

## 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:** Freeman Academy

**Date of Administrative Review (Entrance Conference Date):** 10/31/17

**Date review results were provided to the School Food Authority:** 11/22/17

**Date review summary was publicly posted:** 12/28/17

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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			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>A. Program Access and Reimbursement</b>			
		<b>YES</b>	<b>NO</b>		
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Certification and Benefit Issuance	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Verification	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Meal Counting and Claiming	
Finding(s) Details:					
<ol style="list-style-type: none"> <li><b>Finding 1 (Onsite 128):</b> Household applications were all converted to annual income, regardless of income frequency. To reduce potential mathematical error, household application income frequencies should only be converted when there are multiple income frequencies reported on the application.</li> <li><b>Finding 2 (Onsite 209):</b> Local Education Agency (LEA) selected two household applications for verification, however, based on verification type procedures, only one application should have been selected.</li> <li><b>Finding 3 (Onsite 316, 325):</b> School Food Authority (SFA) overclaimed by seven lunch meals on the September claim for reimbursement. Finding is not systemic, and considered as an issue that arose from manual consolidation. Submitted claims for reimbursement must accurately reflect monthly meal count.</li> </ol>					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>B. Meal Patterns and Nutritional Quality</b>			
		<b>YES</b>	<b>NO</b>		
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Meal Components and Quantities	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Offer versus Serve	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dietary Specifications and Nutrient Analysis	
Finding(s) Details:					
<ol style="list-style-type: none"> <li><b>Finding 4 (Onsite 401):</b> During the onsite review, the reviewer observed three meals selected that did not meet a complete meal under Offer Versus Serve requirements. Per 7 CFR 210.10(e), schools utilizing Offer Versus Serve must ensure that all lunch meals claimed for reimbursement include at least three of the five meal components, with two of the meal components selected in the full amount, and the third selected component being at least ½ cup fruit and/or vegetable. The reviewer provided suggestions on how to adjust menu planning for the selected meal observed at the point of service, including, but not limited to: adjusting recipes for ease of meeting quantity requirements, providing full quantities of the component within a single food item, replacing complex combination items with food items that are easier to credit toward the meal pattern.</li> <li><b>Finding 5 (Onsite 410):</b> The reviewer observed production records not clearly identifying the credit of components for combination food items, a la carte planned servings not identified, and observed milk counts being recorded outside of the planned servings section. Additionally, two recipes (hamburger patty, chicken quesadilla) were not standardized for specific school use. Production records must identify the meal components counted per menu item and provide planned/used servings; recipes must be standardized for the usage of the specific school.</li> </ol>					

		<p>3. <b>Finding 6 (Onsite 502):</b> Signage observed during the day of review explained what constitutes a reimbursable meal to students; however, the signage did not include the requirement to select at least ½ cup fruit or vegetable. Signage is required to include language regarding the selection of ½ cup fruit and/or vegetable for a reimbursable meal.</p> <p>4. <b>Finding 7 (Onsite 605):</b> Nutrient Analysis identifies high calories for K-8 (718 average – target is 600-650), and high sodium (1231 mg average – target is 1230mg). Per 7 CFR 210.10(f), meals offered to each age/grade group must meet, on average over the school week, minimum dietary specifications for calories, saturated fat, sodium, and trans fat.</p>															
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>C. School Nutrition Environment</b></p> <table border="1" data-bbox="380 617 1305 785"> <thead> <tr> <th data-bbox="380 617 467 653">YES</th> <th data-bbox="467 617 548 653">NO</th> <th data-bbox="548 617 1305 653"></th> </tr> </thead> <tbody> <tr> <td data-bbox="380 653 467 688" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="467 653 548 688" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="548 653 1305 688">Food Safety</td> </tr> <tr> <td data-bbox="380 688 467 724" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="467 688 548 724" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="548 688 1305 724">Local School Wellness Policy</td> </tr> <tr> <td data-bbox="380 724 467 760" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="467 724 548 760" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="548 724 1305 760">Competitive Foods (Smart Snacks)</td> </tr> <tr> <td data-bbox="380 760 467 795" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="467 760 548 795" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="548 760 1305 795">Other: Summer Food Service Program – Outreach</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1. <b>Finding 10 (Offsite 1000 Series):</b> Local Wellness Policy does not meet the following minimum requirements for the Local Wellness Policy final rule: <ul style="list-style-type: none"> <li>• A Local Wellness Policy has not been implemented, and not made available to the public. (1000, 1001)</li> <li>• Documentation of the most recent update was not maintained. (1002)</li> <li>• Documentation of outreach to stakeholders for Committee participation/update not maintained/completed. (1003)</li> <li>• Policy does not specify that stakeholders are made aware of their ability to participate in the development, review, update, and implementation of the policy. (1004)</li> <li>• Policy does not include description of assessment/measuring implementation, and assessment is not made available to the public. (1005, 1006)</li> </ul> </li> <li>2. <b>Finding 11 (Onsite 1104, 1105):</b> Reviewer observed products in the vending machine available for purchase during the school day that does not meet Smart Snack compliance. Non-compliant products include regular Gatorade, soda pop. Products for student purchase during the school day (midnight thru 30 minutes <i>after</i> the official end of day) must meet Smart Snack standards.</li> <li>3. <b>Finding 12 (Onsite 1400, 1404, 1407, 1408):</b> Food Safety Plan and Temperature Logs are not present at school. All sites which prepare or serve food must have a Food Safety Plan, required Standard Operating Procedures (SOPs), properly maintained temperature logs, and completed food safety checklists. This item is required for all agencies per <i>Public Law 111-296 Section 302</i>. The reviewer provided the Food Safety Plan, logs, food safety checklist, and instruction to Food Service Directors during the onsite review.</li> <li>4. <b>Finding 13 (Onsite 1403, 1411):</b> Reviewer observed pineapple juice from Philippines and mandarin oranges from China. <i>7 CFR 210.21</i> requires that all foods served be agricultural commodities that are produced in the United States; and food products that are processed in the United States</li> </ol>	YES	NO		<input checked="" type="checkbox"/>	<input type="checkbox"/>	Food Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Competitive Foods (Smart Snacks)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other: Summer Food Service Program – Outreach
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		<p>substantially using agricultural commodities that are produced in the United States.</p> <p>5. <b>Finding 14 (Onsite 1409):</b> Reviewer observed bagged carrots stored on the floor of the cooler. Per <i>Public Law 111-296 Section 302</i>, food must be stored at least six inches above floor, and ready-to-eat (RTE) product must be stored above potentially hazardous foods.</p> <p>6. <b>Finding 15 (Offsite 1601):</b> SFA did not provide documentation demonstrating Summer Food Service Program (SFSP) outreach. All SFAs participating in the school lunch program must provide outreach/communication regarding availability of summer meals in the area.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1. <b>Finding 8 (Offsite 805):</b> SFA requires a note from a qualified medical authority is required for special dietary accommodations. Per 7 CFR 210.10(m), schools must make substitutions in lunches and afterschool snacks for students who are considered to have a disability under 7 CFR 15b.3 and whose disability restricts their diet, and is clarified in the USDA-FNS Accommodating Children with Disabilities in the School Meal Programs resource . When a major life activity is impacted, a statement from a recognized medical authority is only required when the menu planner must deviate from the meal pattern. The reviewer has provided the Child &amp; Adult Nutrition Services memo regarding Meal Modification, and provided direction.</p> <p>2. <b>Finding 9 (Onsite 811):</b> The “And Justice for All” poster was not displayed in a prominent location, visible to recipients of benefits. The reviewer provided a copy of the poster.</p>