

**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
<p>Finding(s) Details:</p> <p><b>Local Wellness Policy - 7 CFR 210.30</b>  The Wellness Policy must be measured periodically on the extent to which schools are in compliance with the local policy, the progress made in attaining goals, and how the policy compares to model school wellness policies, and make assessment available to the public.  Findings: Wellness Policy does not contain all required elements (food and beverage marketing and triennial assessment [minimum]). An assessment for elementary was completed while on-site, but not high school site; therefore, not made available to the public. Statement regarding diet soda available for sale at the junior high does not meet Smart Snack standards.  Corrective Action Required: Update Wellness Policy implementing the areas: food and beverage marketing and assessment. Statement regarding diet pop available for junior high to be removed. Submit a copy of updated board approved Wellness Policy and documentation of high school site assessment and how it is made available to the Public. This is a repeat violation.</p> <p><b>Competitive Foods 7 CFR 210.11 &amp; 220.12</b>  Requirement: #1106 Fundraisers held during the day do not observe state defined limit.  Finding: Fundraising policy does not address 14-day timeline counting as one exemption and restriction of non-smart snack compliant foods not to be sold during meal services. Technical assistance has been provided in regards to sponsor fundraising forms as well.  Corrective Action Required: LEA will submit a board approved exempt fundraising policy.</p> <p><b>Resource Management: Maintenance of the Non-Profit Food Service Account - 7 CFR 210.14</b>  Requirement: #13 All recorded expenses do not represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E.  Finding: There are unallowable costs used for purchase of food for FSMC from a local store in the amount of \$227.14. This is an unallowable cost as FSMC RFP states that all food will be purchased by FSMC and SFA is invoiced at the bid price. Technical assistance has been provided in an understanding of expenses allowable from the SFA.  Corrective Action Required: General Fund to reimburse the SFA account by paying a vendor this fiscal year in the amount of \$227.14 to recover the cost. SFA must submit General ledger expenditure report indicating funds have been recovered.</p> <p><b>Resource Management - Revenue from Nonprogram Foods - 7 CFR 210.14(f) Adult Meals 782-5 Rev. 1</b>  Requirement: #2 Process does not ensure all funds received from sale of non-program are deposited.  Finding: Adult meals are tracked in order for General Fund to reimburse the difference from amount charged and USDA required amount. Based on number of adult breakfast recorded and included on claim documentation, a sufficient amount is not coded to 1730 adult revenue.  Corrective Action Required: General Fund must reimburse SFA by paying an invoice in the amount of \$54.00.</p>				
		<b>D. Civil Rights</b>		
<p>Finding(s) Details:</p>				

Requirement: #5 SFA served adult meals free of charge to adults not directly involved in meal service. Process for recovering full cost of adult meals is sufficient.

Findings: Proper procedures are not followed since employees are charged zero for lunches. This is considered a fringe benefit which is to be included in employee contract. The agreement with State Agency was not followed.

Corrective Action Required: Adults must be charged an amount or if it is a free meal it is a fringe benefit and should be reflected through payroll and indicated in their contract. The district must provide copies of employee contracts or charge the amount that has been indicated in Schedule B of the Agreement with the State Agency. Corrective action has been made for this year and employees are being charged the amount on Schedule B. No further action needed.

#### Professional Standards – 7 CFR 210.31

Requirement: #1213 Food safety certification was obtained in the last 5 years.

Finding: Documentation was not available for completion of food safety training for SFA Director.

Corrective Action Required: Director must complete food safety certification and submit documentation to OSDE Program Specialist.

Requirement: #1216 Validate full-time, part-time staff training on Off-Site Assessment Tool.

Finding: Information was not provided on the off-site tool. High school site full-time staff has completed 2 hours of training. An additional 4 hours is needed. Technical assistance was provided and training links were provided.

Corrective Action Required: High school staff must complete an additional 4 hours of training by May 16, 2024.

Requirement: #1219 Additional employees outside of School Nutrition Program whose responsibilities include duties related to operation of Program received required training.

Findings: Point of Service staff have not received Offer Versus Serve mandatory training.

Corrective Action Required: All personnel assisting with operations of the program must complete OVS training.

#### On-Site Reviews for Multi-sited SFAs – 7 CFR 210.8(a)(1) & 7 CFR 210.11(d)

Requirement: #901a On-site review of the lunch counting and claiming procedure completed prior to February 1.

Finding: High school site had been completed for the current school year, but not the elementary site for lunch. Therefore, records were requested for last year to observe if regulations had been met. No documentation was available to support compliance.

Corrective Action Required: On-Site monitoring of elementary lunch was completed during review week. No further action is required.

Requirement: 902a-c Corrective action of the meal counting and claiming procedure required.

Finding: Corrective action was required for identifying reimbursable meals for breakfast. A critical error of this nature should be followed up on in a more timely manner; although 5 days are left before expiration of the 45 days.

Corrective Action Required: Follow-up monitoring review must be submitted to OSDE Program Specialist.

#### Off-Site Assessment Tool Validation

Requirement: Responses from the off-site assessment tool should demonstrate compliance with FNS (Food and Nutrition Services) requirements and reflect current practices.

Finding: Not all areas of the off-site assessment tool demonstrate compliance with FNS requirements. The following were found to be non-compliant: carryover status changes when new application is received; procedures for verification process and amount adults are being charged for meals. Numerous documents have not been uploaded in the off-site.

Corrective Action Required: SFA/LEA will be required to correct practices that do not demonstrate compliance with FNS. SFA/LEA is required to upload any necessary documents in the off-site.

**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: \_\_\_\_\_