# STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

**School Food Authority Name: Des Arc School District**
**Date of Administrative Review (Entrance Conference Date):** February 10, 2025
**Date review results were provided to the School Food Authority (Exit Conference Date):** March 21, 2025
**High Risk Follow-up Required:** ✓ Yes ☐ No

**General Program Participation**

1. What Child Nutrition Programs does the School Food Authority participate in? (Select all that apply)
   ✓ School Breakfast Program
   ✓ National School Lunch Program
   ☐ Fresh Fruit and Vegetable Program
   ☐ Afterschool Snack
   ☐ Seamless Summer Option
2. Does the School Food Authority operate under any Special Provisions? (Select all that apply)
   ☐ Community Eligibility Provision
   ☐ Special Provision 2

**Review Findings**

3. Were any findings identified during the review of this School Food Authority?
   ✓ Yes ☐ No

| REVIEW FINDINGS | | | | |
|---|---|---|---|---|
| **A. Meal Access and Reimbursement – Performance Standard 1** | | | | |
| **YES** | **NO** | | Technical Assistance | Corrective Action |
| ✓ | ☐ | Module 1: Eligibility: Certification and Benefit Issuance | ✓ | ✓ |
| ✓ | ☐ | Module 2: Verification | ✓ | ✓ |
| ☐ | ✓ | Module 3: Meal Counting and Claiming | ☐ | ☐ |
| ☐ | ✓ | | ☐ | ☐ |

Findings:

1. **Finding (*Module 1: Meal Access and Reimbursement*):** Upon review of two hundred eighty-nine (289) eligibility documents, twelve (12) applications had errors affecting a total of twenty-six (26) students.
   a. Three (3) applications were missing an adult signature, affecting a total of five (5) students. In accordance with 7 CFR 245.6(a)(7), “the application must be signed by an adult member of the family”.
   b. Five (5) applications were not approved within ten (10) operating days of receiving the application from the household, affecting a total of ten (10) students. In accordance with 7 CFR 245.6(c)(6)(i), “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 ten (10) operating days of receiving the application from the household”.
      i. Of these five (5) applications, one (1) application was also missing a social security number (SSN), affecting a total of one (1) student. In accordance with 7 CFR 245.6(a)(6), “applications must have the last four digits of the adult’s SSN or if the adult does not have a SSN, that must be indicated”.
   c. Four (4) applications were determined incorrectly, affecting a total of ten (11) students.
      i. Two (2) applications were determined to be reduced and should have been paid, affecting a total of eight (8) students.
      ii. One (1) application was determined to be reduced and should have been free, affecting a total of two (2) students.
      iii. One (1) application was determined as free, but was given reduced benefits, affecting a total of one (1) student.

In accordance with 7 CFR 210.7(c)(l)(i), "The School Food Authority must correctly approve each child's eligibility for free and reduced meals".

The errors noted above resulted in a 3% error rate. In accordance with 7 CFR 210.18(I), fiscal action must be applied for School Food Authorities (SFAs) with an eligibility error rate of 3% or greater. The total fiscal action for the errors noted above for the Federal Fiscal Year (FFY) 2024 resulting in a net overclaim of $383.97, as indicated in the attached Meal Count Adjustment Form. In accordance with 7 CFR 210.19(d), the state agency has the ability to disregard this overclaim. This disregard may be made once per program within a fiscal year. This overclaim is disregarded.

The total fiscal action for the errors noted above for FFY 2025 resulted in a net overclaim of **$659.32** as indicated in the attached Meal Count Adjustment Form. In accordance with 7 CFR 210.19(d), since this overclaim exceeds the disregard threshold, fiscal action must be applied. A follow-up notice will be sent to the district with instructions for payment remission. The SFA may appeal part of or all of the reclaim for reimbursement. See the appeal procedures attached.

2. **Finding (*Module 2: Verification*):** Upon review of verification documents for SY 2024-2025, of the five (5) applications selected for verification, two (2) applications had errors:
   a. One (1) verified application listing one (1) student, had two (2) errors discovered.
      i. The meal application was missing an adult signature. In accordance with 7 CFR 245.6(a)(7), "the application must be signed by an adult member of the family".
   b. The verified application was determined as "paid" but the benefit issuance system did not reflect any changes and kept as "free". In accordance with 7 CFR 245.6(c)(3)(iii), "the local educational agency must change the children's eligibility status when a change is required as a result of verification activities".
   c. One (1) verified application listing two (2) students, had two (two) errors discovered.
      i. One (1) income source documentation was submitted by the household, but the document was copied incorrectly, revealing only partial information. The partial information did not contain all the required information to verify proof of income. In accordance with 7 CFR 245.6(f)(2), "the documentation must indicate the source, amount and frequency of all income and can be for any point in time between the months prior to application for school meal benefits and the time the household is requested to provide income documentation".
      ii. The verified application was verified as "free" but should have been verified as "paid" based off incomplete verification on sources of income provided by the household. In accordance with 7 CFR 245.6(f)(7), "based on the verification activities, the local educational agency shall make appropriate modifications to the eligibility determination made initially".

