

**Oklahoma State Department of Education (SDE)
Child Nutrition Programs (CNP)
ADMINISTRATIVE REVIEW (AR) SUMMARY**

Name of School Food Authority (SFA): _____ County District Code: _____

Superintendent: _____

Address of SFA: _____ City: _____ Zip Code: _____

Consultant(s) Conducting Review: _____

An AR of your SFA's CNP operation has been completed. The SFA was found in: Compliance Noncompliance

Review Month: _____ Date of Review: _____ Date Review Closed: _____

Number of Schools in SFA: _____ Number of Schools Reviewed: _____ Number of Eating Sites Reviewed: _____

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): _____

School Breakfast Program (SBP): _____

After-School Snack Program (ASSP): _____

Special Milk Program (SMP): _____

Fresh Fruit and Vegetable Program (FFVP): _____

Seamless Summer Food Program (SSFP): _____

Does the SFA operate under any special provisions: (Select any that apply)

Provision 1

Provision 2

Provision 3

Community Eligibility Provision (CEP)

This SFA had violations in the following areas:

PS-1 Violations

PS-2 Violations

Resource Management Violations (Indicate area of violation)

Maintenance of the Nonprofit

Paid Lunch Equity

Revenue from Nonprogram Foods

Indirect Costs

General Area Violations

If applicable, mark appropriate boxes:

Recalculation required

Fiscal Action Workbook completed

YES	NO	REVIEW FINDINGS			
		A. Program Access and Reimbursement			
		YES	NO		
				Certification and Benefit Issuance	
				Verification	
		Meal Counting and Claiming			

Finding(s) Details:

YES	NO	REVIEW FINDINGS			
		B. Meal Patterns and Nutritional Quality			
		YES	NO		
				Meal Components and Quantities	
				Offer versus Serve	
				Dietary Specifications and Nutrient Analysis	

Finding(s) Details:

YES	NO	REVIEW FINDINGS		
		C. School Nutrition Environment		
		YES	NO	
				Food Safety
				Local School Wellness Policy
				Competitive Foods
		Other		

Finding(s) Details:

		D. Civil Rights		
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Finding(s) Details:

Comments/Recommendations:

CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.68[k]): _____

CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[K][1]):

_____ **(30 days from the date the corrective action must be completed)**

An exit conference was conducted (§210.18[i]) discussing the AR Review findings on: _____

with _____ (Name and Title of School Representative)

CNP Consultant(s): _____

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.

Signature of School Representative

Date

Date Review Summary Was Publicly Posted: _____

Requirement: #138 SFA did not update the benefit issuance document accurately and in a timely manner, including students that are new, transferred, or withdrawn.

Findings: SFA did not update the benefit issuance document accurately or timely on students whom benefits were changed due to verification.

Corrective Action Required: Adverse action letters were sent to households indicating that benefits have been changed while on-site. Student roster showing the new benefits must be sent to Consultant.

Verification – 7 CFR 245.6(a)

Requirement: #208a&b Documentation did not demonstrate a confirmation review took place and did not follow required procedures if the confirmation review did not validate the original determination.

Findings: According to the date, a confirmation review did not take place prior to sending notification to household of selection for verification and not following required procedures to validate original determination. Technical assistance was provided.

Corrective Action Required: Statement acknowledging procedure that SFA will use to ensure a confirmation review will take place prior to notification of selection to the household. SFA must review procedures in Child Nutrition manual regarding Verification Procedures prior to Oct. 1 of FY 20 and register for Verification webinar training.

Requirement: #209a&c Applications selected for verification were not properly selected and verified.

Findings: There were 3 applications selected for verification instead of the required 2 applications. Proper documentation was not received. Technical assistance was provided.

Corrective Action Required: SFA has sent adverse action letter to household of verified application while on-site. Benefit will be changed within the 10 day time period. Student roster showing the new benefits must be sent to Consultant or proper documentation to verify the application.

Requirement: #211 SFA verification notification letter includes all required information.

Findings: There is no documentation of letter submitted to the household for selection of verification.

Corrective Action Required: SFA will acknowledge that copies of letters submitted to households for documentation of verification process will be retained on file.

Requirement: #212 SFA did not meet the follow-up requirements if the household failed to respond to the request for verification.

Findings: There is no documentation of follow-up for household who failed to respond.

Corrective Action Required: SFA must submit statement acknowledging that documentation will be retained for all items regarding verification process.

Requirement: #213 SFA's notice of adverse action contain all required information, including notification of appeal rights.

Findings: There is no documentation indicating that adverse action letter was sent to households. Benefits were not updated on the eligibility roster.

Corrective Action Required: Adverse action letters were sent to the households while on-site. Student roster with benefit changes must be submitted to the Consultant.

Requirement: #214 Student's eligibility changed due to verification and SFA did not make updates and benefits were not terminated within 10 calendar days.

Findings: There is no documentation that households were notified and benefits were not changed within the 10 day time period.

