

Twin Rivers Unified School District (03122)

Review ID: 12490

Review Year: 2015-2016
Month of Review: January
Lead Reviewer: Keara Felt
Exit Conference Date: 3/24/2016

Sponsor - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	<p>1)Based on the selected random sample of 590 names of the School food authorities (SFA) approved student applications, a total of eight eligibility errors were identified. See the attached SFA-1 and the written summary below for more detail.</p> <p>Eight application certified incorrectly: -Five applications were certified by the SFA as eligible for free; however, the reviewer validated the households eligible for reduced-price -Two applications were certified by the SFA as eligible for free; however, the reviewer validated the households eligible for paid-status -One application was certified by the SFA as eligible for reduced-price; however, the reviewer validated the household eligible for free</p> <p>The local educational agency (LEA) must determine household eligibility for free or reduced price meals either through direct certification or the application process at or about the beginning of the school year. The local educational agency must determine eligibility for free or reduced price meals when a household submits an application or, if feasible, through direct certification, at any time during the school year as per 7 CFR§245.6(c)(1).</p>	Provide a procedure on how the SFA will ensure all eligibility applications are certified correctly.	<p>See attached document. The application errors listed above were mostly clerical. Staff that process meal applications will receive further training with an emphasis on verifying their entries before processing the application. A Nutrition Services staff member will randomly choose 10% of the meal applications daily as they are being processed. The appropriate corrective actions will be taken for all errors found.</p> <p>Two of the applications resulted in parents verifying the number in the household and status remained the same. See attachment for explanation.</p>

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100 - Certification and Benefit Issuance	V-0100	<p>One application was certified correctly by the SFA as eligible as paid; however, the SFA roster indicated the household was eligible for reduced-priced benefits.</p> <p>The local educational agency (LEA) must determine household eligibility for free or reduced price meals either through direct certification or the application process at or about the beginning of the school year. The local educational agency must determine eligibility for free or reduced price meals when a household submits an application or, if feasible, through direct certification, at any time during the school year as per 7 CFR §245.6(c)(1).</p>	<p>Provide a procedure on how the SFA will ensure that the correct eligibility status is input into the point of service benefit issuance document.</p>	<p>Please see attached. Staff that process meal applications will receive further training with an emphasis on verifying their entries before processing the application. A Nutrition Services staff member will randomly choose 10% of the meal applications daily as they are being processed. The appropriate corrective actions will be taken for all errors found.</p>
200 - Verification	V-0200	<p>Reviewer verified that one student application was verified incorrectly. The application was certified correctly as free. During the verification process, the application was verified as reduced; however the application should have been verified as denied. As per 7 CFR 210.7(c)(1)(A) the system shall accurately reflect eligibility status as well as changes in eligibility made after the initial approval process due to verification findings, transfers, reported changes in income or household size, etc.</p>	<ol style="list-style-type: none"> 1. Provide a copy of the adverse eligibility letter sent to Shane Lal. 2. Provide a procedure on how the SFA will ensure all applications are verified correctly during the verification process. 	<p>Staff responsible for the verification process will be trained more thoroughly. Processes, letters and procedures will be monitored closely by the Director. Shane Lal's status did not change. Reviewer noted that he should be Reduced, the worksheet is in error it states he should be Denied. Please see attached.</p>

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200 - Verification	V-0200	The notice of adverse action (verification results) letter does not list the name of the Hearing official. The contact name provided on the notice of adverse is the Verifying Official. As per 7 CFR 245.6a(j) Adverse Action "If verification activities fail to confirm eligibility for free or reduced price benefits or should the household fail to cooperate with verification efforts, the school or local educational agency shall reduce or terminate benefits, as applicable, as follows: Ten days advance notification shall be provided to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination. The first day of the 10 day advance notice period shall be the day the notice is sent. The notice shall advise the household of: (1) The change; (2) The reasons for the change; (3) Notification of the right to appeal and when the appeal must be filed to ensure continued benefits while awaiting a hearing and decision; (4) Instructions on how to appeal; and (5) The right to reapply at any time during the school year. The reasons for ineligibility shall be properly documented and retained on file at the local educational agency."	Provide a copy of the updated notice of adverse action/verification results letter that shows the name and contact information of the hearing official. (SFA provided copy of updated adverse action letter that included the hearing official.)	Letter has been corrected and will be checked for correct and complete information by the Director on a yearly basis prior to verification.

