

Administrative Review Workshop

**Child & Adult Nutrition Services
South Dakota Department of Education
June 2017**

This institution is an equal opportunity employer.

Welcome to an overview on the Administrative Review Process!

This workshop will give you a general overview of the Administrative Review. For you all, this will be a new review process. We at CANS have been conducting this review for a few years now!

Introductions.

Questions on post it notes.



Restrooms

Outside

Location – to restaurants, etc.

Side Conversations


Temp Check/Knowledge Check – smiley face sticks

Folder Layout

Left Side: Table Tent, PowerPoint, Offsite, Instructions, Hints, Contacts,

Acronyms

Right Side: Activities




- Administrative Review
 - Why?
 - General Information
- Performance Standard 1
- Performance Standard 2
- Resource Management
- General Areas
- Other Federal Programs
- Special Provision Options

Here is our agenda for the day.

First, we will talk about why we conduct reviews and we will talk in greater detail throughout the day about the different sections or areas of the Admin Review: Performance Standard 1 (benefit issuance), Performance Standard 2 (Meal components & quantities), Resource Management (money), General Areas, Other Federal Programs, Special Provision Options.

Administrative Review Myths!

(4)



- Give you a better understanding of AR
- Help you understand why we do this
- Work on Offsite Assessment questions
- Answer questions you have

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We really hope you leave there today with a better understanding of the Admin Review and why we do it. Hopefully, you will have a start on our Offsite Assessment. And finally, we have hopefully answered your questions and settled your nerves about the Admin Review!

If you have questions-write them on the post it notes on your table. Feel free to ask questions throughout the day.

Why Review?

Ensuring Program Integrity

SFA Compliance with
Regulations

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Whenever federal money is involved, there is someone watching someone watching someone else. Administrative Reviews conducted by CANS ensure integrity of the school meal program and ensure that the requirements are being implemented properly and effectively.

Reviews/monitoring is required.

You monitor your sites and have fiscal audits.

We review your program.

We have management evaluations of our programs by USDA/FNS.

Federal programs have the Office of Management and Budget and Office of Inspector General monitoring them.

Areas of Review

Critical Areas

- Performance Standard 1
 - Student Eligibility
 - Meal Counts
 - Reimbursement
- Performance Standard 2
 - Meal Pattern & Components
 - Dietary Specifications

General Areas

- Resource Management
 - Financial
- General Program Compliance
 - Civil Rights, Food Safety, Smart Snacks, Professional Standards, etc.
- Other Federal Programs
 - After School Snack
 - Special Milk Program
 - Fresh Fruit & Veg Program

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Critical Areas: Performance Standard 1 (Student Eligibility, Meal Counts, Reimbursement); Performance Standard 2 (Meal Pattern & Components, Dietary Specifications).

General Areas: Resource Management (Financial), General Program Compliance (Civil Rights, Food Safety, Smart Snacks, Professional Standards, etc.), Other Federal Programs (After School Snack, Special Milk Program, Fresh Fruit & Veg Program).

Administrative Review Structure

Section 1	Section 2	Section 3	Section 4	Section 5
Access & Reimbursement	Nutritional Quality/Meal Pattern	Resource Management	General Program Compliance	Other Federal Program Reviews
•Eligibility Determination	•Meal Components	•Resource Management	•Professional Standards	•Afterschool Snack
•Benefit Issuance	•Offer versus Serve	•Nonprofit School Food Service Acct	•SFA On-site Monitoring	•Seamless Summer Option
•Direct Certification	•Dietary Specifications & Nutrient Analysis	•Paid Lunch Equity	•Local Wellness Policy	•Fresh Fruit and Vegetable Program
•Meal Counting, Claiming & Reimbursement		•Revenue from Non-program Foods	•Competitive Foods	•Special Milk Program
•Verification		•Indirect Costs	•Civil Rights	
			•Water	
			•SBP & SSO Outreach	
			•Food Safety	
			•Health Inspections	

The new Administrative Review approach has been organized into five monitoring areas:

- Access and Reimbursement, again, which corresponds to Performance Standard 1;
- Nutritional Quality/Meal Pattern, which corresponds to Performance Standard 2;
- Resource Management and General Program Compliance, which collectively cover the General Areas of review;
- and Other Federal Program Reviews, which are comprised of both Critical and General areas.

On this slide you can see that within each monitoring section are several modules, each of which addresses a specific review area.

