

# Alabama State Department of Education Child Nutrition Programs



## Houston County Board of Education 035-0000

Administrative Review  
Findings and Recommendations



Alabama State Department of Education  
Child Nutrition Programs  
Gordon Persons Building  
50 North Ripley Street  
Montgomery, Alabama 36130

SUPERINTENDENT:

Mr. Brandy White

SCHOOL FOOD AUTHORITY:

Houston County Board of Education

**Dates of Administrative Review: January 29, 2024 – February 2, 2024**

| School                | Date of Review   | Review Month  | First Review | Second Review | NSLP | SBP |
|-----------------------|------------------|---------------|--------------|---------------|------|-----|
| Cottonwood Elementary | January 30, 2024 | November 2023 | X            |               | X    | X   |
| Rehobeth High         | January 30, 2024 | November 2023 | X            |               | X    |     |
| Ashford Middle        | January 30, 2024 | November 2023 | X            |               | X    | X   |

**CENTRAL OFFICE**

**Performance Standard No. 1: Meal Access and Reimbursement**

**Certification and Benefit Issuance:**

No discrepancies were observed.

**Verification:**

No discrepancies were observed.

**Meal Counting and Claiming:**

**Finding 1:**

**7 CFR 245.2 (2)(iv)- Determining eligibility for free and reduced-price meals in schools state that information obtained from an official responsible for determining if a child is a *foster child*, a *Homeless child*, a *Migrant child*, a *Head Start child*, or a *Runaway child*, as defined in the section.**

Documentation for these children includes the name of the child; a statement certifying that the child has been determined eligible for that program or is enrolled in the Head Start Program; information in sufficient detail to match the child attending school in the local educational agency with the name of a child who has been determined eligible for that program or is enrolled in an eligible Head Start Program; the signature of the official from the program who is authorized to provide such documentation on behalf of that program and the date that the official signed the certification statement. Documentation may also be a list of children, a computer match, or a court document that includes this information.

In 7 CFR 245.2, the definition of a Head Start Child means a child enrolled as a participant in a Head Start program authorized under the Head Start Act ([42 U.S.C. 9831](#) *et seq.*)

During the review, Head Start students participated in Breakfast and Lunch meal services and these meals were counted and claimed. These Head Start Students are not enrolled in Houston County Board of Education and cannot be counted or claimed for reimbursement. Houston County Board of Education is not the authorizer under the Head Start Act. Dothan City Board of Education is the authorizer with the signed Head Start Grant contract for this program.

Corrective action required:

1. The SFA will not be able to claim the meals for the Head Start students in the month of February.
2. The SFA must determine how these meals will be paid or establish a vended meal contract with Dothan City Board of Education in the next ten (10) calendar days.
3. The SFA must revise the Schedule A school information for the Head Start students to ensure correct meal counting and claiming are accurate at each of those schools.
4. The SFA must provide written procedures of the corrective actions that demonstrate the noncompliance is permanently corrected.
5. If meetings occurred or trainings were provided to the staff as part of the corrective actions, submit the documents listed below with the plan.
  - a. Meeting or Training Agenda
  - b. Attendance Sign-in Sheets

(Due to the financial aspect, this information for Finding #2 was sent in email to the CNP Director on February 13, 2024, for the SFA to establish procedures to be in compliance with meal counting and claiming of the Head Start Program.)

### **Performance Standard No. 2: Meal Pattern and Nutritional Quality**

#### **Meal Components and Quantities:**

No discrepancies were observed.

#### **Offer Versus Serve:**

No discrepancies were observed.

#### **Dietary Specifications and Nutrient Analysis:**

No discrepancies were observed.

### **General: Resource Management**

#### **Financial Management:**

No discrepancies were observed.

#### **Procurement:**

No discrepancies were observed.

### **General: General Program Compliance**

#### **Civil Rights: (Ex. Public Media Release)**

No discrepancies were observed.

#### **On-Site Monitoring:**

No discrepancies were observed.

