The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on December 8, 2016; an exit conference summarizing the findings took place on the same day.

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency’s (LEA’s) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. The two performance standards reviewed were found to be unsatisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are no menu findings that warrant the termination of the performance based reimbursement.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the School Food Authority (SFA). All items listed in the Corrective Action Plan must be submitted in writing to CN Resource, by February 24, 2017. Please complete the chart, an electronic version or a hand written response will be acceptable. If any additional responses are needed, please respond on district letterhead. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the AR Corrective Action Document by February 24, 2017.

Thank you,
Administrative Review Summary and Corrective Actions

SFA Name: Lebanon Community Unit School District 9
Administrative Review Conducted on: 12/8/2016
SFA Contact Name and title: Geri Hughes, Admin Secretary
CNR Reviewer: Danielle Reidy

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<table>
<thead>
<tr>
<th>Commendations &amp; Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>The kitchen staff was open to all feedback and welcomed ideas to help make meal service run smoother.</td>
</tr>
<tr>
<td>The kitchen was clean and organized.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Other areas of Technical Assistance (NOT requiring Corrective Action)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Menu Review- Additional technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.</td>
</tr>
<tr>
<td>Menu Review- there are different lunch requirements for grades 6-8 and grades 9-12. As such, it is required that these grade levels either have separate production records (or at least separated serving sizes for each grade group). This ensures that care is taken to meet the minimum requirements for each grade level individually.</td>
</tr>
<tr>
<td>During the review, training for cashiers and substitute cashiers was discussed. The SFA does not provide training to cashiers and substitute cashiers. It is recommended that the SFA provide training annually or as needed to cashiers and substitute cashiers. The SFA acknowledged the technical assistance and will implement needed changes.</td>
</tr>
<tr>
<td>During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum at least once every three years. The results of the assessment must be made available to the public.</td>
</tr>
<tr>
<td>It was determined during the review that the SFA has not performed SFSP outreach. The SFA should perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.</td>
</tr>
<tr>
<td>During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a public ally visible location at the site.</td>
</tr>
</tbody>
</table>
Finding #1  Meal Component and Quantities Review Period AND Day of Review

For the week of menu review and the day of review, the K-12 breakfast menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however not all grains were whole grain-rich and creditable. The following cereal choices are not whole grain-rich and do not contribute to the grain requirements: Malt-O-Meal Frosted Flakes, Coco Roos, and Berry Crunch. The daily grain requirements are met with all other meal options offered daily.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The United States Department of Agriculture Food and Nutrition Services (USDA) (FNS) website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary
Finding #2 Meal Components and Quantities Review Period

For the week of menu review, the K-12 breakfast menu did not meet the minimum weekly requirement of 9 ounce equivalent grain. The following cereal choices are not whole grain-rich and do not contribute to the grain requirements: Malt-O-Meal Frosted Flakes, Coco Roos, and Berry Crunch. The daily grain requirements need to be met, before the yogurt served with cereal can credit towards the weekly grain requirement. The weekly grain requirement is met with all other meal options offered throughout the week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide documentation showing that all cereal choices will be whole grain-rich.

SFA Response

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: 1 oz. equivalent of grains daily.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: minimum 9 oz. equivalents of grain weekly.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide documentation showing that all cereal choices served will be whole grain-rich.

**SFA Response**

**Finding #3  Meal Components and Quantites Review Period**

For the menu review week, the K-12 breakfast menu did not meet the 100% Whole Grain Rich requirement. Not all grains provided were Whole Grain Rich.

**Technical Assistance Provided**

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. 

http://healthymeals.nal.usda.gov/menu-planning/whole-grains

**Regulation / Citation and Summary**

220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched. Effective July 1, 2013 (SY 2013-2014), schools may substitute meats/meat alternates for grains, after the daily grains requirement is met, to meet the weekly grains requirement. One ounce equivalent of meat/meat alternate is equivalent to one ounce equivalent of grains.

**SFA Suggested Guidance for Compliance**
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

**SFA Response**

### Finding #4 Meal Component and Quantities Review Period

For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum daily requirement of 1 ounce equivalent grain, for grades 6-8 and the 2 ounce equivalent grain, for grades 9-12. A grain was provided, however the minimum required portion size was not met.

**Technical Assistance Provided**

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. [http://healthymeals.nal.usda.gov/](http://healthymeals.nal.usda.gov/)

**Regulation / Citation and Summary**

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: 1 oz. equivalent daily grain and 9-12: 2 oz. equivalent grain.

**SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

**SFA Response**
<table>
<thead>
<tr>
<th>Finding #5  Meal Component and Quantities Review Period</th>
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<tbody>
<tr>
<td>For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum weekly requirement of 8 ounce equivalent grain, for grades 6-8 and 10 ounce equivalent grain, for grades 9-12.</td>
</tr>
<tr>
<td>Technical Assistance Provided</td>
</tr>
<tr>
<td>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a></td>
</tr>
<tr>
<td>Regulation / Citation and Summary</td>
</tr>
<tr>
<td>210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: minimum of 8 oz. equivalent of grains per week. 9-12: minimum of 10 oz. equivalent of grains per week.</td>
</tr>
<tr>
<td>SFA Suggested Guidance for Compliance</td>
</tr>
<tr>
<td>To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.</td>
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<td>SFA Response</td>
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<tr>
<th>Finding #6  Meal Component and Quantities Review Period</th>
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<tbody>
<tr>
<td>For the week of menu review, the 9-12 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich.</td>
</tr>
<tr>
<td>Technical Assistance Provided</td>
</tr>
</tbody>
</table>
During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. http://healthymeals.nal.usda.gov/menu-planning/whole-grains

**Regulation / Citation and Summary**

210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

**SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

**SFA Response**

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**Finding #7 Meal Component and Quantities Review Period**

For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum daily requirement of 1 ounce equivalent meat/meat alternate, for grades 6-8 and the 2 ounce equivalent meat/meat alternate for grades 9-12. A meat/meat alternate was provided, however the minimum required portion size was not met.

**Technical Assistance Provided**

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

**Regulation / Citation and Summary**

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the meal pattern for school lunches. 5 cfr 210.10(c) (2012-2013 school year).
For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate, for grades 6-8 and 10 ounce equivalent meat/meat alternate for grades 9-12.

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### SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include:
- A statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group.
- A process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities.
- A statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.
- A statement that additional menu training for all SFA staff will be provided.
- Provide the outline and dates for the trainings that will be completed.
- In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.
- Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward.

### SFA Response

Finding #8  Meal Component and Quantities Review Period

For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate, for grades 6-8 and 10 ounce equivalent meat/meat alternate for grades 9-12.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.

http://healthymeals.nal.usda.gov/

### Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: minimum of 9 oz. equivalent of meat/meat alternate per week.

### SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for meat/meat alternates are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #9  Meal Component and Quantities Review Period
For the week of menu review, the 6-8 and 9-12 lunch menus did not meet the minimum weekly requirement of 1/2 cup beans/legumes vegetable subgroup.

Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables subgroups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each subgroup is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary
210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C bean/peas/legumes.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for vegetable sub-groups are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

### SFA Response

<table>
<thead>
<tr>
<th>Finding #10 Meal Component and Quantities Review Period</th>
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</thead>
<tbody>
<tr>
<td>For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 1 cup vegetable. Vegetables were provided, however the minimum required portion size was not met.</td>
</tr>
</tbody>
</table>

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. [http://healthymeals.nal.usda.gov/](http://healthymeals.nal.usda.gov/)

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<tr>
<td>210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 1 cup of vegetable.</td>
</tr>
</tbody>
</table>

### SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

### SFA Response
Finding #11  Certification and Benefit Issuance

At the beginning of the year, the SFA does not properly handle the status of children who have not submitted an application for the current school year. The SFA has been giving meal benefits to these students past the 30 day carry-over period.

Technical Assistance Provided

During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a child has not submitted and application or is not on the Direct Certification list the student will either receive carryover status from the previous year if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year.

Regulation / Citation and Summary

245.6(c) Determination of eligibility—(1) Duration of eligibility. The local educational agency must determine household eligibility for free or reduced price meals either through direct certification or the application process at or about the beginning of the school year. The local educational agency must determine eligibility for free or reduced price meals when a household submits an application or, if feasible, through direct certification, at any time during the school year.

SFA Suggested Guidance for Compliance

To come into compliance with requirements for the start date of eligibility, the SFA must put a plan in place to ensure future compliance. Please submit the plan. The plan should include a statement that the staff administering the free and reduced lunch program understand these requirements, a process that will be implemented to ensure that benefits are correctly applied to all students at the beginning of the school year, and the name and title of the SFA representative that will oversee the implementation of the process and ensure compliance.

