

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: Castlewood School District

Date of Administrative Review (Entrance Conference Date): 12/15/16

Date review results were provided to the School Food Authority: 3/14/17

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

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"/>	A. Program Access and Reimbursement		
		YES	NO	
		X	<input type="checkbox"/>	Certification and Benefit Issuance
		X	<input type="checkbox"/>	Verification
		X	<input type="checkbox"/>	Meal Counting and Claiming
Finding(s) Details:				
<p>1) Finding PS1 #1: Off Site 106 & 113(a). School Food Authority (SFA) had listed six people with access to free and reduced application (FR app) information and benefit issuance system/documentation. Since this is personally identifying information (PII) this information must be limited to only those staff with a direct need to know the information for operation of the school nutrition program.</p> <p>2) Finding PS1 #2: On-Site 128. One application contained child income that was missed during the income calculation. This error did not change the families benefits denied meal benefits. According to the Eligibility Manual for School Meals (Elig. Manual), routine children’s income must be recorded on the FR app and included in the household income calculation to establish free and reduced price meal benefits. Technical assistance was provided during the on-site review to the Determining Official. During that time, the reviewer went over the income section of the FR app with the determining official to help her gain a better understanding of the new family friendly application format.</p> <p>3) Finding PS1 #3: Off Site 203. SFA was unaware of the verification for cause requirement for questionable applications received from households. SFAs have an obligation to verify all questionable free and reduced price applications; this process is called “verification for cause.” During the on-site, the reviewer explained verification for cause and provided information from the Elig. Manual about when questions or questionable applications are received that require Verification for Cause.</p> <p>4) Finding #4: 305(a): Offer versus Serve. SFA was requiring all high school students to take 1 cup of fruit or vegetable during lunch. During the on-site, the reviewer explained that under offer versus serve at lunch, students must take a minimum of three components. Two of those components must be taken in the full, planned quantity and the third component must be at least ½ cup fruit and/or vegetable.</p>				
X	<input type="checkbox"/>	B. Meal Patterns and Nutritional Quality		
		YES	NO	
		X	<input type="checkbox"/>	Meal Components and Quantities
		<input type="checkbox"/>	X	Offer versus Serve
		<input type="checkbox"/>	X	Dietary Specifications and Nutrient Analysis
Finding(s) Details:				
<p>1) Finding PS2 #5: On-Site 404, 502. SFA posted a daily menu, similar to what is on their website. The information provided on menu did not explain a reimbursable breakfast or lunch to students. The SFA must post a sign to help inform students of the minimum meal components (food</p>				

		items) that make up a reimbursable meal. After breakfast, the reviewer visited with the SFA about this requirement. Reviewer emailed them several pictures of signs ideas from other schools.															
X	<input type="checkbox"/>	<p>C. School Nutrition Environment</p> <table border="1"> <thead> <tr> <th>YES</th> <th>NO</th> <th></th> </tr> </thead> <tbody> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Food Safety</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Local School Wellness Policy</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Competitive Foods</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Other</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <ol style="list-style-type: none"> 1) Finding #11, On-Site 1410: SFA has tuna from Thailand, bananas and mandarin oranges from foreign countries. All purchases of food must comply with the Buy American requirement. The reviewer provided information about the Buy American requirement during the on-site review. Reviewer instructed SFA to contact their vendors to see if an American product was available for tuna, bananas and mandarin oranges. If none available at a reasonable price, SFA must collect documentation from their vendors to explain this or SFA must document the process used to determine a product is not a product of the USA. 2) Finding #7: Off Site 1004; The SFA directly solicits members of for their Wellness Committee which limits participation from various stakeholders. SFAs must allow parents, students, representatives of the SFA, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy. During on-site interview, various options were discussed for soliciting various stakeholders, including a notification being included in the Parent Packets that are sent out yearly, information being included in the Student Handbook and flyers being put up in the school building. 3) Finding #8: Off Site 1005, 1006: SFA has not completed a recent assessment on the implementation of Wellness Policy. The final regulation requires SFAs to perform an assessment on their wellness policy every 3 years. This assessment must determine the SFAs compliance with their wellness policy, how it compares to the state model policy, and progress towards reaching goals set in the SFA's wellness policy. 4) Finding #9: Off Site 1103: SFA currently does not track smart snack compliance. SFA does not currently have vending machines, school store, snack bar or do any school fundraisers during the school day, however have in the past. SFAs are required to track all foods sold to students during the school day outside of the reimbursable meals, defined as midnight to 30 minutes after the end of the school day. Reviewer provided TA during on site visit to explain the requirement and situations that would apply. 5) Finding #10: On-Site 1300: SFA did not have a source of free water available at breakfast. At lunch the water was provided in an igloo water dispenser. All SFAs must provide a free, potable source of water during 	YES	NO		X	<input type="checkbox"/>	Food Safety	X	<input type="checkbox"/>	Local School Wellness Policy	X	<input type="checkbox"/>	Competitive Foods	X	<input type="checkbox"/>	Other
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X	<input type="checkbox"/>	Other															

		<p>breakfast and lunch meal service. The reviewer suggests the same dispenser used at lunch time be used at breakfast.</p> <p>6) Finding #12, Off Site 1601: SFA was unaware that it is required to inform families of the availability of meals offered through the Summer Food Service Program before the end of the school year. SFAs must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session. During the on-site review, technical assistance was given to SFA about the requirement and ideas on how to inform families. An electronic poster is available at http://doe.sd.gov/cans/documents/SFO-Flyer.pdf.</p>
X	<input type="checkbox"/>	<p>D. Civil Rights</p> <p>Finding(s) Details:</p> <p>1) Finding #6: Off Site 803. Currently the SFA has a general Complaint Policy that references Federal Funds, but does not specifically reference discrimination within the USDA FNS School Meal Program. All SFAs are required to have an informal or formal method to handle complaints of discrimination within the school meals program. Please review CANS memo #108, Civil Rights Instructions, starting on page 22 for specific guidance on how complaints of discrimination within the school meals program need to be handled. This memo is posted on the CANS website (http://doe.sd.gov/cans/index.aspx) under Documents, Numbered Memos.</p>