STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

School Food Authority Name: Riverview

✓ Yes

□ No

Date of Administrative Review (Entrance Conference Date): February 12, 2020 Date review results were provided to the School Food Authority: March 4, 2020

Genera	ll 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?

	REVIEW FINDINGS					
A. M	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				

- 1. Of the 380 student eligibility source documents, eight (8) applications did not contain the last four digits of the social security number or an indication that the signing adult did not have one. At the time of review, the Determining Official/s were able to obtain the missing information. Of the 380 student eligibility source documents, there were twenty nine (29) 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. Of the 380 student eligibility source documents, there were two (2) applications that were missing the household signature. At the time of review, the Determining Official/s were able to obtain the missing signature.
 - Out of the 380 student eligibility source documents, three (3) applications were determined free but should have been determined reduced based on income. Also, there was one (1) application that was determined reduced but it is actually a paid application based on income. Correct eligibility status letters were drafted/mailed notifying the household of the change and benefits.
- 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 homeless lists were not signed and dated.
- 3. According to the *Eligibility Manual for School Meals Determining and Verifying Eligibility*, regarding verification efforts, gross income must be used to calculate total household income. Net income is being used to calculate total household income rather than gross income, therefore, two (2) applications should be paid based on income documentation. These two (2) applications were determined by the Verification Official to have no change in benefits. Also, if benefits are decreased, a notice of adverse action must be sent. Local Education Agency's 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)]. There were no letters kept on file documenting verification efforts.

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:

- 4. The completion of the certification tool for the menu section from December 2-6 of the review revealed:
 - a. All five days of lunch meals did not meet the federal meal pattern requirements for the fruit contribution requirement. The 9-12 daily lunch meal pattern minimum required is 1 cup of fruit. Based on production records, on ½ cup of fruit was served each day.
 - b. Based on production record documentation, the following days did not meet the federal meal pattern requirements for the vegetable contribution requirement:
 - i. December 2nd only ¾ cup of vegetables were served
 - ii. December 3rd only 5/8 cup of vegetables were served
 - iii. December 5th only 3/8 cup of vegetables were served

The 9-12 lunch daily meal pattern minimum required is 1 cup of vegetables.

Furthermore, the weekly lunch menu did not contain sufficient quantities of vegetables to meet the requirements for all of the vegetable subgroups. The weekly lunch menu was short ½ cup of vegetables from the other subgroup, 3/8 cup of red/orange vegetables, and 1/8 cup of additional vegetables to reach the minimum weekly amount. The 9-12 group daily lunch meal pattern minimum is 1 cup of vegetables with a weekly minimum of ½ cup coming from the dark green subgroup, 1 ½ cup from the red/orange subgroup, ½ cup from the beans/peas subgroup, ½ cup from the starchy subgroup, ¾ cup from the other vegetable subgroup, and 1 ½ cup of additional vegetables to reach the weekly minimum of 5 cups. 7 CFR 210.10 and 7 CFR 22.8(1).

- c. Based on production record documentation, 2 days of meal options did not meet the federal meal pattern requirement for the grains component. The 9-12 daily meal pattern minimum requirement is 2 ounces. On December 2, the chicken alfredo meal option was only 1 ounce of grain contribution. On December 4, the bbq chicken drumstick meal was only 1 ounce of grain contribution.
- d. Based on production record documentation, 1 lunch meal option did not meet the federal meal pattern requirement for the meat/meat alternate component. On December 5, the breakfast for lunch meal option of a biscuit and sausage gravy meal only credited 1.5 ounce of meat/meat alternate.
- 5. Production records are not accurately complete in accordance with 7 CFR 210.10 (a)(3)*Production and menu records*. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day.
- 6. In accordance with 7 CFR 210.10(a)(2), point of service staff must be trained in identification of a reimbursable meal. At the time of the review, no offer versus serve training had been completed by the Child Nutrition staff.

On the day of breakfast observation, the point of service staff could not identify what items must be present to constitute a reimbursable meal. The number of meals that are counted and claimed that do not contain the requirements of a reimbursable meal is unknown.

C. General Program Areas				
YES	NO		Technical Assistance	Corrective Action
	✓	Resource Management		
✓		Civil Rights	√	√
✓		SFA On-Site Monitoring	✓	√
	V	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:

- 7. The incorrect nondiscrimination statement is located on the districts website under the dining tab. 7 CFR Parts 15, 15a, and 15b. On February 12, the Child Nutrition Director emailed the IT department to notify them of the need to change.
- 8. Documentation that Civil Rights training had been completed with all Determining Officials and Child Nutrition Staff members was not available at the time of review.
- 9. The required SFA on-site monitoring review had not been completed. The deadline for this review/form to be completed is February 1st of each school year. 7 CFR Part 210.8(1)
- 10. Documentation of professional standards is not being kept including lists of employee inservice/trainings, agendas, and sign in sheets. 7 CFR 210.30.
- 11. The food safety plan on file was from 2008 and the food safety standards were updated in 2012. An updated food safety plan/standard operating procedures should be adopted by the district.
- 12. All schools must adhere to food and safety standards in the Arkansas State Board of Health Food Code. The following sections of the Food Code were not being met at the time of review:
 2-103.11 Person in Charge, employees are visibly observing foods as they are received to determine that they are from approved sources, delivered at the required temperatures, protected from contamination, and accurately presented, by routinely monitoring the employees' observations and periodically evaluating foods upon their receipt. On the day of the review, the following nondomestic foods were observed: mandarin oranges (China), pineapple tidbits (Indonesia), sliced peaches (China), and instant yeast (Mexico). The Buy American Justification forms were not available on these items.
 - *This is a repeat finding from the 2016-17 Administrative Review.
 - **3-501.17** Ready-to-Eat, Potentially Hazardous Food, (Time/Temperature Control for Safety Food) Date Marking. When received, all foods should be dated to ensure proper use and safety of food supply (FIFO -first in first out inventory procedures). This was a common observation in the dry storage, refrigerators, and freezers.
 - **3-305.11** and **4-204.122** Food Storage. Foods must be stored at leave 6 inches above the floor. Food in packages and working containers may be stored less than 6 inches above the floor but still off the floor. On the day of the review, food was observed to be on the floor in the outside freezer and in the kitchen.
 - **4-203.11** Temperature Measuring Devices, Food. Thermometer calibration records were not available for observation at the time of review.
 - **8-201.14(D)(6)** Contents of a HACCP Plan. Records to be maintained by the person in charge to demonstrate that the HACCP PLAN is properly operated and managed. Time and temperature records are not being kept for the dry storage and milk coolers. Also, time and temperature monitoring records of the food being cooked and served were not available at the time of review. Documentation that food safety training has been conducted with all Child Nutrition staff was not available at the time of review.