2018-19 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:					
Date of Administrative Review (Entrance Confere	nce Date):				
Date review results were provided to the School F	ood 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- □ There is outdated, missing or incorrect information on: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.
- \Box Applications were not correctly verified.
- \Box 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:

 \square *The claim for reimbursement was incorrectly consolidated.

This error is:	□ Systemic	□ Non-Systemic	🗖 Breakfast	🗖 Lunch	□ Snack
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*Meal counts by category were not combined and recorded correctly on the claim for reimbursement.

This error is:	□ Systemic	□ Non-Systemic	Breakfast
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□ 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
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Meal Pattern and Nutritional Quality

Meal Components and Quantities

 $\square \text{ *Production records were not maintained as required.} \qquad \square \text{ Breakfast } \square \text{ Lunch } \square \text{ Snack}$

\square *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

□ Lunch

□ Snack

□ *Grain items are not whole-grain rich.	□ Repeat Finding
□ *Fluid milk was not offered in at least two varieties.	□ Repeat Finding
\square *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.
- \Box 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
 - \Box not conducted
 - \Box not conducted by February 1 of the current school year.
- □ A self-review of the afterschool snack program was:
 - \Box 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.
- \Box The Verification Collection Report was not submitted by December 15th.
 - □ Cash Analysis was not submitted by October 31st
 - □ Health Inspection Report was not submitted by October 15th
 - □ 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.