# Oklahoma State Department of Education (SDE) <br> Child Nutrition Programs (CNP) <br> ADMINISTRATIVE REVIEW (AR) SUMMARY 

Name of School Food Authority (SFA): Yale Public School County DistrictCode: 60-I103

Superintendent: Mr. Rocky Kennedy
Address of SFA: 315 East Chicago Avenue_City:Yale_Zip Code: 74085
CN Specialist(s) Conducting Review.K. Schoeling
An AR of your SFA's CNP operation has been completed. The SFA was foundin: $\square$ Compliance $\square$ Noncompliance
Review Month: January 2024 Date of Review: 2/15, 20, 21, 23,27/24 Date Review Closed: pending Number of Schoolsin SFA: $3 \quad$ Number ofSchools Reviewed:1__Number of Eating Sites Reviewed: 1 List schools reviewed for the following CNP:

National School Lunch Program (NSLP): Yale Elementary School

School Breakfast Program (SBP): Yale Elementary School

After-School Snack Program (ASSP): N/A
Special Milk Program (SMP): N/A
Fresh Fruit and VegetableProgram (FFVP): N/A
Seamless Summer Food Program (SSFP):
Does the SFA operate under any special provisions: (Select any that apply)Provision 1Provision 2
$\square$ Provision 3
$\square$ Community Eligibility Provision (CEP)
This SFA had violations in the following areas:
$\checkmark$ PS-1 Violations
$\checkmark$ PS-2 Violations
$\square$ Resource Management Violations (Indicate area of violation)Maintenance of the NonprofitPaid Lunch EquityRevenue from Nonprogram FoodsIndirect CostsGeneral Area Violations

If applicable, mark appropriate boxes:Recalculation requiredFiscal Action Workbook completed

| YES | NO | RA. Program Access and Reimbursement |  |  |
| :---: | :---: | :---: | :---: | :---: |
| - | $\bigcirc$ |  |  |  |
|  |  | YES | No |  |
|  |  | $\bigcirc$ | O | Certification and Benefit Issuance |
|  |  | $\bigcirc$ | O | Verification |
|  |  | $\bigcirc$ | $\bigcirc$ | Meal Counting and Claiming |

Finding(s) Details:
Certification and Benefit Issuance - 7 CFR 245.6
Requirement: \#126 Selected applications must be correctly approved.
Finding: One student was approved for free meal benefits without an approved Family Size and Income Application on file.
Corrective Action Required: Adverse action letters must be sent to the household. A copy of the adverse action letter and an updated roster will be submitted as corrective action documentation.

Certification and Benefit Issuance - 7 CFR 245.6
Requirement: \#135 Direct certification lists must be retained on file by the SFA.
Finding: Direct certification lists are not being retained by the SFA. One student was identified as being directly certified without direct certification documentation on file.
Corrective Action Required: LEA will be responsible for maintaining direct certification lists from proper agencies. Corrective action plan will detail how this will be achieved. Adverse action letters must be sent to the household. A copy of the adverse action letter and an updated roster will be submitted as corrective action documentation.

Certification and Benefit Issuance - 7 CFR 245.6
Requirement: \#140 SFA must update benefit issuance documents accurately and in a timely manner upon receipt of direct certification updates.
Finding: 2 students, who were listed on the reduced roster, should have been reported on the free roster based on direct certification list.
Corrective Action Required: Adverse action letters must be sent to the household. A copy of the adverse action letter and an updated roster will be submitted as corrective action documentation.

Verification - 7 CFR 245.6(a)
Requirement: \#215 Completion of Verification must be done by Nov. 15
Findings: Verification process, including change in benefits, was not completed by November 15th deadline. The SFA did not request an extension from the SDE.
Corrective Action Required: All verification activities, including change in benefits, must be completed by November 15th. Corrective action plan will detail how this will be achieved.

Continued below.

