

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: Norwalk Public Schools	Sponsor Number: 10300	Review Date(s): December 11-13, 2018
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Schools Reviewed		Site Number	State Reviewers	
1.	Ponus Ridge Middle School	53	1.	Lead: Jackie Schipke Phone: 860-870-2123
2.	Side by Side Community School	01	2.	Susan Alston
3.	Wolfpit Elementary School	24	3.	Fionnuala Brown
4.			4.	Teri Dandeneau
5.			5.	
6.			6.	

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

Date of Exit Conference: Thursday, December 13, 2018	Response Due Date: Monday, January 28, 2019
<p><i>The Response Due Date 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></p>	

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.

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

Norwalk School Lunch (10300)

Review ID: 1585

Exit Conference Date: 12/13/2018

Review Year: 2019

Month of Review: November

Lead Reviewer: Jackie Schipke

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

100 - Certification and Benefit Issuance	V-0100	<p>Several applications were processed without providing a social security number. The last four digits of the social security number or a no social security number indication on the application must be provided by the household before the application is processed.</p> <p>Additionally, one student was incorrectly determined as free and should have been reduced. One application was determined as denied and should have been reduced.</p>	<p>Develop and forward a plan on how the district will ensure that the determining official does not process the applications without checking that the required social security information is on the application. Also, notify the family (Student ID: 3006367) of the incorrect free determination and give them the right to appeal. Forward a copy of the letter.</p>
100 - Certification and Benefit Issuance	V-0100	<p>The web based online free and reduced-price meal application contains outdated language that is not applicable to Connecticut, i.e., Migrant, FDP, FITAP. Connecticut does not have a Migrant Education Program or a Food Distribution Program on Indian Reservations and FITAP is a Family Independence Temporary Assistance Program that is specific to Louisiana. In CT it is called Temporary Family Assistance. Additionally, the household must indicate the school name or the web application will not allow the application to be processed. Though the Local Education Agency may add this item on the application, it is not required in order for the application to be processed and therefore, must be changed. This is outlined in the USDA Eligibility Manual for School Meals as well as in the FNS Instruction SP 50-2011.</p> <p>Additionally, under the <i>Getting Started Page</i>, it refers to processing applications within 10</p>	<p>Forward a plan on how the district will work with the software company to have them change the outdated language or inactivate the fields (as applicable) so parents cannot check off the areas and inadvertently have their children become eligible for free meals.</p> <p>Also, contact the software company and have the student's school field be optional. Note that the state agency will test the system before approving corrective action.</p> <p>Lastly, provide written assurances that the district will review and test all aspects of the web application at least annually to assess its compliance with the federal regulations</p>

		<p>working days. Federal guidelines require that applications be processed within 10 calendar days. Note that there is a difference between operating and working days:</p> <ul style="list-style-type: none"> · Operating Days: The days on which reimbursable meals or milk are provided by a school or another program sponsor. [7 CFR 245.2] · Working Days: The days when school is open and teachers or school administration are on-site, but the reimbursable meal service is not in operation. 	
1000 - Local School Wellness Policy	V-1000	<p>A comprehensive review of the Local School Wellness Policy (LSWP) was conducted off-site by Donna Heins, Education Consultant. A copy of her assessment was sent by e-mail to the Food Service Director and Business Official. Local School Wellness Policy (LSWP) requirements are not met with respect to documentation. The School Food Authority (SFA) should have a plan in place to retain required documentation for local school wellness policy steps (implementation, transparency, public input and availability). The SFA is not required to submit any further LSWP information to the Connecticut State Department of Education.</p>	No corrective action is required to be submitted.
1200 - Professional Standards	V-1200	<p>The final rule, published March 2, 2015, requires a minimum amount of annual training hours for school nutrition program directors, managers, and staff. There are also minimum hiring standards for new school nutrition program directors. It was determined in preparation for the on-site visit that the foodservice director appointed in November 2018 did not meet the minimum hiring standards and a new individual was assigned by the management company 12/09/2018.</p>	The foodservice management company must submit written assurance that as turnover happens the hiring standards will be met as outlined in the contract.
1400 - Food Safety	V-1400	<p>Non-domestic product was found during the on-site review - Side by Side School-Apple Slices from China, Ponus Ridge MS- Red Peppers from Canada. The Buy American Provision requires SFAs to purchase, to the maximum extent practicable, agricultural products that are produced/grown in the United States. There are limited exceptions to this provision such as situations where purchase of a domestic product is truly not</p>	Develop and forward procedures on how the food service director will ensure that the Norwalk Public Schools has approved the exceptions to the Buy America Provision. If non-domestic items will be purchased and served, please forward documentation justifying the purchase of each nondomestic product with the Norwalk Public Schools approval.

		practicable. SFAs are required to include Buy American terms in solicitations, contracts, and product specifications and to monitor all contracts for compliance. When exceptions to the Buy American Provision are used, SFA's must keep documentation justifying the exception. While there was documentation in explanation of the FSMCs decision to purchase non-domestic apples and red peppers there wasn't any indication that the decision was approved by the SFA.	
700 - Resource Management (2018)	V-0700	At the Wolfpit School the daily cash deposit is left in the cash register and is not store in a locked safe or deposited in a bank.	Develop and forward a plan of how the district will ensure that the daily deposit at this school (and all other applicable schools) will be either stored in a safe or deposited in a bank daily.

