

**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: Cornell School District**

**School Agreement Number: 103-02-210-3**

**Date of Administrative Review (Entrance Conference Date): 11-6-20019**

**Date review results were provided to the School Food Authority (SFA): 11-6-2019**

**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

[x]  Fresh Fruit and Vegetable Program

[ ]  Afterschool Snack

[ ]  Special Milk Program

[ ]  Seamless Summer Option

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

[x]  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?

[x]  Yes [ ]  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:* Upon observation it was found that the SFA has no method of ensuring that not more than one breakfast per child per day is claimed for High School students, who have access to Breakfast in the Cafeteria as well as Grab & Go Breakfast via the Breakfast Cart in the Lobby.
* Upon review it was found that the SFA systemically utilizes a back-out method to determine the breakfast meal counts from the Breakfast Cart.
* The point of service did not provide an accurate meal count. This is a systemic error.  Three students with reimbursable meals were observed to exit past the cashier while the cashier was distracted with the sales of ala carte items.  These meals were unaccounted for.
* The Sponsor has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. An error was identified, resulting in an overclaim, between the CEP tally sheets and the Edit Check.
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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: * Breakfast-A review of the menus for the test week of September 10, 2018 through September 14, 2018 did not validate compliance with Dietary Specifications and Food Component Requirements
* All breakfast meals observed and counted for reimbursement on the day of review did not contain all of the required meal components.
* Milk substitutions based on preference were made with substitutions that were not allowable.
* Lunch-A review of the menus for the test week of September 10, 2018 through September 14, 2018 did not validate compliance with Dietary Specifications and Food Component Requirements**.**
* Upon observation and after a review of the standardized recipes, it was determined that the minimum daily Grain requirements for lunch were not met for the age/grade groups served the Salad entrées on the day of review.
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| [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: * Offer versus Serve (OVS) is not being implemented correctly. Foodservice staff required students to take an additional food item or milk when the student had selected a reimbursable meal.
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| [ ]  | [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: |

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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: |
| [ ]  | [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: |

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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: |

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| [x]  | [ ]  | **Other*** **Reporting and Recordkeeping**
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| Finding Detail:* During the administrative review by the State Agency, it was found that Cornell School District failed to provide adequate supervision of their contracted Food Service Management Company.  The SFA systemically reports claims based on unconfirmed meal counts provided by the FSMC.
* Breakfast and Lunch Production Records submitted for the Test Week were found to be incomplete. This review was expanded to the Test Month and found to be systemic.
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| **COMMENDATIONS** |
| **F. Recognition of Accomplishment** |
| * Review information was well organized.
* Staff was readily available to answer questions and/or concerns.
* FFVP was well presented and entertaining in Mrs. McKee’s Room.
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