SFA Response

Finding #12  Certification and Benefit Issuance

Updates are not made to the point of service (POS) benefit issuance document(s) in a timely manner.

Technical Assistance Provided
During the review, updating the point of service benefit issuance document was discussed with the SFA. When eligibility changes, the SFA must make these updates in a timely manner. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.

**Regulation / Citation and Summary**

245.6(c)(6) Notice of approval—(i) Income applications. The local educational agency must notify the household of the children’s eligibility and provide the eligible children the benefits to which they are entitled within 10 operating days of receiving the application from the household. 245.6(b)(6)(ii )Once the appropriate official has provided the direct certification documentation to the local educational agency, the child must have free benefits made available as soon as possible but no later than three operating days after the date the local educational agency receives the direct certification documentation.

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for updating the POS benefit issuance document, the SFA must provide a plan that will be put in place to ensure future compliance. Please submit the assurance and plan. Eligibility statuses found to be incorrectly listed during the review must be corrected, and the date of the correction must be submitted.

**Finding #13 Civil Rights**

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.

**Technical Assistance Provided**

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement.


**Regulation / Citation and Summary**

FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other sub recipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.

**SFA Suggested Guidance for Compliance**

To come into compliance with civil rights requirements, the SFA must submit an assurance that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu or letter to households with the statement added.
Finding #14  Civil Rights
The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

Technical Assistance Provided
During the on-site review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

Regulation / Citation and Summary
FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

SFA Suggested Guidance for Compliance
To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure.

SFA Response

Finding #15  Civil Rights
The SFA did not provide the yearly civil rights training for the appropriate staff.

Technical Assistance Provided
During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

Regulation / Citation and Summary
FNS Instruction 113-1 Section XI Training is required so that people involved in all levels of administration of
programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures, and directives. Persons responsible for reviewing CR compliance must receive training to assist them in performing their review responsibilities. This training may be carried out as part of ongoing technical assistance. The FNS Regional OCR and State agencies will be responsible for training State agency staffs. State agencies are responsible for training their sub recipients, including “frontline staff.” “Frontline staff” who interact with program applicants or participants, and those persons who supervise “frontline staff,” must be provided civil rights training on an annual basis. Specific subject matter must include, but not be limited to: A. Collection and use of data, B. Effective public notification systems, C. Complaint procedures, D. Compliance review techniques, E. Resolution of noncompliance, F. Requirements for reasonable accommodation of persons with disabilities, G. Requirements for language assistance, H. Conflict resolution, and I. Customer service.

**SFA Suggested Guidance for Compliance**

To come into compliance with this requirement, the SFA must submit the process that will be put into place to ensure that the yearly civil rights training will be provided to all SFA staff and that the training will cover the required topics. Provide supporting documentation to demonstrate that the required topics will be covered, such as an agenda or a copy of the training.

**SFA Response**

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**Finding #16 Local School Wellness Policy**

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include goals for nutrition promotion.

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include goals for other school-based activities to promote student wellness.

**Technical Assistance Provided**

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies.


**Regulation / Citation and Summary**

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must
Finding #17 Local School Wellness Policy

The appropriate people were not given the option to be involved in the development, implementation, periodic review, and update of the Local School Wellness Policy.

The SFA has not reached out to potential stakeholders to participate in the development, review, update, and implementation of the Local School Wellness Policy.

Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate.

Regulation / Citation and Summary

210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must:

1. Contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that:
   -(i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school’s compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

SFA Response
Finding #18  Local School Wellness Policy

An assessment of the Local School Wellness Policy has not been completed.

Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

Regulation / Citation and Summary

210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools’ compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy. (3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement the SFA must submit a statement that moving forward the SFA will advertise the ability to participate in the development and updating of the school wellness policy. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate.

SFA Response

To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted for review.
# Finding #19 Professional Standards

The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements. The School Nutrition Program Manager did not meet the training requirements and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements. Part-time staff did not meet the training requirements. The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.

## Technical Assistance Provided

During the on-site review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that all nutrition completes the required amount of training annually. For further information, please see the USDA’s Guide to Professional Standards for School Nutrition Programs.

## Regulation / Citation and Summary

210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. For the school year beginning July 1, 2015, program directors must complete eight hours of annual training. Beginning July 1, 2016, twelve hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.