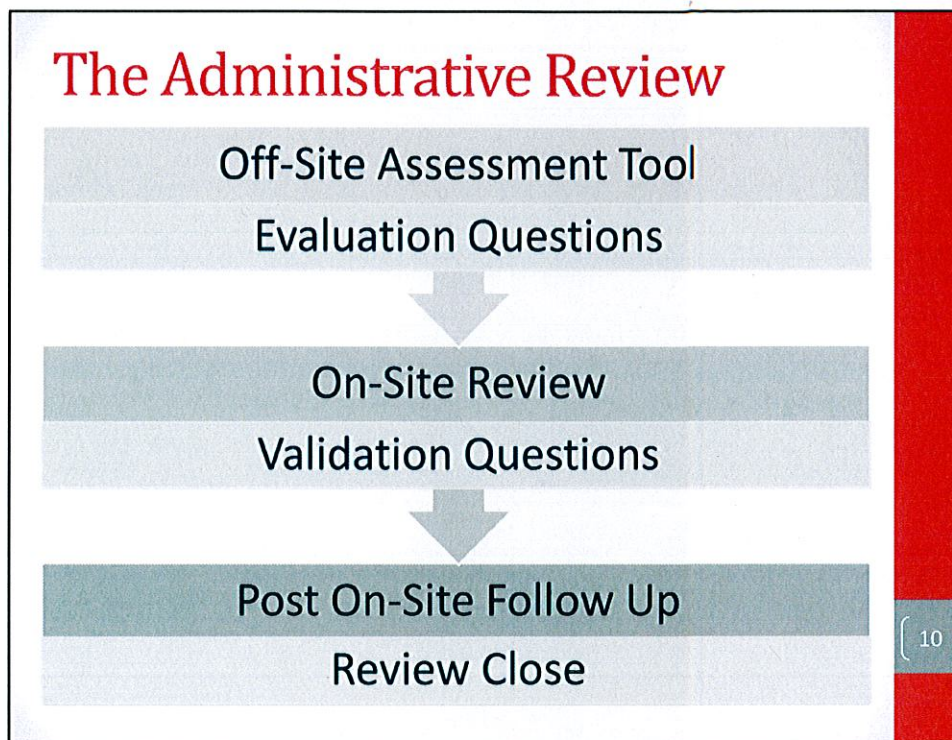
For each module you see listed here, both pre-visit (off-site) and on-site visit materials have been developed where appropriate, to allow for the most efficient collection, submittal and analysis of data and information for a given review area.

Site Selection

- Number of sites reviewed is based on number of sites within the SFA
- ADP, Free Participation Factor
- SFAs with menus that are not certified
 - All sites and distinct menus/grade groups
- School Breakfast Program
 - 50% of selected NSLP sites
- Other Federal Program Reviews
 - Varies based on regulations

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The number of onsite visit locations is based on the number of feeding sites in your district. We have a few that will have two sites visited, but most of you will have only one. Once the number of sites is determined other criteria is used to determine which sites must be reviewed. The selection criteria is based on the average daily participation and the free participation factor. If any menus are not certified, we must review those sites-all SD sites are certified. If the SFA serves breakfast we must review 50% of lunch sites that serve breakfast. For example, if you have 3 sites and they all serve lunch and breakfast, we will observe breakfast and lunch at the same site. Other Federal Program reviews vary based on the program – Afterschool Snack and SMP do not require an onsite review unless the offsite determines it. FFVP is a required onsite visit. If you run the SSO program, you will receive an SSO review the summer following your AR.



There is a three step process used in the new administrative review to determine the SFA's level of compliance with Federal Regulations.

The first step involves the use of the offsite assessment tool. The offsite assessment is intended to be conducted in advance of the on-site portion of the administrative review. The offsite tool will be emailed directly to the authorized representative, food service director, and claim rep. The offsite tool can be found on the CANS NSLP website.

During the offsite assessment process, a variety of methods will be used to fill out the tool (for example, examination of recently filed reports, a series of pre-review questions for the SFA to fill out, and a collection of information provided during annual renewal).

The offsite assessment tool will provide CANS reviewers with some baseline evaluation information about the different processes in place. This information could alert the reviewer to potential areas of non-compliance or technical assistance needs well in advance of the on-site portion of the administrative review.

The information communicated during the offsite assessment will be validated by the reviewer onsite through a series of questions that will be answered based on staff interviews and reviewer observation.

The reviewer will also document any technical assistance that is provided to the SFA at any point during the review. Areas of non-compliance may result in fiscal action.

