

## STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

**School Food Authority Name:** Palestine Wheatley School District- Palestine Wheatley Elementary School

**Date of Administrative Review (Entrance Conference Date):** January 28, 2025

**Date review results were provided to the School Food Authority (Exit Conference Date):** March 18, 2025

**High Risk Follow-up Required:** ☒ Yes ☐ No

### General Program Participation

- 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
- Does the School Food Authority operate under any Special Provisions? (Select all that apply)
  - ☐ Community Eligibility Provision
  - ☒ Special Provision 2

### Review Findings

- Were any findings identified during the review of this School Food Authority?
  - ☒ Yes ☐ No

| REVIEW FINDINGS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                     |                                                           |                                     |                                     |
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| A. Meal Access and Reimbursement – Performance Standard 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                     |                                                           |                                     |                                     |
| YES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | NO                                  |                                                           | Technical Assistance                | Corrective Action                   |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | Module 1: Eligibility: Certification and Benefit Issuance | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | Module 2: Verification                                    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>            | Module 3: Meal Counting and Claiming                      | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <input type="checkbox"/>            |                                                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| Findings:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                     |                                                           |                                     |                                     |
| <ol style="list-style-type: none"><li><b>Finding (Module 3: Meal Counting and Claiming):</b> During review, discrepancies in meal counting and claiming were identified across multiple aspects of the meal service process:<ol style="list-style-type: none"><li>During meal observation of breakfast and lunch, it was noted that preschool meal counts were not being recorded at the point of sale (POS). Additionally, during after-school snack meal observation, it was noted that meal counts for grades K-6 were not being recorded at the point of sale (POS). It was discovered that staff were using attendance as meal counts for meals served. In accordance with 7 CFR 210.18(g)(l)(ii)(B), each type of food service line provides accurate point of service meal counts, by type, and those meal counts are correctly counted and recorded.</li><li>Upon review of the December 2024 claim, there were errors found with meal count totals.<ol style="list-style-type: none"><li>On December 11<sup>th</sup>, 2024, preschool meals were overclaimed by 1 student meal for breakfast and 1 for lunch. The accurate meal counts claimed for breakfast should have been 2,075.</li><li>On December 16<sup>th</sup>, 2024, preschool meals were overclaimed by 1 student meal for breakfast and 1 for lunch. The accurate meal counts claimed for lunch should have been 6,235.</li><li>The total meal counts for afterschool snack showed an underclaim of 6,858 meals. In accordance with 7 CFR 210.7(c)(l)(iv) meal counts should be correctly recorded, consolidated, and reported on the Claim for Reimbursement. Per 7 CFR 210.18(1)(1)(ii) the State Agency must apply fiscal action to the incorrect meal counts at the SFA level. The total fiscal action for the findings above is an underclaim of \$8,287.43, as detailed in the attached Meal Count Adjustment Form.</li></ol></li></ol></li></ol> |                                     |                                                           |                                     |                                     |
| B. Meal Patterns and Nutritional Quality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                     |                                                           |                                     |                                     |
| YES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | NO                                  |                                                           | Technical Assistance                | Corrective Action                   |
| <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>            | Module 4: Meal Components and Quantities                  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Findings:

2. **Finding (Module 4: Meal Pattern and Nutritional Quality):** Upon review of Preschool production records for children ages 3-5 the following errors were found.
  - a. On December 2<sup>nd</sup>, December 4<sup>th</sup>, and January 29<sup>th</sup>, preschool production records for breakfast reported serving  $\frac{1}{4}$  cup fruit. According to 7 CFR 220.8(o)(2) preschooler breakfast meal pattern table, the minimum amounts of vegetables, fruits, or portions of both, to be served at breakfast is  $\frac{1}{2}$  cup for ages 3-5.
  - b. On December 2<sup>nd</sup>, 2024, preschool production records for lunch reported serving 1 oz meat/meat alternative (MMA). According to 7 CFR 220.8(o)(2) preschooler lunch meal pattern table, the minimum amounts of MMA to be served at lunch is 1  $\frac{1}{2}$  oz for ages 3-5.
3. **Finding (Module 4: Meal Pattern and Nutritional Quality):** Upon review of Elementary production records for lunch the following errors were found.
  - a. On December 3<sup>rd</sup>, 2024, production records indicated  $\frac{1}{2}$  cup corn planned to be served, but did not fill out how much was prepared or served.
  - b. On December 4<sup>th</sup> - 6<sup>th</sup>, 2024, productions records indicated  $\frac{1}{4}$  cup fresh vegetable cup being served, however it did not specify what vegetable it was. Therefore, it cannot be determined if the elementary school lunch meals were meeting vegetable subgroup meal pattern.
  - c. On December 6, 2024, the afterschool snack production records were incomplete, missing documentation of the first component, which is needed to determine crediting toward the snack meal pattern.

