

STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

School Food Authority Name: West Memphis School District

Date of Administrative Review (Entrance Conference Date): 10/22/2025

Date review results were provided to the School Food Authority (Exit Conference Date): 10/24/2025

High Risk Follow-up Required: ☒ Yes ☐ No

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	Module 1: Eligibility: Certification and Benefit Issuance	Technical Assistance	Corrective Action
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Module 1: Eligibility: Certification and Benefit Issuance	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Module 2: Verification	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Module 3: Meal Counting and Claiming	<input type="checkbox"/>	<input type="checkbox"/>
Findings: 1)				
B. Meal Patterns and Nutritional Quality				
YES	NO	Module 4: Meal Components and Quantities	Technical Assistance	Corrective Action
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Module 4: Meal Components and Quantities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Findings:				
<ol style="list-style-type: none"> 1. Finding (Module 4 - Nutritional Quality and Meal Pattern): Upon review of the meal service observations at Faulk Elementary and the High School, it was found that Offer Versus Serve (OVS) was not being implemented correctly. At both sites, staff were requiring students to take additional components even though the students already selected a reimbursable meal. In accordance with 7 CFR 220.8(e) and 7 CFR 210.10(e), under offer versus serve: <ol style="list-style-type: none"> a. At breakfast, students must be allowed to decline at least 1 component. b. At lunch, a reimbursable meal must include at least 3 of the 5 required components, and students must select at least ½ cup of either the fruit or vegetable component. 2. Finding (Module 4 - Nutritional Quality and Meal Pattern): Upon review of menu documentation and production records for the week of September 8–12 at the High School for lunch, the following meal pattern errors were discovered: <ol style="list-style-type: none"> a. The district served only 1 oz equivalent for grains daily in their Nacho serving line, which does not meet the daily grain requirement. In accordance with 7 CFR 210.10(c), Schools must offer 2-ounce equivalent of grains as required in the lunch meal pattern. b. The district did not meet the weekly minimum for grains. In accordance with 7 CFR 210.10(c)(2)(iii)(D), the grains component is based on minimum daily servings and total servings over a 5-day school week. 				

C. General Program Areas				
YES	NO		Technical Assistance	Corrective Action
✓	<input type="checkbox"/>	Module 5: Wellness	✓	✓
<input type="checkbox"/>	✓	Module 5: Smart Snacks	<input type="checkbox"/>	<input type="checkbox"/>
✓	<input type="checkbox"/>	Module 6: Food Safety and Storage	✓	✓
<input type="checkbox"/>	<input type="checkbox"/>	Module 7: Hiring and Professional Standards	<input type="checkbox"/>	<input type="checkbox"/>
✓	<input type="checkbox"/>	Module 8: General Area	✓	✓
<input type="checkbox"/>	✓	Module 9: Afterschool Snack	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	✓	Module 10: Fresh Fruit and Vegetable Grant Program	<input type="checkbox"/>	<input type="checkbox"/>
✓	<input type="checkbox"/>	Module 11: Food Service Management Company	✓	✓

Findings:

3. **Finding (Module 5 - Wellness):** Upon review of Wellness documentation, the following were found.
 - a. The menus for the current school year have not been reviewed during the Quarterly Wellness Committee meeting. In accordance with A.CA. § 6-20-709, menus must be reviewed and provided to the school nutrition and physical activity advisory committee on a quarterly basis.
 - b. The triennial assessment has not been completed. In accordance with 7 CFR 210.31(e)(2), at least once every three years, districts must assess schools' compliance with the local school wellness policy and make assessment results available to the public.
4. **Finding (Module 6 – Food Safety):** During the review of food service operations at Faulk Elementary and the High School, the following food safety procedures were not being followed:
 - a. At Faulk Elementary and the High School, items were found that had not been labeled and dated. In accordance with the Arkansas Department of Health Food Code 3-602.10, Food shall be clearly labeled with the common name of the food and the date of preparation or opening, as applicable.
 - b. At Faulk Elementary, food items requiring refrigeration after opening were stored in the dry storage area. In accordance with the Arkansas Department of Health Food Code 3-501.16, time/temperature control for safety (TCS) foods shall be held at proper temperatures to prevent growth of microorganisms.
 - c. At the High School, expired food items were found growing mold. In accordance with the Arkansas Department of Health 3-501.17, foods that are past their use-by or expiration date or show evidence of spoilage shall be discarded.
 - d. At the High School, rat droppings were found lining the dry storage area. In accordance with the Arkansas Department of Health Food Code 6-501.20, the premises shall be maintained free of insects, rodents, and other pests. The presence of insects, rodents, and other pests shall be controlled to eliminate their presence.
5. **Finding (Module 6 – Food Safety):** Upon review of the district's Buy American documentation, it was found that the district was not using the Buy American Tracker to document compliance with Buy American requirements when purchasing non-domestic foods. In accordance with 7 CFR 210.21(d)(5)(ii)(A), by July 1, 2025, non-domestic food purchases must not exceed 10 percent of total annual commercial food costs that a school food authority purchases per school year.
6. **Finding (Module 8 – General):** Upon review of the Districts Outreach documentation, it was found that the district did not notify the public about the availability of the Summer Meals and the School Breakfast Program (SBP). In accordance with 7 CFR 210.12(d)(1) and 7 CFR

210.12(d)(2), information about the SBP must be distributed just prior to or at the beginning of the school year. Additionally, the district must cooperate with SFSP sponsors to distribute materials informing families of the availability and location of free Summer Food Service Program meals when school is not in session.

7. **Finding (*Module 11 – Food Service Management Company*):** Upon review of the September 2025 Taher invoice, it was found that the incorrect meal equivalency (MEQ) rate was being charged. Specifically, MEQs were billed at the breakfast rate rather than the correct lunch meal equivalency rate outlined in the district's contract. In accordance with 2 CFR 200.318(b), the district is required to maintain oversight to ensure contractors perform in accordance with contract terms, conditions, and specifications