

## STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

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 administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website no later than 30 days after the SA provides the final results of the administrative review to the SFA. The SA must also make a copy of the final administrative review report available to the public upon request.

**School Food Authority Name:** Hot Springs School District

**Date of Administrative Review (Entrance Conference Date):** 05/03/17

**Date review results were provided to the School Food Authority:** 07/07/17

**Date review summary was publicly posted:** 7/19/2017

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The review summary must cover access and reimbursement (including eligibility and certification review results), an SFA's compliance with the meal patterns and the nutritional quality of school meals, the results of the review of the school nutrition environment (including food safety, local school wellness policy, and competitive foods), compliance related to civil rights, and general program participation. At a minimum, this would include the written notification of review findings provided to the SFAs Superintendent or equivalent as required at 7 CFR 210.18(i)(3).

### General Program Participation

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)

- School Breakfast Program  
 National School Lunch Program  
 Fresh Fruit and Vegetable Program  
 Afterschool Snack  
 Special Milk Program  
 Seamless Summer Option

2. Does the School Food Authority operate under any Special Provisions? (Select all that apply)

- Community Eligibility Provision  
 Special Provision 1  
 Special Provision 2  
 Special Provision 3

### Review Findings

3. Were any findings identified during the review of this School Food Authority?  
 Yes       No

This institution is an equal opportunity provider.

If yes, please indicate the areas and what issues were identified in the table below.

YES	NO	REVIEW FINDINGS	
X	<input type="checkbox"/>	<b>A. Program Access and Reimbursement</b>	
		<b>YES</b>	<b>NO</b>
		X	<input type="checkbox"/>
		<input type="checkbox"/>	X
		X	<input type="checkbox"/>
<p>Finding(s) Details:</p> <p>1) Finding 1: (Onsite 126) When reviewing the applications the reviewer found one application that had been incorrectly determined to be free, when instead they should have been at the reduced rate. Per regulation 210.7(c)(1) To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum: (i) Correctly approve each child's eligibility for free and reduced price lunches and meal supplements based on the requirements prescribed under 7 CFR part 245; (ii) Maintain a system to issue benefits and to update the eligibility of children approved for free or reduced price lunches and meal supplements. The system shall: (A) Accurately reflect eligibility status as well as changes in eligibility made after the initial approval process due to verification findings, transfers, reported changes in income or household size, etc.; and (B) Make the appropriate changes in eligibility after the initial approval process on a timely basis so that the mechanism the school food authority uses to identify currently eligible children provides a current and accurate representation of eligible children. Changes in eligibility which result in increased benefit levels shall be made as soon as possible but no later than 3 operating days of the date the school food authority makes the final decision on a child's eligibility status. Changes in eligibility which result in decreased benefit levels shall be made as soon as possible but no later than 10 operating days of the date the school food authority makes the final decision on the child's eligibility status.</p> <p>2) Finding 2: (Onsite #128) When converting income with more than one frequency the SFA was converting all income to yearly and then back to monthly. In the Eligibility Manual for School Meals, School Year 2016-2017 it explains that if a household has multiple income sources with varying frequency, the SFA must calculate all income for an entire year and determine eligibility based on that income. The theory behind this is that less math done will minimize errors in eligibility determination.</p> <p>3) Finding 3: (Offsite #308, Onsite 314) School Food Authority (SFA) has a Grab and Go line for their high school students. It is located in the opposite corner of the regular Food Service line. Students punch their numbers in before they receive their meal, this is an alternate point of service meal count system that was not pre-approved by the State agency.</p> <p>Per regulation 210.7(c)(2) Point of service alternatives. (i) State agencies</p>			