Site - Level Findings: Side by Side Community (01)

400 - Meal Components and Quantities - Breakfast	V-0400	<p>Fruit is offered in one-half cup portions but there is no signage informing students that they may select two servings with their breakfast. NOTE: this was a finding on the previous Administrative Review and Corrective Action was required.</p> <p>While there were many signs, there was no clear signage informing students of exactly what they could take with their breakfast meal (for example, "select your breakfast bag, add one or two fruit selections, or a fruit and a juice, and MILK to make a complete meal".)</p>	<p>Create clear signage for the breakfast serving line informing students they may take one or two fruits and also age appropriate signs informing students of all items they may select with the breakfast meal, which must include at least one fruit selection.</p> <p>Submit copies of the signs, and photos of the signs posted on the Side by Side breakfast serving line.</p>
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Site - Level Findings: Wolfpit School (24)

1400 - Food Safety	V-1400	Bagged lunches for field trips are prepared; however, it is unclear as to how they are maintained at the proper temperature once they are delivered to the staff.	Develop and forward procedures on how the district will ensure that field trip meals are maintained at the proper temperature until the bagged lunches are served to the students.
400 - Meal Components and Quantities - Lunch	V-0400	One meal was counted as a reimbursable meal, though it did not contain the required 1/2 cup of fruit or vegetable.	Provide documented technical assistance with the cashier reinforcing the requirement that all students must take a 1/2 cup of fruit and vegetable in order for the meal to be counted as reimbursable. Forward a copy of the date of the technical assistance that was provided.

Site - Level Findings: Ponus Ridge Middle School (53)

400 - Meal Components and Quantities - Breakfast	V-0400	The USDA requires that at least two varieties of milk be available to students throughout breakfast meal service. Only 1% unflavored milk was available at Ponus Ridge MS. The food service staff added chocolate milk for meal service on the day of the onsite review.	Provide written assurances that at least two varieties of milk will be offered throughout breakfast meal service at all Norwalk Public Schools. Specify which types of milk will be available to students.
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400 - Meal Components and Quantities - Lunch	V-0400	During the on-site visit for lunch it was observed that the hot vegetable, sweet potato fries, recipe listed the per portion quantity as .18 Lbs. The foodservice staff were not using the recipe to direct the portion size and when asked did not know what .18 Lbs. portion would be. Due to the inconsistent size/shape of vegetables and fruits. The required 3/4C portion is indicated by weight. Technical assistance was provided.	It appears that the company is currently exploring using a more user friendly quantity per portion on the recipes. Develop and submit the plan to guide foodservice staff regarding the portion sizes for fruits and vegetables. Submit documentation of staff training.
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As a reminder, each issue cited in the finding summary report must be addressed by the district 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. The summary will be available on the the CSDE Administrative Review Web page.

Additional comments:

It was a pleasure visiting the Norwalk Public School system. The staff were professional and very welcoming. All documents were well organized and ready for our review demonstrating that the staff was well prepared for the Administrative Review.

The three sites that were visited offered a variety of menu items for the students and the meals were well received. The cashiers did an excellent job in identifying reimbursable breakfasts and lunches and had a great rapport with the children. The claims for reimbursement for the review month were accurate and the documentation supported the claims. The former food service director did an excellent job in preparing the USDA Menu Worksheets for both the breakfast and lunch programs and the documentation reviewed supported compliance with the meal pattern requirements.

We would recommend considering adding fat-free chocolate milk as a choice at breakfast. Students today often drink many other beverages rather than milk, and many choose to decline the milk offered with meals, especially if it is unflavored. The 1% white milk served in the NPS contains 12 grams of natural sugar, and the chocolate milk contains a total of 22 grams of sugar, natural and added. So, more than one-half of the sugar in chocolate milk (12 gms) is naturally-occurring lactose found in all milk. Only about 60 calories in chocolate milk are from added sugars, which is small relative to the powerhouse of nutrients chocolate milk provides.

We recognize there have been many positive changes made to the food service operation since the previous Administrative Review in 2014-15. The support of both the school business official and superintendent is commendable. It is evident that the district and the food service staff are supportive of the improvements in the school nutrition program. There is a team approach to addressing the needs of the students and the nutrition program, and there has been support from the Board of Education on many issues. The district Wellness Committee is well-functioning, supporting many positive changes to the school nutrition programs. The district not only utilizes FoodCorps service members to assist in promoting health and nutrition among the students but it also partners with Norwalk Grows to create school gardens at some of the schools. Additionally, the district also applied for and received an AASA breakfast grant to bring breakfast out of the cafeteria improving student access to this important meal. Excellent!

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:  Date: 12/13/18

Sponsor Representative:  Date: 12/13/18