

## 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:** Irene-Wakonda School District 13-3

**Date of Administrative Review (Entrance Conference Date):** 12/13/2016

**Date review results were provided to the School Food Authority:** 1/12/2017

**Date review summary was publicly posted:** 3/15/2017

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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	
XX	<input type="checkbox"/>	<b>A. Program Access and Reimbursement</b>	
		<b>YES</b>	<b>NO</b>
		XX	<input type="checkbox"/> Certification and Benefit Issuance
		XX	<input type="checkbox"/> Verification
		XX	<input type="checkbox"/> Meal Counting and Claiming
		Finding(s) Details:	
		<p>1) Finding 1 – Offsite 115: Reviewer observed that the computer system generated notification letter used by the school is not the approved template in the iCAN SNP application. Notification letters letter must be included in your annual iCAN SNP application with CANS. During the approval CANS will verify that necessary language is included.</p> <p>2) Finding 2 – Onsite 126: Reviewer observed three miscategorized household applications, with 9 total students incorrectly approved due to math errors (8 students were granted Free benefits, but should have been approved as Reduced; 1 student was approved for Reduced benefits, but should have been denied ).</p> <p>3) Finding 3 – Offsite 200, Onsite 209: Local Education Agency (LEA) selected 3 applications for verification, instead of 1 application, as identified by the method of verification selection used.</p> <p>4) Finding 4 – Offsite 202: The Secretary conducted the SY16-17 Verification confirmation activities was completed by the Business Manager, who was listed as the Confirmation Official in the iCAN annual application. The iCAN application must reflect current practices at the School Food Authority (SFA).</p> <p>5) Finding 5 – Onsite 213: LEA provided verbal notice of adverse action. All households must be provided 10 calendar days’ written notice of the change prior to the date the change will go into effect. The notice of adverse action may be sent via the postal service or to the e-mail address of the parent or guardian. The LEA cannot notify the household of adverse action by phone only.</p> <p>6) Finding 6 – Onsite 215: The SFA incorrectly reported data on the Verification Report. The LEA reported 1 household with 3 students changed eligibility from free to reduced price. The reviewer determined that the LEA should have reported 1 household with 4 students that changed eligibility (free to reduced price) due to verification activities.</p> <p>7) Finding 7 – Offsite 305L: Reviewer determined the school backdates eligibility beyond the flexibility timeframe allowed. As noted in your iCAN SNP Checklist item: Annual Information Update question 2c. Flexibility is only allowed in the start date of free and reduced price meal benefits when a complete household application is date stamped by the school at receipt. The start date can go back to the date of the receipt stamped on the application. Any</p>	

