### 2021-22 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:  $\Box$  CEP  $\Box$  P2

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

### $\Box$ No Findings.

# **Meal Access and Reimbursement**

# Certification and Benefit Issuance Document

- $\square$  \*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.
- $\Box$  Household applications were incorrectly denied.
- $\square$  \*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.
- $\hfill\square$  The Direct Certification Matching Process (DCMP) was not conducted as required.
- $\Box$  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There is outdated, missing or incorrect information on the: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

- $\Box$  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.
- $\Box$  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.
- $\Box$  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:  $\Box$  Systemic  $\Box$  Non-Systemic

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

□ \*Meal counts by category were not combined and recorded correctly on the claim for reimbursement.

This error is:  $\Box$  Systemic  $\Box$  Non-Systemic

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  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:  $\Box$  Systemic  $\Box$  Non-Systemic

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

 $\square$  \*Meals are not counted at the point of service.

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

### **Nutritional Quality and Meal Pattern**

#### Meal Components and Quantities

 $\square$  \*Production records were not maintained as required.

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

 $\square$  \*Production records were not completed consistently and/or accurately.

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

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

□ Crediting documentation was not maintained as required.

 $\square$  \*Meals Offered at:

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

□ Did not contain all required components

□ Did not contain sufficient quantities

□ Repeat Finding

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

 $\Box$  Review of production records and/or other supporting menu documentation

□ Observation

 $\square$  \*A vegetable from the required subgroup was not served during the review period.

□ *Repeat Finding* 

 $\square$  \*Meals served were incomplete.

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

□ Meals *served* were missing required components

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

 $\square$  \*100% of the weekly grains offered are not whole-grain rich.

□ *Repeat Finding* 

 $\square$  \*Fluid milk was not offered in at least two varieties.

□ Repeat Finding

 $\square$  \*An unallowable milk type(s) was offered.

Cartering Repeat Finding

 $\Box$  Signage indicating what constitutes a reimbursable meal was not displayed.

 $\square$  \*The meal service was not structured to comply with the required age/grade group requirements.

 $\Box$  Breakfast  $\Box$  Lunch  $\Box$  Snack

# Offer versus Serve (OVS)

□ Signage did not indicate meal requirements under OVS.

 $\Box$  OVS is not properly implemented.

 $\Box$  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.

 $\Box$  The SFA did not increase the paid selling price as required.

□ The Nonprogram Food Tool was not completed prior to the review.

 $\Box$  Program foods are not separated from nonprogram foods.

 $\Box$  No documentation to show that adult meals are being funded using non-school nutrition funds.

 $\Box$  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.

 $\Box$  An incorrect base or rate was used to calculate indirect costs.

# **General Program Compliance**

# Civil Rights

 $\Box$  No documentation was maintained to support that a Public Announcement was released.

 $\Box$  The Public Announcement contains outdated, missing or incorrect information.

 $\Box$  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.

 $\Box$  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.

 $\Box$  A self-review of the afterschool snack program was:

 $\Box$  not conducted.

 $\Box$  first review not conducted within the first 4 weeks of operation.

 $\Box$  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

 $\Box$  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. The following items are not allowable:

□ 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.

 $\Box$  The SFA is not maintaining the appropriate documentation necessary to demonstrate that all staff meet the annual training requirements.

### Water

 $\Box$ 

 $\Box$  Free potable water is not available to students during the meal service:

 $\Box$  Breakfast  $\Box$  Lunch

### Food Safety

 $\Box$  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.

 $\Box$  Improper personal hygiene.

 $\Box$  Cross-contamination is not prevented.

 $\Box$  Food temps not monitored/recorded.

□ Refrigerator and/or freezer temperatures not monitored/recorded.

 $\Box$  Food prep and/or service areas not clean.

□ Utensils/equipment not clean.

 $\Box$  Evidence of pests present.

 $\Box$  Improper food storage.

### **Buy American**

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□ 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)

 $\Box$  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.

 $\square$  \*The Special Milk Program is not administered as required.

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