

## 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:** Clark School District

**Date of Administrative Review (Entrance Conference Date):** March 15, 2017

**Date review results were provided to the School Food Authority:** April 13, 2017

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

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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)

- XX School Breakfast Program  
 XX National School Lunch Program  
 Fresh Fruit and Vegetable Program  
 XX 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"/>	Certification and Benefit Issuance
		<input type="checkbox"/>	X	Verification
		X	<input type="checkbox"/>	Meal Counting and Claiming
Finding(s) Details:				
<ol style="list-style-type: none"> <li>1) Finding #1 (Offsite 103): School determined carryover by calendar days instead of operating days. Carryover at beginning of year is first 30 operating school days.</li> <li>2) Finding #2 (Onsite 126): 2 household applications (5 total students) were incorrectly approved as free, but should have been reduced price. Application errors were result of incorrect conversion factors and not including farming income.</li> <li>3) Finding #3 (Onsite 126): The determining official approved an application at face value with a case number that does not follow the '9-digit, leading with one or more zeros' format. The determining official followed up with the household; the household provided the actual case number, which was searchable in the iMATCH system, with a file match date prior to the review period; no eligibility change is necessary; documentation maintained in review documents. All case numbers approved at face value must follow required format; case numbers which do not follow the standard format must be followed up with the family to confirm there is a valid SNAP or TANF case number.</li> <li>4) Finding #4 (Onsite 138): 2 students were approved as free based on income, however, students were observed to have free benefits based on direct certification. Directly certified free student eligibility must always supersede all other forms of free meal certification.</li> <li>5) Finding #5 (Offsite 308): Middle School and High School were approved in the annual application with CANS for an alternate point of service at breakfast, but no longer use an alternate point of service at breakfast. The annual application with the CANS office must reflect current practice.</li> </ol>				
X	<input type="checkbox"/>	<b>B. Meal Patterns and Nutritional Quality</b>		
		<b>YES</b>	<b>NO</b>	
		X	<input type="checkbox"/>	Meal Components and Quantities
		X	<input type="checkbox"/>	Offer versus Serve
		X	<input type="checkbox"/>	Dietary Specifications and Nutrient Analysis
Finding(s) Details:				
<ol style="list-style-type: none"> <li>1) Finding #6 (Onsite 401): The reviewer observed 5 incomplete breakfast meals during the day of review. The meals were short of the ½ c fruit offer versus serve (OVS) requirement. When OVS is utilized at breakfast, meals counted for reimbursement must meet breakfast OVS requirements of at least 3 selected food items – 2 of the items must be taken in full, planned quantity, and 1 item must be at least ½ cup fruit.</li> <li>2) Finding #7 (Onsite 402): Reviewer observed 100% fruit juice available in as much as a 1 cup quantity and peaches available in ½ cup quantity at</li> </ol>				

