

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

Name of School Food Authority (SFA): \_\_\_\_\_ County District Code: \_\_\_\_\_

Superintendent: \_\_\_\_\_

Address of SFA: \_\_\_\_\_ City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

CN Specialist(s) Conducting Review: \_\_\_\_\_

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

Review Month: \_\_\_\_\_ Date of Review: \_\_\_\_\_ Date Review Closed: \_\_\_\_\_

Number of Schools in SFA: \_\_\_\_\_ Number of Schools Reviewed: \_\_\_\_\_ Number of Eating Sites Reviewed: \_\_\_\_\_

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): \_\_\_\_\_

School Breakfast Program (SBP): \_\_\_\_\_

After-School Snack Program (ASSP): \_\_\_\_\_

Special Milk Program (SMP): \_\_\_\_\_

Fresh Fruit and Vegetable Program (FFVP): \_\_\_\_\_

Seamless Summer Food Program (SSFP): \_\_\_\_\_

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 (Indicate area of violation)

Maintenance of the Nonprofit

Paid Lunch Equity

Revenue from Nonprogram Foods

Indirect Costs

General Area Violations

If applicable, mark appropriate boxes:

Recalculation required

Fiscal Action Workbook completed

YES	NO	REVIEW FINDINGS			
		<b>A. Program Access and Reimbursement</b>			
		YES	NO		
				Certification and Benefit Issuance	
				Verification	
		Meal Counting and Claiming			

Finding(s) Details:

YES	NO	REVIEW FINDINGS			
		<b>B. Meal Patterns and Nutritional Quality</b>			
		YES	NO		
				Meal Components and Quantities	
				Offer versus Serve	
				Dietary Specifications and Nutrient Analysis	

Finding(s) Details:

YES	NO	REVIEW FINDINGS		
		<b>C. School Nutrition Environment</b>		
		YES	NO	
				Food Safety
				Local School Wellness Policy
				Competitive Foods
		Other		

Finding(s) Details:

		<b>D. Civil Rights</b>		
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Finding(s) Details:

**Comments/Recommendations:**

**CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.18[i][2]):** \_\_\_\_\_

**CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[j][2]):**  
\_\_\_\_\_  
**(30 days from the date the corrective action must be completed)**

An exit conference was conducted (§210.18[i][2]) discussing the AR Review findings on: \_\_\_\_\_

with \_\_\_\_\_ (Name and Title of School Representative)

CNP Specialist(s): \_\_\_\_\_

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.

\_\_\_\_\_  
Signature of School Representative

\_\_\_\_\_  
Date

Date Review Summary Was Publicly Posted: \_\_\_\_\_

### **Certification and Benefit Issuance – 7 CFR 245.6**

**Requirement:** All family size and income applications must be approved properly, and the correct benefits transferred to roster.

**Finding:** Not all family size and income applications were approved correctly. There were four applications approved for free, eligible for reduced benefits. One application was approved for free but did not qualify for benefits.

**Corrective Action Required:** All family size and income applications must be approved correctly. Send adverse action letters to families & change benefits according to regulation. Provide copies as part of the corrective action.

**Requirement:** Correct income eligibility guidelines used to certify applications.

**Finding:** The correct income eligibility guidelines were not used to approve some free and reduced applications.

**Corrective Action Required:** Use the correct income eligibility guidelines to approve applications.

**Requirement:** Correct conversion factor used when processing applications when more than one income.

**Finding:** It appears when more than one income was reported it was not included in total income.

**Corrective Action Required:** Ensure all income recorded on FSIA is included when approving applications.

### **Verification – 7 CFR 245.6(a)**

**Requirement:** Documentation demonstrating that a confirmation review took place and on file at the SFA.

**Finding:** Confirmation review was not conducted prior to conducting verification.

**Corrective Action Required:** Provide procedure for ensuring confirmation review will be conducted on all applications selected for verification.

### **Meal Counting and Claiming - 7 CFR 210.7(c)**

**Requirement:** Total meal counts for review period reasonable compared to meal counts for day of review.

**Finding:** Meal counts for the review month appear to be taken from attendance.

**Corrective Action Required:** Meal counts must be taken at point of service by student name.

Note: CNP staff went back on -site March 1, 2023 and requested edit checks for February 2023 and meal count appear to be taken by student name at point of service. State agency staff used February numbers to complete re-calculation.

**Requirement:** Free, reduced, paid lunch counts exceed attendance adjusted eligible students without a valid explanation.

**Finding:** Because the district appeared to be claiming meals by student attendance the school claimed more meals by adjusted students eligible without acceptable explanation.

**Corrective Action Required:** Only claim meals by point of service count and ensure attendance factor is being used on the edit checks. The current attendance factor is 0.945.

**Requirement:** Free, reduced and paid counts must be accurate.

**Finding:** It appears meal counts were reported by attendance record.

**Corrective Action Required:** Take meal counts at point of service and claim meals by free, reduced, and paid correctly on claim for reimbursement.

**Requirement:** Counts must be correctly used in claim for reimbursement.

**Finding:** Breakfast and lunch meal counts were claimed for a day when school was not in session and students were not on school grounds. Meal counts appear to be claimed by attendance records.

**Corrective Action Required:** Use point of service meal counts for reimbursement.

### **Meal Components and Quantities – 7 CFR 210.10 & 220.8**

**Requirement:** All meals observed and counted for reimbursement for the day of review must contain all the required meal components.

