

**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: St John Neumann Regional Academy High School Campus**

**School Agreement Number: 217-41-050-1**

**Date of Administrative Review (Entrance Conference Date): December 18, 2019**

**Date review results were provided to the School Food Authority (SFA): December 18, 2019**

**General Program Participation**

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

[ ]  School Breakfast Program

[x]  National School Lunch Program

[ ]  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)

[ ]  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:1. A review of the Income Eligibility Forms (IEF's) during the on-site Administrative Review on December 18, 2019, revealed that the Sponsor failed to ensure that the Determining Official listed on the Off-Site Assessment tool signed the IEF's when approving or denying them. There is no signature from any representative of the School Food Authority (SFA) on the IEF's that were approved or denied by the SFA. The Sponsor must ensure that only the Determining Official processes the IEA's because they contain confidential information.
2. A review of free and reduced eligibility applications during the Administrative Review of December 18, 2019, revealed that the Sponsor did not approve all eligibility applications correctly. The Sponsor extended benefits to students despite application errors.
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| [x]  | [ ]  | **Verification** – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meals |
| Finding Detail: 1. A review of verification documents during the on-site Administrative Review on December 19, 2019, revealed that the Sponsor failed to obtain the correct proof of income documents from the household for verification year 2019-20. The household submitted a word document which indicated revenue, expenses and profit from their personal business. The Sponsor utilized this to determine proof of income instead of requesting the required 1040 Schedule C, document.
2. Review of Verification documents during the on-site Administrative Review of December 18, 2019, revealed that the Sponsor failed to ensure that the application selected for verification included the confirming official's review.
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| [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:1. A review of edit check worksheets during the on-site administrative review on December 18, 2019, revealed that the Sponsor failed to ensure that staff correctly used them at the Intermediate School. Staff only documented reimbursable meals served to participants for free and reduced participants each day of the test month of October 2019. There is no documentation of enrollment or attendance adjusted enrollment so that staff can ensure that the Sponsor claims the correct number of meals. The Sponsor did not have edit check worksheets for the test month of October 2019 for the High School campus.
2. Observation of the lunch service line during the on-site Administrative Review on December 18, 2019 revealed that the point of service did not provide an accurate meal count by eligibility status. Staff counted meals when the participant entered the service line and not once all five food components were taken.
3. Review of the edit check worksheet and the claim submitted to the State Agency during the on-site Administrative Review of December 18, 2019, revealed that the Sponsor failed to claim lunch meals without error due to inaccurate counting and/or claiming procedures for the test month of October 2019. The edit check worksheet did not match the claim.
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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:  |
| [ ]  | [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:1. Review of the menus for the test week of October 7-11, 2019, for ST John Neumann Regional Academy High School site, entered into Primero Edge Nutrient Analysis system during the on-site Administrative Review of December 18, 2019, revealed that the School Food Authority (SFA) failed to be in compliance with Dietary Specifications and Food Component Requirements. The test week menu is too low in calories due to insufficient grain component served to participants.
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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:1. Review of documents and Interview with the Food Service Director during the on-site Administrative Review on December 18, 2019, revealed that the Sponsor does not maintain the minimum required temperature logs. The Sponsor failed to ensure that staff document and maintain temperature logs for coolers.
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| [x]  | [ ]  | **Local School Wellness Policy** – Review of the SFA’s established Local School Wellness Policy  |
| Finding Detail:1. The local school wellness policy does not include the minimum required elements.
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| [ ]  | [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:1. A training plan outlining how Program staff will meet training hours this school year was not provided.
2. The school Nutrition Program Director did not complete food safety training was obtained in the last 5 years.
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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: 1. A review of program documents during the on-site Administrative Review on December 18, 2019, revealed that the Sponsor failed to ensure that the correct non-discrimination statement is noted on all documents such as the Income Eligibility Forms (IEF).
2. Observation of the cafeteria during the on-site Administrative Review on December 18, 2019, revealed that the Sponsor failed to ensure that the "And Justice for All" poster is posted in a prominent location in serving and dining areas and visible to all program participants. The Sponsor failed to post the "And Justice for All" poster anywhere at the Intermediate Campus.
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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** |
| Finding Detail:1. During the on-site Administrative Review on December 18, 2019, the Sponsor could not provide documentation indicating that either of the two sites within the school district were monitored for lunch by February 1, 2017 or 2018.
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| **COMMENDATIONS** |
| **F. Recognition of Accomplishment** |
| * Clean kitchen, friendly staff.
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