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200 - Verification	V-0200	Verification was not complete by the Nov 15 deadline due to this date falling on a weekend (Sunday). All verification was completed as of Nov 17-18th. 7 CFR 245.6a(b)(2)Verification Requirements - Deadlines and extensions for local educational agencies - Deadline extensions"(i)The local educational agency may request an extension of the November 15 deadline, in writing, from the State agency. The State agency may approve an extension up to December 15 of the current school year due to natural disaster, civil disorder, strike or other circumstances that prevent the local educational agency from timely completion of verification activities. (ii) In the case of natural disaster, civil disorder or other local conditions, USDA may substitute alternatives for the verification deadline in paragraph (b)(1) of this section."	Providea procedures on how the SFA will ensure the verification process will be completedby the November 15th deadline.	Staff responsible for the verification process will be trained more thoroughly. Processes, letters and procedures will be monitored closely by the Director and in the future, verification will be completed within all regulations and by the November 15th deadline.

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Site - Level Findings: Madison Elementary (14006)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1400 - Food Safety	V-1400	The food safety inspection report was not posted in a publicly visible location. This was corrected on-site prior to the lunch meal service. Not corrective action required. 7 CFR 210.13(b)Facilities Management - Food Safety InspectionsSchools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request. Sites participating in more than one child nutrition program shall only be required to obtain two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals.	No corrective action required	Staff will be reminded that they must post a copy of their health inspections in a publicly visible location.

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Site - Level Findings: Madison Elementary (14006)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>Free counts exceeded the attendance adjusted eligible students on the following days: 1/14, 1/20, and 1/21. There were no explanations or justifications noted on the edit check. 7 CFR 210.8(a)(3)Claims for Reimbursement - Internal controls - Edit Checks"(i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor. (ii) School food authorities that are identified in subsequent administrative reviews conducted in accordance with §210.18 as not having meal counting and claiming violations and that are correctly complying with the procedures in paragraph (a)(3)(i) of this section have the option of developing internal controls in accordance with paragraph (a)(2)(i) of this section."</p> <p>SFA explainedto reviewer that it is not abnormal for them to serve 100% of their free students. However, the SFA just needs to document on the edit check when the attendance factor of 97.61% is exceeded.</p>	Develop anddescribe the procedures to be followed to ensure there will be explanations when the daily count exceed the enrollment adjusted eligible for all sites. Identify the staff that will be responsible for the task.	<p>At the time of the review, we were still using the acceptable 93.8% standard attendance factor. We now use the actual attendance factors, by site, provided by the district, averaging 96%+. This has resolved the inaccurate edit checks that reported we were serving meals in excess of our attendance. See attached.</p> <p>When our edit checks show that our daily count exceeds the enrollment adjusted for attendance, our Accounting Supervisor, Michael Carrick, will be responsible for resolving the issue.</p>

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Site - Level Findings: Woodlake Elementary (14018)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>Reduced counts exceeded the attendance adjusted eligible on : 1/7, 1/8, 1/13, 1/25, 1/26. There were no explanations or justifications noted on the edit check report. 7 CFR 210.8(a)(3) Claims for Reimbursement - Internal controls - Edit Checks"(i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor. (ii) School food authorities that are identified in subsequent administrative reviews conducted in accordance with §210.18 as not having meal counting and claiming violations and that are correctly complying with the procedures in paragraph (a)(3)(i) of this section have the option of developing internal controls in accordance with paragraph (a)(2)(i) of this section."</p> <p>SFA explained to reviewer that it is not abnormal for them to serve 100% of their reduced students. However, the SFA just needs to document on the edit check when the attendance factor of 95.96% is exceeded.</p>	See question 323 under Madison Elementary.	<p>At the time of the review, we were still using the acceptable 93.8% standard attendance factor. We now use the actual attendance factors, by site, provided by the district, averaging 96%+. This has resolved the inaccurate edit checks that reported we were serving meals in excess of our attendance. See attached.</p> <p>When our edit checks show that our daily count exceeds the enrollment adjusted for attendance, our Accounting Supervisor, Michael Carrick, will be responsible for resolving the issue.</p>
900 - SFA On Site Monitoring	V-0900	Site monitoring form was not fully completed by SFA. As per 7 CFR 210.8(a)(1) every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year.	Describe how the SFA will ensure that all site monitoring forms are fully completed.	Our Assistant Director will review site monitoring procedures with Supervisors. The person assigned to track forms will review them as well as the Assistant director to ensure completeness.

