

STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

School Food Authority Name: Pulaski County Special School District
 Date of Administrative Review (Entrance Conference Date): January 13, 2020
 Date review results were provided to the School Food Authority: February 18, 2020

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

REVIEW FINDINGS				
A. Meal Access and Reimbursement – Performance Standard 1				
YES	NO		Technical Assistance	Corrective Action
✓		Certification and Benefit Issuance	✓	✓
✓		Verification	✓	✓
	✓	Meal Counting and Claiming		
	✓	Charge Policy and Unpaid Meal Procedures		

Findings:

1. Of the 590 student eligibility source documents, a significant number of applications were not signed or dated by the Determining Official/s. At the time of review, the Determining Official/s were able to obtain the date the applications were processed by utilizing the meal application software.
2. Of the 590 student eligibility source documents, a significant number of applications that had missing or inconsistent household sizes. At the time of review, the Determining Official/s verified the correct household members for the applications to be complete. Due to verifying the household size, two (2) applications were determined reduced but should have been free. An updated eligibility letter was drafted and sent to the households notifying them of the change in benefits.
3. Out of the sample size chosen for denied applications, there were two (2) applications that had missing or inconsistent household sizes. These two (2) applications could be reduced based on the household size provided by the household. These applications should be verified with the household and an updated eligibility status made, if applicable.
4. According to the *Eligibility Manual for School Meals Determining and Verifying Eligibility*, Categorically eligible lists (migrant, homeless, foster children, Head Start, Even Start) must be signed and dated by the appropriate liaison as changes are made, however, at the time of the review, the migrant and foster lists were not signed and dated.
5. According to the *Eligibility Manual for School Meals Determining and Verifying Eligibility*, regarding verification efforts, if benefits are decreased, a notice of adverse action must be sent. LEAs must provide ten (10) days advance notification to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination [7 CFR 245.6a(j)]. The adverse action letter the district is using to complete the verification efforts does not provide the ten (10) days advance notification to the households.

B. Meal Patterns and Nutritional Quality				
YES	NO		Technical Assistance	Corrective Action
✓		Meal Components and Quantities	✓	✓
	✓	Offer versus Serve		
	✓	Dietary Specifications and Nutrient Analysis		

Findings:

1) On the day of breakfast observation at Sherwood Elementary, preschool students were given Trix cereal. According to the Child and Adult Care Food Program (CACFP) meal pattern, cereals must contain no more than six (6) grams of less per dry oz. Therefore, the CACFP meal pattern is not being followed for the preschool students.

C. General Program Areas				
YES	NO		Technical Assistance	Corrective Action
✓		Resource Management	✓	✓
	✓	Civil Rights		
	✓	SFA On-Site Monitoring		
	✓	Local School Wellness Policy		
✓		Smart Snacks in Schools	✓	✓
	✓	Professional Standards		
	✓	Water		
✓		Food Safety, Storage, and Buy American	✓	✓
	✓	Reporting and Record Keeping		
	✓	School Breakfast Program and Summer Meals Outreach		
	✓	After School Snack		
	✓	Seamless Summer		
	✓	Fresh Fruit and vegetable Program		
	✓	Other:		

Findings:

- 1) On the day of lunch observation at Mills High, a PBIS program was announced in the cafeteria during meal service time. Upon questioning the announcer regarding the PBIS program, it was communicated that "there were no food or drinks involved, only trinkets". The Administrative Reviewers did in fact witness food and drinks being provided to students at the schools concession stand for the PBIS program. The required documentation was not available to confirm compliance with Smart Snack regulations. According to the *Arkansas Department of Education Rules Governing Nutrition and Physical Activity and Body Mass Index for Age Assessment Protocols in Arkansas Public Schools (May 2016)*, all food and beverages provided and/or sold to students must be Smart Snack compliant when sold or provided between midnight of the school day until 30 minutes after the school day has ended.
- 2) The warehouse must adhere to food and safety standards in the Arkansas State Board of Health Food Code. 3-501.17 Ready-to-Eat, Potentially Hazardous Food, (Time/Temperature Control for Safety Food) Date Marking. When received, all food should be dated to ensure proper use and safety of food supply (FIFO-first in first out inventory procedures). On the day of the warehouse review, if there were pallets of food that had not been broken open, a sheet of paper was stuck down in the plastic wrapping with the date received. However, once these pallets are being opened the date received is not being transferred to the individual boxes. These pallets/boxes of food included USDA donated foods provided by the Department of Human Services commodity items as well.
- 3) Upon completing the more in-depth review of Maintenance of the Nonprofit School Food Service Account, internal controls should be increased [2CFR 200.303]. Money is being handled by only one individual at the schools (money is collected, counted, and deposited by the same cashier).