commonly calculated using the Paid Lunch Equity Tool) in order to determine compliance with paid lunch equity requirements. The SFA's submitted tool was incomplete and contained significant errors. The SFA should properly train staff on how to complete the Paid Lunch Equity Tool, in order to correctly determine if a paid lunch price increase is necessary. Training is available through the State Agency, and further technical assistance was provided during the review to help the SFA correctly complete the tool.

For detailed regulation see: 210.14(e) Pricing paid lunches.

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Confirm you have received a corrected copy of the SY 17-18 Paid Lunch Equity Tool. | | | |

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| 2. Provide assurance that you have read through the technical assistance given by the reviewer, understand the errors that were made on the tool, and are aware of how to correctly complete the tool for next year. | | | |
| 3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |

Finding #43: Resource Management

The SFA did not charge enough for paid lunches, and did not transfer enough non-federal funds into the food service account to make up for a paid lunch price deficiency.

Technical Assistance

The SFA did not increase paid lunch prices as required by paid lunch equity requirements (calculated using the Paid Lunch Equity Tool), and did not transfer sufficient non-federal funds into the food service account to make up for this paid lunch price deficiency. The SFA's revised PLE tool showed a weighted average price requirement of \$1.89 for the SY 17-18 (\$1.59 with the \$.10 cap applied), but the SFA's current weighted average price is only \$1.49. The SFA should have increased prices by \$.10. The SFA should ensure the Paid Lunch Equity Tool is completed annually, and if the tool shows a paid lunch price increase is necessary, the SFA must raise the weighted average paid lunch price as required (no more than \$.10 per year is required). If the SFA chooses to not raise paid lunch prices as required, they must complete the NonFederal Calculator tab of the Paid Lunch Equity Tool to determine how much non-federal funds is required to make up for the price deficiency. Appropriate non-federal fund sources include state funding received for student lunches and breakfasts, general funds, and funds provided by community organizations. Nonprogram food sales cannot be used to offset the cost of paid lunches.

For detailed regulation see: 210.14(e) Pricing paid lunches.

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide documentation showing that paid lunch prices have been increased as necessary, or that sufficient nonfederal funds have been transferred into the food service account. If prices will not be increased until a later date (such as the beginning of the next semester), provide written assurance of the new paid lunch price(s) and the date that the new price(s) will be implemented. | | | |
| 2. Explain the internal controls you have put in place to ensure paid lunch equity requirements are met in the future. This could include training on how to complete and interpret the Paid Lunch Equity Tool, improving communication between food service staff and school administrators, and having a written timeline for when the tool will be completed and paid lunch price decisions will be made. | | | |

Finding #44: Resource Management

The SFA does not track the food service fund balance, and has not ensured that food service revenues are used only to operate/improve the nonprofit school food service program. Compliance with net cash resource requirements could not be determined.

Technical Assistance

In order to meet the requirement for having a separate financial account for the nonprofit school food service program, the SFA must track the ending balance of the nonprofit food service account. Tracking food service revenues & expenditures separately from other SFA operations is not sufficient when the food service program operates at a surplus. The SFA must track the profits accumulated by the program, as these profits can only be used to improve & operate the nonprofit school food service program. This can be accomplished through a designated food service bank account, separate food service balance sheet accounts, or manually tracking the accumulating profits in an annual report of Financial Position. Additional information was provided in an email to the SFA during the review.

The SFA provided reports showing that the food service program operated at a \$9,219 profit in SY 16-17, but the bank account where cafeteria funds are deposited had a balance of only \$200 as of June 30, 2017. They were unable to provide documentation showing what happened to the profits from the review year. They were also unable to provide a report showing the ending fund balance as of June 30, 2017, as they did not track the accumulating profits from previous years.

If the SFA's ending fund balance exceeds the 3 month average expenses, the SFA must submit a spend-down plan explaining how they will reduce the excess balance. 3 month average expenses can be determined by taking total expenses for the year, dividing by 9 operating months, and multiplying by 3.

For detailed regulation see: 214.10 (a) Nonprofit School Food Service, (b) Net Cash Resources, and (c) Financial Assurances

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Submit documentation showing the ending food service balance as of June 30, 2017. This should be the accumulation of any food service profits since the program's inception. | | | |
| 2. Explain how the food service surplus revenues (profits) were used. If the funds were used for other school operations, explain how you will ensure food service revenues are used only for allowable food service expenses in the future. If you determine that the Quickbook reports provided during the review were missing some allowable food service expenditures, you may resubmit the | | | |
| 3. Explain the internal controls that have been put into place to ensure that the food service fund balance is tracked accurately. This could include additional staff training, a year-end financial review of the nonprofit food service program, opening a separate bank account for food service, etc. | | | |
| 4. If the SFA's ending fund balance exceeded the three month average expenses, the SFA must submit a spend-down plan explaining how the SFA will lower the nonprofit school food service fund balance to a level at or below 3 months average expenditures. This should include estimated dates and amounts of any planned purchases/costs, as well as an expected timeline for spending down | | | |

Finding #45: Resource Management

The SFA did not reimburse the food service account for catering and other unallowable expenses.