		<p>money collected from the household must also be refunded.</p> <p>8) Finding 8 – Onsite 316: Reviewer observed Pre-K students participate in Lunch service twice per week. Student meals are marked off on sheet of paper, and the counts are then entered into the computer later. Paper sheets are thrown away. All program materials, including original point of service counts, must be maintained for 3 years plus the current year. Starting immediately, retain all paper meal counts taken for Pre-K.</p>															
XX	<input type="checkbox"/>	<p><b>B. Meal Patterns and Nutritional Quality</b></p> <table border="1"> <thead> <tr> <th>YES</th> <th>NO</th> <th></th> </tr> </thead> <tbody> <tr> <td>XX</td> <td><input type="checkbox"/></td> <td>Meal Components and Quantities</td> </tr> <tr> <td><input type="checkbox"/></td> <td>XX</td> <td>Offer versus Serve</td> </tr> <tr> <td><input type="checkbox"/></td> <td>XX</td> <td>Dietary Specifications and Nutrient Analysis</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <p>1) Finding 9 – Onsite 401: Reviewer observed 5 incomplete meals at lunch service during the day of review. Meals were short of the ½ c fruit and/or vegetable offer versus serve (OVS) requirement. This finding will result in a fiscal calculation. When OVS is utilized, meals counted for reimbursement must meet OVS requirements of at least 3 food components – 2 components taken in full quantity, 1 must be at least ½ c fruit and/or vegetable.</p> <p>2) Finding 10 – Onsite 409: Production Records do not display combination food items meeting multiple components (i.e. – breaded pork fritter displayed in Meat/Meat Alternate component only, the breading should also be recorded in the Grains). Component section of production records must record all components to document a complete and reimbursable meal is planned.</p> <p>3) Finding 11 – Onsite 409: Most Food Service Management Company (FSMC) standardized recipes have a decimal measure for ingredients (49.98 pounds of ground beef, 2.875 pounds of rice). These are very difficult and sometimes impossible for food service directors to measure, causing them to round up or down, skewing the recipe. Recipes must be measured in volumes or measurements that food service staff can follow and use in kitchens with standard measuring instruments, for example 49 and a half pounds of ground beef, or 4 ¾ cups of beans.</p>	YES	NO		XX	<input type="checkbox"/>	Meal Components and Quantities	<input type="checkbox"/>	XX	Offer versus Serve	<input type="checkbox"/>	XX	Dietary Specifications and Nutrient Analysis			
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		<p>policy does not identify a stance on marketing of foods and beverages. Local wellness policies must include policy for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.</p> <p>4) Finding 16 – Offsite 1000: Local School Wellness Policy: The local wellness policy does not identify the position of the LEA or school official(s) responsible for the implementation and oversight of the local school wellness policy.</p> <p>5) Finding 17 – Offsite 1002: Local School Wellness Policy: Documentation of most recent update not maintained on file. Local Wellness Policy must be updated periodically, and documentation of update maintained on file when update occurs.</p> <p>6) Finding 18 – Offsite 1003: Local School Wellness Policy: Local wellness policy does not identify positions of wellness committee. Positions of personnel involved in the review and update of the Local Wellness Policy must be identified in the policy.</p> <p>7) Finding 19 – Offsite 1004: Local School Wellness Policy: Documentation not maintained demonstrating how potential stakeholders (at minimum: parents, students, representatives of the SFA, teachers of PE, school health professionals, school board, school administration, and general public) are made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</p> <p>8) Finding 20 – Offsite 1005: Local School Wellness Policy: The local wellness policy does not provide a description to measure implementation and assessment of the policy at least once every three years.</p> <p>9) Finding 21 – Offsite 1006: Local Wellness Policy assessment was not completed at time of review. Public must be notified of the assessment of the Local Wellness Policy; posting to webpage is sufficient.</p> <p>10) Finding 22 –</p> <ul style="list-style-type: none"> <li>• Offsite 1204, Onsite 1216: Professional Standards: Food Service Directors (one school official and one FSMC staff member) have not met professional standards training requirements for professional standards “food service director.”</li> <li>• Offsite 1205, Onsite 1217: One Kitchen Manager has not met professional standards requirements for professional standards “manager.”</li> <li>• Offsite 1206, Onsite 1218: Two Full-Time staff have not met professional standards requirements for full-time staff.</li> <li>• Offsite 1210, Offsite 1211, Onsite 1220, and Onsite 1221: Two Part-Time Staff (less than 20 hrs. work per week with food service) have not met professional standards requirements for part time staff.</li> </ul> <p>11) Finding 23 – Onsite 1405: Food Safety, Reviewer observed the most recent</p>
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		<p>kitchen inspection posted inside of the kitchen. Inspection reports must be posted in a publicly visible location to program participants.</p> <p>12) Finding 24 – Onsite 1410: Buy American: Reviewer observed product with a country of origin outside of the USA (Mandarin Oranges). According to the Buy American rule, all products provided must have a country of origin of the USA, or documentation must be maintained.</p> <p>13) Finding 25 – Offsite 1601: Outreach: 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> <p>14) Finding 26 – Onsite 1901: Fresh Fruit and Vegetable Program (FFVP): It is observed that the FSMC typically provides a monthly breakdown of costs for FFVP, but does not provide invoices to the Local Education Agency (LEA) unless requested. SP 33-2012 indicates FSMCs must provide documentation clearly outlining the allocation of costs charged to the FFVP. Documentation provided by the FSMC is then used as a basis for the reimbursement claim.</p> <p>15) Finding 27 – Onsite 1901: Fresh Fruit and Vegetable Program (FFVP): The FFVP claim submitted by the LEA are based on number of enrolled students and cost of product divided by enrolled students. FFVP claims must be based on number of units (such as cases or pounds of product) used, and cost per unit, and supported by invoices.</p>
XX	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1) Finding 13 – Offsite 803: SFA does not have a formal or informal policy to handle complaints of discrimination within the school meals program.</p> <p>2) Finding 14 – Offsite 806: Newest employee that works within the school meal program had not completed Civil Rights training at the time of review.</p>