Administrative Review Summary SY2020

School Food Authority Name: Rome City
Date of Administrative Review Entrance Conference: November 5, 2019
Date final review results were provided to the School Food Authority: March 11, 2020
Date review summary was publicly posted: March 24, 2020

General Program Participation

1. What Child Nutrition Programs does the School Food Authority participate in?
   - School Breakfast Program
   - National School Lunch Program
   - Afterschool Snack
   - Seamless Summer Option

2. Does the School Food Authority operate under any Special Provisions for meal counting and claiming?
   - Community Eligibility Provision
   - Provision 2

Review Findings

3. Did the review identify areas of non-compliance with School Nutrition Program regulations?
   - Yes
**Section** | **Form subsection** | **Site Name** | **Question #** | **Due Date** | **Status**
---|---|---|---|---|---
Local School Wellness | Local School Wellness | | 1006 | 12/13/2019 | CAP Accepted

**Corrective Action History**

**Finding:**
At the time of the off-site review, there was not a method for the public to know about Local Wellness Policy (LWP) assessments and implementation.

**Corrective Action:**
The School Food Authority (SFA) will provide information on the School Nutrition website indicating how the public can access the information about the implementation of the Local Wellness Policy and how to access the most recent Triennial Assessment which will be available by June 2020.

Local School Wellness | Local School Wellness | | 1005 | 12/13/2019 | CAP Accepted

**Corrective Action History**

**Finding:**
The SFA has not conducted a System-wide Assessment of the Local Wellness Policy and does not have a plan in place currently to conduct a Triennial Assessment. The Assessment the SFA Director attached is a summary of the Wellness Coalitions most recent meeting.

**Corrective Action:**
The SFA will put a plan in place indicating how they will conduct the system-wide Wellness Assessment and provide a timeline to get the Assessment completed by June 1, 2020.

Food Safety, Storage and Buy American | Food Safety, Storage and Buy American | Rome High School | 1407 | 12/13/2019 | CAP Accepted

**Corrective Action History**

**Finding:**
The SFA/Sponsor’s written Food Safety Plan is not being implemented. The Rome Transitional Academy was using time as method of control at the satellite site for food service. Time as a control is not permitted for use during transport of food to an off-site location.
### Required Corrective Action:

The School Nutrition Director has contacted the Manager at Rome High School and has required them to take temperatures of the food once it arrives to ensure the food is within the correct temperature ranges.

A procedure for Rome Transitional Academy to take temperatures at the site once food is delivered will be written and submitted to the State Agency. A temperature log for one week of temperatures for food at Rome Transitional Academy will be provided.

### Food Safety, Storage and Buy American

| Food Safety, Storage and Buy American | 1403 | 12/13/2019 | CAP Accepted |

#### Finding:

A review of agricultural food components indicates violations of the Buy American provision (7 CFR 210.21 (d)). There is no documentation that demonstrates domestic alternatives were considered or that an acceptable exception was granted. The Director obtained documentation from the vendor for broccoli from Ecuador. This documentation indicated that broccoli is largely imported from out of the country. The reviewers also found frozen carrots from Canada and frozen green peppers from Mexico. The SFA was not notified that these items had been delivered to the schools.

#### Required Corrective Action:

The Director will contact her food service distributor to find out why non-domestic products were delivered to her schools without her knowledge. She will determine once she gets the information if it meets criteria of exceptions with Buy America provision (7 CFR 210.21). She will decide whether to accept, decline or find a substitution(s) for the non-domestic product(s). The Director will provide evidence of communication with her vendors that they will not deliver non-domestic food items to her schools without approval. The Director will provide the State Agency with the results of this decision and will maintain any correspondence regarding non-domestic items delivered in the future. Training will be provided to School Nutrition staff regarding identifying country of origin when checking in food orders and provide the State Agency with an agenda and sign-in sheet.
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<td>During the review of the Local Wellness Policy, no procedure was in place to inform potential stakeholders that they could participate in the Local Wellness Policy.</td>
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<td>Corrective Action:</td>
<td>The SFA will include on their website how stakeholders may contact the department to participate in the Local Wellness Program. In addition to providing it on the website, they may also provide information at the schools to inform parents and staff how they may participate.</td>
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<td>The Local Education Agency has planned and allowed fundraisers that are not Smart Snack compliant and exceed the Exempted Fundraiser limits. Several of the fundraiser exceeded the 3-day limit.</td>
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<td>Corrective Action Required:</td>
<td>The principal will provide the School Nutrition Department with the Exempted Fundraiser form and indicate that they will discontinue any fundraisers that have exceeded the limit of 30 fundraisers per year and three consecutive days limit.</td>
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<td>Foods and beverages sold to students during the school day (defined as 12AM on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods and beverages sold during meal services, do not meet Smart Snacks standards (Includes food items sold during non-exempt fundraisers). The Mayfield Nutty Buddy Ice Cream Bar does not meet Smart Snacks standards.</td>
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**Finding:**

Planned menu quantities do not meet meal pattern requirements for the review period and production records and/or other supporting documentation for the review period do not indicate that the required quantities of food were available. During the review of production records and completion of the USDA Menu Worksheets, the State Agency found that breakfast meals did not meet the required number of grains for the week. The menu offers a 2-ounce equivalent grain item daily and a 1-ounce equivalent grain cereal each day. The 1-ounce equivalent grain cereal option does not provide the students with the 7-10-ounce equivalent grain requirement for grades K-12 at breakfast.

**Required Corrective Action:**

The menu planner has added a slice of toast that meets the 1-ounce equivalent grain requirement to the Elementary School Breakfast. The State Agency observed this addition on the day of the on-site review. The SFA will provide an updated menu with the Cereal and Toast option and provide a week's Production Records indicating that the toast was offered with the 1-ounce equivalent grain cereal each day.