

Child Nutrition Program Administrative Review Overview Report

This form represents written notification of the findings of this review, required corrective action, and the timeframe for the required corrective action. **This information will be shared with the superintendent and/or appropriate administrative personnel.**

Sponsor Name: New Fairfield Public Schools	Sponsor Number: 09100	Review Date(s): 3/8/2018 & 3/9/2018
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Schools Reviewed	Site Number	State Reviewers
1. Consolidated School	01	1. Lead: Fionnuala Brown Phone: 860-807-2129
2.		2.
3.		3.
4.		4.
5.		5.
6.		6.

Check CNP Programs Reviewed	Check Type of Review	Check if Applicable
<input checked="" type="checkbox"/> National School Lunch Program	Follow-up	<input type="checkbox"/> Provision 2
<input checked="" type="checkbox"/> School Breakfast Program	Additional	<input type="checkbox"/> Community Eligibility Provision
<input type="checkbox"/> After School Snack Program	Do all of the schools in the district participate in the School Breakfast Program? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/> Fresh Fruit and Vegetable Program	If no, indicate the district's reason given during the exit conference:	
<input type="checkbox"/> Seamless Summer Food Program		
<input type="checkbox"/> Special Milk Program		
Does your district/institution participate in Farm to School? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Comments:		

Date of Exit Conference: 3/28/2018	Response Due Date: 4/27/2018 unless otherwise indicated
The <i>Response Due Date</i> is the date the sponsor's response and written Corrective Action Plan are due to the lead reviewer. Note: Failure to respond by this date will result in Claims for Reimbursements being withheld.	

- I. **Overview of Sponsor Findings:** Attached is an overview of findings from the reviewed materials and school(s). Please note that any findings associated with Meal Access and Reimbursement, and Meal Pattern and Nutritional Quality may result in fiscal action. Each problem area cited must be addressed in your written Corrective Action Plan to the Child Nutrition Programs (CNP). All findings have been entered into the CNP Online System Compliance Module. Corrective Action must be completed and submitted the Compliance Module <https://ct.enpus.com/prod/Splash.aspx>.

In addition to the areas noted with findings. The following areas were reviewed and technical assistance was provided as needed.

- Meal Access and Reimbursement
- Verification
- Meal Counting and Claiming
- Nutritional Quality and Meal Pattern –
- Meal Components and Quantities
- Offer versus Serve
- Dietary Specifications & Nutrition Analysis
- Resource Management - Maintenance of Non-Profit School Food Service Account
- Resource Management - Paid Lunch Equity
- Resource Management - Revenue from Non-Program Food
- Resource Management - Indirect Costs
- General Areas - Civil Rights
- General Areas - On-site Monitoring
- General Areas - Local School Wellness Policy
- General Areas - Smart Snacks in School
- General Areas – Food Safety
- General Areas – School Breakfast and Summer Food Service Programs Outreach
- General Areas - Professional Standards

New Fairfield Public Schools (09100)

Review ID: 1458

Exit Conference Date: 3/28/2018

Review Year: 2018

Month of Review: February

Lead Reviewer: Fionnuala Brown

Area	Findings ID	Finding Description	Required Corrective Action
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Sponsor - Level Findings

100 - Certification and Benefit Issuance	V-0100	<p>A letter sent to parents dated August 2017, stating that if a child owes money from the previous year they are not allowed to charge lunch this year. This is not in compliance with federal regulations. Additionally, New Fairfield's Charging Policy refers to Type A meal- this in an outdated term.</p> <p>Operational Memorandum No. 4-17 Guidance on Unpaid Meal Charges and Collection of Delinquent Meal Payments</p> <p><i>Effective with school year 2017-18, the CSDE requires that the household pays all delinquent student debts no later than June 30 to ensure that students' accounts are closed. Any delinquent debts that have not been recovered by June 30 will be considered bad debt. These student meal accounts must be at a zero balance for the next school year.</i></p>	<p>Revise and submit the letter to be used to inform parents regarding New Fairfield Public School's Charging Policy.</p> <p>Revise and submit the Charging Policy, due June 30, 2018.</p> <p>Please refer to OM No.4-2017.</p>
100 - Certification and Benefit Issuance	V-0100	<p>1. The SFA did not accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document. One application was approved correctly however 3 student were listed as reduced and one as free on the benefit issuance document, all student should have been reduced.</p>	<p>1) Notify households of the error and provide a date for the change of status.</p> <p>2) Submit copies of letters sent to the households.</p>

