

## Review Findings and Corrective Action Documents ID: 22662

Review

**Form:** 1000 - Local School Wellness Policy

**Question:** 1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with Food Services requirements? If NO, ex...

**Finding ID:** V-1000 Local School Wellness Policy requirements are not met.

**Finding Description:** The wellness policy does not contain the minimum requirements as outlined in the Healthy Hunger-Free Kids Act of 2010. The following minimum requirements were not met:

- Specific student goals
- Foods and Beverages Marketing Policies
- Policy leadership
- Local contact for each school site
- Public involvement and notification

7 CFR 210.31 Local school wellness policy. (a) General. Each local educational agency must establish a local school wellness policy for all schools participating in the National School Lunch Program and/or School Breakfast Program under the jurisdiction of the local educational agency. The local school wellness policy is a written plan that includes methods to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meals and other food and beverages sold and otherwise made available on the school campus during the school day are consistent with applicable minimum Federal standards.

**Required Corrective Action:** Develop a plan to ensure that the Local School Wellness Policy requirements are met. Include the name and title of the staff person(s) responsible.

**Sponsor Corrective Action Response:** Food Services has evaluated the District's adherence to the Local School Wellness Policy (LSWP) and is/has instituted the following plan to ensure requirement compliance: Wellness Committee is scheduled to meet in May 2018 to discuss the District's Administrative Review and finding focusing on the LSWP. Agenda topics to include, but not limited to:

- Expand site & community representation on Wellness Committee (WC).
- Establishment of committee organization & leadership (SFA).
- Development of procedural steps in reviewing LSWP and Policy revisions as determined.
- Posting of District's policies of food and beverage marketing and communications (attached).
- Sub-committee to work with District Education & Student Services divisions to define

achievable/sustainable student goals in LSWP

WC will create a conduit for information and advocacy with student leaders through the District's ICC program. Additionally, Food Services has included WC representatives, meeting schedules and the District's LSWP assessment tool on its website.

### Document Attachments:

#### ***Food and Beverage Marketing in Schools***

The District is committed to providing a school environment that ensures opportunities for all students to practice healthy eating and physical activity behaviors throughout the school day while minimizing commercial distractions. Any foods and beverages marketed or promoted to students on the school campus will meet or exceed the USDA Smart Snacks in School nutrition standards and California's Nutrition Standards. Only those foods that comply with or exceed those nutrition standards are permitted to be marketed or promoted to students. The marketing and advertising of non-nutritious foods and beverages on school property through signage, vending machine fronts, logos, scoreboards, school supplies, advertisements in school publications, or other means is prohibited.

Submitted for Acceptance: 4/25/2018  
Accepted by Reviewer: 4/27/2018

01633-SN-19-PSD

**Antelope Valley Union High School District**

DBA:

44811 N. Sierra Hwy.

Lancaster, CA 93534-3226

CD: 1964246

Vendor #: 642400

**Form:** Resource Mgt Comprehensive Review

**Question: 5**

How does the SFA ensure that only allowable costs are charged to the nonprofit school food service account (e.g. staff training, the implementation of...

**Finding ID:** PINCO, a separate entity outside of Antelope Valley Union High School District Food Services, shares office space with the SFA who pays the entirety of the office lease. No disallowances will occur for this finding at this time, however disallowance will occur in future administrative reviews for repeat findings.

Per MB NSD-SNP-07-2013 Cafeteria Funds-Allowable Uses, "Districts may not charge the cafeteria account for the rental or lease of district-owned facilities that are being used by the Food Service department (*EC* Section 38100). Districts may, however, rent or lease privately owned facilities for the Food Service department (2 *CFR* Part 225, Appendix B, Item 37)"

**Required Corrective Action:** If AVUHSD continues to share leased space with PINCO, the SFA will need to set up a lease agreement with PINCO. Develop a plan and procedure to ensure the leased space is solely for the operation of AVUHSD food services.

**Sponsor Corrective Action Response:** In securing its office space for the 2018-2019 fiscal year, the District and Food Services will negotiate a month-to-month lease with the property owner as the District has scheduled to move Food Services, as well as PINCO (separate entity) into a District-supported facility eliminating the expense from the Food Services Fund 13 budgeting. Current timeline for facility move is spring, 2019.