**B. Meal Patterns and Nutritional Quality**

| YES | NO | | Technical Assistance | Corrective Action |
|---|---|---|---|---|
| ☐ | ✓ | Module 4: Meal Components and Quantities | ☐ | ☐ |

3. **Finding (*Module 3: Meal Counting and Claiming*):** During meal observation of breakfast and lunch, it was noted that preschool meal counts were not being recorded at the point of sale (POS). In accordance with 7 CFR 210.18(g)(1)(ii)(b), "For each school selected for review, each type of food

service line provides accurate point of service meal counts, by type, and those meal counts are correctly counted and recorded."

**C. General Program Areas**

| YES | NO | | Technical Assistance | Corrective Action |
|---|---|---|---|---|
| ☐ | ✓ | Module 5: Wellness | ☐ | ☐ |
| ☐ | ✓ | Module 5: Smart Snacks | ☐ | ☐ |
| ✓ | ☐ | Module 6: Food Safety and Storage | ✓ | ✓ |
| ☐ | ✓ | Module 7: Hiring and Professional Standards | ☐ | ☐ |
| ☐ | ✓ | Module 8: General Area | ☐ | ☐ |
| ☐ | ✓ | Module 9: Afterschool Snack | ☐ | ☐ |
| ☐ | ✓ | Module 10: Fresh Fruit and Vegetable Grant Program | ☐ | ☐ |
| ☐ | ✓ | Module 11: Food Service Management Company | ☐ | ☐ |

4. **Finding (*Module 5: Wellness*):** Upon reviewing wellness documentation, it was discovered that the district did not make the wellness information and activity public. In accordance with 7 CFR 210.31(d)(2), the local educational agency must, "inform the public about the content and implementation of the local school wellness policy and make the policy and any updates to the policy available to the public on an annual basis".

5. **Finding (*Module 6: Food safety*):** Upon review of the food safety practices at the Des Arc High School, the following was discovered:
    a. Review of the Food Safety Plan discovered that the plan had not been updated since 2018. Per 7 CFR 210.13(c), "the SFA must develop and implement a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served."
    b. Review of the storage areas at Des Arc High School revealed the following:
        i. The following storage areas were observed to have the violation of storage food less than six (6) inches above the floor:
        ii. The pantry bottom shelves, in all the shelving units
        iii. A platform in the pantry holding a crate of oranges. This crate of oranges was also discovered to have substantial mold covering the surface of the food. To ensure the health and safety of consumers, foods that have spoiled or passed the manufacturer's recommended expiration date must be discarded. In accordance with the Arkansas Rules Pertaining to Retail Food Establishments code 3-305-11, "Food shall be protected from contamination by storing the food: (1) in a clean, dry location; (2) where it is not exposed to splash, dust, or other contamination; and (3) at least (6 inches) above the floor".
        iv. The walk-in freezer bottom shelves, in all the shelving units
        v. A platform in the walk-in freezer holding boxes of food

    In accordance with the Arkansas Rules Pertaining to Retail Food Establishments 3-305.10(iii), "the SFA is required to ensure that the necessary facilities for storage, preparation, and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss".
    c. The 3-Door fridge had a daily temperature above 41°F. In accordance with the Arkansas Rules Pertaining to Retail Food Establishments, code 3-501.16(A)(2)(a), "Except during preparation, cooking, or cooling, or when time is used as the public health control as specified in Subpart 3-501.19, and except as specified in Subparagraph (B) of this section, potentially hazardous

food shall be maintained at a temperature and time specified in the following: 5 degree Celsius (41 degrees Fahrenheit) or less for a maximum of 7 days".

d. Upon review of the food storage areas, several products were found without a date and/or labeled. In accordance with 21 CFR 101 – Food Labeling and 9 CFR 317 – Labeling, Marking Devices, and Containers, any food packaged within a retail food establishment must be clearly labeled and dated.

6. **Finding (*Module 7: Professional Standards*):** Upon review it was found that there are district employees outside of the school nutrition program that have the responsibility of running the point of service (POS) systems, and distribution of meals at mealtimes. A review of training logs indicated no documentation of civil rights training or training related to their duties. Per FNS 113-1, "local agencies are responsible for training their subrecipients, including "frontline staff" who interact with program applicants or participants."

   **Technical Assistance:** Technical assistance was provided to the CND concerning non-nutrition staff who have responsibilities to the program obtaining annual civil rights training and training related to their duties.

7. **Finding (*Module 8: General*):** Upon review, it was discovered that the SFA did not publicly advertise the availability of summer meals. Per 7 CFR 210.12(d)(2), "SFAs 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 when school is not in session."