Pre-Visit Procedures

- Notify Authorized Representative and Food Service Director
- Initiate Off-Site Assessment Tool
- Select sites for review
- Obtain pre-visit information
- Ask for and review SFA documentation

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A lot of work is done before we come onsite! The process will begin when we notify the Authorized Rep and the FSD via email. The email will contain information about the review, action steps, due dates, and contact information. It will also contain attachments: offsite assessment tool, offsite assessment tool instructions, glossary & hints. Once the offsite assessment tool is received back in our office (completed by you), you will be contacted by your reviewer. You and your reviewer will discuss the offsite and we will gather any clarification from you that is needed. We will then discuss which site(s) will be visited and what will take place. We will also share with you the other documentation we will collect prior to our visit: week of menu, claim, etc.

Plug: to lessen the number of questions possibly needed by the reviewer, please review the mini webinars on the CANS/NSLP webpage!

Offsite Assessment-look for questions numbered throughout this PP.

Review Period

- Most recent month claim submitted, must include ≥ 10 operating days
- Period of onsite review
- Special Circumstances
 - Reviews early in the school year
 - Year-round, multi-track & provision schools
 - May require FNS approval or special procedures

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The review period is the most recent month for which a claim for reimbursement was submitted, provided that it covers at least ten (10) operating days. The month of claim to be reviewed will be decided between the reviewer and the agency. Please do not just pick your own month of claim for review now!

Period of onsite review, or the day of review, which is the day(s) on which the on-site review of the individual sites selected for review occurs.

There may be some special circumstances determined necessary for reviews taking place very early in the school year, at year round or provision schools. Please keep in mind special circumstances may need approval from FNS.

On-site Review Procedures

- Entrance Conference
- On-site Review
 - Meal and document observation
- Exit Conference
 - If no time for onsite, a conference call will be scheduled

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As previously mentioned, you and your reviewer will schedule a time for an onsite visit. Please be aware that you may have an onsite conducted by CANS staff or by a Department of Public Safety (DPS) health inspector. DPS health inspectors have been trained by us to conduct the onsite portion of the review. Your reviewer will conduct an entrance conference to talk about how the day will go. We will “interview” staff, observe lunch and breakfast (if applicable) prep and service, inspect documents (SOPs), check for logs, USDA poster, health inspections, etc. Following all meal service observations, an exit conference will be scheduled. We try to conduct the exit onsite before we leave, but sometimes we may have to schedule a conference call for a later date.

Post-Visit Procedures

- AR Report sent to SFA listing corrective action items
- SFA submits corrective action items responses to SA

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Within 30 days of the onsite, you will receive a written report including findings needing corrective action responses. Remember, findings are not always a bad thing! Your reviewer will give you a deadline for the CA responses to be returned. Please note that the AR report will be sent to the authorized rep and cc'd to others involved in the review. We expect a single response back from the authorized rep.

Findings/Corrective Action

- Documentation starts as soon as SFA is notified of review
- Findings are documented during previsit, onsite, and post visit
- Once acceptable and lasting CA is received and approved, review is closed

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Findings can be documented as soon as SFA is notified of review. Findings are documented during previsit, onsite, and post visit. Once acceptable and lasting CA is received and approved, the reviewer will close the review. The SFA will receive a packet including the AR documents, a close letter, and AR report.

CHANGE IS CONSTANT!

- Forms WILL CHANGE!
- Information requests WILL CHANGE!
- New Modules may be added to the Offsite Assessment and to the Review for SY17-18
 - Unpaid Meal Charge Policy
- The forms, the way CANS conducts reviews and the documents we look at are federally mandated-there are no state additions to the AR process

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Please note the documents we are sharing with you today may—most likely will—change for next school year, and the next school year, etc!

The offsite assessment tool and most other forms we are going through today are current for SY16-17. A new version will be released by FNS sometime in July, 2017 for SY17-18. Also, please know that we do not add any forms, documents, or procedures to the review. This review is HUGE and is laid out to us by USDA/FNS.

ACCESS AND REIMBURSEMENT CRITICAL AREA PERFORMANCE STANDARD 1

Certification & Benefit Issuance
Verification
Meal Counting & Claiming

(17)

Handout-benefit issuance roster – Yellow

Certification & Benefit Issuance

- Validate SFA's procedures from off-site assessment tool-questions 100-121
 - Much of this is contained within your application in iCAN
- Validate student certifications with Benefit Issuance Document
 - Review Free/Reduced Applications
 - Review list from iMATCH
 - Any other certification documentation

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The certification and benefit issuance process covers the SFA's certification of a student's eligibility for free or reduced-price meals and the link to the SFA's meal counting and claiming system. On a review, we will ensure that eligible children receive the meals they are entitled to, and that claims for reimbursement are valid.