Meal Counting and Claiming - 7 CFR 210.7(c)
Requirement: \#314 SFA(School Food Authority) must be following their approved SFA-SA (State Agency) Agreement/Application in regards to breakfast.
Findings: SFA has selected to participate in OVS per their SA agreement/application for breakfast. On day of meal observation, students were being required to take milk and juice even when having a reimbursable tray.
Corrective Action Required: If SFA wishes to continue offer vs serve at breakfast, staff need to be trained on what a reimbursable tray must be. If SFA wishes to discontinue offer vs serve at breakfast, they will need to contact the State Agency and make adjustments to their elementary site application. SFA will detail plans in corrective action plan.

| YES | NO |  |  | REVIEW FINDINGS |
| :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | $0$ | B. Meal Patterns and Nutritional Quality |  |  |
|  |  | YES | No |  |
|  |  | $\bigcirc$ | $\bigcirc$ | Meal Components and Quantities |
|  |  | - | $\bigcirc$ | Offer versus Serve |
|  |  | $\bigcirc$ | $\bigcirc$ | Dietary Specifications and Nutrient Analysis |

Finding(s) Details:
Signage on the Line-7 CFR 210.10(a)(2)
Requirement: \#404a\&b. Signage must be available explaining what constitutes a reimbursable breakfast and lunch.
Finding: At the elementary site, signage was not available to explain what constitutes a reimbursable breakfast or lunch.
Corrective Action Required: SFA will be responsible for ensuring that signage is available to explain what constitutes a reimbursable breakfast or lunch everyday. This process will be explained in corrective action plan.

Offer versus Serve - 7 CFR 201.10 \& 220.8
Requirement: \#500 Offer versus serve must be being properly implemented.
Findings: At breakfast, students are being required to take milk and juice even when having a reimbursable tray.
Corrective Action Required: SFA must allow options for food choices, with exception of one choice must be at least $1 / 2$ cup of fruit component. Students are not required to take milk. SFA will detail corrective action steps in corrective action plan.

Requirement: \#501 Cafeteria staff must be adequately trained on OVS.
Finding: Full-time and part-time staff are not implementing OVS properly. Offer vs serve training documentation was not available on all required staff.
Corrective Action Required: On-line training of offer vs. serve must be completed by all full-time, part-time staff and those assisting in food service. Documentation will be submitted to program specialist as part of corrective action plan.

Meal Components and Quantities - 7 CFR 210.10 \& 220.8
Requirement: \#410a\&b Planned menu quantities must meet meal pattern requirements for the review period or production records must indicate required quantities of food were available. Findings: Due to school outings related to weather, December 2023 production records were reviewed in addition to January 2024 production records. Please refer to attachment 1 for meal details. Not all recipes are standardized; CN labels are not being maintained on all required products; Vegetable serving sizes are insufficient; Fruit and grain serving is insufficient at breakfast; Standardized recipes are not being followed. This is not a reoccurring finding so fiscal action will not be assessed.
Corrective action Required: An unannounced follow-up visit will be conducted in the spring of 2024. At that time, all areas of menu planning will be reviewed.

| YES | NO | REVIEW FINDINGS |  |  |
| :---: | :---: | :---: | :---: | :---: |
| $0$ | $\bigcirc$ | C. School Nutrition Environment |  |  |
|  |  | YES | NO |  |
|  |  | O | $\bigcirc$ | Food Safety |
|  |  | $\bigcirc$ | (-) | Local School Wellness Policy |
|  |  | $\bigcirc$ | $\bigcirc$ | Competitive Foods |
|  |  | (-) | $\bigcirc$ | Other Off-Site, Reporting \& Recordkeeping, Buy |

Finding(s) Details:
Professional Standards - 7 CFR 210.31
Requirement: Food Safety Certification must be completed by the Child Nutrition Director every 5 years.
Findings: The Child Nutrition Director has not completed the required food safety certification.
Corrective Action Required: The Food Service Director must complete the required Food Safety Training and send a confirmation to Kristen Schoeling as part of the corrective action plan.

Competitive Foods 7 CFR $210.11 \& 220.12$
Requirement: \#1106. Fundraisers held during the school day must meet Smart Snack requirements or school must observe state-defined limit on fundraisers.
Findings: Fundraiser exemption policy was not available for review; Fundraiser exemption forms were not available for review.
Corrective Action Required: If LEA chooses to allow non-smart snack fundraisers, a fundraiser exemption policy will be developed and board approved. Fundraiser exemption forms will be completed for any food fundraisers that are not Smart Snack compliant. As part of corrective action plan, LEA will submit fundraiser exemption policy and forms for all exempt fundraisers.