Corrective Action Required: SFA must submit statement acknowledging that documentation will be retained for all items regarding verification process and that benefits will be changed within the appropriate time frame.

Requirement: #215 SFA did not complete verification by November 15 and extension was not requested.

Findings: There is not any documentation to support that verification was completed by November 15 or that an extension was requested. Confirmation review took place in March and benefits were not updated on the benefit issuance document.

Corrective Action Required: The procedure of the Verification process must be completed by November 15. SFA will submit a statement acknowledging process will be completed in a timely manner.

Meal Counting and Claiming – 7 CFR 210.7(c)

Requirement: #314 SFA is not following their SFA-SA Agreement/Application (including POS).

Findings: SFA was not observing OVS as stated on their agreement for breakfast and was not observing traditional serve as stated on agreement for lunch. Technical assistance was provided.

Corrective Action Required: The agreement was changed on site to reflect OVS for all age groups for both breakfast and lunch. No additional corrective action required.

Requirement: #316, 325 Counts for all schools for the review period are not correctly claimed by SFA.

Findings: Meals are consolidated and claimed, but the POS count is not accurate, due to unacceptable POS practice and procedure.

Corrective Action: SFA must explain procedure that will be used consistently for point of service, who is responsible for POS, and the backup plan.

Requirement: #318, 320 Each type of meal service line as observed on day of review does not provide an accurate count by eligibility category at the point of service, and recorded correctly.

Findings: The count was correct on day of observation. One class group is not marked on the roster at the time they are served. Point of service should be at the time meal is served instead of entering at a later time at the office.

Corrective Action Required: All reimbursable meals must be entered on the POS roster at the time of service. These are the only meals that should be claimed. Rosters for week of April 1-5 must be submitted to Consultant and also edit check worksheet for that week.

Requirement: 321a,c Total meal counts by category for the review period are not reasonable compared to the counts for day of review.

Findings: There is not a reasonable explanation from the SFA. Days of observation for breakfast were 69, 56, and 56. The lowest for the review month was 100. Lunch observation was 77, 75, and 131. The lowest for the review month was 107. There is not sufficient documentation from POS to support the number of meals being claimed.

Corrective Action Required: SFA must be consistent on their POS and only claim meals that are reimbursable. Accurate POS records must be available. Rosters for week of April 1-5 must be submitted to Consultant and also edit check for that week.

Requirement: #324 Patterns in the free, reduced or paid meal counts appear questionable and no reasonable explanation.

Findings: They are not questionable on the edit check for month of review, but after observation on-site, numbers are consistently lower than claimed. This raises concerns that POS is not accurate.

Corrective Action Required: Reimbursable meals only are to be claimed and have an accurate POS procedure. Edit check for week of April 1-5 must be submitted to Consultant.

Requirement: #325 Counts by category are not correctly used in the Claim for Reimbursement.

Findings: Due to POS practice and procedures, meals claimed are not accurate and/or reimbursable.

Corrective Action Required: SFA must be consistent on their POS and only claim meals that are served as a reimbursable meal.

Dietary Specifications and Nutrient Analysis – 7 CFR 210.10(f)

Requirement: There are areas identified during off-site review requiring technical assistance or corrective action prior to beginning of on-site portion of review.

Findings: Technical assistance was provided for quantities, keeping up to date CN labels and how to read them, and how information is to be recorded on production records.

Corrective Action Required: Corrective action was made while on-site.

Local Wellness Policy – 7 CFR 210.30

Requirement: Local Wellness Policy

Findings: The Local Wellness Policy does not include assessment of the program and other required elements (food and beverage marketing, fundraising, etc.). The policy and assessment are not made available to the public, i.e. on the website or provided during enrollment.

Corrective Action: SFA must update Local Wellness Policy. Copy of policy and assessment must be made available to the public. Copy of policy is to be submitted to the Consultant along with description of how it will be accessible to the public. An assessment must be completed at least every 3 years.

Revenue from Nonprogram Foods – 7 CFR 210.14(f)

Requirement: Process does not ensure all funds received from sale of non-program are deposited.

Finding: Adult meals are not being tracked accurately at point of service; therefore there should be additional revenue collected from adult meals.

Corrective Action Required: POS staff must mark all adult meals, excluding CN staff. Roster for the week of April 1-5 must be submitted.

Requirement: Breakfasts and lunches sold to adults are not priced so payment is sufficient to cover the overall cost of the adult meal.

Finding: Adult meals are not meeting the minimum USDA requirement and no additional funds are covering adequately.

Corrective Action Required: Adult meals must be increased for FY 20 to at least the price on Schedule B of the agreement each year unless other funds are used to support the difference.

Requirement: SFA's revenue ratio is less than its food cost ratio.

Finding: District's expenditure ratio of non-program foods is higher than the ratio of the revenue received from non-program foods.

Corrective Action Required: An increase in adult meal prices and ala carte items for FY 20.