210.30(d) Continuing education/training standards for all staff with responsibility for school nutrition programs.
To come into compliance with the requirements for Professional Standards, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan indicating how the SFA will ensure that the appropriate training is completed and the dates of all future trainings.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan indicating how the SFA will ensure that the appropriate training is completed and the dates of all future trainings.

Finding #20  Professional Standards

The SFA is not tracking training hours.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA’s Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

210.30(c) Continuing education/training standards for all school nutrition program managers. Each school year, the school food authority must ensure that all school nutrition program managers have completed annual continuing education/training. For the school year beginning July 1, 2015, program managers must complete six hours of annual training. Beginning July 1, 2016, ten hours of annual training are required. The annual training must include, but is not limited to, the following topics, as applicable: (1) Administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures); (2) The identification of reimbursable meals at the point of service; (3) Nutrition; (4) Health and safety standards; and (5) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Each school year, the school food authority must ensure that all staff with responsibility for school nutrition programs that work an average of at least 20 hours per week, other than school nutrition program directors and managers, completes annual training in areas applicable to their job. For the school year beginning July 1, 2015, staff must complete four hours of annual training. Beginning July 1, 2016, six hours of annual training are required. Part-time staff working an average of less than 20 hours per week must complete four hours of annual training beginning July 1, 2015. The annual training must include, but is not limited to, the following topics, as applicable to their position and responsibilities: (1) Free and reduced price eligibility; (2) Application, certification, and verification procedures; (3) The identification of reimbursable meals at the point of service; (4) Nutrition; (5) Health and safety standards; and (6) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues.

SP 39-2015: Question 29: Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only? No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these individual should receive adequate training specific to the task they will perform.
To come into compliance with the requirements for Professional Standards, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan indicating how the SFA will ensure that training is now being tracked.

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**Finding #21  Certification and Benefit Issuance**

Not all selected applications were approved correctly. The SFA did not calculate the income correctly. Two applications were incorrectly calculated.

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**Technical Assistance Provided**

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must base its determination on all household members and their income as listed on the application. For more information on which household members must be included, see the Eligibility Manual for School Meals, Chapter 2.

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**Regulation / Citation and Summary**

245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. When a household submits an application containing complete documentation, as defined in §245.2, and the household's total current income is at or below the eligibility limits specified in the Income Eligibility Guidelines as defined in §245.2, the children in that household must be approved for free or reduced price benefits, as applicable.

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**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for determining applications, the SFA must provide an assurance that staff administering the free and reduced lunch program understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted. If the SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the date that this letter was sent.

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**SFA Response**
### Finding #22  Certification and Benefit Issuance

The SFA did not use the correct conversion factors for applications with more than one income frequency.

#### Technical Assistance Provided

During the review, the conversion factors were discussed with the SFA. When determining eligibility, the SFA must utilize the correct income version factors as outlined in the Eligibility Manual for School Meals, Chapter 3. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

#### Regulation / Citation and Summary

245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household’s total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA totals all sources and compares the total to the IEGs.

#### SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide written assurance that the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income.

#### SFA Response

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### Finding #23  Certification and Benefit Issuance

The SFA did not update the benefit issuance document accurately and in a timely manner for students who are new, transferred, or withdrawn.

#### Technical Assistance Provided

During the review, updating the benefit issuance document timely was discussed with the SFA. The SFA must update the benefit issuance document accurately and in a timely manner for students who are new, transferred, or withdrawn.

#### Regulation / Citation and Summary

Eligibility Manual, Chapter 3: The LEA must provide benefits promptly. Eligible children may receive benefits immediately and the LEA may assume consent, if refusal has not been received within a certain number of days, as determined by the LEA. When a child transfers to another school within the LEA, the date of the transfer must be noted on the application and the point of service must be updated.

#### SFA Suggested Guidance for Compliance
To come into compliance with the requirements for updating the benefit issuance document, the SFA must provide a written statement that the SFA understands the requirements and that moving forward all changes in eligibility will be reflected on the benefit issuance document. The statement should also include the process that will be implemented to ensure that the benefit issuance document is kept up to date and accurate. The name and title of the SFA representative that will oversee compliance should also be provided. Eligibility statuses found to be incorrectly listed during the review must be corrected, and the date of the correction must be submitted.

**SFA Response**

**Finding #24  Food Safety**

The SFA does not have a food safety plan.

**Technical Assistance Provided**

During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.