We will collect:

Eligibility Roster – we will match students eligibility up with f/r applications, direct cert list, etc.

Free/Reduced applications, denied applications – we will do the math to ensure eligibility was granted or denied correctly.

Direct cert lists from iMATCH – we will compare with current iMATCH, roster

We will review any other certification documentation you might have

Certification & Benefit Issuance

Eligibility Roster MUST:

- Contain name and benefit status for all F/R students
- Be generated from POS
- Not contain duplicate names

Eligibility Roster SHOULD:

- Include school name
- Include cert method
- Include signature or initial of determining official and date of certification
- Include total number of eligible students

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Eligibility Roster MUST (red boxes):

- Contain name and benefit status for all F/R students
- Be generated from POS
- Not contain duplicate names

Eligibility Roster SHOULD:

- Include school name (purple box)
- Include cert method (orange boxes)
- Include signature or initial of determining official and date of certification
- Include total number of eligible students

Having all these things-required and suggested, makes reviewing this documentation must easier.

Certification & Benefit Issuance

F/R Applications

- iMATCH Direct Certification supersedes application
- Other Source Categorical=must confirm child's status before approving (except foster)
- Medicaid is not acceptable determination method
- No retroactive meal benefits
 - Check flexibility option in application in iCAN
- Colony school income
 - Must have CPA form for income verification

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F/R Applications Reminders:

iMATCH Direct Certification supersedes an application

Other Source Categorical=must confirm child's status before approving (except foster)

Medicaid is not acceptable determination method

No retroactive meal benefits

Check Flexibility option in application in iCAN

Colony school income

Must have CPA form for income verification

F/R Applications ACTIVITY!

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F/R Applications – Green
12 groups (tables) / each app done by two groups.

Each app should have two groups working on it.

Go through applications.

Williams: Family is reduced.

Jones: Family is free – SNAP number.

Jackson: have them complete the “farm” form. Family is free. 0 income.

Smith: Family is free. Income conversion.

Brown: Family is reduced.

Johnson: Family is denied. No income conversion.

Talk about completing the back.

Verification

- Validate SFA's procedures from off-site assessment tool-questions 200-204
- Confirms student eligibility for F/R meals
- Only required for students who are approved based on application
- AR determines compliance with verification requirements
- Review current year unless AR is before verification is submitted, then review previous year

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Verification is a process used by SFAs to confirm selected students' eligibility for free and reduced-price meals in the NSLP and SBP. Verification is only required for a sample of students whose eligibility is certified using a household application submitted with income information or a case number for the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR), or Temporary Assistance for Needy Families (TANF). Students certified for free meal benefits through direct certification (conducted with an eligible assistance program, officials, or agencies that provide documented Other Source Categorical Eligibility) are not subject to verification.

The goal of this Module is to ensure the SFA properly implements the verification process as part of the free and reduced-price eligibility requirements.

Verification cont.

What documentation must be kept for verification?

- Free/Reduced application
- Letter/notice to families notifying them of the verification of their application
- Income verification documentation
 - Pay stubs
 - Tax return
 - Documentation of SNAP, TANF, FDPIR
- Notification to family of verification outcome
- Refer to CANS Memo 51

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What documentation must be kept for verification?

Free/Reduced application that was chosen for verification.

Letter/notice to families notifying them of the verification of their application.

Income verification documentation received from family:

Pay stubs

Tax return

Documentation of SNAP, TANF, FDPIR

Notification to family of verification outcome.

Refer to CANS Memo 51.8 (for SY16-17).

Meal Counting & Claiming

- Validate SFA's procedures from off-site assessment tool
 - Questions 300-311
- Manual system = keep ALL paper documentation and worksheets used to build monthly claim

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Handout-benefit issuance roster – Yellow

The SFA must have a meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed, by category (i.e., free, reduced-price, or paid). The meal counting and claiming process must include either a manual or electronic way of counting meals and consolidating meal totals at each school within the SFA. The mechanism must include an internal control system that validates the total meal counts prior to the submission of the claim for reimbursement to the SA.

