

## 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: Isna Wica Owayawa

Date of Administrative Review (Entrance Conference Date): 2-26-20

Date review results were provided to the School Food Authority: 6-23-20

Date review summary was publicly posted: 8-7-20

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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 type="checkbox"/>	<input checked="" type="checkbox"/>
		Certification and Benefit Issuance	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Verification	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Meal Counting and Claiming	
		Finding(s) Details:	
		1) Finding 1 (Offsite 303): No staff members have received training on Meal Counting and Claiming. According to 7 CFR 210.30 School Nutrition Program Professional Standards, (a) General, SFAs that operate the National School Lunch Program, or the School Breakfast Program (7 CFR part 220), must establish and implement professional standards for school nutrition program directors, managers, and staff, as defined. Those employees outside of the School Nutrition Program that have responsibilities related to the operation of the Program must have training relevant to their duties.	
<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 type="checkbox"/>	<input checked="" type="checkbox"/>
		Dietary Specifications and Nutrient Analysis	
		Finding(s) Details:	
		1) Finding 2 (Onsite 501): Staff have not been trained on Offer vs Serve. All staff responsible for menu planning and point of service meal counts must be able to identify a complete and reimbursable meal.	
		2) Finding 3 (Onsite 409, 411): According to 7 CFR 210.10, Meal Requirements for Lunches and Requirements for Afterschool Snacks, 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. <ul style="list-style-type: none"> <li>• Lunch K-8               <ul style="list-style-type: none"> <li>○ Grain Component On 1-13-20 the meal served did not contain a grain component. Original menu included rice but potatoes were served as a substitute. A vegetable may not be substituted for the grain component in a reimbursable meal.</li> <li>○ Vegetable Sub-Groups 0 cups of Beans/Peas (Legumes) were served during the week; at least 1/2 cup of Beans/Peas (Legumes) must be served throughout the week</li> </ul> </li> </ul>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>C. School Nutrition Environment</b>	
		<b>YES</b>	<b>NO</b>
		<input checked="" type="checkbox"/>	<input 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: Professional Standards, Buy American, Outreach
		<p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1) Finding 5 (Offsite 1000-1006): SFA does not have a Local Wellness Policy. According to 7 CFR 210.31 Local School Wellness Policy, (a) General. Each local educational agency must establish a local school wellness policy for all schools participating in the National School Lunch Program and/or School Breakfast Program under the jurisdiction of the local educational agency.</li> <li>2) Finding 6 (Offsite 1204, 1206, 1209, Onsite 1214 ,1216, 1217, 1218, 1219): Food Service Director, new employee, and Part Time staff do not currently meet the minimum number of required annual training hours. According to 7 CFR 210.30 School Nutrition Program Professional Standards, (a) General, SFAs that operate the National School Lunch Program, or the School Breakfast Program (7 CFR part 220), must establish and implement professional standards for school nutrition program directors, managers, and staff, as defined. Food Service Directors are required to have at least 12 hours of training annually, full time staff are required to have at least 6 hours of training annually and part time staff are required to have at least 4 hours of training annually. Those employees outside of the School Nutrition Program that have responsibilities related to the operation of the Program must have training relevant to their duties. Please remember that tracking hours annually is required in a compiled document. It is recommended that the training tracker(s) for each person be updated as training happens. <ul style="list-style-type: none"> <li>• Director – 12 hours is required, currently has 9.5.</li> <li>• Claim Representative – Training must occur that is relevant to the duties that she is responsible for in the Program, currently has 0.</li> <li>• Dishwasher – Part-time in SNP, 4 hours required, currently has 0.</li> <li>• new employee – Full-time in SNP, 6 hours is required, currently has 0.</li> </ul> </li> <li>3) Finding 7 (Onsite 1400, 1404, 1407): SFA was unable to provide a copy of a written Food Safety Plan/Standard Operating Procedures (SOP). The Food Safety Checklist was also not present. Per 7 CFR 210.13 Facilities Management, school food authorities must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. Food Safety Checklist must be completed at least monthly.</li> <li>4) Finding 8 (Onsite 1406): Food Safety Inspection report is not on display. According to 7 CFR 210.13 Facilities Management, schools shall post in a publicly visible location a report of the most recent inspection conducted and provide a copy of the inspection report to a member of the public upon request.</li> <li>5) Finding 9 (Onsite 1403, 1411): Reviewer observed six products with a country of origin outside of the USA (Italian Squash, Cucumbers, Bell Peppers, Mandarin Oranges, Black Olives, and Pineapple). 7 CFR 210.21 Procurement 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. As indicated in</li> </ol>		

		<p>Memo SNP 251-1 Buy American, FNS does allow for limited exceptions to the Buy American provisions when 1 of 2 events occur: 1) a specific product is not produced or manufactured in the U.S. “in sufficient and reasonable available quantities of a satisfactory quality”; and 2) when competitive bids show that the costs of the U.S. products are significantly higher than nondomestic products. The SFA did not have documentation on file to support an exception to the Buy American requirement for these products.</p> <p>6) Finding 10 (Offsite 1600): SFA serves breakfast but does not promote or notify households of the School Breakfast Program. According to 7 CFR 210.12 Student, parent, and Community Involvement, to the maximum extent practicable, school food authorities must inform families about the availability of breakfasts for students. Information about the School Breakfast Program must be distributed just prior to or at the beginning of the school year. In addition, schools are encouraged to send reminders regarding the availability of the School Breakfast Program multiple times throughout the year.</p> <p>7) Finding 11 (Offsite 1601): SFA did not inform households of the availability of Summer Food Service Program (SFSP). According to 7 CFR 210.12 Student, Parent, and Community Involvement, 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>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <p>1) Finding 4 (Onsite 811): It was noted during the Onsite review that the And Justice For All posters on display were outdated. Current posters with the most current information must be on display.</p>