

## STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

**School Food Authority Name:** Magnolia School District

**Date of Administrative Review (Entrance Conference Date):** November 14, 2016

**Date review results were provided to the School Food Authority:** January 3, 2017

### 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
  - Seamless Summer Option
2. Does the School Food Authority operate under any Special Provisions? (Select all that apply)
  - Community Eligibility Provision
  - Special Provision 2

### Review Findings

3. Were any findings identified during the review of this School Food Authority?
  - Yes
  - No

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
		X	<input type="checkbox"/>	Verification
		X	<input type="checkbox"/>	Meal Counting and Claiming
Finding(s) Details:				
1) Some free and reduced price meal applications need more details on documentation of changes or updates made by the district. 2) The Reduced benefit approval letter sent to the Households had indicated the student's eligibility was "Free-Grace", not "Reduced" which made the determination notification hard to understand. The letters sent for approval by the state agency with the Agreement for 2016-17 school year did not include this letter of "Free-Grace", therefore it had not been approved for use. The Determining Official sent a letter explaining the reduced benefits which did help the households understand the student's eligibility status. However, this letter did not include the United States Department of Agriculture (USDA) non-discrimination statement or household's right to appeal as required. 3) One application that had been verified for the 2016-17 school year did not have the total income determined correctly based on the documentation submitted by the household. 4) The free and reduced price eligibility numbers at Walker PK were not accurate each day due to students being in attendance and eating before they had been entered into eSchool enrollment records. The child nutrition point of service software system, Solana Software, downloads from eSchool, so the students could not be entered to claim meals until the enrollment records were updated. At that time the students approved meal benefit status is updated. Based on SFA explanation and review of documentation it appears the claims for reimbursement for these meals are accurate based on the source documents of eligibility status. The				

