

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: Herreid School District

Date of Administrative Review (Entrance Conference Date): February 20, 2019

Date review results were provided to the School Food Authority: March 7, 2019

Date review summary was publicly posted: October 21, 2019

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: Finding 1 (Onsite 128): Reviewer observed a few household income applications with the same income frequency being converted to annual. No errors were found in the determination. The <i>Eligibility Manual for School Meals</i> states that the SFA is to convert the frequency to “annual” only when multiple income frequencies are provided on the household application. Please refer to the <i>Eligibility Manual for School Meals</i> , page 61 Income Conversions. Finding 2 (Onsite 213): The SFA did not notify the family chosen for verification of their continued benefits. According to <i>the Eligibly Manual for School Meals, page 113</i> , the local agency must notify the household if there are no changes in benefits. Verification templates can be found on the CANS/NSLP webpage: https://doe.sd.gov/cans/memos.aspx . Finding 3 (Onsite 316): Meal counts are not being taken accurately for lunch. The claims for January 2019 indicated an underclaim by 33 paid meals. <i>7 CFR 210.8 Claims for Reimbursement</i> states that the school food authority shall establish internal controls which ensure the accuracy of meal counts prior to the submission of the monthly Claim for Reimbursement.				
X	<input type="checkbox"/>	B. Meal Patterns and Nutritional Quality		
		YES	NO	
		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: Finding 4 (Onsite 401): During the onsite review, the reviewer observed twenty-one lunch meals selected that did not meet a complete meal under Offer Versus Serve requirements. Per <i>7 CFR 210.10 Meal Requirements for Lunches and Requirements for Afterschool Snacks(e)</i> , schools utilizing Offer Versus Serve must ensure that all meals claimed for reimbursement include at least three of the five required components, including at least ½ cup fruit and/or vegetable. This finding will result in a fiscal calculation. Finding 5 (Onsite 404, 502): Signage did not indicate what constitutes a reimbursable meal and did not include the requirements to select at least				

