

**STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY**

Section 207 of the HHFKA amended section 22 of the NSLA (42 U.S.C. 1769c) to require State Agencies (SA) to report the results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) requires the SA to post a summary of the most recent final administrative review results for each School Food Authority (SFA) on the SA publicly available website no later than 30 days after the SA provides the results of the administrative review to the SFA. The SA must also make a copy of the final administrative review report available to the public upon request.

**School Food Authority Name: Bristol Borough School District**

**School Agreement Number: 122-09-130-3**

**Date of Administrative Review (Entrance Conference Date): June 30, 2020**

**Date review results were provided to the School Food Authority (SFA): November 13, 2020**

**General Program Participation**

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)

[x]  School Breakfast Program

[x]  National School Lunch Program

[ ]  Fresh Fruit and Vegetable Program

[ ]  Afterschool Snack

[ ]  Special Milk Program

[x]  Seamless Summer Option

1. Does the School Food Authority operate under any Special Provisions? (Select all that apply)

[ ]  Community Eligibility Provision

[ ]  Special Provision 1

[ ]  Special Provision 2

[ ]  Special Provision 3

**Review Findings**

1. Were any findings identified during the review of this School Food Authority?

[x]  Yes [ ]  No

1. Is there fiscal action associated with findings identified during the review of this School Food Authority?

[ ]  Yes [x]  No

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| **REVIEW FINDINGS** |
| 1. **Program Access and Reimbursement**
 |
| **YES** | **NO** |  |
| [ ]  | [x]  | **Certification and Benefit Issuance** – Validation of the SFA certification of students’ eligibility for free or reduced-price meals |
| Finding Detail: |
| [ ]  | [x]  | **Verification** – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meals |
| Finding Detail:  |
| [x]  | [ ]  | **Meal Counting and Claiming** – Validation of the SFA meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed, by category |
| Finding Detail:* **Reference Regulation 210.8(a)(3) Edit checks.(i)**

For the Site-BRISTOL JSHS (Grades 7-12) and Test Month (February 2020), the Sponsor did not correctly conduct a daily edit check for each meal service. The Edit Check Worksheets noted that Claimed students (i.e., Free, Reduced Price, Paid) were higher than Eligible Students due to the POS Software entering the number of eligible for students in Sr High School in lieu of Jr High School AND Sr High School (Grades 7-12).The Field Advisor manually validated that the total number students (i.e., Free, Reduced Price, Paid) meals claimed did not exceed the Eligible. As such, the Sponsor did not overclaim and no Fiscal Action will occur. |

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| 1. **Meal Patterns and Nutritional Quality**
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| **YES** | **NO** |  |
| [x]  | [ ]  | **Meal Components and Quantities** – Validation that meals claimed for reimbursement contain the required meal components (also referred to as food components) and quantities |
| Finding Detail: * **Reference Regulation 220.8(b) Meal requirements for school breakfasts**

For the Site-BRISTOL JSHS (Grades 7-12) and Test Month (February 2020), menus and production records not available for review.* **Reference Regulation 210.10(a)(1)(i) Requirements for lunch**

For the Site-BRISTOL JSHS (Grades 7-12) and Test Month (February 2020), menus and production records not available for review. |
| [ ]  | [x]  | **Offer versus Serve (provision that allows students to decline some of the food components offered)** – Validation of SFA compliance with OVS requirements if applicable |
| Finding Detail:  |
| [x]  | [ ]  | **Dietary Specifications and Nutrient** **Analysis** – Validation that meals offered to children through the school meal programs are consistent with federal standards for calories, saturated fat, sodium, and *trans* fat |
| Finding Detail:* A review of the menus for the test week did not validate compliance with Dietary Specifications and Food Component Requirements.
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| 1. **School Nutrition Environment**
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| **YES** | **NO** |  |
| [x]  | [ ]  | **Food Safety** – Validation that all selected schools meet the food safety and storage requirements, and comply with the Buy American provisions specified by regulation |
| Finding Detail:* **Reference Regulation 210.15(b)(5) Recordkeeping summary**

**Finding:** For the Site-BRISTOL JSHS (Grades 7-12) and Test Month (February 2020), requested temperature logs for review were not available for review. NOTE: Sponsor provided some relevant temperature logs for the Site-SNYDER-GIROTTI EL SCH (Grades K-6); however some of the temperature logs were not available for review.  |
| [ ]  | [x]  | **Local School Wellness Policy** – Review of the SFA’s established Local School Wellness Policy  |
| Finding Detail: |
| [ ]  | [x]  | **Competitive Foods** – Validation of the SFA compliance with regulations for all food and beverages to students outside of the reimbursable meal |
| Finding Detail: |
| [x]  | [ ]  | **Professional Standards** – Validation of SFA compliance with required hiring standards and annual training requirements  |
| Finding Detail:* **Reference Regulation** 210.30(d) - Continuing education/training standards for all staff with responsibility for school nutrition programs. Each school year, the school food authority must ensure that all staff with responsibility for school nutrition programs complete annual training in areas applicable to their job; 6 hours of annual training are required for full-time staff(20+ hours/week) and Part-time staff (less than 20 hours/week) must complete 4 hours of annual training. The annual training must include, but is not limited to, the following topics, as applicable to their position and responsibilities: (1) Free and reduced price eligibility; (2) Application, certification, and verification procedures; (3) The identification of reimbursable meals at the point of service; (4) Nutrition; (5) Health and safety standards; and (6) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues.**Finding**: The school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year, nor adequate carry over hours from the previous school year, to meet annual training requirements. No plan to "make up" delinquent training hours during the following school year was provided.
* **Reference Regulation** 210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. Beginning July 1, 2016, twelve (12) hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.**Finding:** The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements, nor a plan to "make up" delinquent training during the following school year under the flexibility to meet training over a 2 year period.
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| **D. Civil Rights** |
| **YES** | **NO** |  |
| [ ]  | [x]  | **Civil Rights –** Validation of SFA compliance with civil rights requirements as applicable to the Child Nutrition Programs |
| Finding Detail:  |

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| **E. Resource Management** |
| **YES** | **NO** |  |
| [x]  | [ ]  | **Resource Management –** Validation of SFA compliance with overall financial health of the school food service account |
| Finding Detail:* **7 CFR 210.14 Resource management7 CFR 210.19 Additional Responsibilities, (a) General Program Management 2 CFR 200**The School Food Authority (SFA) is charging indirect costs to the Non-profit Food Service Account (NSFSA) on an unallowable basis.
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| [ ]  | [ ]  | **Other** |
| Finding Detail: |

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| **COMMENDATIONS** |
| **F. Recognition of Accomplishment** |
| * Sponsor was receptive to suggestions for improvement.
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