In accordance with 7 CFR 210.10(a)(3), 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 meal components and food quantities for each age/grade group every day.

4. **Finding (Module 4: Meal Pattern and Nutritional Quality):** Upon review of lunch production records for the week of December 3-6, 2024, the following meal pattern errors were found.
  - a. On December 3<sup>rd</sup>, productions records indicated only  $\frac{1}{8}$  cup of vegetable was served.
  - b. On December 6<sup>th</sup> productions records indicated only  $\frac{1}{2}$  cup vegetable was served.

In accordance with 7 CFR 210.10(c), schools must offer the meal components and quantities required in the lunch meal pattern established in the following table: In a four (4) day/week school, grades K-8 need a minimum of  $\frac{3}{4}$  cup vegetable per day.
  - c. A total of only 2  $\frac{1}{8}$  cup vegetables for the week. In accordance with 7 CFR 210.10(c), schools must offer the meal components and quantities required in the lunch meal pattern established in the following table: In a four (4) day/week school, grades K-8 need a minimum of 3 cups vegetable per week.
  - d. Zero cups of dark green vegetable subgroup for the week. In accordance with 7 CFR 210.10(c), schools must offer the meal components and quantities required in the lunch meal pattern established in the following table: In a four (4) day/week school, grades K-8 need a minimum of  $\frac{1}{2}$  cup dark green vegetable subgroup per week.
  - e.  $\frac{1}{2}$  cup red/orange vegetable subgroup for the week. In accordance with 7 CFR 210.10(c), schools must offer the meal components and quantities required in the lunch meal pattern

established in the following table: In a four (4) day/week school, grades K-8 need a minimum of ¾ cup red/orange vegetable subgroup per week.

- f. Beans, Peas and Lentils (legumes) were not offered for the week. In accordance with 7 CFR 210.10(c), schools must offer the meal components and quantities required in the lunch meal pattern established in the following table: In a four (4) day/week school, grades K-8 need a minimum of ½ cup beans/peas (legumes) vegetable subgroup per week.

5. **Finding (Module 4: Meal Pattern and Nutritional Quality):** Upon review of Elementary production records for breakfast on December 3<sup>rd</sup>-6<sup>th</sup>, 2024 it was found that only 4 oz of grain was served for the week. In accordance with 7 CFR 220.8(c), schools must offer the meal components and quantities required in the breakfast meal pattern established in the following table: In a 4 day/week school, grades K-5 need a minimum of 5.5-8 oz of grains or meats/meat alternates and grades 6-8 need a minimum of 6.5-8 oz grains or meat/meat alternates per week.

#### C. General Program Areas

| YES                                 | NO                                  |                                                    | Technical Assistance                | Corrective Action                   |
|-------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Module 5: Wellness                                 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Module 5: Smart Snacks                             | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Module 6: Food Safety and Storage                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Module 7: Hiring and Professional Standards        | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Module 8: General Area                             | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Module 9: Afterschool Snack                        | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Module 10: Fresh Fruit and Vegetable Grant Program | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Module 11: Food Service Management Company         | <input type="checkbox"/>            | <input type="checkbox"/>            |

#### Findings:

6. **Finding (Module 5: Wellness and Smart Snack):** Upon review of Wellness documents, it was discovered that the triennial assessment had not been completed. In accordance with 7 CFR 210.31(e)(2), at least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public.
7. **Finding (Module 6: Food Safety Site):** While conducting a kitchen facility walkthrough the following was revealed:
- A hole in the front outside threshold of the walk-in cooler. In accordance with the Arkansas State Board of Health 6-501.10, the physical facilities will remain in good repair.
  - A moderate water leak in the WIC coming from the outside roof down to the back structural panel. In accordance with 29 CFR 1910.22(a)(3), walking-working surfaces are maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice. Upon review of the two (2) most recent Health Inspections dated February 29, 2024, and August 20, 2024, the findings above were listed as repeat observations that were reported requiring corrective action (CA), which had not been resolved.
8. **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.

9. **Finding (Module 8: General):** Upon review of Revenue from Nonprogram Foods documentation, the district submitted a Cost Per Tray breakdown which showed the charges for adult meals were not enough to cover the baseline cost of a meal for both breakfast and lunch. In accordance with 7 CFR 210.14(f)(2), the proportion of total revenue from the sale of nonprogram foods to total revenue of the school food service account shall be equal to or greater than: the proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account.
10. **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.