We will collect:

1 month of claim – determined by SFA and reviewer

Meal Counts for said claim (paper and electronic)

talk about bad/good meal counts example

paper and electronic

Edit checks

MEAL PATTERN & NUTRITIONAL QUALITY CRITICAL AREA PERFORMANCE STANDARD 2

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

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Performance Standard 2 is the second critical area of the Review

Meal Components and Quantities, Offer vs. Serve, and Dietary Specifications and Nutrient Analysis are all aspects that are looked at under Performance Standard 2.

Meal Components & Quantities

- SFA will submit one week of menu docs
 - Production records
 - Food labels
 - Child Nutrition (CN) Labels
 - Product Formulation Statements (PFS)
- Refer to Production Record Handbook
- Onsite meal observation to validate menu and production records

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Handouts-PR, Labels, etc., PR Handbook - Pink

The meal pattern is the foundation of federal school nutrition programs, and SA staff must ensure SFAs are offering reimbursable meals at breakfast and lunch according to the regulations. The scope of review for this module is to establish that meals claimed for reimbursement contain the appropriate meal components and quantities for the SBP and the NSLP.

The SFA will submit one week of menu documentation to the reviewer for breakfast and lunch and it will need to include the following:

- Production records
- Food labels
- Child Nutrition (CN) Labels
- Product Formulation Statements (PFS)

Your reviewer will work with you and your SFA to pick a week that works well for you and us. For example, we cannot use a week with less than 3 consecutive days. We also want to review a week that as an accurate representation of what you are normally serving. An example would be if you serve a special meal for Thanksgiving, that week probably would not represent a typical week for your school.

After your reviewer looks over the documentation that you submit, they may have

some questions. Do not be alarmed, questions do not automatically mean that you are doing something wrong. Your reviewer just wants to ensure that everyone is on the same page.

During the onsite review, meal service will be observed to validate the menu and production records that were submitted. We will also ask that you submit menu documentation for the day of the onsite review as well.

Production Records

- Required for documentation that proves reimbursable meals were served for breakfast, lunch, and after school snack
- All information at top must be completed
- All menu items must be completed
 - Easy glance to ensure all items are served
- All other columns must be completed

[27]

Production records are required for breakfast, lunch, and after school snack. Think of production records as your grocery receipt to the Feds for your claim for reimbursement. They show and prove that you served all of the components and in the right amounts to provide a reimbursable meal to the number of students who ate that day.

All menu items must be filled out on the production record. It is an easy double check to have someone look over the production records to ensure that every section is filled out and nothing was missed. If you do not document a component on the production record, it looks like that component was not served, resulting in meals that cannot be claimed for reimbursement and will have to be assessed as fiscal action during the review. A missing component can result in the USDA menu certification extra six cents reimbursement to be shut off and that money to no longer be received by your school.

Production records should be filled out the day that the meal was served and should not be taken home to finish. They are considered property of the SFA and need to stay on site at the SFA.

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR _____						Serving Size		Lunch Menu				
DATE: _____						K-8	9-12					
School Dist: _____						Meal Counts						
Site Name: _____						Planned		Actual				
Offer Versus Serve: Yes: _____ No: _____						K-8:						
OVS Grades: _____						9-12:						
Purchased A la Carte? Yes: _____ No: _____						Adults:						
Free Seconds? Yes: _____ No: _____						Total:						
A	B	C		D		E		G		H	I	J
Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (005) Product Name & Code # (Brand Name 4234)	Serving Size	Grade: K-8		Grade: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (Bx, #0 Cans, # Recipes, etc)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
Grains/Bread												
Fruits <input type="checkbox"/> See Food Bar Form												
Vegetables <input type="checkbox"/> See Food Bar Form												
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Other Foods (Condiments, etc.) <input type="checkbox"/> See Food Bar Form												

Offer vs. Serve

- Optional for K-12 at breakfast
- Optional for K-8 at lunch
- Required for 9-12 at lunch
- Signage is required for breakfast and lunch
 - Must include that students take at least 1/2 cup fruit and/or veg

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The meal pattern is the foundation of federal school nutrition programs, and SA staff must ensure SFAs are offering reimbursable meals at breakfast and lunch according to the regulations. The scope of review for this Module is to establish that meals claimed for reimbursement contain the appropriate meal components (also referred to as food components) and quantities for the SBP and the NSLP.

Within Performance Standard 2, Nutrition Quality and Meal Pattern, is Offer Versus Serve. Offer Versus Serve allows students the opportunity to choose a reimbursable meal, rather than simply providing a student with all components associated with the prepared menu.

