

2018-19 NYSED Administrative Review Summary of Findings

SFA Name: Westminster Community Charter School SFA LEA Code: 14060086874

Child Nutrition Programs (check all that apply): NSLP SBP Afterschool Snacks FFVP SMP

Special Provision Option: CEP P2

Date of Administrative Review (Entrance Conference Date): 11/14/18

Date review results were provided to the School Food Authority: 11/14/18

Date review summary was publicly posted: June 2019

No findings.

Meal Access and Reimbursement

Certification and Benefit Issuance:

- *Students were incorrectly certified for free or reduced price meals.
- *Free or reduced price meal benefits were provided to students without having appropriate certification documentation on file.
- Students' prior year eligibility status was not carried over for the first 30 operating days of the current school year.
- Free benefits were not extended to all students in a household containing at least one directly certified student.
- Household applications were incorrectly denied.
- *Student eligibility was not properly transferred to the benefit issuance document.
- *Student eligibility updates were not made to the point of service benefit issuance document according to SFA's established timeframes.
- The Direct Certification Matching Process was not conducted as required.

- Documentation to support that the following information was sent to households was not maintained:
 - Income Application
 - Parent letter
 - Eligibility Notification letter
 - Denial letter
 - Direct Certification Notification letter
- There is outdated, missing or incorrect information on:
 - Income Application
 - Parent letter
 - Eligibility Notification letter
 - Denial letter
 - Direct Certification Notification letter
- Administrative Prerogative was incorrectly used.

Verification:

- The income verification process was not completed by November 15th.
- An Alternate Sampling Method was used when the SFA did not meet the criteria required to use an alternate process.
- No confirmation review was conducted on applications selected for verification.
- The number of applications verified was incorrect.
- Free and reduced price meal benefits for students of households that failed to respond to the verification request were not terminated.
- Applications were not correctly verified.
- Appropriate changes were not made to the benefit status of a student(s) as a result of verification.

- Families not notified appropriately of a change in benefit status as a result of verification:
 - For a decrease in benefits, families were not notified in writing at least 10 calendar days in advance
 - For an increase in benefits, families were not notified within 3 calendar days
- The letter sent to families who have been selected for verification contains outdated, missing or incorrect information.
- The Letter of Verification Results contains outdated, missing or incorrect information.
- The Verification Collection Report was not accurately completed.

Meal Counting and Claiming:

- *The claim for reimbursement was incorrectly consolidated.

This error is: Systemic Non-Systemic Breakfast Lunch Snack
- *Meal counts by category were not combined and recorded correctly on the claim for reimbursement.

This error is: Systemic Non-Systemic Breakfast Lunch Snack
- The meal counting and claiming system does not prevent overt identification of students receiving free and reduced price benefits.
- *Meals are not counted at the point of service. Breakfast Lunch Snack

Meal Pattern and Nutritional Quality

Meal Components and Quantities

- *Production records were not maintained as required. Breakfast Lunch Snack
- *Meals Offered:
 - did not contain all required components
 - did not contain sufficient quantities Repeat Finding
 - were not in portion sizes appropriate to each age/grade group
- *Meals served were incomplete
- All required meal components were not offered to students
- Meals served were missing required components Breakfast Lunch Snack

- *Grain items are not whole-grain rich. Repeat Finding
- *Fluid milk was not offered in at least two varieties. Repeat Finding
- *An unallowable milk type(s) was offered. Repeat Finding

Offer versus Serve:

- Signage indicating what constitutes a reimbursable meal was not displayed.
- *The meal service was not structured to comply with the required age/grade group requirements.
 - Breakfast Lunch Snack
- Signage did not indicate meal requirements under Offer vs. Serve.
- Offer vs. Serve is not properly implemented.
- Staff not adequately trained on Offer Versus Serve requirements.

Dietary Specifications and Nutrient Analysis:

- *The nutrient analysis conducted of meals offered did not meet the following Dietary Specifications for the age/grade group being served and:
 - Calories Trans Fat
 - Saturated Fat Sodium
 - Repeat Finding

Resource Management

- The Nonprofit Food Service Account has an excess fund balance that exceeds three months' average operating expenses
- The Nonprofit Food Service Account has a negative ending fund balance
- The Paid Lunch Equity Tool was not completed prior to the review.
- The Non-program Food Tool was not completed prior to the review.
- Program foods are not separated from non-program foods.
- No assurance that the price of an adult meal covers all costs of the meal
- No assurance that non-program food revenue generates at least the same amount it costs to purchase the food.
- Indirect costs were charged to the nonprofit food service account without an approved indirect cost rate agreement.
- An incorrect base or rate was used to calculate indirect costs.

General Program Compliance

Civil Rights:

- No documentation to support that a Public Announcement was released.
- The Public Announcement contains outdated, missing or incorrect information.
- Documentation to support annual civil rights training for all staff was not maintained.
- The USDA Non-Discrimination Statement is not included on all Program documents or is not the updated Non-Discrimination Statement.
- The SFA does not appear to be in compliance with all Civil Rights requirements.

SFA On-site Monitoring:

- The on-site review of the breakfast and lunch counting and claiming system was
 - not conducted
 - not conducted by February 1 of the current school year.
- A self-review of the afterschool snack program was:
 - not conducted
 - first review not conducted within the first 4 weeks of operation
 - second review not conducted prior to the end of the school year
- The SFA did not conduct a follow-up review to ensure corrective action from the initial self-review was implemented.

Local School Wellness Policy:

- No Local Wellness Policy.
- Local Wellness Policy requirements are not met.

Smart Snacks in School (All Foods Sold in School):

- Foods and/or beverages sold during the school day are not compliant with Smart Snack regulations as defined.
- There is no process to ensure food items sold during the school day are in compliance with Smart Snack regulations.

Professional Standards:

- The new school nutrition program director does not meet the hiring requirements
- All school nutrition program personnel have not met or will not meet the annual training requirements.

Water:

- Free potable water is not available to students during the meal service.
 - Breakfast
 - Lunch

Food Safety, Storage, and Buy American:

- No written food safety plan is maintained.
- The written food safety plan is outdated and/or does not reflect actual practices.
- No documentation to support that food safety inspections were requested from the health department.
 - The most recent health inspection was not posted in a publically visible location.
 - HACCP principles and/or local and State health standards are not being met.
 - No current permit to operate a food service
 - Improper personal hygiene
 - Cross-contamination is not prevented
 - Food temperatures not monitored/recorded
 - Refrigerator and/or freezer temperatures not monitored/recorded
 - Food prep and/or service areas not clean
 - Utensils/equipment not clean
 - Evidence of pests present
- Improper food storage
- A review of the food products on-site at reviewed schools and/or at off-site storage facilities indicated a violation of the Buy American provision.

Reporting and Recordkeeping:

- Program records are not maintained on file for three years plus the current year.
- Reports are not submitted to SED by deadlines.
- The Verification Collection Report was not submitted by December 15th.
 - Cash Analysis was not submitted by October 31st
 - Health Inspection Report was not submitted by October 15th
 - The results of the independent review of applications was not submitted by October 31st
 - Reimbursement claims are not submitted within 60 days following the last day of the full month covered by the claim

SBP and SFSP Outreach:

- The School Breakfast Program is not being promoted as required.
- The Summer Food Service Program is not being promoted as required.

Other Federal Program Reviews:

- *The Afterschool Care Program (Snack) is not administered as required.
- *The Fresh Fruit and Vegetable Program is not administered as required.
- *The Special Milk Program is not administered as required.

****Finding(s) that may result in fiscal action.***