Submitted for Acceptance: 4/25/2018

Accepted by Reviewer: 4/27/2018

**Antelope Valley Union High School District**

DBA:

44811 N. Sierra Hwy.

Lancaster, CA 93534-3226

CD: 1964246

Vendor #: 642400

**Form:** Resource Mgt Comprehensive Review

**Question:** 11 - Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provisions of 2 CFR 200 Subpart E?

Did all recorded expenses represent an activity or function recognized as reasonable, necessary, allocable and otherwise compliant with the provision...

**Finding ID:** V-RMCRF

**Finding Description**1. The SFA did not obtain written prior approval from CDE for purchases over \$5,000 for the utility cart, purchased at \$6,945.02, used exclusively for food services. Federal requirements (found in the Office of Management and Budget [OMB] guidance cited at Title 2, Code of Federal Regulations [2 CFR], Part 225 [Cost Principles for State, Local, and Indian Tribal Governments], Appendix B, Item 15 [Equipment and other Capital Expenditures]) require a grantee or subgrantee to obtain prior written approval from its awarding agency before incurring the cost of a capital expenditure. Both the OMB guidance and generally accepted accounting principles identify equipment as a capital expenditure. For purposes of this federal prior approval requirement, OMB guidance and USDA regulations define "equipment" as any item of nonexpendable personal property with a useful life of more than one year and an acquisition cost that equals or exceeds the federal per-unit capitalization threshold of \$5,000, or a lower threshold set by state or local-level regulations.

The USDA approved the CDE capital expenditure list on July 21, 2014. The CDE does not require SFAs purchasing equipment included on the USDA-approved list on or after July 21, 2014, to submit a request to the CDE for prior approval. However, SFAs must continue following all applicable federal, state, and local procurement procedures. In addition, if an SFA chooses to select equipment that is not included on the USDA-approved list, the SFA must submit a request to the CDE for approval prior to purchasing the item as required by 2 CFR, Part 225, Appendix B, Item 15.

**Required Corrective Action:** Develop a procedure to ensure all purchases over \$5,000 have the necessary approval before purchase. Include the name and title of the staff person responsible.

As a result of this administrative review, the SFA requested and received retroactive approval from CDE, and no fiscal action will occur.

**Sponsor Corrective Action Response:** The following step(s) have been added to Food Services Procurement Policy regarding approval for capital expenditures over \$5,000.00:

Prior to soliciting quote(s) for needed equipment, Food Services will review CDE's list of pre-approved equipment under capital expenditure. In the event the equipment is not listed, Food Services will request approval from the CDE Resource Management Unit. Food Services will solicit quotes as outlined in current procedures (see attached; page one- bullet "two").

**ANTELOPE VALLEY UNION HIGH SCHOOL DISTRICT  
FOOD SERVICES PROCUREMENT PROCEDURES  
PROCUREMENT BACKGROUND**

**Document Attachments:**

Submitted for Acceptance: 4/25/2018

Accepted by Reviewer: 4/27/2018

**Antelope Valley Union High School District**

DBA:

44811 N. Sierra Hwy.

Lancaster, CA 93534-3226

CD: 1964246

Vendor #: 642400

**Form:** Resource Mgt Comprehensive Review

**Question:** 10 - If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take further steps to sufficiently increase its nonprogram food prices, add sufficient funds to its nonprofit food service account, and/or take other actions to adequately resolve the problem?

If the SFA found that its revenue ratio was less than its food cost ratio, did the SFA take further steps to sufficiently increase its nonprogram food...

**Finding ID:** V-RMCRF

**Finding Description:** The nonprogram food revenue calculator tool indicated the SFA needed \$3,485 additional revenue in SY 16-17 to bring their nonprogram foods into compliance. As a result from previous non-administrative review findings, the SFA limited their nonprogram food sales and substantially decreased the amount of additional revenue that was needed to comply with federal regulations.

7 CFR 210.14(f) *Revenue from nonprogram foods*. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of nonprogram foods complies with the requirements in this paragraph.

(1) *Definition of nonprogram foods*. For the purposes of this paragraph, nonprogram foods are those foods and beverages:

- (i) Sold in a participating school other than reimbursable meals and meal supplements; and
- (ii) Purchased using funds from the nonprofit school food service account.

(2) *Revenue from nonprogram foods*. The proportion of total revenue from the sale of nonprogram foods to total revenue of the school food service account shall be equal to or greater than:

- (i) The proportion of total food costs associated with obtaining nonprogram foods to
- (ii) The total costs associated with obtaining program and nonprogram foods from the account.

