

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- There is outdated, missing or incorrect information on the: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 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
- *80% of the weekly grains offered 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

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.

--

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.

--

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. 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.
- 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

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.*