2018-19 NYSED Administrative Review Summary of Findings

SFA Name: Tonawanda City SD SFA LEA Code: 142500010000

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): 04/11/19

Date review results were provided to the School Food Authority: 04/11/19

Date review summary was publicly posted: June 2019

☐ **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- ☐ There is outdated, missing or incorrect information on: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 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.