(3) All revenue from the sale of nonprogram foods shall accrue to the nonprofit school food service account of a participating school food authority.

**Required Corrective Action:**

- Evaluate the current pricing of nonprogram foods (NPF) sold by the SFA to bring NPF into compliance. Describe your plan and include the name and title of the staff member(s) responsible.
- Develop a procedure to evaluate the NPF on a regular basis to ensure compliance.
- Conduct a 22-day reference period to track NPF revenues and expenses and use the information to complete the NPF calculator (remove catering from the calculation). Submit as corrective action.

**Sponsor Corrective Action Response:** In assessing the District's NPF program, it has been determined Food Services is not receiving revenues substantial enough to absorb NPF expenses.

Attached is an example of a 22-day period (Oct. 2- Nov. 1) with Adult Meals at the current rate of .50 cents above Student pricing along with Milk sales compared with Adult Meal pricing \$1.00 above Student pricing with Milk sales at a proposed rate of \$1.00 above Student pricing.

The discrepancy was erased with the higher pricing model; Increases to Adult breakfast and lunch will go into effect August 7, 2018 at the start of the 2018-2019 school year.

Jacque Speidel, Assistant Director of Food Services will review NPF expenses in comparison to revenue monthly and adjust pricing as expenses dictate to ensure revenue/profit neutrality.

Nonprogram Revenue Calculator

Use the grid for reimbursable meal cost of nonprogram food and revenue

Cost for Reimbursable Meal Food	\$	248,832
Cost of Nonprogram Food	\$	222
Total Food Costs	\$	249,054
Total Nonprogram Food Revenue	\$	144
Total Revenue	\$	248,910
Minimum portion of revenue from nonprogram foods	\$	89
Minimum Revenue Required from the Sale of Nonprogram Foods	\$	360
Additional Revenue Needed to Comply	\$	46

\*Click on the hyperlinks to view a definition of the term.

Nonprogram Revenue Calculator

Use the grid for reimbursable meal cost of nonprogram food and revenue

Calculate what food change in adult meal price is necessary to meet the minimum revenue from nonprogram foods

Cost for Reimbursable Meal Food	\$	248,832
Cost of Nonprogram Food	\$	214
Total Food Costs	\$	249,046
Total Nonprogram Food Revenue	\$	404
Total Revenue	\$	248,642
Minimum portion of revenue from nonprogram foods	\$	89
Minimum Revenue Required from the Sale of Nonprogram Foods	\$	360
Additional Revenue Needed to Comply	\$	0

\*Click on the hyperlinks to view a definition of the term.

**Documents Attachments:**

Submitted for Acceptance: 4/25/2018

Accepted by Reviewer: 4/30/2018

Antelope Valley Union High School District

DBA:
44811 N. Sierra Hwy.
Lancaster, CA 93534-3226
CD: 1964246

HIGHLAND HIGH
39055 25th St. West
Palmdale, CA 93551-4164

Form: 400 - Meal Components and Quantities - Lunch

Question: 401

Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?

Finding ID: V-0400

Meal Components and Quantities (Lunch) are not met. [Regulation 7 CFR 210.10]

Finding Description: During the first lunch, students that chose the salad bar line did not have access to the targeted vegetable subgroup resulting in a vegetable component shortage. As a repeat vegetable subgroup finding, 52 meals served for the first lunch will be disallowed.
7 CFR 210.10(c)(2)(iii) Meal requirements for lunches and requirements for afterschool snacks - Meal pattern for school lunches - Food components - Vegetables component "(iii) Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement. All vegetables are credited based on their volume as served, except that 1 cup of leafy greens counts as 1/2 cup of vegetables and tomato paste and puree are credited based on calculated volume of the whole food equivalency. Pasteurized, full-strength vegetable juice may be used to meet no more than one-half of the vegetables component. Cooked dry beans or peas (legumes) may be counted as either a vegetable or as a meat alternate but not as both in the same meal. Vegetable offerings at lunch over the course of the week must include the following vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: (A) Dark green vegetables - This subgroup includes vegetables such as bok choy, broccoli, collard greens, dark green leafy lettuce, kale, mesclun, mustard greens, romaine lettuce, spinach, turnip greens, and watercress; (B) Red-orange vegetables - This subgroup includes vegetables such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes; (C) Beans and Peas (legumes) - This subgroup includes vegetables such as black beans, black-eyed peas (mature, dry), garbanzo beans (chickpeas), kidney beans, lentils, navy beans pinto beans, soy beans, split peas, and white beans; (D) Starchy vegetables - This subgroup includes vegetables such as black-eyed peas (not dry), corn, cassava, green bananas, green peas, green lima beans, plantains, taro, water chestnuts, and white potatoes; and (E) Other vegetables - This subgroup includes all other fresh, frozen, and canned vegetables, cooked or raw, such as artichokes, asparagus, avocado, bean sprouts, beets, Brussels sprouts, cabbage, cauliflower, celery, cucumbers, eggplant, green beans, green peppers, iceberg lettuce, mushrooms, okra, onions, parsnips, turnips, wax beans, and zucchini."

