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

Name of School Food Authority (SFA): Osage Public School
County District Code: 46-C043

Superintendent: Don Pullen

Address of SFA: 7960 West 490
City: Pryor
Zip Code: 74361-0000

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: 2/1-3, 6-8/2017  Date Review Closed: ___________________________

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

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): Osage Elementary

School Breakfast Program (SBP): Osage Elementary

After-School Snack Program (ASSP): Osage Elementary

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
☑ General Area Violations
☐ Recalculation required
<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>REVIEW FINDINGS</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>✓</td>
<td>A. Program Access and Reimbursement</td>
</tr>
<tr>
<td></td>
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<td>YES</td>
</tr>
<tr>
<td>☐</td>
<td>✓</td>
<td>Certification and Benefit Issuance</td>
</tr>
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<td>☐</td>
<td>✓</td>
<td>Verification</td>
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<tr>
<td>☐</td>
<td>✓</td>
<td>Meal Counting and Claiming</td>
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Finding(s) Details:
<table>
<thead>
<tr>
<th>YES</th>
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<th>REVIEW FINDINGS</th>
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<tbody>
<tr>
<td></td>
<td>✓</td>
<td>B. Meal Patterns and Nutritional Quality</td>
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<tr>
<td></td>
<td></td>
<td>YES</td>
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<tr>
<td></td>
<td>✓</td>
<td>Meal Components and Quantities</td>
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<tr>
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<td>✓</td>
<td>Offer versus Serve</td>
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<tr>
<td></td>
<td>✓</td>
<td>Dietary Specifications and Nutrient Analysis</td>
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Finding(s) Details:
<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>REVIEW FINDINGS</th>
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<tbody>
<tr>
<td>✓</td>
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<td>C. School Nutrition Environment</td>
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<tr>
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<tr>
<td></td>
<td>✓</td>
<td>Food Safety</td>
</tr>
<tr>
<td></td>
<td>✓</td>
<td>Local School Wellness Policy</td>
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<tr>
<td></td>
<td>✓</td>
<td>Competitive Foods</td>
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<tr>
<td>✓</td>
<td></td>
<td>Other</td>
</tr>
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</table>

Finding(s) Details:

Professional Standards

Requirement:
1214. Hiring requirements were not met when the SFA hired a new director on or after July 1, 2015.
1215. Validation of previous food safety certification was not obtained in the last 5 years or that the newly hired School Nutrition Program Director completed food safety training eight hours of food safety certification completed within 30 calendar days of the start date.

Findings:
The Food Service Director resigned in November and a staff member which was hired in October and took the position. The new Food Service Director has met the hiring requirements except the eight hours of food safety certification (8 hours completed within 30 calendar days of the start date). The food safety training is scheduled for April 10th and 11th.

Corrective Action Required:
Food safety certification completed for new Food Service Director by 4/11/2017.

Revenue from Nonprogram Foods

Requirement:
No program 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. 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 nonprofit 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. The SFA did not correctly calculate its nonprogram food ratio and its food cost ratio. The SFA did not take sufficient steps to ensure compliance with the non-program food cost.

All revenue from nonprogram foods did not accrue to the SFA's nonprofit school food service account.
The SFA did not charge staff for any meals last school year. The A-la-carte sales were incorrectly coded as adult meals instead of a-la-carte (1730 instead of 1720). Technical assistance was provided to the correct OCAS codes for adult meals and a-la-carte. Corrective action by 3/10/2017.
CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.68[k]): 3/10/2017 & 4/11/2017

CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[K][3]):

4/11/2017 & 5/15/2017 (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: 2/8/2017

with Don Pullen, Superintendent; Debra Newby, FSD; Kim Bruce, Treasurer (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: 2/23/17