		<p>breakfast during day of review. Fruit juice provided over the course of the week must not exceed half of the total weekly fruit offering per meal service.</p> <p>3) Finding #8 (Onsite 404, Onsite 502): No signage communicating a reimbursable meal for breakfast or lunch was observed. Signage instructing selection of a reimbursable meal including language indicating that a complete meal contains at least ½ cup fruit and/or vegetable must be visible to students in the meal service area.</p> <p>4) Finding #9 (Onsite 409): Hillcrest Colony did not have fruit available at lunch on 2/13 and 2/16 during initial menu review. All meal components must be available to students. Lunch and breakfast production records from the months of February and March were requested for a check of components. Lunch services for 2/2, 2/6, 2/7, 2/9, 2/13, 2/16, 2/23, 2/27, 3/7, 3/8, 3/13, and 3/14 did not have the fruit component recorded.</p> <p>5) Finding #10 (Onsite 410): The reviewer identified the following quantity violations during the menu review from the review period for Hillcrest Colony:</p> <ul style="list-style-type: none"> <li>a. Serving sizes not consistent throughout week for grade levels</li> <li>b. K-3 receive a lesser quantity on occasion – this resulted in insufficient quantities served to this grade group per meal pattern requirements.</li> <li>c. Serving sizes recorded in decimals on production record. Since common kitchen measurements are in fractions this must be converted so kitchen staff can accurately follow the recipe rather than guess at actual quantity to use.</li> <li>d. Leftovers/added not recorded on production record as required.</li> <li>e. Unallowable milk types were listed on lunch production records 2/13 (1% and 2%) and 2/16 (2% and whole). Breakfast production records all identified acceptable milk types (1% and skim).</li> </ul> <p><b>Lunch:</b></p> <ul style="list-style-type: none"> <li>f. Missing the following required vegetable subgroups: dark green, beans/peas/legume, and short quantity in red orange group</li> <li>g. Short quantity in weekly fruit requirement</li> <li>h. Short quantity in weekly meat/meat alternate requirement</li> <li>i. Short quantity in weekly whole grain rich requirement</li> <li>j. 100 % of grains served were not all whole grain rich: cinnamon roll &amp; stuffing</li> <li>k. Short quantity in daily meat/meat alternate (pork chops – 2/14 and Ham – 2/17)</li> <li>l. Short quantity in daily grain (bread slice too small – 2/14, 2/15, 2/17)</li> <li>m. Short quantity in daily fruit (apple pockets – 2/14 and apple sauce serving size too small – 2/15)</li> <li>n. Short quantity in daily vegetable (carrot/potato soup, sour kraut – 2/16 and carrots, string bean soup – 2/17)</li> </ul> <p><b>Breakfast:</b></p> <ul style="list-style-type: none"> <li>o. Exceeding 50% juice maximum (breakfast) – fruit juice availability must not exceed half of the total weekly fruit offering.</li> <li>p. Short daily and weekly fruit minimum</li> <li>q. Short daily and weekly grain minimum</li> </ul> <p>6) Finding #11 (Onsite 500): Although two milk types were present during</p>
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		<p>the onsite portion of the review, the food service had pre-poured glasses of milk for all students already set at dinner table. Students did not have the option to select or decline milk or milk types. When utilizing offer versus serve, the student must have the opportunity to select and decline menu items, including milk types.</p> <p>7) Finding #12 (Onsite 605): Results of the nutrient analysis identify the provided K-8 lunch menu for Hillcrest Colony exceeds the calorie range by 1 calorie. No concerns noted with the breakfast menu. Suggestions to meet the calorie requirements with this week of lunch menus include:</p> <ol style="list-style-type: none"> <li>Eliminating the cheese slice from the burger menu from 3/24</li> <li>Eliminating the Sun Chips from the burger menu, and increasing the burger bun size from 3/24</li> <li>Providing skim unflavored milk instead of skim flavored milk on the burger menu from 3/24</li> </ol>															
X	<input type="checkbox"/>	<p><b>C. School Nutrition Environment</b></p> <table border="1" data-bbox="380 821 1292 989"> <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"> <li>Finding #19 (Onsite 1400): Standard Operating Procedures in the Food Safety Plan are identified as 'Sample SOP's'. The Food Safety Plan must be updated for each specific site and school district. See the instruction page on inside cover of Food Safety Plan for additional information.</li> <li>Finding #20 (Onsite 1405): The most recent kitchen health inspection was posted in kitchen, out of visibility to participants. The inspection must be posted in a location visible to program participants and adults.</li> <li>Finding #21 (Onsite 1407): Thermometer calibration logs, freezer logs, and cooler logs were not consistently maintained. Temperature logs must be recorded daily (thermometer calibration weekly), and kept on file for at least 6 months.</li> <li>Finding #22 (Onsite 1408): The reviewer observed storage violations with a bag of flour being stored on the floor in store room, and all products in the freezer being stored on the floor. Food products must be stored at least 6 inches off the floor.</li> <li>Finding #23 (Onsite 1410): The reviewer observed product with a country of origin outside of the US (bananas from Guatemala, pineapple from Vietnam). According to the Buy American rule, all products provided must be grown and processed in the US, or documentation must be on file to justify why a foreign product was required.</li> </ol> <p>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.</p>	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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		<p>6) Finding #16 (Offsite 1000 series): The following areas of the local school wellness policy/procedure are out of compliance with the final rule, which goes into effect on July 1, 2017:</p> <ol style="list-style-type: none"> <li>a. The policy must identify standards &amp; nutrition guidelines must meet lunch (210.10 &amp; 210.11) and breakfast (220.8) meal pattern and nutrition requirements. (Q1000)</li> <li>b. The policy must permit marketing on the school campus during school day of only foods and beverages which meet the lunch nutrition standards under 210.11. (Q1000)</li> <li>c. The policy must identify the position of the LEA or school official(s) responsible for the implementation and oversight of the LWP. (Q1000)</li> <li>d. The policy must identify that stakeholders (parents, students, representatives of the SFA, teachers of PE, school health professionals, school board, school admin, and general public) are permitted to participate in the update/review of policy. (Q1000)</li> <li>e. The policy must identify how stakeholders are provided opportunity to participate in development, implementation, review/update of policy. (Q1000)</li> <li>f. The policy must include description to measure the implementation of the policy, and will be assessed at least triennially (Q1000, Q1005)</li> <li>g. Maintain documentation of most recent update, such as meeting minutes, agenda, or attendance. (Q1002)</li> <li>h. Maintain documentation of stakeholder outreach, such as a flyer, mass email, etc. (Q1004)</li> <li>i. Self-assessment of policy not completed and posted/available to public triennially. (Q1006)</li> </ol> <p>7) Finding #17 (Onsite 1105): Reviewer observed products in the vending machine available for purchase during the school day that are not smart snack compliant. Non-compliant products include:</p> <ul style="list-style-type: none"> <li>• Snickers candy bar</li> <li>• Twizzlers Nibs</li> <li>• Grandma’s Chocolate Brownie</li> <li>• Frosted pop tarts (enriched)</li> <li>• Welch’s fruit snacks (exceeds 35% sugar by weight)</li> </ul> <p>8) Finding #15 (Offsite 900, Onsite 901): Onsite Monitoring was completed for lunch, but was not completed for breakfast. Onsite monitoring for both lunch and breakfast must be completed prior to February 1 in SFAs with more than one preparation and/or serving site.</p> <p>9) Finding #18 (Offsite 1205, Offsite 1206, Offsite 1208, Offsite 1210, Offsite 1211 , Onsite 1217, Onsite 1218, Onsite 1219, Onsite 1221): Site managers (colony schools), full-time food service staff, and part-time staff outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program have not met annual training requirements, and anticipated training is not</p>
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		<p>identified. All sites must have a site manager and/or director.</p> <p>The SFA does not have a tracking mechanism which contains required information. Tracking of training must include the event name, date of completion, number of hours (15-minute increments), type of training, training category, and type of documentation of training completion.</p> <p>10) Finding #24 (Offsite 1601): SFA did not provide documentation demonstrating Summer Food Service Program outreach. All SFAs participating in the school lunch program must provide outreach/communication regarding availability of summer meals in the area.</p>
X	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1) Finding #14 (Onsite 811): The 'And Justice For All' poster is posted in a visible location, however, the poster is of smaller size. The 'And Justice For All' poster must be posted in standard size provided by the USDA.</p>