Required Corrective Action:

- 1. Provide a procedure for ensuring the vegetable subgroups are offered at all serving lines including the salad bar.
2. Correct the vegetable subgroup shortage and upload copies of supporting menu documentation showing meal pattern compliance.
3. Train staff on updated salad bar procedure.

Sponsor Corrective Action Response: Food Services has highlighted cycle menus to reflect vegetable subgroup requirements in each program cycle menu. Henceforth, Food Services will plan menus highlighting vegetable subgroup listing(s) for each day in the serving week to ensure each area has the required components throughout the serving week; attached is the menu back-up paperwork used by staff at each site with each menu's vegetable subgroup(s) highlighted in "bold."

Food Services met with Managers in February for training and review menu pattern and procedures moving forward. Staff were trained in February and March to follow menu back-up in providing/offering the highlighted targeted subgroup or substitution from the SAME vegetable subgroup (attached).

Document Attachments:

Table with columns: Daily Required Vegetables, Menu, and Recipe. Includes a sidebar with 'FOOD SERVICES MANAGER'S MEETING FEBRUARY 2018' and various sections like FINANCIAL, PROGRAM, FOOD, and PERSONNEL.

**Antelope Valley Union High School District**  
DBA:  
44811 N. Sierra Hwy.  
Lancaster, CA 93534-3226  
CD: 1964246

**HUGHES-ELIZABETH LAKES**  
16633 Elizabeth Lake Rd.  
Lake Hughes, CA 93532-1229

**Form:** 300 - Meal Counting and Claiming - Lunch

**Question:** 324

a. Were there patterns in the free, reduced or paid meal counts which appear questionable?

**Finding ID:** V-0300

Meal Counting and Claiming procedure requirements are not met.

**Finding Description:** The current meal counting and claiming practices at Hughes-Elizabeth Lakes school does not consistently provide an accurate meal count. The daily meal count rosters are printed and provided to the site by classroom. On three days out of the review month, one of the classroom's printed roster was not available and the teacher completed a handwritten roster with the students' first names (and last name initials, inconsistently). These rosters are entered into the claiming software system, by the cafeteria manager at Highland High School the following day, to create a meal count for Hughes-Elizabeth Lakes school. The cafeteria manager is not equally familiar with the students as the staff at Hughes-Elizabeth lakes and thus the meal counting and claiming system requires streamlining to ensure an accurate meal count. The documentation for the review month was sufficient to create an accurate meal count, however to prevent potential meal counting and claiming errors in the future, this process requires further review.

7 CFR 210.8(a)(2) Claims for Reimbursement - Internal controls - School Food Authority claims review process "Prior to the submission of a monthly Claim for Reimbursement, each school food authority shall review the lunch count data for each school under its jurisdiction to ensure the accuracy of the monthly Claim for Reimbursement. The objective of this review is to ensure that monthly claims include only the number of free, reduced price and paid lunches served on any day of operation to children currently eligible for such lunches. (i) Any school food authority that was found by its most recent administrative review conducted in accordance with §210.18, to have no meal counting and claiming violations may: (A) Develop internal control procedures that ensure accurate meal counts. The school food authority shall submit any internal controls developed in accordance with this paragraph to the State agency for approval and, in the absence of specific disapproval from the State agency, shall implement such internal controls. The State agency shall establish procedures to promptly notify school food authorities of any modifications needed to their proposed internal controls or of denial of unacceptable submissions. If the State agency disapproves the proposed internal controls of any school food authority, it reserves the right to require the school food authority to comply with the provisions of paragraph (a)(3) of this section; or (B) Comply with the requirements of paragraph (a)(3) of this section. (ii) Any school food authority that was identified in the most recent administrative review conducted in accordance with §210.18, or in any other oversight activity, as having meal counting and claiming violations shall comply with the requirements in paragraph (a)(3) of this section."

