

**2022-23 NYSED Administrative Review Summary of Findings**

SFA Name:

SFA LEA Code:

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):

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 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- There is outdated, missing or incorrect information on the: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 15<sup>th</sup>.
- 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.

***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.
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### ***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.
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***Water***

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

***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.*