

**Oklahoma State Department of Education (SDE)  
Child Nutrition Programs (CNP)  
ADMINISTRATIVE REVIEW (AR) SUMMARY**

Name of School Food Authority (SFA): Coweta Public Schools County District Code: 73-1017

Superintendent: Jeff Holmes

Address of SFA: 14540 S. 302Nd East Ave. 407 N BROADWAY City: COWETA Zip Code: 74429-0550

Consultant(s) Conducting Review: Pat Gower

An AR of your SFA's CNP operation has been completed. The SFA was found in:

Compliance  Noncompliance

Date of Review: 4/10-13 & 17-19/2017 Date Review Closed: \_\_\_\_\_

Number of Schools in SFA: 8 Number of Schools Reviewed: 2 Number of Eating Sites Reviewed: 2

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): Central ES 105; Coweta JHS 610

School Breakfast Program (SBP): Central ES 105

After-School Snack Program (ASSP): NA

Special Milk Program (SMP): NA

Fresh Fruit and Vegetable Program (FFVP): NA

Seamless Summer Food Program (SSFP): NA

Does the SFA operate under any special provisions: (Select any that apply)

- Provision 1
- Provision 2
- Provision 3
- Community Eligibility Provision (CEP)

This SFA had violations in the following areas:

- PS-1 Violations
- PS-2 Violations
- Resource Management Violations
- General Area Violations
- Recalculation required

YES	NO	REVIEW FINDINGS			
<input data-bbox="272 176 321 222" type="checkbox"/>	<input checked="" data-bbox="508 176 557 222" type="checkbox"/>	<b>A. Program Access and Reimbursement</b>			
		YES	NO		
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Certification and Benefit Issuance	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Verification	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Meal Counting and Claiming	
Finding(s) Details:					

YES	NO	REVIEW FINDINGS			
<input data-bbox="272 157 324 210" type="checkbox"/>	<input checked="" data-bbox="508 157 560 210" type="checkbox"/>	<b>B. Meal Patterns and Nutritional Quality</b>			
		YES	NO		
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Meal Components and Quantities	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Offer versus Serve	
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dietary Specifications and Nutrient Analysis	
Finding(s) Details:					

YES	NO	REVIEW FINDINGS																	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>C. School Nutrition Environment</b></p> <table border="1" data-bbox="652 170 1417 365"> <thead> <tr> <th data-bbox="652 170 716 207">YES</th> <th data-bbox="716 170 779 207">NO</th> <th data-bbox="779 170 1417 207"></th> </tr> </thead> <tbody> <tr> <td data-bbox="652 207 716 245" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="716 207 779 245" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="779 207 1417 245">Food Safety</td> </tr> <tr> <td data-bbox="652 245 716 283" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="716 245 779 283" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="779 245 1417 283">Local School Wellness Policy</td> </tr> <tr> <td data-bbox="652 283 716 321" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="716 283 779 321" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="779 283 1417 321">Competitive Foods</td> </tr> <tr> <td data-bbox="652 321 716 359" style="text-align: center;"><input checked="" type="checkbox"/></td> <td data-bbox="716 321 779 359" style="text-align: center;"><input type="checkbox"/></td> <td data-bbox="779 321 1417 359">Other</td> </tr> </tbody> </table> <p data-bbox="652 365 1417 403">Finding(s) Details:</p> <p data-bbox="652 409 1417 709">Revenue from Nonprogram Foods Requirement: All revenue from the sale of nonprogram foods accrues to the non-profit school food service account; and Revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods. When an SFA assesses compliance with the Revenue from Nonprogram Food requirements in 7 CFR 210.14(f), the SFA must ensure that it includes all of its nonprogram food costs and revenues in its calculations as applicable, that the reference period it used was sufficient if the SFA used a 5 Day Reference Period as described in FNS Policy Memo SP 06-2016, and that the revenue and food cost ratios were calculated correctly.</p> <p data-bbox="652 716 1417 831">Findings: 6) The SFA did not include all the a la carte food items expenses coded as nonprogram expenses. The SFA did not include all of its nonprogram revenues and costs in its calculation to ensure compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f).</p> <p data-bbox="652 837 1417 1014">The last school year adult meals were coded to 1730 and a la carte (extra milk, 2nd entrées, bottled water, pizza, snack items which meet Smart Snack requirements) was coded 1720. Some parents who prepaid last year and the students selected a la carte food items did not get moved from 1710 (Students meals) to 1720 (a la carte), but funds were transferred into the SFA's nonprofit school food service account.</p> <p data-bbox="652 1020 1417 1136">Corrective Action Required: Ensure a la carte food items expenses are coded to the OCAS account code 3110 and a la carte revenue is coded to the OCAS code 1720. Ensure all nonprogram revenues and costs are used in the calculations to ensure compliance with the Revenue from No program Food requirements.</p> <p data-bbox="652 1142 1417 1194">Food Safety, Storage and Buy American Requirement: 1402. A review of products indicates violations of the Buy American provision in 7 CFR 210.21(d).</p> <p data-bbox="652 1201 1417 1287">Findings: Food items identified as not meeting the Buy American requirement: Central Kitchen: Ambrosia Diced Pears, China; Horn of Plenty Diced Peaches, Greece; Sysco Poly Gloves and Sandwich Bags, China;</p> <p data-bbox="652 1293 1417 1379">Corrective Action Required: Include the Buy American in all solicitations for products to include the requirement of Buy American. Upon delivery inspect food items to ensure meets the Buy American requirements.</p> <p data-bbox="652 1386 1417 1501">Corrective Action Required: The SFA will provide a solicitation letter including the Buy American requirement to include with all bids, price quotes, and all purchasing documents. The SFA will ensure food items delivered meet the Buy American requirement.</p> <p data-bbox="652 1507 1417 1623">Smart Snacks in School Requirement: Schools must meet the minimum requirements in 7 CFR 210.11 for all foods and beverages sold in school (also known as Smart Snacks in School) to increase consumption of healthful foods during the school day and support a healthy school environment.</p> <p data-bbox="652 1629 1417 1682">Findings: 1106. The school does hold fundraisers during the school day where students may purchase food or beverages. Not all items are Smart Snacks</p>			YES	NO		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Food Safety	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Local School Wellness Policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Competitive Foods	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other
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<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><b>D. Civil Rights</b></p> <p data-bbox="652 1717 1417 1755">Finding(s) Details:</p>																	

**Comments/Recommendations:**

**CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.68[k]):** 5/19/2017

**CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[K][1]):**

6/16/2017 **(30 days from the date the corrective action must be completed)**

An exit conference was conducted (§210.18[i]) discussing the AR Review findings on: 4/19/2017

with Brad Tackett, CFO; Vickie Middleton, FSD (Name and Title of School Representative)

CNP Consultant(s): Pat Gower

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

Date Review Summary Was Publicly Posted: 4/28/17