**Regulation / Citation and Summary**

210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for food safety, the SFA must provide an assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. In addition to the assurance an electronic copy of the food safety plan must be submitted for review.

**SFA Response**
### Finding #25  Meal Counting and Claiming Day of Review

The meal counting system as implemented is allowing for overt identification of students receiving free and reduced price benefits.

#### Technical Assistance Provided

During the review, overt identification was discussed with the SFA. The implemented meal counting system is allowing for overt identification of students receiving free and reduced priced benefits. To be in compliance, the SFA must ensure that the meal counting system does not allow for overt identification. A child’s eligibility status must not be disclosed at any point in the process of providing free or reduced price meal. The SFA acknowledged the finding and will implement needed changes immediately.

#### Regulation / Citation and Summary

SP 45-2012: SFAs must assure that a child’s eligibility status is not disclosed at any point in the process of providing free or reduced price meals, including notification of the availability of free or reduced price benefits; certification and notification of eligibility; provision of meals in the cafeteria; and the point of service. Of particular concern is prevention of overt identification in the food service area, especially at the point of service. Any meal cards, tickets, tokens or other methods to obtain reimbursable meals cannot be coded or colored in a manner that would overtly identify free and reduced price eligible children. In addition, SFAs must take steps to assure that rosters, computer-screens or other equipment used at the point of service cannot be viewed by anyone not needing the information, especially students. Further, the information on the rosters or screens should be masked or coded to avoid other students discerning any student’s eligibility status.

#### SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. The plan must include: an indication that the meal counting system is no longer allowing for overt identification, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward.

#### SFA Response

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### Finding #26  Meal Counting and Claiming Day or Review

The point of service did not provide an accurate meal count by eligibility status. This is a systemic error. There was no POS during the breakfast service. The POS during lunch service was so busy that the assigned staff member was not able to verify all meals counted for reimbursement contained the required components.

#### Technical Assistance Provided

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During the review, an accurate point of service was discussed with the SFA. The point of service does not provide an accurate meal count by eligibility status. This is a systemic error. To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

**Regulation / Citation and Summary**

210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum: (iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for counting and claiming, the SFA must provide an assurance that the appropriate staff have been trained and understand the requirements. The SFA must develop and describe the plan that will be put into place to ensure accurate counting and claiming. Please include written assurance that the plan will be followed now and in the future. Also include the person, by position, who will be responsible for oversight of the new procedures. Once the plan is approved and implemented, the SFA must complete an accurate 30 meal count, for both breakfast and lunch and submit the counts for review. A recalculation of meals counts from the beginning of the school year will be completed. Fiscal Action may occur.

**SFA Response**

Finding #27  Meal Components and Quantities Day of Review

One of the fruit juice choices offered at breakfast and lunch was not full strength juice.

**Technical Assistance Provided**

During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that all required components are offered. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

**Regulation / Citation and Summary**

210.10(c)(2)(ii) Fruits component. Schools must offer fruits daily as part of the lunch menu. Fruits that are fresh; frozen without added sugar; canned in light syrup, water or fruit juice; or dried may be offered to meet the requirements of this paragraph. All fruits are credited based on their volume as served, except that 1/4 cup of dried fruit counts as 1/2 cup of fruit. Only pasteurized, full-strength fruit juice may be used, and may be credited to meet no more than one-half of the fruits component.

**SFA Suggested Guidance for Compliance**
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include: a statement that all menus will be reviewed to ensure that all required components are planned, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward.

SFA Response

Finding #28  Meal Components and Quantities Day of Review

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast including the requirement for students to select at least 1/2 cup fruit

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance Provided

Requirements under Offer vs. Serve include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation and Summary

220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

210.10(a)(2) Unit pricing. Schools must price each meal as a unit. Schools need to consider participation trends in an effort to provide one reimbursable lunch and, if applicable, one reimbursable afterschool snack for each child every school day. If there are leftover meals, schools may offer them to the students but cannot get Federal reimbursement for them. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s). The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions.

Requirements under Offer vs. Serve include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. During the review, it was determined that the SFA is not following these requirements. The requirement as well as examples of the findings and possible solutions were reviewed with the SFA.

SFA Suggested Guidance for Compliance
To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.

SFA Response

**Finding #29  Meal Components and Quantities Review Period**

The SFA is not maintaining daily production records.

**Technical Assistance Provided**

During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.

**Regulation / Citation and Summary**

210.10(a)(3) Production and menu records. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance.