## Wellness Policy:

### Finding 2:

**7 CFR 210.31 lists the requirements regarding the establishment, required changes, periodic review, and update of local school wellness policies and includes public involvement and public notification, implementation assessments and updates, and recordkeeping requirements regarding the local school wellness policy.**

- The Healthy, Hunger-Free Kids Act of 2010 requires each local educational agency participating in the National School Lunch Program or other federal Child Nutrition programs to establish a local school wellness policy for all schools under its jurisdiction. Each local education agency must designate one or more local education agency officials or school officials to ensure that each school complies with the local wellness policy. At a minimum, a local school wellness policy must:
  - Include goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
  - Include nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
  - Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and review and update of the local wellness policy.
  - Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies.
  - Be measured periodically on the extent to which schools are in compliance with the local wellness policy, the extent to which the local education agency's local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy and make this assessment available to the public.

The review of the district wellness policy revealed it was not made available to the public and did not address all the minimum required elements as followed:

- a. How the public is made aware or notified of the ability to participate in the review and update of the wellness policy for meetings, activities, and assessments.
- b. How the public can locate the district Wellness Policy and Triennial Assessment.

### Corrective Action Required:

1. The SFA must provide written procedures of how the corrective actions demonstrate that the noncompliance is permanently corrected.
2. An updated Local Wellness Policy must be submitted that includes:
  - a. How the public is made aware of the Wellness Policy Committee, and how the public will be notified of updates and Triennial Assessments.
  - b. How the public can locate the district Wellness Policy and Triennial Assessment.
3. If meeting occurred or training was provided to the staff as part of the corrective actions, submit the documents listed below with the plan.
  - a. Meeting or Training Agenda
  - b. Attendance Sign-in Sheets

**Smart Snack: (Ex. Attestation Statement)**

No discrepancies were observed.

**Professional Standards:**

No discrepancies were observed.

**Food Safety, Storage, and Buy American:**

No discrepancies were observed.

**Reporting and Recordkeeping: (Ex. Online Application Agreement)**

No discrepancies were observed.

**School Breakfast Programs Outreach:**

No discrepancies were observed.

**Summer Food Service Programs Outreach:**

No discrepancies were observed.

**Afterschool Snack Program:**

No discrepancies were observed.

**Fresh Fruit and Vegetable Program:**

No discrepancies were observed.

**Special Provision Options:**

No discrepancies were observed.

**Food Distribution:**

No discrepancies were noted.

**COTTONWOOD ELEMENTARY SCHOOL**

**Performance Standard No. 1: Meal Access and Reimbursement**

**Certification and Benefit Issuance:**

No discrepancies were observed.

**Verification:**

No discrepancies were observed.

**Meal Counting and Claiming:**

No discrepancies were observed.

**Performance Standard No. 2: Meal Pattern and Nutritional Quality**

**Meal Components and Quantities:**

No discrepancies were observed.

**Offer Versus Serve:**

No discrepancies were observed.

**Dietary Specifications and Nutrient Analysis:**

No discrepancies were observed.

**General: Resource Management**

**Procurement:**

No discrepancies were observed.

**General: General Program Compliance**

**Civil Rights:**

No discrepancies were observed.

**Wellness Policy:**

No discrepancies were observed.

**Smart Snack:**

**Finding 3:**

**7 CFR 210.11(b) lists the general requirements for competitive foods, including the nutritional standards of Smart Snacks.**

USDA Smart Snack Policy requires snack to be a “whole grain-rich” grain product, or have as the first ingredient, fruit, vegetable, dairy product, protein food; or combination food that contains at least ¼ cup of fruit and/or vegetable.

Foods must also meet several nutrient requirements:

**Calorie limits:**

Snack items: ≤ 200 calories

Entrée items: ≤ 350 calories

**Sodium limits:**

Snack items: ≤ 200 mg

Entrée items: ≤ 480 mg

**Fat limits:**

Total fat: ≤ 35% of calories

Saturated fat: < 10% of calories

Trans fat: zero grams

**Sugar limit:**

≤ 35% of weight from total sugars in foods

Foods and beverages sold to students during the school day (defined as 12 a.m. 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 did not meet Smart Snacks standards.