**Required Corrective Action:**

1. Develop a procedure for Hughes-Elizabeth Lakes school to ensure daily rosters, used at the point of service, include information to ensure accurate meal counts.
2. Train applicable staff. Provide training documentation (agenda and sign-in sheet) as evidence.
3. Submit a copy of the revised Meal Counting and Claiming Procedures to your analyst.

**Sponsor Corrective Action Response:**

- Food Services has addressed roster requirements with HELUS office and cafeteria staff and made revisions where needed (attached).
- Cafeteria Manager met with HELUS staff to review updated menu count/collection procedures (attached).
- Attached are program's revised 2017-2018 Meal Counting and Collection Procedures.

**Document Attachments:**

ANTELOPE VALLEY UNION HIGH SCHOOL DISTRICT  
FOOD SERVICES DEPARTMENT  
MEAL COUNT AND COLLECTION PROCEDURES  
2017-2018

HACCP-BASED SOP

EMPLOYEE TRAINING RECORD

TRAINING TOPIC: AVUNED MEAL COUNT AND COLLECTION PROCEDURES  
USDA meal accountability form / state submission  
TRAINING DURATION: 20 min

Antelope Valley UHSD  
Student Roster  
09001 Hughes Elizabeth Lakes

Total = 8  
By Classroom:  
Breakfast  Lunch

**Form:** 400 - Meal Components and Quantities - Lunch

**Question:** 403

a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? If SFA/sc...

**Finding ID:** V-0400

Meal Components and Quantities (Lunch) are not met. [Regulation 7 CFR 210.10]

**Finding Description:** One student was reported to have a milk intolerance and was offered juice instead of a fluid milk substitute. The student's medical statement does not support juice as a substitution for fluid milk.

7 CFR 210.10(d)(3) Meal requirements for lunches and requirements for afterschool snacks - Fluid milk requirement - Fluid milk substitutes If a school chooses to offer one or more substitutes for fluid milk for non-disabled students with medical or special dietary needs, the nondairy beverage(s) must provide the nutrients listed in the following table. Fluid milk substitutes must be fortified in accordance with fortification guidelines issued by the Food and Drug Administration. A school need only offer the nondairy beverage(s) that it has identified as allowable fluid milk substitutes according to the following chart.

**Required Corrective Action:**

1. Provide a procedure to ensure milk substitutions are compliant with federal regulations. Within your procedure, detail what forms are used and maintained to substantiate the need for the substitution and include the name and title of the staff person(s) responsible.
2. Train the applicable staff at Hughes-Elizabeth Lakes school on the procedures, and provide the reviewer with the sign-in sheet and agenda.

**Sponsor Corrective Action Response:** Milk substitutions are made in cases where a current USDA meal accommodations form has been submitted by a QME\*. Food Services has approved milk alternates available for students with approved accommodations; default program option is soy milk with other USAD approved options available dictated by required accommodation(s).

All staff have been trained on providing milk substitutions as directed (attached).

\*Staff may use a Dr.'s note in lieu until an USDA meal accommodations form has been submitted.

**Document Attachments:** Training agenda and sign-in is attached to CAD for question 324 under Hughes Elizabeth Lake.

**Form:** 400 - Meal Components and Quantities - Lunch

**Question:** 409

Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal c...

**Finding ID:** V-0400

Meal Components and Quantities (Lunch) are not met. [Regulation 7 CFR 210.10]

**Finding Description:** During the targeted week of review, in which the site visit also occurred, vegetable subgroup shortages were identified in the salad bar line. Meals were disallowed in finding 401. No further fiscal action required.

