

NH DOE, Office of Nutrition Programs and Services
NSLP/SBP/FFVP Administrative Review and Procurement Review Report for SAU #21
(Seabrook Elementary School)
Conducted on November 28 & 29, 2018

This report addresses areas of the USDA Administrative Review (AR) and Procurement Review (PR) for the **National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP), and Fresh Fruit and Vegetable Program** that had Findings of noncompliance requiring a Plan of Corrective Action (CA) with potential Fiscal Action (FA) or Technical Assistance (TA) provided to strengthen current systems and understanding of USDA regulations. FA is the recovery of overpayment due to errors in critical review areas associated with federal dollars or repeat Findings. The School Food Authority (SFA) is responsible for overseeing all aspects of the administration of the USDA Child Nutrition Programs. Findings must be corrected system wide (all schools in SAU). At the exit conference held on November 15, 2018, a copy of the Draft Action Summary Plan of the AR/PR outcome was provided to Matthew Ferreira, Business Administrator; and Abigail Kaplan, Food Service Director.

The 6 cents per lunch meal claimed was found to be in compliance and will be maintained.

Review Areas:

Meal Access and Reimbursement

Certification and Benefit Issuance

No Findings

Observation:

- All Applications were determined correctly, great job!

Verification

No Findings

Technical Assistance:

- Each verified income application should be maintained in a packet that includes: COPIES of the 2-sided income application with the Confirming Officials (CO) signature, the Household's Notification of Selection, at least one follow-up attempt for documentation, as needed, the Household's response, the Household's Notification of Results and any appeal documentation or additional correspondence.
- The Eligibility Manual for School Meals, July 2017 (https://www.education.nh.gov/program/nutrition/documents/eligibility_manual_2017.pdf) is the resource for Certification and Benefit Issuance is the resource for Verification

Meal Counting and Claiming

No Findings

Observation:

- It was clear that all students were trained on what was needed to have a reimbursable meal.

Meal Pattern and Nutritional Quality

Meal Components and Quantities

Menu and Meal Pattern

No Findings

Production Records (PRs)

Observations:

- Production Records did not have the portion or serving size listed.
- The grades were missing from the Production Records.
- Condiments, such as cream cheese and ketchup, were not listed on the Production Records.

Technical Assistance:

- Production Records must support the menu and the claim. It must identify the creditable serving sizes of all foods offered to students, including milk types and condiments. It must record all identifying information for the day, not limited to: Date, Food Items, Recipe # (if applicable), creditable component and serving size, Planned Quantity, Actual Servings, Used, Leftovers, # of students served, # of adults served (if applicable), menu.
- Production Records are a federal requirement. Proper documentation on Production Records validates the meal pattern, reflects all food items served, including milk types and condiments, and supports menus, Menu Worksheets and claims.
- Muffins on the Breakfast Menu Worksheet were listed as a 2 oz. grain, according to the Product Formulation Statement it should be a 1 oz. The overall weekly grain requirements were not affected.
- Menu Worksheets can be found at:
https://www.education.nh.gov/program/nutrition/six_cent_cert_index.htm
- Menu Planner can be found at: <https://www.fns.usda.gov/tn/menu-planner>
- Sample food item production record from Connecticut:
<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320672>

Findings:

- ✓ Production Records must be completed with all information required to support the menu and the claim.
- ✓ The Production Records must record all food items offered to students.

Corrective Action: By **March 14, 2019**, please submit: Plan for Corrective Action that will ensure that processes are in place to address the Findings above regarding accurate and complete information on the Production Records.

OVS (Offer vs. Serve)

No Findings

Signage

No Findings

Resource Management

Maintenance of the Nonprofit School Food Service Account

Low Risk;

No Findings

Paid Lunch Equity (PLE)

Low Risk;

No Findings

Revenue from Non-program Foods

High Risk; Comprehensive Review required

Observation:

- Documentation that supported the Non-Program Food Revenue (NPFR) tool for the 2017-2018 reference period was not retained and available for review.

Technical Assistance:

- Per regulation 7 CFR 210.14(f) and FNS Instruction 782-5 Rev.1, Revenues from the sale of non-program foods must generate at least the same proportion of total school food service account revenues that expenditures from the purchase of non-program foods contribute to total school food service account costs. This information must be kept for the required retention time (3 years plus the current).

Finding:

- ✓ Create a process for completing the NPFR Tool annually; the process must include the retention of the reports used to complete the tool.

Corrective Action: By **March 14, 2019**, please submit: **Plan for Corrective Action** that will ensure that a system will be developed for completing the NPFR Tool and for retention of the supporting documentation for the applicable time frame.

Indirect Costs

Not Applicable

Meal Charging Policy

No Finding

General Program Compliance

Civil Rights

Observations:

- Not all Child Nutrition Letters had the current Non-discrimination Statement on them.
- Non-Food Service staff working within the meals' programs have not received annual Civil Rights training.

Technical Assistance:

- Most updated version of non-discrimination statement must be on all pertinent documents referencing Child Nutrition Programs.
- Civil Rights Training for all staff is required annually, including any non-food service staff who work with students, Point of Service, applications, etc. and documentation of training must be maintained.

Findings:

- ✓ All Child Nutrition Letters did not have the current Non-discrimination Statement on them. NOTE: (The SAU has removed the old statement and has revised the Child Nutrition Letters with the current non-discrimination statement. This has been reviewed by State Agency and *no further action is required.*)
- ✓ Civil Rights Training for all staff is required annually, including any non-food service staff who work with students, Point of Service, applications, etc. and documentation of training must be maintained.