In observation Cottonwood Elementary School did not comply with USDA's Smart Snack Standards requirements. The school store sold items that did not meet USDA Smart Snack compliance. Items sold in the school store (Sun Chips) had total fat calories exceeding 35%.

**Corrective Action Required:**

1. The LEA must ensure all a la carte items sold during meal service and items sold in the school store meet USDA Smart Snack requirements. Any item that does not meet the above criteria cannot be sold and must be discontinued immediately.
2. The SFA must submit a written corrective action plan stating how they will ensure that the problem will not occur again.
3. If a meeting occurred or training was provided to the staff as part of the corrective actions, submit the documents listed below.
  - a. Meeting and/or Training Agenda
  - b. Attendance Sign-in Sheets

**Water:**

No discrepancies were observed.

**Food Safety, Storage, and Buy American:**

No discrepancies were observed.

**Reporting and Recordkeeping: (Ex. Online Application Agreement)**

No discrepancies were observed.

**Finding 4:**

**CFR 210.10(a)(3) addresses the requirement that production and menu records must be maintained in accordance with FNS guidance and show all pertinent information.**

Cottonwood Elementary School did not properly record serving sizes on the production record for the K-8<sup>th</sup> age/grade group. On the serving line, 2 oz serving ladles were used for Broccoli and Baked Beans and the production record indicated 4 oz serving sizes were provided.

**Corrective Action Required:**

1. The SFA must provide written procedures of the corrective actions that demonstrate how the noncompliance was permanently corrected.
2. If training was provided to the staff as part of the corrective actions, the SFA must include a copy of the following documentation with the written procedures:
  - a. Training Agenda
  - b. Attendance Sign-In Sheets

**Afterschool Snack Program:**

No discrepancies were observed.

**Fresh Fruit and Vegetable Program:**  
Not applicable.

**Special Provision Options:**  
No discrepancies were observed.

**Food Distribution:**  
No discrepancies were noted.

## **REHOBETH HIGH SCHOOL**

### **Performance Standard No. 1: Meal Access and Reimbursement**

**Certification and Benefit Issuance:**  
No discrepancies were observed.

**Verification:**  
No discrepancies were observed.

**Meal Counting and Claiming:**  
No discrepancies were observed.

### **Performance Standard No. 2: Meal Pattern and Nutritional Quality**

**Meal Components and Quantities:**  
No discrepancies were observed.

**Offer Versus Serve:**  
No discrepancies were observed.

**Dietary Specifications and Nutrient Analysis:**  
No discrepancies were observed.

### **General: Resource Management**

**Procurement:**  
No discrepancies were observed.

### **General: General Program Compliance**

**Civil Rights:**  
No discrepancies were observed.

**Wellness Policy:**  
No discrepancies were observed.

**Smart Snack:**  
No discrepancies were observed.



**Water:**

No discrepancies were observed.

**Food Safety, Storage, and Buy American:**

No discrepancies were observed.

**Reporting and Recordkeeping: (Ex. Online Application Agreement)**

No discrepancies were observed.

**Afterschool Snack Program:**

Not applicable.

**Fresh Fruit and Vegetable Program:**

Not applicable.

**Special Provision Options:**

No discrepancies were observed.

**Food Distribution:**

No discrepancies were noted.

**ASHFORD MIDDLE SCHOOL**

**Performance Standard No. 1: Meal Access and Reimbursement**

**Certification and Benefit Issuance:**

No discrepancies were observed.

**Verification:**

No discrepancies were observed.

**Meal Counting and Claiming:**

No discrepancies were observed.

**Performance Standard No. 2: Meal Pattern and Nutritional Quality**

**Meal Components and Quantities:**

No discrepancies were observed.

**Offer Versus Serve:**

No discrepancies were observed.

**Dietary Specifications and Nutrient Analysis:**

No discrepancies were observed.

**General: Resource Management**

**Procurement:**

No discrepancies were observed.

## **General: General Program Compliance**

### **Civil Rights:**

No discrepancies were observed.

### **Wellness Policy:**

No discrepancies were observed.

### **Smart Snack:**

No discrepancies were observed.