Technical Assistance

The food service program used funds from the nonprofit school food service to cater food or beverages for internal school departments, officials, events, meetings and/or for external organizations, but was not reimbursed for these purchases. This is an unallowable use of food service funds. If catering services are provided, the food and labor expenses incurred must be reimbursed to the food service account. The food service department should bill the receiving department or organization and ensure payment is received in full for every catering event.

During SY 16-17, the SFA purchased foods for non-program events, including \$51.65 for an Open House, \$14.02 for a Christmas Dinner, \$22.06 from McDonalds for a Daycare lunch, \$13.86 for a Luncheon, \$74.98 for Snacks, and \$13.73 for Bishops Mass. Dates for these transactions were sent in an email, along with additional technical assistance.

For detailed regulation see: 210.14(f) Revenue from nonprogram foods.

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide a written statement of understanding that all catering expenses incurred by the food service program will be reimbursed in full. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide documentation showing that the cost of all foods purchased in SY 16-17 for internal school departments and/or external organizations has been reimbursed to the food service account. | | | |

Check the confirmation check box, sign and date the form (typing in your signature is acceptable) and upload the signed copy to cnrsupport.com by the due date indicated.

By checking this box you confirm that all of the above responses have been reviewed and are representative of practices within the SFA. In addition the SFA ensures that additional training will be provided to all applicable staff to bring all finding areas into compliance moving forward.

Signature of SFA Representative: _____
 Signature of CN Resource Reviewer: _____ *Danielle Reidy*

Date: _____
 Date: _____ February 15, 2018

If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



Administrative Review Team
 CN Resource
 P.O. Box 31060
 Mesa, AZ 85275
 866-941-6368
adminreview@cnresource.com

Helpful Resources

The following are a list of links to resources that may be helpful when responding to the findings from the Administrative Review and helping to bring all finding areas into compliance.

USDA Federal Regulations:

National School Lunch Program: [USDA FNS 7 CFR 210](#)

School Breakfast Program: [USDA FNS 7 CFR 220](#)

Determining Eligibility: [USDA FNS 7 CFR 245](#)

Certification and Benefit Issuance:

2017-2018 Federal Income Eligibility Guidelines:

<https://www.fns.usda.gov/school-meals/fr-041017>

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Verification:

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Counting and Claiming:

2017-2018 USDA Reimbursement Rates:

<https://www.fns.usda.gov/school-meals/rates-reimbursement>

Menu Compliance:

USDA Nutrition Standards for School Meals:

<https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>

Whole Grain Resource Guide:

<https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf>

Meal Pattern Guide by Grade Group:

<https://fns-prod.azureedge.net/sites/default/files/dietaryspecs.pdf>

Offer vs Serve:

USDA Offer versus Serve Guidance Manual:

<https://fns-prod.azureedge.net/sites/default/files/SP57-2014a.pdf>

Resource Management:

2017-2018 USDA Paid Lunch Equity Tool:

<https://www.fns.usda.gov/school-meals/paid-lunch-equity-sy2017-18-calculations-and-revised-tool>

USDA Non-Program Food Revenue Tool:

<https://www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods>

Civil Rights:

USDA Non-Discrimination Statement

<https://www.fns.usda.gov/fns-nondiscrimination-statement>

USDA-FNS Accommodating Children with Disabilities in the School Meal Programs

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf>

On-Site Monitoring:

USDA On-Site Monitoring forms for National School Lunch and School Breakfast Programs:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf>

Wellness Policy:

USDA Wellness Policy Implementation Tools and Resources:

<https://www.fns.usda.gov/tn/implementation-tools-and-resources>

Smart Snacks:

USDA Guide to Smart Snacks:

<https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf>

Professional Standards:

USDA Professional Standards tools and references:

<https://www.fns.usda.gov/school-meals/professional-standards>

Food Safety:

USDA Food Safety Resources:

<https://www.fns.usda.gov/ofs/food-safety>

Institute of Child Nutrition Food Safety Plan:

<http://www.theicn.org/ResourceOverview.aspx?ID=75>

Buy American Provision:

2017 USDA Memo on Compliance with Buy American Provision:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP38-2017os.pdf>

School Breakfast and Summer Food Service Program Outreach:

<https://www.fns.usda.gov/sfsp/raise-awareness>

Afterschool Snack Program:

USDA Webpage for the Afterschool Snack Program:

<https://www.fns.usda.gov/school-meals/afterschool-snacks>

Special Milk Program:

USDA Webpage for the Special Milk Program:

<https://www.fns.usda.gov/smp/special-milk-program>

Fresh Fruit and Vegetable Program:

USDA Fresh Fruit and Vegetable Program Handbook:

<https://fns-prod.azureedge.net/sites/default/files/handbook.pdf>

Community Eligibility Provision and Provision II:

USDA Community Eligibility Guidance and Updated FAQs:

<https://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1>