**Finding:** For lunch, the district indicated verbally they were not OVS. Students were not served the full  $\frac{3}{4}$  cup vegetable. For breakfast, the students were not served one cup of fruit/juice.

**Corrective Action Required:** Serve students all required components. If not participating in OVS

**Requirement:** The minimum daily requirements meet the age/group being offered.

**Finding:** The district did not offer the required quantity.

**Corrective Action Required:** Serve the daily required quantity for all components.

**Requirement:** Fluid milk must be offered in at least two required varieties throughout the serving period on all service lines.

**Finding:** The SFA only offered one type of milk during meal observation for breakfast.

**Corrective Action Required:** Ensure two types of milk are being offered to all students.

**Requirement:** Milk substitutions being provided must meet milk nutrient requirements.

**Finding:** Milk substitutions provided did not meet the nutrient requirement.

**Corrective Action Required:** Ensure milk substitutions being made meet USDA requirements, see page C-83 in the child nutrition manual. Provide label of product being served.

**Requirement:** Signage posted explaining a reimbursable meal for breakfast and lunch.

**Finding:** There was not any signage posted in the cafeteria explaining a reimbursable meal for breakfast and lunch.

**Corrective Action Required:** Display signs explaining a reimbursable meal for breakfast and lunch.

**Requirement:** Records must show the district is eligible to receive the Performance Based Reimbursement.

**Finding:** Production records and labels provided indicate the districts Performance Based Reimbursement must be turned off.

**Corrective Action Requirement:** Provide a copy of April production records that show meals meet meal pattern requirements. Provide copies of whole grain labels, recipes, and CN labels.

The Performance Based Reimbursement will not be turned back on until SDE staff can validate meal patterns meet all requirements using the information provided by the school.

#### **Offer vs Serve – 7 CFR 201.10 & 220.8**

**Requirement:** Offer vs Serve properly implemented.

**Finding:** The application for NSLP and SB program is marked the school is participating in offer vs serve. During the meal observation plates were pre-plated. Students were not allowed to decline any components.

**Corrective Action Required:** The SFA needs to change the NSLP, SB to not participate in OVS or train all staff properly and implement OVS.

**Requirement:** Offer vs Serve training completed.

**Finding:** The staff has not completed training for OVS. The SDE was on site in September and October for technical assistance the SDE told the staff to attend OVS training.

**Corrective Action Required:** All child nutrition staff must attend OVS training and send certificates to Rhonda Stevens if the school plans to implement OVS.

#### **Review Period - Meal Components and Quantities – 7 CFR 210.10 & 220.8**

**Requirement:** Production records and other supporting documentation must show all meal components per weekly meal pattern requirements were offered and served to students.

**Finding:** Production records and other supporting documentation was insufficient.

**Corrective Action Required:** Provide April production records with supporting documentation showing all meal components are offered and served.

**Requirement:** Planned menu quantities meet meal pattern.

**Finding:** The state agency reviewed production records and could not determine if the daily requirements were being met. Production records lack quantities, total quantities, number of students served, temperatures and whole grain. The school served a side salad but completed a salad bar production record.

**Corrective Action Required:** Provide April production records with all required information documented.

#### **Dietary Specification and Nutrient Analysis – 7 CFR 210.10(f)**

**Requirement:** Areas identified during off site require technical assistance or corrective action prior to the beginning of the review.

**Finding:** The SA was on site in September and October providing technical assistance to the child nutrition director and cook. The production records were not on correct form, family size and income applications had not been collected or approved. The child nutrition director did not have a point of service count was using a tally sheet for point of service.

**Corrective Action Required:** The child nutrition director and cook must complete cafeteria managers training and send certificate to Rhonda Stevens.

#### **Competitive Foods - 7 CFR 210.11 & 220.12**

**Requirement:** All foods and beverages sold to students must meet the Smart Snack guidelines. Foods that are sold as exempt fundraisers must follow the State-defined limit and guidelines.

**Finding:** Non-compliant foods were being sold to students that did not meet required guidelines. Exempt fundraising form was not provided during review.

**Corrective Action Required:** Provide documentation of any Smart Snack and or fundraiser being sold during school hours.

#### **Professional Standards – 7 CFR 210.31**

**Requirement:** Director of Child Nutrition completed food safety training.

**Finding:** The SFA director has not completed food safety training.

**Corrective Action Required:** Provide documentation of the completed 8-hour food safety training.

#### **Revenue from Nonprogram Food – 7 CFR 210.14(f)**

**Requirement:** Breakfast & lunches sold to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per lunch revenues from other sources designated specifically for the support of adult meals is sufficient to cover the overall cost of the lunch.

**Finding:** The district failed to collect or reimburse Child Nutrition for meals served to adults.

**Corrective Action Required:** The district must charge adults the correct amount, and or General Fund must reimburse Child Nutrition with non-federal funds. Submit written plan showing how district will reimburse Child Nutrition for adult meals.

**Requirement:** SFA correctly calculates its nonprogram food ratio and it food cost ratio.

**Finding:** The district failed to calculate nonprogram food ratio and food cost ratio correctly.

**Corrective Action Required:** Track adult meals, charge adults the required amount, and or supplement cost out of General Fund using nonfederal funds. Code adult meal revenue and expenditures correctly in Oklahoma Cost Accounting System.