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

Name of School Food Authority (SFA): Locust Grove Public School
Superintendent: Lord Helton
County District Code: 46-1017

Address of SFA: PO Box 399
City: Locust Grove
Zip Code: 74352-0399

Consultant(s) Conducting Review: Pat Gower

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

☐ Compliance  ☑ Noncompliance

Date of Review: 2/9-10, 14-17/2017
Date Review Closed:

Number of Schools in SFA: 4  Number of Schools Reviewed: 1  Number of Eating Sites Reviewed: 1

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): Locust Grove Upper Elementary 110

School Breakfast Program (SBP): Locust Grove Upper Elementary 110

After-School Snack Program (ASSP): NA

Special Milk Program (SMP): NA

Fresh Fruit and Vegetable Program (FFVP): Locust Grove Upper Elementary 110

Seamless Summer Food Program (SSFP): NA

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
☒ General Area Violations
☐ Recalculation required
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**REVIEW FINDINGS**

A. Program Access and Reimbursement

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- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming

Finding(s) Details:
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<tr>
<th>YES</th>
<th>NO</th>
<th>REVIEW FINDINGS</th>
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<td></td>
<td>✓</td>
<td>B. Meal Patterns and Nutritional Quality</td>
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<td>YES</td>
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<td></td>
<td>✓</td>
<td>Meal Components and Quantities</td>
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<td>✓</td>
<td>Offer versus Serve</td>
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<td></td>
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<td>Dietary Specifications and Nutrient Analysis</td>
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Finding(s) Details:
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### C. School Nutrition Environment

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- **Food Safety**
- **Local School Wellness Policy**
- ☐ **Competitive Foods**
- ☐ **Other**

**Finding(s) Details:**

Revenue from Nonprogram Foods:

Requirement: Nonprogram Foods: Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure: All revenue from the sale of nonprogram foods accrues to the non-profit school food service account; and Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. The requirement that revenues from the sale of nonprogram foods must generate at least the same proportion of total school food service account revenues that expenses from the purchase of nonprogram foods contribute to total school food service account food costs.

Adult Meals: FNS Instruction 782-5 Rev. 1 specifies that school food authorities must ensure that the federal reimbursements, children's payments, and other non-designated non-profit food service revenues do not subsidize program meals served to adults.

Findings: The SFA does not have processes and procedures for ensuring compliance with FNS requirements concerning Revenue from Nonprogram Foods. All revenue from nonprogram foods did not accrue to the SFA's nonprofit school food service account. Adult Meals: The SFA did ensure funds received were documented as Adult Meals, but did not ensure all funds were collected and the difference between what was charged and what was required to be charged was not transferred into the nonprofit food service account.

Contract Meals: The SFA did not deposit Head Start contract meals into the SFA's nonprofit school food service account; it was deposited into the General Fund. Technical Assistance was provided for using OCAS revenue coding 1760. Invoices from the Head Start Program were charged correctly, but the funds received from the Head Start Program were not transferred into the nonprofit school food service account in full for the last school year, but was coded into the General Fund. Technical assistance was given for coding the contract breakfast and lunches (1760) as revenue back into the nonprofit food service account.

Corrective Action Required: A process will be in place to ensure compliance with the FNS requirements concerning revenue from nonprogram foods and ensure all nonprogram foods sold will accrue to the SFA's nonprofit school food service account.

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### D. Civil Rights

**Finding(s) Details:**
Comments/Recommendations:

School Level Questions

Requirement: Schools participating in the NSLP must make potable water available to children at no charge where meals are served during the meal service and program operators are not to promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area.

Findings: The signage did not promote water as an alternative, but water was placed too close to the milk and would seem that it was promoting water as an alternative. Technical assistance was provided and the bottled water was moved to a location out in the dining room, so students could not select the water as an alternate to milk.

Corrective Action Required: Technical assistance was provided. Ensure water is not in competition with milk.

CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.68[k]): 3/30/2017

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

4/28/2017 (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: 3/1/2017

with Lori Helton, Superintendent; Malynda Willis, FSD (Name and Title of School Representative)

CNP Consultant(s): Pat Gower

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.

Date Review Summary Was Publicly Posted: 3/31/17