

**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: New Foundation CS**

**School Agreement Number: 126-51-342-0**

**Date of Administrative Review (Entrance Conference Date): January 19, 2021**

**Date review results were provided to the School Food Authority (SFA): January 26, 2021**

**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

[ ]  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:The SFA (School Food Authority) did not perform Direct Certification matches according to the required timeframes established by the State Agency. The following was identified:\*During program year 20-21, Direct Certification matches occurred on 08-19-2020 and 01-08-2021. A match did not occur during date range October 1-31, 2020.\*During program year 19-20, Direct Certification matches occurred on 08-21-2019 and 01-30-2020. A match did not occur during date range October 1-31, 2019.Errors were discovered when evaluating certification and benefit issuance for New Foundations Charter School. The following issues were found:\*Income eligibility forms were incomplete: missing the frequency of current income for each household member, missing parent/guardian signatures and dates, missing social security number or indication of no social security number for forms based on income.\*Income eligibility forms were missing because no income eligibility form available for Field Advisor review or missing as a result of the SFA collecting data from a parent/guardian via email and considering the email communication a method to substitute the income eligibility form.\*Income eligibility forms were incorrectly determined. |
| [x]  | [ ]  | **Verification** – Validation of the process used by the SFA to confirm selected students’ eligibility for free and reduced-price meals |
| Finding Detail: After reviewing the SFA (School Food Authority) Verification documentation from the current program year 20-21, the following issues were noted:\*The verification report was not supported by the SFA’s Verification documentation. \*The SFA under-reported the number of error-prone applications.\*The SFA did not conduct a confirmation review appropriately and was carried out after the verification process. The confirmation official did not sign/date on each application that was part of the verification sample. The confirmation official just sent an email to the determining official indicating that everything looked great.\*The SFA could not provide supporting documentation to validate a second follow-up letter was sent to households with a nonresponse. Based on an interview with the SFA, the follow-up second "We Must Check" letter for nonresponses were the identical initial first "We Must check" letter that was issued to households. Because the date of the follow-up second letter, and the letter itself being completely identical to the first letter that was sent, the Field Advisor could only accept the "We Must Check" letter as the one and only letter that was sent to households resulting in the SFA missing supporting documentation.\*The Field Advisor was unable to determine if the SFA was compliant with the timeline for benefit issuance changes (increase/decrease):1. If the SFA increased benefits for participants 3 days after the "We Have Checked" letter because the letter was not dated.
2. If the SFA decreased benefits within 10 days after the "We Have Checked" letter because the letter was not dated.

\*Though the "We Have Checked" letter was not dated, the SFA's "We Have Checked" letters provided:1. A notice for a participant household a decrease in benefit changes from free to reduced eligibility would occur on Tuesday 12-01-2020, but the SFA's electronic software indicated a different date on which "eligibility begins" on Friday 11-13-2020.
2. A notice for the participants with a no-response a decrease in benefit changes moving to paid eligibility would occur on Tuesday 12-01-2020, but the SFA's electronic software indicated a different date on which "eligibility begins" on Friday 12-04-2020.
3. A notice for a participant household with an increase in benefit changes moving from reduced to free eligibility would occur on Tuesday 12-01-2020, but the SFA's electronic software indicated a different date on which "eligibility begins" on Friday 11-13-2020.

\*The "We Must Check" letter was dated 10-1-2020 and indicated a deadline for households to respond by 11-13-2020. This allows an excessive amount of time for the participant to respond but only 2 days to receive documentation from the second request and complete the verification process before the November 15th deadline. This does not allow sufficient time to for the household to receive a 2nd request letter much less respond to it, and for the SFA to meet the November 15th deadline to complete the entire process. |
| [ ]  | [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: |

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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: |

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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:New Foundations Charter School did not yet have any record of any food facility inspection reports for current program year 20-21 and only one (1) food facility inspection report from program year 19-20 and program year 18-19. The SFA was not able to provide any documentation to support any record of requests for a second inspection. |
| [ ]  | [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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| [ ]  | [ ]  | **Other** |
| Finding Detail: |

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| **COMMENDATIONS** |
| **F. Recognition of Accomplishment** |
| SFA was accessible throughout the SNP AR and was prompt in submitting documentation before deadlines. Foodservice worked diligently in coordinating non-congregate bulk meal pick up. The SFA and FSMC worked well together and were both accommodating during the virtual review process. |