

**Oklahoma State Department of Education (SDE)  
Child Nutrition Programs (CNP)  
ADMINISTRATIVE REVIEW (AR) SUMMARY**

Name of School Food Authority (SFA): Miami Public Schools County District Code: 58-I023

Superintendent: Jillian Douthit

Address of SFA: 601 16th Ave NW City: Miami Zip Code: 74354

Consultant(s) Conducting Review: Mona King

An AR of your SFA's CNP operation has been completed. The SFA was found in:  Compliance  Noncompliance

Review Month: 12/2025 Date of Review: 2/2-12 & 3/30/2026 Date Review Closed: Pending

Number of Schools in SFA: 6 Number of Schools Reviewed: 2 Number of Eating Sites Reviewed: 2

List schools reviewed for the following CNP:

National School Lunch Program (NSLP): Nichols Upper Elementary - 140 and Roosevelt Elementary - 120

School Breakfast Program (SBP): Nichols Upper Elementary - 140

After-School Snack Program (ASSP): Roosevelt Elementary - 120

Special Milk Program (SMP): NA

Fresh Fruit and Vegetable Program (FFVP): NA

Seamless Summer Food Program (SSFP): \_\_\_\_\_

Does the SFA operate under any special provisions: (Select any that apply)

- Provision 1     District-wide     Partial  
 Provision 2     District-wide     Partial     Breakfast     Lunch  
 Provision 3     District-wide     Partial  
 Community Eligibility Provision (CEP)     District-wide     Partial

This SFA had violations in the following areas:

- General Area Violations  
 PS-1 Violations  
 PS-2 Violations  
 Resource Management Violations (Indicate area of violation)  
     Maintenance of the Nonprofit     Paid Lunch Equity  
     Revenue from Nonprogram Foods     Indirect Costs

If applicable, mark appropriate boxes:

- Recalculation required     Full     Partial  
 Fiscal Action Workbook completed

Contract with an FSMC:

- Yes     No

If yes, please indicate name of company:

Opaa

YES	NO	PS-1 Violations			
<input type="radio"/>	<input checked="" type="radio"/>	A. Program Access and Reimbursement			
		YES	NO		
		<input type="radio"/>	<input checked="" type="radio"/>	Certification and Benefit Issuance - 7 CFR 246.6	
		<input type="radio"/>	<input checked="" type="radio"/>	Verification - 7 CFR 245.6a	
<input type="radio"/>	<input checked="" type="radio"/>	Meal Counting and Claiming- 7 CFR 210.7(c)			

Finding(s) Details:

YES	NO	PS-2 Violations			
<input type="radio"/>	<input checked="" type="radio"/>	<b>B. Meal Patterns and Nutritional Quality</b>			
		YES	NO		
		<input type="radio"/>	<input checked="" type="radio"/>	Meal Components and Quantities - 7 CFR 210.10 & 220.8	
		<input type="radio"/>	<input checked="" type="radio"/>	Offer versus Serve - 7 CFR 210.10 & 220.8	
<input type="radio"/>	<input checked="" type="radio"/>	Dietary Specifications and Nutrient Analysis - 7 CFR 210.1(f)			

Finding(s) Details:

YES	NO	General Area Violations			
<input checked="" type="radio"/>	<input type="radio"/>	<b>C. School Nutrition Environment</b>			
		YES	NO		
		<input type="radio"/>	<input checked="" type="radio"/>	Food Safety - 7 CFR 210.13	
		<input checked="" type="radio"/>	<input type="radio"/>	Local School Wellness Policy - 7 CFR 210.30	
		<input checked="" type="radio"/>	<input type="radio"/>	Competitive Foods - 7 CFR 210.11 & 220.12	
<input checked="" type="radio"/>	<input type="radio"/>	Other Res Mgmt Rev NonPgm 7 CFR 210.14(f)			

Finding(s) Details:

**Local Wellness Policy – 7 CFR 210.30**  
Requirement: SFA must assess its Local Wellness Policy a minimum of once every three years.  
Finding: The district Wellness Policy states that an assessment of the policy will be completed annually, however the policy has not been assessed annually or within the three year requirement.  
Corrective Action Required: Comply with requirements in the district Wellness Policy and assess the policy using the assessment tool in CARS-other documents or equivalent. Send corrective action plan to state agency Regional CNP specialist.

**Competitive Foods 7 CFR 210.11 & 220.12**  
Requirement: Local Wellness Policy requires that all foods and beverages sold on campus during the school day will meet or exceed smart snack standards and that non-food items or foods that meet smart snack requirements will be sold as fundraisers. Documentation for fundraisers must meet state board of education requirements, identified exemptions, and must be consistently and properly tracked.  
Findings: Fundraiser documentation with smart snack calculator and nutrition labels was not provided during the administrative review therefore the state agency could not determine whether the district is compliant with the Wellness Policy and state board of education requirements for fundraisers/exempt fundraisers. See Comments page 5 for Corrective Action.

<input type="radio"/>	<input checked="" type="radio"/>	<b>D. Civil Rights - 7 CFR 210.23(b)</b>
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Finding(s) Details:

**Comments/Recommendations:**

Corrective Action Required: Implement process using fundraiser forms with state board of education requirements and consistently track all fundraisers for each site. Maintain smart snack compliant documentation for sale of foods/beverages during the school day for all school stores, classroom/office, vending, clubs, SFA ala carte, and any other food/beverage sales on any campus. Ensure that all state board of education and Wellness Policy requirements are met. Provide corrective action plan to state agency Regional CNP Specialist.