7 CFR 210.10(c)(2)(iii) Meal requirements for lunches and requirements for afterschool snacks - Meal pattern for school lunches - Food components - Vegetables component "(iii) Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement. All vegetables are credited based on their volume as served, except that 1 cup of leafy greens counts as 1/2 cup of vegetables and tomato paste and puree are credited based on calculated volume of the whole food equivalency. Pasteurized, full-strength vegetable juice may be used to meet no more than one-half of the vegetables component. Cooked dry beans or peas (legumes) may be counted as either a vegetable or as a meat alternate but not as both in the same meal. Vegetable offerings at lunch over the course of the week must include the following vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: (A) Dark green vegetables - This subgroup includes vegetables such as bok choy, broccoli, collard greens, dark green leafy lettuce, kale, mesclun, mustard greens, romaine lettuce, spinach, turnip greens, and watercress; (B) Red-orange vegetables - This subgroup includes vegetables such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes; (C) Beans and Peas (legumes) - This subgroup includes vegetables such as black beans, black-eyed peas (mature, dry), garbanzo beans (chickpeas), kidney beans, lentils, navy beans pinto beans, soy beans, split peas, and white beans; (D) Starchy vegetables - This subgroup includes vegetables such as black-eyed peas (not dry), corn, cassava, green bananas, green peas, green lima beans, plantains, taro, water chestnuts, and white potatoes; and (E) Other vegetables - This subgroup includes all other fresh, frozen, and canned vegetables, cooked or raw, such as artichokes, asparagus, avocado, bean sprouts, beets, Brussels sprouts, cabbage, cauliflower, celery, cucumbers, eggplant, green beans, green peppers, iceberg lettuce, mushrooms, okra, onions, parsnips, turnips, wax beans, and zucchini."

**Required Corrective Action:** Correct the vegetable subgroup shortage on the salad bar line and submit supporting documentation demonstrating compliance.

(Sponsor provided lunch and breakfast nutrient analysis to the reviewer.)

**Sponsor Corrective Action Response:** Food Services has highlighted cycle menus to reflect vegetable subgroup requirements in each program cycle menu. Henceforth, SFA will plan menus highlighting vegetable subgroup listing(s) for each day in the serving week to ensure each area has the required components throughout the serving week; attached is the menu back-up paperwork used by staff at each site with each menu's vegetable subgroup(s) highlighted in "bold."

Food Services met with Managers in February for training and review menu pattern and procedures moving forward. Staff were trained in February and March to follow menu back-up in providing/offering the highlighted targeted subgroup or substitution from the SAME vegetable subgroup.

**Document Attachments:** Documents supporting this corrective action are attached at site level question 401 under Highland High.

**Form:** 400 - Meal Components and Quantities - Lunch

**Question:** 401

Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?

**Finding ID:** V-0400

Meal Components and Quantities (Lunch) are not met. [Regulation 7 CFR 210.10]

**Finding Description:** During the first lunch, students that chose the salad bar line did not have access to the targeted vegetable subgroup resulting in a vegetable component shortage. As a repeat vegetable subgroup finding, 49 meals served for the first lunch will be disallowed.

7 CFR 210.10(c)(2)(iii) Meal requirements for lunches and requirements for afterschool snacks - Meal pattern for school lunches - Food components - Vegetables component "(iii) Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement. All vegetables are credited based on their volume as served, except that 1 cup of leafy greens counts as 1/2 cup of vegetables and tomato paste and puree are credited based on calculated volume of the whole food equivalency. Pasteurized, full-strength vegetable juice may be used to meet no more than one-half of the vegetables component. Cooked dry beans or peas (legumes) may be counted as either a vegetable or as a meat alternate but not as both in the same meal. Vegetable offerings at lunch over the course of the week must include the following vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: (A) Dark green vegetables - This subgroup includes vegetables such as bok choy, broccoli, collard greens, dark green leafy lettuce, kale, mesclun, mustard greens, romaine lettuce, spinach, turnip greens, and watercress; (B) Red-orange vegetables - This subgroup includes vegetables such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes; (C) Beans and Peas (legumes) - This subgroup includes vegetables such as black beans, black-eyed peas (mature, dry), garbanzo beans (chickpeas), kidney beans, lentils, navy beans pinto beans, soy beans, split peas, and white beans; (D) Starchy vegetables - This subgroup includes vegetables such as black-eyed peas (not dry), corn, cassava, green bananas, green peas, green lima beans, plantains, taro, water chestnuts, and white potatoes; and (E) Other vegetables - This subgroup includes all other fresh, frozen, and canned vegetables, cooked or raw, such as artichokes, asparagus, avocado, bean sprouts, beets, Brussels sprouts, cabbage, cauliflower, celery, cucumbers, eggplant, green beans, green peppers, iceberg lettuce, mushrooms, okra, onions, parsnips, turnips, wax beans, and zucchini."