		<p>may authorize alternatives to the point of service lunch counts provided that such alternatives result in accurate, reliable counts of the number of free, reduced price and paid lunches served, respectively, for each serving day. State agencies are encouraged to issue guidance which clearly identifies acceptable point of service alternatives and instructions for proper implementation. School food authorities may select one of the State agency approved alternatives without prior approval.</p> <p>(ii) In addition, on a case-by-case basis, State agencies may authorize school food authorities to use other alternatives to the point of service lunch count; provided that such alternatives result in an accurate and reliable lunch count system. Any request to use an alternative lunch counting method which has not been previously authorized under paragraph (2)(i) is to be submitted in writing to the State agency for approval. Such request shall provide detail sufficient for the State agency to assess whether the proposed alternative would provide an accurate and reliable count of the number of lunches, by type, served each day to eligible children. The details of each approved alternative shall be maintained on file at the State agency for review by FNS.</p> <p>Located on the Meal Count Method Form in the Annual Agreement South Dakota Child and Adult Nutrition Service (CANS) has defined the Alternate Point of Service as: Alternate Point of Service (ALT POS) is a location somewhere in line that is not at the end of the serving line, can also include locations in the building that occur outside of the standard cafeteria meal service area. ALT POS must be pre-approved by State Agency.</p>												
X	<input type="checkbox"/>	<p><b>B. Meal Patterns and Nutritional Quality</b></p> <table border="1" data-bbox="380 1207 1292 1344"> <thead> <tr> <th>YES</th> <th>NO</th> <th></th> </tr> </thead> <tbody> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Meal Components and Quantities</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Offer versus Serve</td> </tr> <tr> <td><input type="checkbox"/></td> <td>X</td> <td>Dietary Specifications and Nutrient Analysis</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <p>1) Finding 4: (Onsite 400 &amp; 500) SFA's Grab –n- Go line is only for high school students and does not offer a vegetable. Meal is pre-packaged in a paper bag to include milk, fruit and the main entrée. Per regulation 210.10, Offer versus serve for grades K through 12. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Incomplete meals will be disallowed.</p>	YES	NO		X	<input type="checkbox"/>	Meal Components and Quantities	X	<input type="checkbox"/>	Offer versus Serve	<input type="checkbox"/>	X	Dietary Specifications and Nutrient Analysis
YES	NO													
X	<input type="checkbox"/>	Meal Components and Quantities												
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Meal pattern	Lunch meal pattern		
	Grades K-5	Grades 6-8	Grades 9-12
	Amount of food <sup>a</sup> per week (minimum per day)		
Fruits (cups) <sup>b</sup>	2½ (½)	2½ (½)	5 (1)
Vegetables (cups) <sup>b</sup>	3½ (¾)	3½ (¾)	5 (1)
Dark green <sup>c</sup>	½	½	½
Red/Orange <sup>c</sup>	¾	¾	1½
Beans and peas (legumes) <sup>c</sup>	½	½	½
Starchy <sup>c</sup>	½	½	½
Other <sup>d</sup>	½	½	½
Additional Veg to Reach Total <sup>e</sup>	1*	1*	1½*
Grains (oz eq) <sup>f</sup>	8-9 (1)	8-10 (1)	10-12 (2)
Meat/Meat Alternates (oz eq)	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups) <sup>g</sup>	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week			
Min-max calories (kcal) <sup>h</sup>	550-850	600-700	750-850
Saturated fat (% of total calories) <sup>i</sup>	<10	<10	<10
Sodium (mg) <sup>j</sup>	≤400	≤710	≤740
Trans fat <sup>k</sup>	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.		

  

X	<input type="checkbox"/>	<b>C. School Nutrition Environment</b>		
		<b>YES</b>	<b>NO</b>	
		X	<input type="checkbox"/>	Food Safety
		X	<input type="checkbox"/>	Local School Wellness Policy
		<input type="checkbox"/>	X	Competitive Foods
X	<input type="checkbox"/>	Other		
<p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>Finding 8: (Onsite 1410) Reviewer observed two products with a country of origin outside of the USA (Mandarin Oranges, Pineapple). The SFA did not have documentation on file to support an exception to the Buy American requirement for these products.  The Buy American requirement states that a food or food product is grown and/processed in the USA. At least 51% of the final processed product must be made up of domestically grown commodities. For products that are not USA grown and processed, the SFA needs to have a documentation indicating that domestic products are truly not available or reasonably priced.</li> <li>Finding 5: (Offsite 1003, 1004) The SFA's Local Wellness Policy (LWP) committee only includes their School Board members. According to the LWP Final Rule, SFA's need to allow parents, students, SFA representatives, Physical education teachers, school health professionals, school board members, school administrators and members of the general public to participate in the development, implementation and periodic review and update of the LWP.</li> <li>Finding 6: (Offsite 1005) SFA has not completed a recent assessment on the implementation of Wellness Plan. The Final Rule, released in July of 2016 states that a triennial assessment must be done once every 3 years. This assessment must determine compliance with the Wellness Policy, how it compares to model policies, and what progress has been made in attaining the goals set forth in the SFA's Wellness Policy.</li> <li>Finding 7: (Offsite 1203, Onsite 1215) Due to not understanding that the oversight and evaluation of the school meals program remains with the</li> </ol>				

		SFA regardless of having a Food Service Management Company (FSMC), the SFA's Food Service Director does not have the required food safety training.
<input type="checkbox"/>	X	<b>D. Civil Rights</b>
		Finding(s) Details: