

**2019-2020 NYSED Administrative Review Summary of Findings**

SFA Name: \_\_\_\_\_ SFA LEA Code: \_\_\_\_\_

Child Nutrition Programs (check all that apply):     NSLP         SBP         Afterschool Snacks         FFVP         SMP

Special Provision Option:     CEP         P2

Date of Administrative Review (Entrance Conference Date): \_\_\_\_\_

Date review results were provided to the School Food Authority: \_\_\_\_\_ Date

review summary was publicly posted: \_\_\_\_\_

**No findings.**

**Meal Access and Reimbursement**

**Certification and Benefit Issuance:**

- \*Students were incorrectly certified for free or reduced price meals.
- \*Free or reduced price meal benefits were provided to students without having appropriate certification documentation on file.
- Students' prior year eligibility status was not carried over for the first 30 operating days of the current school year.
- Free benefits were not extended to all students in a household containing at least one directly certified student.
- Household applications were incorrectly denied.
- \*Student eligibility was not properly transferred to the benefit issuance document.
- \*Student eligibility updates were not made to the point of service benefit issuance document according to SFA's established timeframes.
- The Direct Certification Matching Process was not conducted as required.

- Documentation to support that the following information was sent to households was not maintained:
  - Income Application
  - Parent letter
  - Eligibility Notification letter
  - Denial letter
  - Direct Certification Notification letter
- There is outdated, missing or incorrect information on:
  - Income Application
  - Parent letter
  - Eligibility Notification letter
  - Denial letter
  - Direct Certification Notification letter
- Administrative Prerogative was incorrectly used.

**Verification:**

- The income verification process was not completed by November 15th.
- An Alternate Sampling Method was used when the SFA did not meet the criteria required to use an alternate process.
- No confirmation review was conducted on applications selected for verification.
- The number of applications verified was incorrect.
- Free and reduced price meal benefits for students of households that failed to respond to the verification request were not terminated.
- Applications were not correctly verified.
- Appropriate changes were not made to the benefit status of a student(s) as a result of verification.

- Families not notified appropriately of a change in benefit status as a result of verification:
  - For a decrease in benefits, families were not notified in writing at least 10 calendar days in advance
  - For an increase in benefits, families were not notified within 3 calendar days
- The letter sent to families who have been selected for verification contains outdated, missing or incorrect information.
- The Letter of Verification Results contains outdated, missing or incorrect information.
- The Verification Collection Report was not accurately completed.

**Meal Counting and Claiming:**

- \*The claim for reimbursement was incorrectly consolidated.
  - This error is:  Systemic     Non-Systemic                       Breakfast     Lunch             Snack
- \*Meal counts by category were not combined and recorded correctly on the claim for reimbursement.
  - This error is:  Systemic     Non-Systemic                       Breakfast     Lunch             Snack
- The meal counting and claiming system does not prevent overt identification of students receiving free and reduced price benefits.
- \*Meals are not counted at the point of service.                                       Breakfast     Lunch             Snack

**Meal Pattern and Nutritional Quality**

**Meal Components and Quantities**

- \*Production records were not maintained as required.                                       Breakfast     Lunch             Snack
- \*Meals Offered:
  - did not contain all required components
  - did not contain sufficient quantities                                       Repeat Finding
  - were not in portion sizes appropriate to each age/grade group
- \*Meals served were incomplete
- All required meal components were not offered to students
- Meals served were missing required components                                       Breakfast     Lunch             Snack

- \*Grain items are not whole-grain rich.  Repeat Finding
- \*Fluid milk was not offered in at least two varieties.  Repeat Finding
- \*An unallowable milk type(s) was offered.  Repeat Finding

**Offer versus Serve:**

- Signage indicating what constitutes a reimbursable meal was not displayed.
- \*The meal service was not structured to comply with the required age/grade group requirements.  
 Breakfast    Lunch    Snack
- Signage did not indicate meal requirements under Offer vs. Serve.
- Offer vs. Serve is not properly implemented.
- Staff not adequately trained on Offer Versus Serve requirements.