Reporting and Recordkeeping
Requirement: \#1501. Records are to be retained for 3 years after the final claim for reimbursement for the fiscal year.
Finding: SFA was unable to locate all past 3-year records.
Corrective Action Required: In corrective action plan submitted to the State Dept. of Education, SFA will explain how records will be retained.

| Finding(s) Details: | D. Civil Rights |
| :--- | :--- | :--- |

Continued from page 4

Off-Site Assessment Tool Validation
Requirement: Responses from the off-site assessment tool should demonstrate compliance with FNS (Food and Nutrition Services) requirements and reflect current practices.
Finding: Not all areas of the off-site assessment tool demonstrate compliance with FNS requirements. The following
were found to be non-compliant: Public Release has not been completed for current school year.
Corrective Action Required: SFA/LEA will be required to correct practices that do not demonstrate compliance with FNS. As part of corrective action plan, documentation will be submitted showing local newspaper has been contacted for publishing public release.

SFA On-site Monitoring-7 CFR 210.8(a)(1) \& 7 CFR 201.11 (d)
Requirement: On-site monitoring reviews must be completed by February 1st. District may request an extension from the state agency.
Finding: SFA did not complete on-site lunch monitoring reviews by February 1st nor was an extension requested. Corrective Action Required: All on-site, lunch monitoring reviews will need to be completed. Please submit monitoring reviews as part of corrective action plan.

Buy American-7 CFR 210.21(d)
Requirement: $1411 \mathrm{a} \& \mathrm{~b}$. A review of agricultural food components indicated a violation of the Buy American provision. Documentation was not available to determine if domestic alternatives were considered due to costs or availability.
Finding: The following products were found to be in noncompliance with the Buy American provision: Fresh grapes; Romaine Lettuce; Fresh Cauliflower
Corrective Action Required: With corrective action plan, SFA will submit Buy American documentation. This documentation will be item specific.

Food Safety-CFR 210.12
Requirement: A food safety/HACCP plan is required to be available for review.
Finding: A food safety plan was not available for review. Plan needs to be reviewed by Child Nutrition staff to ensure all staff are aware of HACCP requirements. Due to food safety plan not being available, it was not able to be implemented.
Corrective Action Required: SFA will be responsible for reviewing and implementing a Food Safety Plan. SFA will submit a sampling of Standard Operating Procedures (SOPs) as corrective action as well as a sign-in sheet showing cafeteria staff have reviewed Food Safety Plan requirements. A HACCP based food safety plan template was emailed to CN Director on 2/26/24.
*Due to 5 consecutive days not being available in the review month, January 2024, program specialist was required to review December 2023 menus and production records. December 2023 was used for completing the USDA Meal Certification Tool.
*Fruits \& vegetables need to be recorded in $1 / 4 \mathrm{c}, 1 / 2 \mathrm{c}, 3 / 4 \mathrm{c}$ serving size on food production records.
*CN labels, recipes, grain labels, etc. should be maintained at each cafeteria site.
*The sweet and unsweet tea being prepared and given to teachers needs to no longer take place.
*It is strongly recommended that the point of sale (POS) be moved to the other end of the serving line. Students will enter the serving line, pick up their milk and their tray and exit at the POS. *It is recommended that a representative of child nutrition be included on the wellness policy committee.
*Fiscal action workbook was completed. However, fiscal action will not be assessed against the district due to not exceeding the $\$ 600$ disregard.
*All staff involved with child nutrition operations must complete required Child Nutrition professional development by June 30, 2024.

CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY(§210.18[i][2]): $\underline{\mathrm{U} / \mathrm{LO} / \mathrm{L4}}$

## CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[j][2]):

05/27/24
( 30 days from the date the corrective action must be completed)
An exit conference was conducted ( $\$ 210.18[\mathrm{i}][2]$ ) discussing the AR Reviewfindings on: 2/27/24 with Mr. Rocky Kennedy, Superintendent (Name and Title of School Representative)

CNP Specialist(s): K. Schoeling
Section 207 of the HHFKA amended section 22 of the NSLA (42 U.S.C. 1769c) to require state agencies to report the final results of the AR to the public in an accessible, easily understood manner in accordance with the guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) require the State Agency to post a summary of the most recent final AR results for each SFA on the State Agency's publicly available Web site no later than 30 days after the State Agency provides the final results of the AR to the SFA. The State Agency must also make a copy of the final AR report available to the public upon request.