	<p>½ cup fruit and/or vegetable. Regulations in 7 CFR 210.10 <i>Meal Requirements for Lunches and Requirements for Afterschool Snacks</i> require schools to identify reimbursable meals to students.</p> <p>Finding 6 (Onsite 409): According to 7 CFR 210.10, <i>Meal Requirements for Lunches and Requirements for Afterschool Snacks</i>, meals offered to each age/grade group must include the food components and food quantities specified in the meal pattern. Repeat violations in this area may result in fiscal action. See below for specific menu findings.</p> <ul style="list-style-type: none"> ○ 0 cups of Beans/Peas (Legumes) was served during the week; at least 1/2 cup of Beans/Peas (Legumes) must be served throughout the week <ul style="list-style-type: none"> ○ 1/4 cup of Starchy Vegetables was served during the week; at least 1/2 cup of Starchy Vegetables must be served throughout the week <p>Lunch K-8 Vegetable Sub Groups Grains</p> <ul style="list-style-type: none"> ○ 1/7: 0.25 oz. eq. Grains was served on this day; at least 1 oz. eq. Grains must be served daily ○ 1.6% of the Grains served for the week were Whole Grain Rich. 100% of Grains served during the week must be Whole Grain Rich <p>Lunch 9-12 Vegetable Sub Groups</p> <ul style="list-style-type: none"> ○ 0 cups of Beans/Peas (Legumes) was served during the week; at least 1/2 cup of Beans/Peas (Legumes) must be served throughout the week <p>Meat/Meat Alternate</p> <ul style="list-style-type: none"> ○ 1/7: 0.75 oz eq. MMA was served on this day; at least 2 oz. eq. MMA must be served daily <p>Grains</p> <ul style="list-style-type: none"> ○ 1/7: 0.75 oz. eq. Grains were served on this day; at least 2 oz. eq. Grains must be served daily <p>According to 7 CFR 210.18(l)(2)(ii), the State agency must calculate fiscal action for repeated vegetable subgroup violations. State agency discretion was used to calculate fiscal action for meals served on January 7, 2019 (89 lunch meals) from the week of menu review, as required in conjunction with the repeat vegetable subgroup violation.</p> <p>Finding 7 (Onsite 501): All staff who are involved with the service of lunch must have Offer VS. Serve training including the teachers assisting, the Food Service Director, the custodian, and any person who is operating the</p>
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	<p>POS system. <i>CFR 210.10 Meal Requirements for Lunches and Requirements for Afterschool Snack</i> state that school lunches must offer daily the five food components specified in the meal pattern. Under offer versus serve, students must be allowed to decline two components at lunch, <i>except</i> that the students must select at least ½ cup of either the fruit or the vegetable component. Students should also be educated so they know what they must have on their trays. Also, make sure that signage is appropriate for the age groups.</p> <p>Finding 8 (Onsite 603): Documentation and conversations with food service director indicate no understanding of sodium and calorie limits. According to <i>7 CFR 210.10 Meal Requirements for Lunches and Requirements for Afterschool Snacks</i>, average sodium and calorie content of meals offered to each age/grade group must not exceed maximum levels.</p> <p>Finding 13 (Offsite 605): During the Nutrient Analysis week (4/23/19 – 4/26/19), the following was observed:</p> <p>Calories</p> <ul style="list-style-type: none"> a. K-8 calorie average (700) was outside of the required average target range (600-650). b. 9-12 calorie average (912) was outside of the required average target range (750-850). <p>Sodium</p> <ul style="list-style-type: none"> a. K-8 sodium average (1,455) exceeded the target average maximum (1,230). b. 9-12 sodium average (1,972) exceeded the target average maximum (1,420). <p>Saturated fat</p> <ul style="list-style-type: none"> a. K-8 percent of calories from saturated fat (14.14%) exceeded the target average maximum (10%). b. 9-12 percent of calories from saturated fat (13.40%) exceeded the target average maximum (10%). <ol style="list-style-type: none"> 1. Limit weekly grain offerings to 9 ounce-equivalents for K-8 and 12 ounce-equivalents to 9-12 between the main line and the salad bar. (Calories, Sodium) 2. Remove cheese slices, salami, bacon bits, cottage cheese from salad bar (Sodium, Sat Fat) 3. Adjust scalloped potatoes recipe to replace heavy whipping cream with 1% milk (Sodium, Sat Fat) 4. If crispy crowns/ ‘fried’ potatoes are served, limit to ½ cup serving for all
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		grades 5. If homemade buns will be served, follow the Healthier Kansas recipe, or equivalent, to meet sodium, saturated fat, and whole grain requirements.
X	☐	C. School Nutrition Environment
		YES NO
		<input type="checkbox"/> <input checked="" type="checkbox"/> Food Safety
		<input checked="" type="checkbox"/> <input type="checkbox"/> Local School Wellness Policy
		<input type="checkbox"/> <input checked="" type="checkbox"/> Competitive Foods
		<input checked="" type="checkbox"/> <input type="checkbox"/> Other: Summer Food Outreach, Professional Standards, Buy American
<p>Finding(s) Details:</p> <p>Finding 9 (Offsite 1000-1006): District does not have a Local Wellness Policy (LWP). According to <i>7 CFR 210.31 Local School Wellness Policy</i>, each local educational agency must establish a Local School Wellness Policy for all schools participating in the National School Lunch Program under the jurisdiction of the local educational agency. The local school wellness policy is a written plan that includes methods to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meals and other food and beverages sold and otherwise made available on the school campus during the school day are consistent with applicable minimum Federal standards.</p> <p>Finding 10 (Offsite 1601): SFA did not inform households of the availability of Summer Food Service Program (SFSP). No documentation available. According to <i>7 CFR 210.12 Student, Parent, and Community Involvement</i>, school food authorities 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.</p> <p>Finding 11 (Offsite 1202, 1204, 1206, 1208-1209/Onsite 1212, 1214, 1216-1217, 1219):</p> <p>A. Food Service Director does not meet hiring requirements as set forth in <i>7 CFR 210.30 School Nutrition Program Professional Standards</i>. Food Service Directors hired after July 1, 2015 must hold a high school diploma or equivalency, and at least three years of relevant school nutrition program experience. For a local educational agency with less than 500 students, the State Agency has discretion to approve the hire of a director that meets the minimum educational requirement but has less than the required relevant school nutrition program experience.</p> <p>B. No training is being tracked for any staff with duties related to school food service as set forth in <i>7 CFR 210.30 Nutrition Program Professional</i></p>		

		<p><i>Standards.</i> Each school year, the SFA must ensure that all school nutrition program staff complete and track annual continuing education/training. Food Service Directors require 12 hours of annual training, Part Time Food Service staff require 4 hours of annual training, others who work directly in support of School Nutrition require duty-specific training. Items that must be tracked: Name, Title, Training Topic, Date, Number of Hours (minimum 15 minutes), Type of Training, Training Category, Document Examples (sin-in sheets, agendas, etc.). The SD Training Tracker can be found on CANS/NSLP website: https://doe.sd.gov/cans/nslp.aspx under the School Meal Programs Requirements category, Professional Standards heading.</p> <p>Finding 12 (Onsite 1403, 1411): Reviewer observed tropical fruit salad from Indonesia. <i>7 CFR 210.21 Procurement</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 substantially using agricultural commodities that are produced in the United States.</p>
<input type="checkbox"/>	X	<p>D. Civil Rights</p> <p>Finding(s) Details: No findings identified in this area.</p>