**SFA Suggested Guidance for Compliance**

To bring this area into compliance the SFA must submit a written assurance that includes; a statement that the SFA is aware of the production records requirement, a statement that production records will be maintained for all meals produced, a process for completing the productions records, and a statement that additional training will be provided to the SFA staff, include the training outline and the dates that the trainings will be held. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit a week of completed production records for review.

SFA Response

**Finding #30  Meal Components and Quantities Review Period**

The SFA is not maintaining standardized recipes.

**Technical Assistance Provided**
During the review, standardized recipes were discussed with the SFA. The SFA must ensure that all sites are using standardized recipes for the meals they produce. If the SFA is using USDA recipes, they are already standardized, however if they make any modifications to the recipe it must be documented. If the SFA creates their own recipes it is recommended that they use the USDA template for standardized recipes to ensure that they include all required areas.

**Regulation / Citation and Summary**

210.10(c)(5) Standardized recipes. All schools must develop and follow standardized recipes. A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods. Standardized recipes developed by USDA/FNS are in the Child Nutrition Database.

**SFA Suggested Guidance for Compliance**

To bring this area into compliance the SFA must submit a written assurance that includes; a statement that the SFA is aware of the standardized recipe requirement, a statement that standardized recipes will be maintained for all menu items, a process for completing the standardized recipes, and a statement that additional training will be provided to the SFA staff, include the training outline and the dates that the trainings will be held. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit a week of standardized recipes with the corresponding menu and planned production records for review.

**SFA Response**

**Finding #31  Offer vs Serve Day of Review**

Offer versus Serve is not being implemented correctly. Some meals were incomplete due to insufficient quantities offer and/or selected by the students.

**Technical Assistance Provided**

Requirements under Offer vs. Serve include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. During the review, it was determined that the SFA is not following these requirements. The requirement as well as examples of the findings and possible solutions were reviewed with the SFA.

**Regulation / Citation and Summary**

210.10 (e) Offer versus serve. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two items at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve. Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.

**SFA Suggested Guidance for Compliance**
To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written process that has been put in to place to ensure Offer vs Serve is now being implemented correctly at the senior high school(s). In addition to the new process the SFA must also provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the new process and the date the training was completed.

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**Finding #32 SMART Snacks**

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to middle school students during the school day.

**Technical Assistance Provided**

During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold. The SFA should review Smart Snack requirements online at: http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks

**Regulation / Citation and Summary**

Smart Snacks interim final rule: Middle School: Plain water or plain carbonated water (no size limit); Low-fat milk, unflavored (≤12 fl oz); Non-fat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; 100% fruit/vegetable juice (≤12 fl oz.); and 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤12 fl oz.).

**SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for Smart Snacks, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan, which must indicate that all competitive items sold are now in compliance with Smart Snacks rules. Please include the date in which all non approved items were removed and the person by position who will oversee that these items are not sold.

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**Finding #33 Food Safety**

Temperature logs are not being maintained for all food storage areas.

**Technical Assistance Provided**
Finding #34  On-Site Monitoring

The SFA did not complete on-site monitoring by February 1st and an extension was not requested.

Technical Assistance Provided

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. http://www.fns.usda.gov/sites/default/files/SP14-2011_os.pdf

Regulation / Citation and Summary

210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting and claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for food safety, the SFA must provide an assurance that the appropriate staff understand the requirements for food safety documentation. The assurance should include: a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, a statement that all temperature documents will be maintained for a minimum of 6 months, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.
Finding #35 SFSP Outreach
The SFA has not performed SFSP outreach.

Technical Assistance Provided
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA’s website, parent newsletters and district-wide emails were discussed with the SFA.

Regulation / Citation and Summary
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

SFA Suggested Guidance for Compliance
To come into compliance with this requirement, the SFA must submit an assurance that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

As the corrective action response please identify when the follow-up visit was completed and what process will be put in place moving forward to ensure that any necessary follow-up visits are completed within 45 days of the on-site review. Please identify the name(s) and title(s) of the person(s) who will be responsible for following up on findings related to on-site monitoring. Additionally, please submit supporting documentation that the follow-up visit was completed.

SFA Response

Signature of Reviewer: Danielle Reidy Date: 12/12/2016
Signature of SFA Representative: Date: _______
Please insert your detailed responses, save, print, sign, scan and upload the signed copy to cnrsupport.com by the due date indicated. Thank you.