See added pages for continued General Area Violations in Resource Management

**CORRECTIVE ACTION REQUIRED TO BE COMPLETED BY (§210.18[j][2]):** 4/29/2026

**CORRECTIVE ACTION DOCUMENTATION REQUIRED IN STATE AGENCY BY (§210.18[k][1]):**  
5/29/2026 (30 days from the date the corrective action must be completed)

An exit conference was conducted (§210.18[i]) discussing the AR Review findings on: 3/30/2026  
with Lisa Namestka, CND/AR, Jillian Douthit, Supt. (Name and Title of School Representative)

CNP Consultant(s): Mona King

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 AR to the public in an accessible, easily understood manner in accordance with the guidelines promulgated by the Secretary. Regulations at 7 CFR 210.18(m) require the State Agency to post a summary of the most recent final AR results for each SFA on the State Agency's publicly available Web site no later than 30 days after the State Agency provides the final results of the AR to the SFA. The State Agency must also make a copy of the final AR report available to the public upon request.

\_\_\_\_\_  
Signature of School Representative Date

Date Review Summary Was Publicly Posted: \_\_\_\_\_

Administrative Review Summary cont.

General Area - Resource Management Violations

Revenue from Non-program Foods – 7 CFR 210.14(f) and Adult Meals FNS Instruction 782-5 Rev. 1 cont. Pg 6

**Requirement:** The school food authority (SFA) must have processes in place to ensure that all funds received from the sale of non-program foods are deposited into the SFA's nonprofit school food service account. OCAS coding must be correctly applied with separate amounts for adult sales and ala carte sales for all deposits to be reported in the correct non-program food category in OCAS. Non-program foods expenditures must be accurately coded in OCAS.

**Findings:** Daily deposits are made for all types of non-program food sales, however, OCAS coding for separate adult meals and ala carte sales deposits are not reported. OCAS coding is not correctly applied for student ala carte sales deposits. Student revenues are reported as source 1710 student reimbursable meals but should be reported as 1720 ala carte because the district is non-pricing due to Provision 2 participation district wide, and this money is for the purchase of extra items or ala carte items. After school snack program (ASSP) expenditures were coded as ala carte expense function 3110 in OCAS, which is a non-program food code. These ASSP expenditures are an extension of the NSLP program foods, and should be reported as function 3140, object 570.

**Corrective Action Required:** Correctly code deposits with separate ala carte and adult revenue codes. Code student deposits as ala carte because student meals are non-pricing. Report appropriate revenues as non-program revenue so the SFA's compliance with Revenue from Non-program foods can be properly assessed. Accurately report non-program expenditures in OCAS.

**Requirement:** The SFA must assess its compliance with the Revenue from Non-program Foods requirements. The SFA must ensure that it includes all its non-program food costs and revenues in its calculations and that the revenue and food cost ratios are correctly calculated.

**Findings:** The SFA did not assess its compliance with the Revenue from Non-program Foods Revenue/Cost Ratio. The Regional Specialist assessed compliance by completing the USDA tool. While reviewing OCAS coding to correctly include all non-program food revenues errors were identified. OCAS coding for separate adult meals and ala carte sales deposits is not reported. OCAS coding is not correctly applied for student ala carte sales deposits. Student revenues are reported as source 1710 student reimbursable meals but should be reported as 1720 ala carte because the district is non-pricing due to Provision 2 participation district wide, and this money is for the purchase of extra or ala carte items.

After school snack program (ASSP) expenditures were coded as ala carte expense function 3110 in OCAS, which is a non-program food code. These ASSP expenditures are an extension of the NSLP program foods, and should be reported as function 3140, object 570.

**Corrective Action Required:** Assess compliance with the Revenue from Non-program Foods requirements annually using the USDA tool or equivalent. Ensure that all the non-program food costs and revenues are correctly coded in OCAS so they can be included in the calculations. Ensure that the ratios are calculated correctly and that any difference required for deposit into the food service account is documented and completed so the SFA is compliant with this requirement.

**Requirement:** The SFA must take additional 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 issue.

**Findings:** The SFA revenue ratio is less than the food cost ratio therefore is non-compliant. OCAS uploaded documentation report for FY25 also shows non-compliance. The SFA did not take additional steps to sufficiently increase non-program food prices, add sufficient funds to the nonprofit food service account or take other actions to adequately resolve the problem.

**Corrective Action Required:** The SFA must increase ala carte pricing to sufficiently increase the revenue ratio and adequately cover the cost of all non-program foods sold. It must include all its non-program food costs and revenues in its calculations. The SFA must ensure that all revenues received from adult meal sales and ala carte or any other non-program food sales are adequately tracked, and that revenues are accrued to the non-profit food service account within the fiscal year. The SFA must not allow child nutrition program monies to supplement the cost of non-program foods and must annually assess its compliance with the Revenue from non-program foods requirements.

A detailed corrective action plan is due to the state agency Regional Child Nutrition Program Specialist, outlining the processes for 1) assessing non-program foods, 2) for ensuring that all non-program food costs and revenues are included in the assessment, 3) for outlining additional steps taken by the district to sufficiently increase non-program food prices when the revenue ratio is less than the food cost ratio, and 4) for specifying how the SFA is adding sufficient funds to the nonprofit food service account or taking other action to adequately resolve the problem.