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Site - Level Findings: Higher Learning Academy (14022)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
900 - SFA On Site Monitoring	V-0900	<p>SFA completed a breakfast site monitoring visit prior to February 1st; however a lunch site monitoring visit is required prior to February 1st.</p> <p>As per 7 CFR 210.8(a)(1) every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year.</p>	<p>1. SFA must conduct a lunch onsite monitoring visit and provide the reviewer with the completed onsite monitoring form</p> <p>2. Describe how the SFA will ensure all lunch site monitoring visits are conducted by February 1st.</p>	<p>All site monitoring review dates are tracked on one form and we require our supervisors to observe a breakfast meal in addition to lunch.</p> <p>One of the breakfast reviews was mistakenly marked as a completed lunch review on the tracking sheet, so it appeared as if it had been completed. The person tracking our site monitoring will double verify the accuracy of the entry before completing the task to ensure all lunch site monitoring visits are conducted by February 1st. The list will be double verified by the Assistant Director prior to the February 1st date to ensure all sites have been reviewed.</p>

Site - Level Findings: Rio Linda High (14048)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	<p>Four breakfasts observed at Rio Linda High on the day of review, February 8, 2016, did not contain 1/2 cup fruit. Of the four breakfasts, two contained a cinnamon mini, one cup of milk, and no fruit. The other two breakfasts contained a cinnamon mini, one kiwi, and one cup of milk. According to the Food Buying Guide for School Nutrition Programs, Fruit Section, page 2-19, one fresh kiwi equals 1/4 cup. According to USDA's 2014-2015 Offer Versus Serve Manual page 18, all students at any grade level must select at least three food items, one of which is at least 1/2 cup of fruit or vegetables. Disallow 4 free breakfast meals.</p> <p>During the onsite administrative review, the reviewer verified that the SFA was now bundling two kiwis to make it equivalent to a half cup portion size.</p>	<p>Describe how the site will ensure that every student takes a reimbursable breakfast meal.</p>	<p>We provide Offer v Serve and Component training to all staff annually, sometimes more often. The cafeteria staff at this site have received disciplinary action for their negligence and given additional training. We will ramp up our training district-wide to ensure that all staff have a clear understanding of the regulations regarding meal components during all meal services.</p> <p>The office staff that create our menu production records have been reminded to refer to the Buying Guide if there is no official documentation on portioning.</p>

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Site - Level Findings: Elwood J. Keema High (25234)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
300 - Meal Counting and Claiming - Lunch	V-0300	<p>On January 8, 2016, SFA claimed more free lunch meals than were taken. The total number of lunch meals that were taken were 8 free lunch meals. SFA had claimed 15 free lunch meals. Disallow 7 free lunch meals.</p> <p>Meals are prepared and put in the vending machine for the students to select. The students input their specific number assigned to them (a combo of their birthday and a assigned code). The system was thought to differentiate when a student selects a breakfast and lunch meal and claim it as such. It was verified by the company of the vending machine that the machine did not have that mechanism. SFA updated procedure and will deliver breakfast meals in the morning for the breakfast service, and then return to take the leftover breakfast meals and put in the lunch meals for the lunch service.</p>	SFA provided updated procedure prior to the onsite review.	<p>This is an independent-study school where students report to their "teachers" randomly during the day and week depending on their busing and work schedules. Nutrition Services provides a vending machine that dispenses reimbursable breakfast and lunch meals, there is no site-scheduled lunch period except for when the machine is open during specific meal times.</p> <p>at 7:30am, a food service worker removes the lunch meals from the previous day and fills the machine with breakfast meals. At 10:28am, a food service worker returns to empty the machine of breakfast meals and fill with lunch meals by 10:30. The machine stops selling breakfast at 10:28am and resumes sales for lunch at 10:30. The machine dispenses lunch meals until 5:00 due to the non-traditional schedule. Form SNP-36 has been sent to Donna Reedy for approval of an extended lunch period for Keema.</p>