		<p>Preschool program is being invoiced monthly for student's meals that are not eligible for reimbursement due to documentation issues. When correct documentation is provided the edit check reports from Solana Software appears to indicate more students ate meals than were eligible due to this discrepancy.</p> <p>5) In a review of documentation of free and reduced meal eligibility and meals claimed for the month of October 2016, the Solana reports indicated free eligible students in Central Elementary went from 401 on October 24, to 489 on October 25, then 398 on October 26. On the same dates Walker PK reports indicated free eligibles as 91-0-91.</p>												
X	<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>X</td> <td><input type="checkbox"/></td> <td>Meal Components and Quantities</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Offer versus Serve</td> </tr> <tr> <td>X</td> <td><input type="checkbox"/></td> <td>Dietary Specifications and Nutrient Analysis</td> </tr> </tbody> </table> <p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1) The district menu planner was crediting non-whole grain rich products as being whole grain rich, which made the planned menus not meet the federal meal pattern requirements. Grains crediting to meet meal pattern requirements, must be made with at least 50% whole grains per item. The menu planner indicated they believed the requirement was for 50% of the grains served on the menu to be whole grain rich, which is not accurate.</li> <li>2) The Point of Service (POS) area needs better signage on offer vs serve requirements at breakfast grab and go. This will help ensure students understand the meal components they may take to make a reimbursable meal. Some students were not taking the required fruit component necessary to provide a reimbursable meal. Some students were being over served by taking more food items than required for the breakfast meal. This over service caused students at the end of the serving line to not have the options offered at the beginning of the meal service. Lunch OVS needs better signage in order for a student to understand what makes a reimbursable meal. This is especially important with several options offered and when the entrée is paired with another option to meet the meal pattern requirements.</li> <li>3) Prior to meal service on Tuesday, November 16th the State Agency reviewers determined the menu planned for 9<sup>th</sup> through 12<sup>th</sup> grade lunch meals would not meet the meal pattern requirements for reimbursement of lunches.</li> <li>4) In discussions with the menu planners prior to the on-site portion of the review at the Junior High it was stated the food products ordered and being served were low sodium and low fat. In addition, the menu planners stated the staff did not add margarine to cooked vegetables or to rolls before serving. It was observed at the time of the review that vegetables, soups, gravies and sauces in store rooms were not labeled as low sodium or low fat. It was also observed on the day of review that margarine was added to pots of vegetables as well as margarine brushed on rolls. The recipes supplied by the menu planner often included margarine in the vegetable recipes. There is not a problem with using margarine in food preparation as long as the overall dietary specifications (when averaged over a week) meet the federal meal pattern requirements as specified in 7 CFR 210.10 and 7 CFR 220.8.</li> <li>5) Based on the food product labels provided by the district the gravy mix used indicates it has trans-fats in the product. Non-naturally occurring trans-fats are prohibited from use in the child nutrition programs.</li> </ol>	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
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<input type="checkbox"/>	X	School Meal Environment
X	<input type="checkbox"/>	Competitive Foods
<input type="checkbox"/>	X	Smart Snacks in Schools
<input type="checkbox"/>	X	Professional Standards
<input type="checkbox"/>	X	Water
X	<input type="checkbox"/>	Food Safety
<input type="checkbox"/>	X	Storage
X	<input type="checkbox"/>	Buy American
X	<input type="checkbox"/>	Reporting and Record Keeping
<input type="checkbox"/>	X	School Breakfast Program and Summer Meals Outreach
X	<input type="checkbox"/>	Other
<p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1) The SFA's completed on-site review monitoring form indicated the Standard Operating Procedures (SOPs) are accurate and available for staff to use. However, it was observed at the time of the review the Junior High staff were not following the SOPs, especially with regard to time and temperature control of foods prepared. When asked, the manager did not know where to find the SOPs or how they were to be used. The procedures outlined in the SOPs were not updated and were not being used.</li> <li>2) The Wellness Committee is required to meet at least quarterly as outlined in Commissioner's Memos CNU-17-016: Wellness Policy Requirements: Updates from USDA Final Rule and CNU-17-013: Wellness Committee Responsibilities: A Joint Memo from ADE Child Nutrition and School Health Services. The Wellness Committee has met one time this school year, however no agenda, minutes or documentation of review of menus were available for review.</li> <li>3) Food safety is a concern at the Junior High School, especially without the Standard Operating Procedures (SOPs) being updated and implemented as previously discussed. The most recent Health Inspection indicated temperature control issues as a food safety violation. As observed at the time of the review the child nutrition staff were not taking temperatures of prepared, potentially hazardous foods, and the few items they were taking temperatures were not documented as required. On day of review only the hot rolls were temped and documented, however bread is not considered potentially hazardous. The temperatures were not taken or documented for the turkey, dressing, gravy, and green beans or the cold items on the salad bar. The staff did take temperatures of food items when requested by state reviewers, and the items that were not at the minimum required temperatures were reheated and brought into the safe range upon request of reviewers prior to service to students. This caused the third serving period at the Junior High to be a little late getting started due to the food safety issues identified.</li> <li>4) Food items purchased with child nutrition funds must meet Buy American requirements as outlined in Commissioner's Memo CNU-16-039. Many items were observed in the food storage areas that did not meet the Buy American requirements. Broccoli, cauliflower, Romaine, fresh herbs, fruit mix, peaches and fruit juice at the Junior High School were non-domestic.</li> <li>5) Non-program foods are any foods sold outside of reimbursable meals to students. This would include a la carte food sales. USDA requires documentation to ensure the child nutrition program is recovering all costs associated with non-program foods. At the time of the review, there was no documentation being kept by the district of non-program food cost for a la carte items sold. Please see Commissioner's Memo FIN-15-044 for more information regarding non-program food costs.</li> <li>6) Based on the information provided at the time of the review there are several adults that are not involved in the child nutrition program receiving free meals. Regulatory Citation:</li> </ol>		

		<p>FNS INSTRUCTION 782-5, 7 CFR Section 210.6 and 220.6: Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may, at the discretion of the School Food Authority, be furnished at no charge. As such, their cost may be fully attributed to and supported by the nonprofit food service operation.</p> <p>7) Based on discussions with the SFA staff it appears the SFA is not monitoring the contract with K-12 Culinary Connections to ensure all of the agreed upon terms are being met.</p>
X	<input type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p>Finding(s) Details:</p> <ol style="list-style-type: none"> <li>1) The USDA Non-discrimination statement was not on school district website as required.</li> <li>2) See also Item 2 under Program Access and Reimbursement.</li> </ol>