Allowing students to choose their meal provides an opportunity for students to play a role in their own nutritional quality. It is commonly viewed that a student is more apt to consume a healthy meal if the student chooses it themselves. Additionally, offer versus serve would help restrict food waste.

Offer Versus Serve is required to be utilized for grades 9-12 at lunch. It is optional for all other grades at lunch, and also optional for K-12 at breakfast.

Schools must make the decision on utilization of Offer Versus Serve at agreement time. It is important to keep communication lines open between the person responsible for the agreement, and the menu planner.

We will take a closer look at the requirements of Offer Versus Serve on the following slide.

(Reference the Handouts-PR, Labels, etc., PR Handbook, if available)

Offer vs. Serve

at least 3 components for NSLP
or food items for SBP



at least 1 component is:
½ cup fruits and/or vegetables for NSLP
½ cup fruits for SBP

(30)

In order to obtain a reimbursable meal through Offer Versus Serve, the student must select at least 3 different components at lunch. Of the components selected, at least 1 needs to be in the form of at least ½ cup fruit, or a ½ cup vegetable. Although fruits and vegetables are considered as two separate components, there is flexibility which allows the student to take a combination of fruit and vegetable to make up the ½ cup serving size.

A common way to remember the rule of Offer Versus Serve is “5-3-2-1”.

- 5 – All 5 components must be made available, in the full amount identified from the meal pattern
- 3 – At least 3 of the 5 components must be selected
- 2 – Of the components selected, at least 2 need to be in the full amount identified from the meal pattern
- 1 – Of the components selected, at least 1 must be in the form of a ½ cup fruit and/or vegetable

For a reimbursable breakfast, a student must take at least 3 food items. Of the items selected, at least 1 must be in the form of ½ cup fruit.

- If Offer Versus Serve is utilized at breakfast, at least 4 items must be made available.
- Grain, Fruit, and Milk must be included in the availability for the student to select.
- Of the minimum 4 items made available to the student, at least 3 must be selected.
- Of the minimum 3 selected, 2 must be in the full amount provided.

- Of the items selected, 1 must be in the form of at least $\frac{1}{2}$ cup fruit.
- We will look at a couple examples on the following slides.

K-8 OVS Example



**WW Spaghetti and
Meat Balls**
2 oz Meat/Meat
Alternate
1 oz eq Grains
¼ cup Red/Orange
Vegetable



Grapes
½ cup Fruit



Milk
1 cup Milk

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Here we have a lunch example for the K-8 grade group.

The student selects:

- Spaghetti and Meatballs (which includes 2 oz MMA, 1 oz Grain, and ¼ V)
- Grapes (crediting as ½ cup F)
- Milk (1 c)

Is this meal reimbursable?

Yes – All 5 components are made available in the full amount; at least 3 different components are selected (MMA, G, F, M); 2 are in the full amount (milk, MMA, Grain); at least ½ c F and/or V selected (Grapes – ½ c)

We will look at 9-12 on the following slide.

9-12 OVS Example



Fish Taco

2 oz

Meat/Meat Alternate

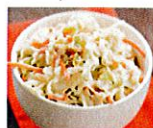
WW Tortilla

2 oz eq Grain



Milk

1 cup Milk



Coleslaw

¼ cup Other Vegetable

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The student selects:

- Fish taco (crediting as 2 oz eq MMA; 2 oz eq G)
- Milk (1 c)
- Coleslaw (crediting as ¼ c V)

Is this meal reimbursable?

Although the student took at least 3 different components (MMA, Grain, Milk, Veg), and at least 2 are in the full amount (MMA, G, Milk), the student did not take enough fruit and/or vegetable (only took ¼ cup coleslaw).

What could the student do to make the meal reimbursable?

- Take more coleslaw, Take at least ¼ c F

OVS ACTIVITY!

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We will now do a quick activity on Offer Versus Serve.

Dietary Specifications & Nutrient Analysis

- Dietary Specification Risk Assessment
 - Completed offsite
 - Completed onsite
- Based on menu review, Nutrient Analysis may or may not be completed

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The Dietary Specifications and Nutrient Analysis Module details procedures to assess whether meals offered to children through the school meal programs are consistent with Federal standards for calories, saturated fat, sodium, and *trans* fat. To reduce childhood obesity and minimize students' risk of chronic disease, SA staff must ensure SFAs are offering meals that meet regulatory requirements.