**Required Corrective Action:**

1. Provide a procedure for ensuring the vegetable subgroups are offered at all serving lines including the salad bar.
2. Correct the vegetable subgroup shortage and upload copies of supporting menu documentation showing meal pattern compliance.
3. Train staff on updated salad bar procedure.

**Sponsor Corrective Action Response:** Food Services has highlighted cycle menus to reflect vegetable subgroup requirements in each program cycle menu. Henceforth, Food Services will plan menus highlighting vegetable subgroup listing(s) for each day in the serving week to ensure each area has the required components throughout the serving week; attached is the menu back-up paperwork used by staff at each site with each menu's vegetable subgroup(s) highlighted in "bold."

Food Services met with Managers in February for training and review menu pattern and procedures moving forward. Staff were trained in February and March to follow menu back-up in providing/offering the highlighted targeted subgroup or substitution from the SAME vegetable subgroup.

**Document Attachments:** Requested attached documents are the same as question 401 at Highland High

**Form:** 400 - Meal Components and Quantities - Lunch

**Question:** 400

a. Were all required meal components available on every reimbursable meal service line to all participating students prior to the beginning of meal se...

**Finding ID:** V-0400

Meal Components and Quantities (Lunch) are not met. [Regulation 7 CFR 210.10]

**Finding Description:** On the salad bar line, the targeted vegetable subgroup was not available during the first lunch. By the second meal service, the targeted vegetable subgroup was added to the salad bar line.

7 CFR 210.10(c)(2)(iii) Meal requirements for lunches and requirements for afterschool snacks - Meal pattern for school lunches - Food components - Vegetables component "(iii) Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement. All vegetables are credited based on their volume as served, except that 1 cup of leafy greens counts as 1/2 cup of vegetables and tomato paste and puree are credited based on calculated volume of the whole food equivalency. Pasteurized, full-strength vegetable juice may be used to meet no more than one-half of the vegetables component. Cooked dry beans or peas (legumes) may be counted as either a vegetable or as a meat alternate but not as both in the same meal. Vegetable offerings at lunch over the course of the week must include the following vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: (A) Dark green vegetables - This subgroup includes vegetables such as bok choy, broccoli, collard greens, dark green leafy lettuce, kale, mesclun, mustard greens, romaine lettuce, spinach, turnip greens, and watercress; (B) Red-orange vegetables - This subgroup includes vegetables such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes; (C) Beans and Peas (legumes) - This subgroup includes vegetables such as black beans, black-eyed peas (mature, dry), garbanzo beans (chickpeas), kidney beans, lentils, navy beans pinto beans, soy beans, split peas, and white beans; (D) Starchy vegetables - This subgroup includes vegetables such as black-eyed peas (not dry), corn, cassava, green bananas, green peas, green lima beans, plantains, taro, water chestnuts, and white potatoes; and (E) Other vegetables - This subgroup includes all other fresh, frozen, and canned vegetables, cooked or raw, such as artichokes, asparagus, avocado, bean sprouts, beets, Brussels sprouts, cabbage, cauliflower, celery, cucumbers, eggplant, green beans, green peppers, iceberg lettuce, mushrooms, okra, onions, parsnips, turnips, wax beans, and zucchini."

**Required Corrective Action:**

1. Provide a procedure for ensuring the vegetable subgroups are offered at all serving lines including the salad bar.
2. Correct the vegetable subgroup shortage and upload copies of supporting menu documentation showing meal pattern compliance.
3. Train staff on updated salad bar procedure.

**Sponsor Corrective Action Response:** Food Services has highlighted cycle menus to reflect vegetable subgroup requirements in each program cycle menu. Henceforth, Food Services will plan menus highlighting vegetable subgroup listing(s) for each day in the serving week to ensure each area has the required components throughout the serving week; attached is the menu back-up paperwork used by staff at each site with each menu's vegetable subgroup(s) highlighted in "bold."

Food Services met with Managers in February for training and review menu pattern and procedures moving forward. Staff were trained in February and March to follow menu back-up in providing/offering the highlighted targeted subgroup or substitution from the SAME vegetable subgroup.

**Document Attachments:** Documents supporting this corrective action are attached at site level question 401 under Highland High.