**Dietary Specifications and Nutrient Analysis:**

- \*The nutrient analysis conducted of meals offered did not meet the following Dietary Specifications for the age/grade group being served and:
  - Calories       Trans Fat
  - Saturated Fat    Sodium
  - Repeat Finding

### **Resource Management**

- The Nonprofit Food Service Account has an excess fund balance that exceeds three months' average operating expenses
- The Nonprofit Food Service Account has a negative ending fund balance
- The Paid Lunch Equity Tool was not completed prior to the review.
- The Non-program Food Tool was not completed prior to the review.
- Program foods are not separated from non-program foods.
- No assurance that the price of an adult meal covers all costs of the meal
- No assurance that non-program food revenue generates at least the same amount it costs to purchase the food.
- Indirect costs were charged to the nonprofit food service account without an approved indirect cost rate agreement.
- An incorrect base or rate was used to calculate indirect costs.

### **General Program Compliance**

#### **Civil Rights:**

- No documentation to support that a Public Announcement was released.
- The Public Announcement contains outdated, missing or incorrect information.
- Documentation to support annual civil rights training for all staff was not maintained.
- The USDA Non-Discrimination Statement is not included on all Program documents or is not the updated Non-Discrimination Statement.
- The SFA does not appear to be in compliance with all Civil Rights requirements.

**SFA On-site Monitoring:**

- The on-site review of the breakfast and lunch counting and claiming system was
  - not conducted
  - not conducted by February 1 of the current school year.
- A self-review of the afterschool snack program was:
  - not conducted
  - first review not conducted within the first 4 weeks of operation
  - second review not conducted prior to the end of the school year
- The SFA did not conduct a follow-up review to ensure corrective action from the initial self-review was implemented.

**Local School Wellness Policy:**

- No Local Wellness Policy.
- Local Wellness Policy requirements are not met.

**Smart Snacks in School (All Foods Sold in School):**

- Foods and/or beverages sold during the school day are not compliant with Smart Snack regulations as defined.
- There is no process to ensure food items sold during the school day are in compliance with Smart Snack regulations.

**Professional Standards:**

- The new school nutrition program director does not meet the hiring requirements
- All school nutrition program personnel have not met or will not meet the annual training requirements.

**Water:**

- Free potable water is not available to students during the meal service.
  - Breakfast
  - Lunch

**Food Safety, Storage, and Buy American:**

- No written food safety plan is maintained.
- The written food safety plan is outdated and/or does not reflect actual practices.
- No documentation to support that food safety inspections were requested from the health department.
  - The most recent health inspection was not posted in a publically visible location.
  - HACCP principles and/or local and State health standards are not being met.
  - No current permit to operate a food service
  - Improper personal hygiene
  - Cross-contamination is not prevented
  - Food temperatures not monitored/recorded
  - Refrigerator and/or freezer temperatures not monitored/recorded
  - Food prep and/or service areas not clean
  - Utensils/equipment not clean
  - Evidence of pests present
- Improper food storage
- A review of the food products on-site at reviewed schools and/or at off-site storage facilities indicated a violation of the Buy American provision.

**Reporting and Recordkeeping:**

- Program records are not maintained on file for three years plus the current year.
- Reports are not submitted to SED by deadlines.
- The Verification Collection Report was not submitted by December 15<sup>th</sup>.
  - Cash Analysis was not submitted by October 31st
  - Health Inspection Report was not submitted by October 15<sup>th</sup>
  - The results of the independent review of applications was not submitted by October 31st
  - Reimbursement claims are not submitted within 60 days following the last day of the full month covered by the claim

**SBP and SFSP Outreach:**

- The School Breakfast Program is not being promoted as required.
- The Summer Food Service Program is not being promoted as required.

**Other Federal Program Reviews:**

- \*The Afterschool Care Program (Snack) is not administered as required.
- \*The Fresh Fruit and Vegetable Program is not administered as required.
- \*The Special Milk Program is not administered as required.

*\*Finding(s) that may result in fiscal action.*