The dietary specifications will be assessed off site and then validated during the on site visit. If your SFA is determined high risk during either of these assessments (onsite or offsite) a nutrient analysis will be conducted.

If a nutrient analysis is conducted, we will take a more in-depth look at your menus. Typically, we conduct a nutrient analysis because of issues with missing components. If this is the reason behind the nutrient analysis, we will ask for a week of perfect menus (production records and supporting documentation that meet all meal pattern requirements) to use to conduct the nutrient analysis. Typically this does not happen in only one week, so be prepared to work with your reviewer to get everything done as smoothly and quickly as possible.

Dietary Specs ACTIVITY!

(35)

By table/small groups

RESOURCE MANAGEMENT

Paid Lunch Equity
Indirect Costs
Maintenance of the Nonprofit School Food
Service Account
Revenue from Non-program Foods

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Resource Management – This section will apply to all SFA's that are on the SNP. There is one section that only applies to nonpricing programs (all children eat free, even if they are technically in the reduced or paid category) – the PLE section.

Another difference for this section is that we look at the prior completed school year documentation to complete the questions in this section.

Also, this review may be conducted off site. We like to complete this before the on site visit when possible.

Let's get on the same page. Our staff are not trained Business Managers. We receive our guidance from USDA FNS and a significant portion of our training comes through USDA FNS. However, we also work with our SD DOE Finance and Management (Susan and Bobbi) to ensure we are looking at proper documentation. For the purpose of this discussion if you can look at your Goldenrod handout, this is a common document that we look at during this review. Your Fund 51 statement of Revenues and Expenses and a similar document called a Balance Statement is primarily what we look at when evaluating this area.

Resource Management Risk Indicator Tool

- SA conducts a risk assessment based on responses in off-site assessment tool-questions 700-711
- Risk indicators determine when to conduct comprehensive review
- Comprehensive review can be conducted in all four areas
- RM review includes most previous completed school year

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The intent and scope of monitoring in this section is to apply a systematic approach to ensuring the overall financial health of an SFA's nonprofit school food service. This Section consists of a review of four areas integral to the financial health of the SFA's school food service. Includes Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, Indirect Costs.

This section uses a risk assessment to determine low or high risk programs. A high risk ranking is not the same as a finding, in many cases a high risk can simply mean that your school is operating a more complicated program. And it means we will be digging a little deeper into documentation to confirm that program requirements are followed. Each section is assessed for a low or high risk ranking and each section is evaluated for a comprehensive review. This has changed over the past few years and I expect small changes to continue for a short while longer.

Paid Lunch Equity

- Offsite tool questions 706-709
- Ensure SFA is charging the minimum weighted average paid price
- Use PLE tool to determine prices
- Increase prices according to PLE tool or use nonfederal source of funding in support of paid lunch prices

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Paid Lunch Equity (PLE) – This rule requires that paid student meal prices are set high enough to cover the cost of the meal. Each year there is an adjustment to the requirement which is why the tool is updated annually.

During agreement time we provide technical assistance to every school before the application is approved. However, during the review we may dig a little deeper. We will first check your PLE tool from the prior school year. If there are questions, we may dig deeper to ensure that the PLE requirements were met to either increase prices or to provide a source of funding to support the student paid lunch meals.

Paid Lunch Equity Comp Review

- Gather SFA's calculations used to determine if the SFA needed to increase paid lunch price
- The school year 2010-11 (start year of Paid Lunch Equity) weighted average paid lunch price
- All paid lunch prices for October of the previous school year
- Number of paid lunches served associated with each paid lunch price in October of the previous school year
- Total paid lunches claimed in the second preceding school year if needed

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If a comprehensive review is required in this area we will look at the data entered into the tool. We may need to look at prior year data if your school is using the allowed nickel round down carry over.

If your school is adding federal funds, we will look at a statement that indicates the payment was added to the NonProfit School Food Service Account. And the dollar amount must match (or be less than) what the PLE indicates is required.

If a PLE Exemption is requested we will also look into the exemption to see if it is supported by documentation.

Failure to meet the PLE requirement will result in unallowed costs that must be returned to the NonProfit School Food Service Account. For the purpose of this review, repayment of unallowed costs is different than "Fiscal Action" or a "Fiscal Finding." "Fiscal Action" results in a noncompliance found in either Performance Standard 1 (elig. benefits, benefit issuance, meal counts, etc.) or Performance Standard 2 (meal pattern plans, dietary specifications, production records, etc.).

