2022-23 NYSED Administrative Review Summary of Findings

SFA Name: Liberty CSD SFA LEA Code: 590901060000

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

Special Provision Option: ☒ CEP ☐ P2

Date of Administrative Review (Entrance Conference Date):	03/16/2023
Date review results were provided to the School Food Authority:	03/16/2023
Date review summary was publicly posted:	04/04/2023

☐ **No Findings**

Meal Access and Reimbursement

Certification and Benefit Issuance Document

☐ *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's 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 (DCMP) 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☐ There is outdated, missing or incorrect information on the:

- ☐ 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 as specified by the Verification Booklet.

☐ No confirmation review was conducted on the 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 were 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.

☐ The SFA's meal counting system at the POS does not have appropriate edit checks in place.

This error is: ☐ Systemic ☐ Non-Systemic

☐ Breakfast ☐ Lunch ☐ Snack

☒ *Meals are not counted at the point of service.

☒ Breakfast ☐ Lunch ☐ Snack

☐

Nutritional Quality and Meal Pattern

Meal Components and Quantities

☐ *Production records were not maintained as required.

☐ Breakfast ☐ Lunch ☐ Snack

☐ *Production records were not completed consistently and/or accurately.

☐ Breakfast ☐ Lunch ☐ Snack

☐ Standardized recipes were not completed consistently and/or accurately.

☐ Crediting documentation was not maintained as required.

☐ *Meals Offered at:

☐ Breakfast ☐ Lunch ☐ Snack

☐ Did not contain all required components

☐ Did not contain sufficient quantities

☐ *Repeat Finding*

☐ Were not in portion sizes appropriate to each age/grade group. Identified by:

☐ Review of production records and/or other supporting menu documentation

☐ Observation

☐ *A vegetable from the required subgroup was not served during the review period.

☐ *Repeat Finding*

☒ *Meals served were incomplete.

☐ All required meal components were not *offered* to students.

☒ Meals *served* were missing required components

☒ Breakfast ☐ Lunch ☐ Snack

☐ Pre-school meal pattern was not followed when students were not co-mingled with other age/grade groups.

☐ *80% of the weekly grains offered are not whole-grain rich.

☐ *Repeat Finding*

☐ Fruit/vegetable juice exceeds half of the total amount of fruit/vegetable offered during the week.

☐ Breakfast ☐ Lunch

☐ *Fluid milk was not offered in at least two varieties.

☐ *Repeat Finding*

☐ *An unallowable milk type(s) was offered.

☐ *Repeat Finding*

☐ 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

☐

Offer versus Serve (OVS)

☐ Signage did not indicate meal requirements under OVS.

☐ OVS is not properly implemented.

☒ Staff is not adequately trained on OVS requirements.

☒ OVS was implemented for Pre-K at breakfast.

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: ☐ Calories ☐ Sodium ☐ Saturated Fat ☐ Trans fat

☐ *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 to evaluate the SFAs paid selling price.
- ☐ The SFA did not increase the paid selling price as required.
- ☐ The Nonprogram Food Tool was not completed prior to the review.
- ☐ Program foods are not separated from nonprogram foods.
- ☐ No documentation to show that adult meals are being funded using non-school nutrition funds.
- ☐ The SFA is not appropriately charging adults for meals.
- ☐ There is no assurance that nonprogram 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.
- ☐ Internal controls have not been implemented to maintain effective oversight over federal funds and ensure charges to the nonprofit school food service account are allowable.
- ☐ Recorded expenses did not represent an activity or function recognized as reasonable, necessary, allocable, and otherwise compliant with the provisions of 2 CFR 200 Subpart E.
- ☐ The SFA did not maintain records that adequately identify the source and use of funds for food service activities.
- ☐

General Program Compliance

Civil Rights

- ☐ No documentation was maintained 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.
- ☐ The SFA does not have a meal modifications process.
- ☐

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 Wellness Policy

- ☐ The SFA has no Local Wellness Policy.
- ☐ Local Wellness Policy requirements are not met.
- ☐

Smart Snacks 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.
- ☐ The SFA is not maintaining the appropriate documentation necessary to demonstrate that all staff meet the annual training requirements.
- ☐

Water

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

Food Safety

- ☐ 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 food safety inspections were requested from the health dept.
- ☐ The most recent health inspection was not posted in a publicly visible location in accordance with USDA regulations.
- ☐ HACCP principles and/or local and State health standards are not being met.
  - ☐ No current Food Service Permit.
  - ☐ Improper personal hygiene.
  - ☐ Cross-contamination is not prevented.

- ☐ Food temps 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.

☐

Buy American

☐ 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.

- ☐ Verification Collection Report (Dec 15)
- ☐ Cash Analysis (Oct 31)
- ☐ Health Inspection Report (Oct 15)
- ☐ Results of the independent review of applications (Oct 31)
- ☐ Reimbursement claims are not submitted within 60 days following the last day of the full month covered by the claim

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School Breakfast and Summer Food Service Program 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.*