### Cornerstone Schools of Alabama, Inc.

### STATE AGENCY ADMINISTRATIVE REVIEW SUMMARY

Section 207 of the Healthy Hunger-Free Kids Act (HHFKA) amended section 22 of the National School Lunch Act (NSLA) (42 U.S.C. 1769c) to require State agencies (SA) 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. Regulations at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each School Food Authority (SFA) on the State agency's publicly available website no later than 30 days after the SA provides the final results of the administrative review to the SFA. The SA must also make a copy of the final administrative review report available to the public upon request.

School Food Authority Name:

Cornerstone Schools of Alabama, Inc.

Date of Administrative Review:

October 8, 2024

Date review results were provided to the School Food Authority:

November 14, 2024

Date review summary was publicly posted:

December 16, 2024

The review summary must cover access and reimbursement (including eligibility and certification review results), the SFA's compliance with the meal patterns and the nutritional quality of school meals, the results of the review of the school nutrition environment (including food safety, local school wellness policy, and competitive foods), compliance related to civil rights, and general program participation. At a minimum, this would include the written notification of review findings provided to the SFA's superintendent or equivalent as required at 7 CFR 210.18(i)(3).

# General Program Participation

What Child Nutrition Programs does the SFA participate in? (Select all that apply)

Х	School Breakfast Program	
X	National School Lunch Program	
	Fresh Fruit and Vegetable Program	
Х	Afterschool Snack	
	Special Milk Program	
	Seamless Summer Option	

Does the School Food Authority operate under any Special Provisions? (Select all that apply)

X	Community Eligibility Provision
	Special Provision 1
	Special Provision 2
	Special Provision 3

# **Review Findings**

Were any findings identified during the review of this School Food Authority?

YES	NO
X	

Please complete the following charts to indicate findings and details.

YES	NO	REVIEW FINDINGS
	Х	A. Program Access and Reimbursement
YES	NO	AREAS
	X	Certification and Benefit Issuance
	X	Verification
	Х	Meal Counting and Claiming

YES	NO	REVIEW FINDINGS
Х		B. Meal Patterns and Nutritional Quality
YES	NO	AREAS
Х		Meal Components and Quantities
	Х	Offer versus Serve
	X	Dietary Specifications and Nutrient Analysis

## Finding(s) Details:

1. The SFA failed to comply with 7 CFR 210.10(b)(1) which states that on a daily basis, meals offered to each age/grade group must include the food components and food quantities specified in the meal pattern.

YES	NO	REVIEW FINDINGS
X		C. School Nutrition Environment
YES	NO	AREAS
X		Food Safety
Х		Local School Wellness Policy
	Х	Competitive Foods
Х		Other

#### Finding(s) Details:

- 1. The SFA failed to comply with 7 CFR 210.13(c)(1)(v) which requires a school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles to establish a record keeping system.
- 2. The SFA failed to comply with 7 CFR 210.31(e)(2) which states at least once every three years, the local education agency must assess schools' compliance with the local school wellness policy and make assessment results available to the public.
- 3. All private schools and RCCI's are required to complete and submit a Child Nutrition Program Annual Report (CNPAR) each year according to USDA regulations.
- 4. The SFA failed to comply with 2 CFR 200.318 which states the recipient or subrecipient must maintain and use documented procedures for procurement transactions under a Federal award or subaward, including for acquisition of property and services. These documented procurement procedures must be consistent with State, local, and tribal laws and regulations.
- 5. The SFA failed to comply with 7 CFR 210.14(f) which lists the regulations regarding nonprogram food costs and revenue. USDA regulations require SFAs to use the USDA Nonprogram Food Revenue Tool or a USDA-approved alternative method to calculate the nonprogram food costs and nonprogram food revenues.
- 6. The SFA failed to comply with 7 CFR 210.30(b)(1)(iii)(v) which requires all school nutrition program directors, for all local educational agency sizes, must have completed at least eight hours of food safety training within five years prior to their starting date or complete eight hours of food safety training within thirty (30) calendar days of their starting date.
- 7. The SFA failed to comply with FNS Instruction 782-5 Rev. 1 which sets forth the policy on pricing of meals served to adults under the NSLP, Commodity School and School Breakfast Program in participating schools and institutions which claim reimbursement under Sections 4 and 11 of the National School Lunch Act and Section 4 of the Child Nutrition Act.
- 8. The SFA failed to comply with 7 CFR 210.8(a) which lists the requirements regarding the establishment of internal controls for the accuracy of meal counts.
- 9. The SFA failed to comply with 7 CFR 210.9(c)(7) which requires SFAs to review each afterschool care program two times a year; the first review shall be made during the first four weeks that the school is in operation each school year and
- 10. The SFA failed to comply with 7 CFR 210.10(a)(1)(ii) which states schools offering afterschool snacks in afterschool care programs must meet the meal pattern requirements in of this section. Schools must plan and produce enough food to offer each child the minimum quantities under the meal pattern in <a href="mailto:paragraph">paragraph</a> (o) of this section. Schools must plan and produce enough food to offer each child the minimum quantities under the meal pattern in <a href="mailto:paragraph">paragraph</a> (o) of this section.

YES	NO	REVIEW FINDINGS
Χ		D. Civil Rights

#### Finding(s) Details:

- The SFA failed to comply with FNS (Food and Nutrition Service) 113-1(IX)(A)(4)(d) which states
  all other FNS nutrition assistance programs, State, or local agencies, and their subrecipients,
  must post the current applicable nondiscrimination statement and include it, in full, on all
  materials regarding such programs that are produced for public information, public education, or
  public distribution.
- 2. The SFA failed to comply with 7 CFR 245.5(a)(2) and 7 CFR 245.5(b) which requires on or about the beginning of each school year, a public release, containing the same information supplied to parents, and including both free and reduced-price eligibility criteria shall be provided to the informational media, the local unemployment office, and to any major employers contemplating large layoffs in the area from which the school draws its attendance
- 3. The SFA failed to comply with FNS 113-1 (XVII)(B) which places certain direct requirements on local agencies to maintain a processing system for discrimination complaints.