		2. Directly Certified or extended eligibility students were not correctly approved. It was determined that an application listed a handwritten case number and did not have the case number confirmed prior to approving the application.	
100 - Certification and Benefit Issuance	V-0100	The determining official was converting all income on applications to annual, even when all income reported was of the same frequency. USDA specifies that if income is all of the same frequency, it must be totaled and compared to the Income Guidelines for Free and Reduced-Price Meals. If income is of different frequencies, then the income should be converted to ANNUAL income, using the conversion directions on the back of the household application.	Provide written assurances that the Determining Official will attend Application Certification and Verification training offered this summer by the CSDE.
1000 - Local School Wellness Policy	V-1000	A comprehensive review of the Local School Wellness Policy (LSWP) is being conducted off-site by Donna Heins, Education Consultant. A copy of her assessment will be forthcoming. LSWP non-compliance with the Healthy, Hunger-Free Kids Act 2010 is addressed through this technical assistance only. The effective date for full compliance is June 30, 2017. Please review the assessment and take action to ensure compliance in the sections noted as needing action.	No further action is required.
1200 - Professional Standards	V-1200	All employees who have duties related to the operation of the School Nutrition Program who are not food service employees are also required by the Professional Standards Final Rule to have job-specific training to ensure that they perform their jobs effectively and in compliance with program regulations. This includes, but is not limited to employees involved with the application and verification process, meal counting and claiming, on-site monitoring, civil rights procedures, etc. Training must be documented and tracked on an annual basis to ensure compliance.	Develop and submit the plan that all employees outside of the School Nutrition Programs that have duties related to the operation of the School Nutrition Program have job-specific training. All trainings must be documented and tracked annually.

200 - Verification	V-0200	The application(s) subjected to verification was/were not properly selected in accordance with the sample size option used. Two applications were verified however based on the sample size only one should have been verified.	Corrective action has been submitted and accepted for this finding. The determining official must attend the training offered by the State Department of Education during the summer of 2018, submit registration proof.
200 - Verification	V-0200	The SFA did not complete verification by November 15th.	Corrective action was submitted and approved.
300 - Meal Counting and Claiming	V-0300	The monthly claim consolidation process does NOT include verifying the number of free and reduced eligible students at each school.	Develop and submit the procedures for monthly claim consolidation. Include roles and responsibilities of each involved individual and ensure all of the elements of the monthly claim consolidation are included. (see CSDE Overview of Meal Counting and Claiming Process)
800 - Civil Rights	V-0800	Annual Civil Rights training is required for all staff who interact with program applicants or participants (i.e., cafeteria staff, F/R application approval staff) and their supervisors. This includes the hearing official. The Civil Rights training did not cover the required material- Civil Rights- Responsibilities in the Child Nutrition Programs.	Retrain staff using the appropriate Power Point. Submit proof of training and written assurance that training will be up to date in future years.
800 - Civil Rights	V-0800	The SFA does not have a procedure for receiving and processing complaints alleging civil rights discrimination within the FNS School Meal Program.	Develop and submit a procedure for receiving and processing complaints alleging civil rights discrimination within the FNS School Meal Program. Train staff and submit documentation of training.
900 - SFA On Site Monitoring	V-0900	While on-site monitoring was conducted for lunch at all sites prior to February 1. 1. On-site monitoring of the breakfast program was not completed. Regulations require that 50% of sites participating in the breakfast program have on-site monitoring completed annually by February 1. Technical assistance was provided. 2. Only the first two pages of the form were used. The READILY OBSERVABLE GENERAL AREAS were not included as part of the on-site review as required.	Complete and submit pages 3 and 4 of the monitoring form for all schools for breakfast and lunch.

Site - Level Findings: Consolidated School (01)

1400 - Food Safety	V-1400	Non-domestic products were found during the on-site review at the High School (Olives and Jalapenos). Recent guidance provided by USDA in February 2016, notes that when exceptions to the Buy American Provision are used, SFA's must keep documentation justifying the exception.	Develop and forward procedures on how the food service director will ensure that there is oversight of the Buy American provision. Also, develop and implement a procedure for school staff accepting deliveries that includes reviewing items for compliance with the Buy American Provision and the process for refusal of nondomestic items. Submit this procedure. However, if non-domestic items will continued to be purchased and served, please forward documentation justifying the purchase of each nondomestic product. The guidance is on the CSDE website and can be reached by the link provided below: http://www.fns.usda.gov/compliance-and-enforcement-buy-american-provision-nslp .
300 - Meal Counting and Claiming - Lunch	V-0300	The attendance factor that is used on the edit check is different than the attendance factor that is in the online system and applied to the monthly claims.	Confirm the correct attendance factor and either adjust the edit check worksheet or the online system. Forward the correct attendance factor and the adjusted form.

As a reminder, each issue cited in the finding summary report must be addressed by the district/school as part of corrective action. All findings have been entered into the CNP Online System Compliance Module. Corrective Action must be completed and submitted in the Compliance Module which is part of the Connecticut Online Application and Claiming System for the USDA Child Nutrition Programs. Also, once this has been completed by the district/school, an email notification must be sent to the lead reviewer indicating that the corrective action was completed and submitted for CSDE review and approval.

Additionally, Section 207 of the HHFKA amended section 22 of the NSLA (42 U.S.C. 1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website. Note the location on the CSDE Administrative Review Website will be forthcoming.

Additional comments:

It was a pleasure visiting the New Fairfield Public School System. The staff were well-prepared and all activities pertaining to the USDA Child Nutrition Programs were well documented and presented in an organized manner, allowing for an efficient review process.

The Child Nutrition Program (CNP) State Agency reviewer and the sponsor representative must sign and date this report at the exit conference. A copy must be made for the sponsor and the CNP reviewer retains the original. Note: You have the right to appeal any or all findings directly to the Connecticut State Department of Education. Procedures and timelines for filing an appeal are attached.

State Reviewer, Child Nutrition Programs:

Lionnuala Brown

Date:

3/29/18

Sponsor Representative:

Craig McClain

Date:

3-29-2018