

## STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

**School Food Authority Name:** Highland School District  
**Date of Administrative Review (Entrance Conference Date):** 11/7/22  
**Date review results were provided to the School Food Authority:** 12/1/22

### 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
<input type="checkbox"/>	P	Certification and Benefit Issuance	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Verification	<input type="checkbox"/>	<input type="checkbox"/>
P	<input type="checkbox"/>	Meal Counting and Claiming	P	P
<input type="checkbox"/>	P	Charge Policy and Unpaid Meal Procedures	<input type="checkbox"/>	<input type="checkbox"/>
Findings:				
1) Meal Counting at Cherokee Elementary School was not taking place at the point of sale (POS). Meal Counts were taken in the classroom by the teacher after children had eaten breakfast in the cafeteria. Teachers then deliver bar code cards to the cafeteria to be put in the POS system. According to 7 CFR 220.11(d), it is important that an accurate count is obtained at the POS and that counts are accurately taken and consolidated for the monthly claim.				
B. Meal Patterns and Nutritional Quality				
YES	NO		Technical Assistance	Corrective Action
<input type="checkbox"/>	P	Meal Components and Quantities	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Offer versus Serve	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Dietary Specifications and Nutrient Analysis	<input type="checkbox"/>	<input type="checkbox"/>
C. General Program Areas				
YES	NO		Technical Assistance	Corrective Action
P	<input type="checkbox"/>	Resource Management	P	P
<input type="checkbox"/>	P	Civil Rights	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	SFA On-Site Monitoring	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Local School Wellness Policy	<input type="checkbox"/>	<input type="checkbox"/>
P	<input type="checkbox"/>	Smart Snacks in Schools	P	P
<input type="checkbox"/>	P	Professional Standards	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Water	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Food Safety, Storage, and Buy American	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	Reporting and Record Keeping	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	P	School Breakfast Program and Summer Meals Outreach	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	After School Snack	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	Seamless Summer	<input type="checkbox"/>	<input type="checkbox"/>

<input type="checkbox"/>	<input type="checkbox"/>	Fresh Fruit and vegetable Program	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	Other:	<input type="checkbox"/>	<input type="checkbox"/>

Findings:

- 1) Violations of the Division of Elementary and Secondary Education (DESE) Rules Governing Nutrition, Physical Activity and BMI for Age Assessment Protocols were observed. On November 8, 2022 the following was observed:
- a. A vending machine at the middle school contained foods and beverages for grades 5-8 that did not meet the smart snack standards.
  - b. A vending machine at the high school contained foods that did not meet smart snack standards.
  - c. Nonprogram preschool snacks were being ordered and given to preschool students during the school day.

DESE Rules Governing Nutrition, Physical Activity and BMI for Age Assessment Protocols state:

- 8.01.3 - during the school day, all schools may sell or provide competitive food or beverages to students anywhere on school premises thirty (30) minutes after the last lunch period has ended as long as those food and beverage items meet the smart snack requirements.
- 8.01.3.2 – “Beverages shall not contain more than fifty-five (55) milligrams of caffeine per serving.”
- 9.02.3 – “A choice of two (2) fruits and/or 100% fruit juices must be offered for sale at the same time and place whenever competitive foods are sold.
- 9.02.4 – “At the point of choice, at least 50% of beverage selections in vending machines, school stores, and other sales venues shall be 100% fruit juice, low-fat or fat free milk, and unflavored, unsweetened water”

National School Lunch Program 7 CFR 210.11(m)(2)(i-v): Allowable beverages for middle school-aged students are limited to: Plain water or plain carbonated water, Low fat milk, flavored or unflavored, Non fat milk, flavored or unflavored, Nutritionally equivalent milk alternatives as permitted in § 210.10 and § 220.8 of this chapter, and 100 percent fruit/vegetable juice, and 100 percent fruit and/or vegetable juice diluted with water (with or without carbonation and with no added sweeteners).

- 2) During review CND reported that in school year 2021-2022, preschool meals were put into the point of sale (POS) system and into excel sheets that were added to the POS count. This error resulted in preschool meals being double claimed August 2021 to April 2022. The overclaim totaled \$24,475.99. According to 7 CFR 210.14(a), School Food Authority (SFA) must maintain a nonprofit school food service account. This includes correctly recording, consolidating, and reporting breakfast and lunch counts on the Claim for Reimbursement (7 CFR 210.7(c)(1)(iv) and 7 CFR 220.11(d)(2)).