### **Water:**

#### **Finding 5:**

7 CFR 210.10(a)(1)(i) states schools must make potable water available and accessible without restriction to children at no charge in place(s) where lunches are served during the meal service.

Observation revealed water was not available during the breakfast meal service.

#### **Corrective Action Required:**

1. The SFA must provide written procedures of the corrective actions that demonstrate how the noncompliance was permanently corrected.
2. The SFA needs to create a procedure to ensure water is available and accessible without restriction to all students during the breakfast and lunch meal service at no charge.
3. If training was provided to the staff as part of the corrective actions, the SFA must include a copy of the following documentation with the written procedures:
  - a. Training Agenda
  - b. Attendance Sign-In Sheets

### **Food Safety, Storage, and Buy American:**

#### **Finding 6:**

**7 CFR 210.13(c) requires the SFA to develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or [paragraph \(c\)\(2\)](#) of this section, and the requirements in [§ 210.15\(b\)\(5\)](#).**

The purpose of a school food safety program is to ensure the delivery of safe foods to children in the school meals programs by controlling hazards that may occur or be introduced into foods anywhere along the flow of the food from receiving to service (food flow). An effective food safety program will help control food safety hazards that might arise during all aspects of food service (receiving, storing, preparing, cooking, cooling, reheating, holding, assembling, packaging, transporting, and serving). HACCP policies and procedures were not being followed.

The SFA did not follow the HACCP Standard Operating Procedures (SOPs) or record keeping practices. On-site observation revealed the SFA did not have temperature logs available for the review period and the documentation was discarded by accident.

**Corrective Action Required:**

1. All HACCP policies and procedures must be followed without exception to ensure the health and safety of students and adults.
2. The SFA must review current procedures and determine if updates are needed to procedures and recording keeping of documents.
3. The SFA must provide written procedures of the corrective actions that demonstrate the noncompliance is permanently corrected.
4. The SFA must submit a completed week of the storage temperature log when updates to procedures have been implemented, if applicable.
5. Training must be provided to support staff regarding food safety record keeping requirements as part of the corrective actions, submit the documents listed below with the plan.
  - a. Agenda
  - b. Attendance Sign-In Sheets

**Reporting and Recordkeeping: (Ex. Online Application Agreement)**

No discrepancies were observed.

**Afterschool Snack Program:**

Not applicable.

**Fresh Fruit and Vegetable Program:**

Not applicable.

**Special Provision Options:**

No discrepancies were observed.

**Food Distribution:**

No discrepancies were noted.

**Corrective Action Plan**

All findings require corrective action. Written confirmation detailing the corrective action you have taken in all areas cited must be submitted within thirty (30) calendar days from the receipt of this final report via DocuSign. When an adequate corrective action plan is not received by the established due date, the United States Department of Agriculture (USDA) regulations require that state agencies withhold program payments until corrective action plans are in place and verified.

**Corrective Action Plan for each finding must adhere to the following:**

- ✓ The finding is clearly stated, and the SFA seems to understand the noncompliance.
- ✓ An individual(s) is listed who is accountable for the results of the corrective action plan.
- ✓ Correction has been implemented.
- ✓ There is logical flow between the finding and the root cause determination.

- ✓ The plan has measurable solutions that address the root cause. The plan addresses people, processes and/or tools.
- ✓ Each step/solution has a person accountable for it and resourced.
- ✓ The corrective action plan addresses all issues identified.
- ✓ Implemented dates are stated and/or achievable deadlines are set.
- ✓ The SFA certifies that the corrective action required for each violation is complete.
- ✓ The corrective actions demonstrate how the noncompliance will be permanently eliminated.
- ✓ Evidence is presented that verifies the cause(s) of the finding is eliminated.
- ✓ Supporting Documents included with plan: (If required)

**Exit Conference:**

Mr. Joe Clark and Ms. Sharon Allison with the Alabama State Department of Education discussed the results of the review with Mr. Brandy White, Superintendent; Ms. Marie Payne, Child Nutrition Program Director; and staff at the Houston County Board of Education central office on February 1, 2024.