Corrective Action: By **March 14, 2019**, please submit a Plan of Corrective Action that will address how SAU #21 will ensure that: all staff, both food service and non-food service working within the meals' programs receive annual Civil Rights training and that appropriate documentation is maintained.

On-site Monitoring (formerly Accuclaim)

No Findings

Observation:

These are completed by the different Food Service Directors within the SAU. Nice Practice.

Local Wellness Policy (LWP)

Observations:

- The LWP is missing the following requirements: Measurable goals for Nutrition Education, Nutrition Promotion, Physical Education and Other School-Based Wellness Activities. It does not identify the leadership responsible for compliance, how stakeholders can participate in the development, implementation, review and/or update of the LWP, or identify how stakeholders and public will be notified.
- The website provided (www.sau21.org) does not provide the public with the policies to review or notices to comply with regulations.
- Triennial assessment has not occurred.

Technical Assistance:

- Each Local Educational Agency that participates in the National School Lunch Program or other federal Child Nutrition programs is required by federal law to establish a local school wellness policy for all schools under its jurisdiction.
- <http://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>
- Please note additional requirements have been added to Local School Wellness Policy Implementation. This information is located on our website: http://www.education.nh.gov/program/nutrition/school_lunch.htm under Local Wellness Policy Toolkit and related resources. This includes:
 - Review and update the Wellness Policy to set goals, document meetings/activities and track progress toward attaining objectives.
- SA Reviewer suggests that a wellness link be established on the SAU website that would house all wellness related documents.
- The LEA should be moving towards strengthening local wellness policies, by
 1. Making efforts to include students in the development, implementation and periodic review and update of the policy, and,
 2. Taking required steps regarding implementation, transparency, public input and assessment available to the public.

Finding:

- The Wellness Policy must be updated to include the missing minimum requirements regarding items listed above.

Corrective Action: By March 14, 2019 please submit: **Plan for Corrective Action** that will ensure that the Wellness Policy will be updated to meet measurable goals and notification requirements. Please provide a copy of the revised Wellness Policy.

Smart Snacks

No Findings

Professional Standards

Observation:

- Master list of the tracking of trainings did not include the non-food service employees working within the meals program

Technical Assistance:

- NSLP Policy Memo: SP 38-2016, Questions and Answers on the Final Rule "Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010"
- <http://www.fns.usda.gov/school-meals/professional-standards>
- Appropriate records must be maintained in the training file (agenda, sign-in sheets, certificates of completion, resources used in training). All training must be recorded in a log to help track employee status in meeting the applicable training requirement.
- A Master List of Trainings should be maintained to confirm that all employees meet the required hours of training each year, this should include all SAU non-food service employees working within the meals program.

Finding:

- ✓ Create a Master List of Trainings for all Districts' food staff and SAU non-food service employees working within the meals program and maintain to confirm that all employees meet the required hours of training each year.

Corrective Action: By XXXXX, please submit: **Plan for Corrective Action** that will ensure that trainings provided to all staff working within the meals program are logged appropriately. Submit the Master List of Trainings to the State Agency.

Water

No Findings

Food Safety and Buy American

Observations:

- One Food Safety Inspections has been completed for this school year and a request has been made to NH DHHS for a second inspection.
- There is no current up-to-date Food Safety Plan based on HACCP principles. The FSD for Seabrook Elementary is currently working on developing the plan, along with the SOP's.
- There are some products that did not initially comply with Buy American regulations; however, there was documentation for the exceptions for each product.

Recommendations:

- Review storage practices/Standard Operating Procedures.
- Think of the Food Safety Plan based on HACCP principles as a Procedure Manual so anyone can come into the kitchen, pick up the manual and be able to complete any job in the kitchen.

Technical Assistance:

- Schools participating in NSLP and/or SBP are required to implement a Food Safety Plan based on HACCP principles. This became a requirement in the school year **beginning July 1, 2005**. Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the Richard B. Russell National School Lunch Act.
- https://healthymeals.fns.usda.gov/sites/default/files/uploads/Food_Safety_HACCPGuidance.pdf USDA HACCP Guidance
- <https://theicn.org> National Food Service Management Institute (NFSMI) Developing a School Food Safety Plan resources
- https://theicn.org/?page_id=108611&catid=181 NFSMI Standard Operating Procedures (SOPs)
- Food safety training by an approved course required for food service staff within their first year of employment; NH DOE Technical Advisory #13 http://www.education.nh.gov/standards/tech_advisories.htm.
- Policy Memo SP-24-2016; Compliance with, and Enforcement, of the Buy American Provision in the National School Lunch Program.

Finding:

- ✓ The Food Safety Plan based on HACCP Principles needs to be completed.

Corrective Action: By **March 14, 2019** please provide a Plan of Corrective Action that will address how SAU 21 will ensure that there is a Food Safety Plan based on HACCP principles for Seabrook Elementary School and will submit copy to State Agency.

Reporting and Recordkeeping

No Findings – everything is very organized

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach Observations:

- The School Breakfast Program (SBP) is announced at the beginning of the year with the school packet that goes home to every student.
- The Summer Food Service Program (SFSP) Outreach is conducted at the end of the year to all families in the district.

Other Federal Program Reviews

Fresh Fruit and Vegetable Program

Observation:

- A wide variety of fruits and vegetables are offered. Usually two choices are offered.

Remember: There are no appeals for the identification of Findings requiring plans of Corrective Action. However, if this review includes a financial finding you may appeal the financial amount, 7 CFR 210.18(q). Financial findings will be determined upon receipt of all plans of Corrective Action.

Procurement Review

No Findings:

State Agency Reviewer: Patty Carignan

USDA Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.) should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint or discrimination, complete the USDA Program Discrimination Complaint Form. (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter address to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: US Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov

This institution is an equal opportunity provider