Indirect Costs

- Offsite tool question 711
- Charging indirect costs to the nonprofit school food service account
- Must have documentation of and prior approval from Federal Cognizant agency
 - Public Schools = DOE
 - BIE Schools = BIE

40

This section asks about Indirect Costs charged to your NonProfit School Food Service Account.

While this is allowed it is a rare practice that must be preapproved by CANS in your iCAN application.

The SFA must provide documentation of their approval to charge indirect costs against federal programs from the Cognizant Agency. That is a big word that essentially means the "Federal" agency that pays your school the largest amount of federal funds. For Public school the SD DOE (Susan and Bobbie) is the Cognizant Agency. For a BIE school and some grant schools, the Bureau of Indian Education is the likely Cognizant Agency. In a very small number of agencies in the state, CANS/SD Grants Management is the Cognizant Agency.

The review will not only verify the proper approval was obtained, but the correct indirect cost rate is used, and indirect costs are applied equally and consistently for all sources of federal funding. A review of the total indirect cost rate charged to the prior school year NonProfit School Food Service Account balance statement will be calculated to ensure the proper rate was applied.

A check of proper classification of costs will be conducted to ensure that costs are not charged both directly and indirectly (double dipping).

Charging indirect costs incorrectly or without preapproval will result in unallowed costs that must be returned to the NonProfit School Food Service Account.

Maintenance of the Nonprofit School Food Service Account

- Offsite Tool Questions 700-705
- Separate account (line item) for food service
 - Fund 51 for public schools
- Annual review of account
- Allowable vs. non allowable costs

41

Revenues and Expenses Handout – Goldenrod

A common conversation that we have with nonpublic schools – the review document asks for a separate account dedicated as the NonProfit School Food Service Account. It can be a dedicated line item within the accounting system.

At the end of each SY every school/agency must complete a year end review of total revenues and expenses to determine the accounts nonprofit status.

Did the SFA have year end expenses in excess of revenues that required a general fund transfer to cover the negative balance? This account must be zeroed out each year using a source of nonfederal funds and cannot carry a negative balance.

Were any funds transferred OUT of this account? Where they allowable? Basically, no funds should be moving out of this fund unless it is to pay bills for the direct support and operation or improvement of the School Lunch, Breakfast, or Afterschool Snack programs.

At the end of the year did you assess your 3 months avg. operating balance to ensure you were not exceeding it? If you are exceeding it, are you on a plan to spend down the account?

[calculation: divide a full year's total expenses by the # of full school months (generally 9 months) and multiply that result by 3]

Does your school/agency have a method in place to ensure only allowable costs are charged to this account? If nonprogram or unallowable costs were charged to this account, how is the reimbursement of the account handled?

Maintenance of the Nonprofit School Food Service Account Comp Review

- Review statement of revenue and expenses
- Review revenue, expenses, net cash resources
- Determine allowable vs. unallowable expenses
- Review 10% of costs
- Review invoices/payments/receipts, etc.

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Using the statement of revenue and expenses or a year end balance statement the area's mentioned previously will be analyzed.

Digging into allowable versus unallowable costs approximately 10% of expenses in several categories using the general ledger or similar document will be evaluated for allowable program costs. An evaluation of costs for "reasonable, necessary, and allocable" will be completed.

Charging unallowable costs will result in unallowed costs that must be returned to the NonProfit School Food Service Account.

Nonprogram Foods

Any non-reimbursable foods and beverages **purchased** using money from the **nonprofit school food service account**

Common Examples:

Purchased second entrees
a la carte foods
second milks
adult meals
catering or vending machines

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Revenue for the sales of nonprogram foods must support the true cost of the nonprogram foods and schools and agencies that sell/offer nonprogram foods must have a way to make this determination each new school year. A USDA Nonprogram Food Tool must be completed to make the assessment, which we will go into in more detail in just a moment.

Fair warning: Since we began looking at this requirement a few years ago we are seeing a large percentages of our school that are having a significant amount of problems making this assessment and resulting in a large amount of unallowable costs that must be repaid. CANS is considering adding the nonprogram food tool to the annual iCAN application. By moving it to the application we are able to provide targeted corrective action which can greatly limit unallowable costs that must be repaid to the NonProfit School Food Service Account. If this change is made, look for it in your SY18-19 application.

Nonprogram Foods

- Offsite tool question 710
- A la carte foods
 - Second milks, entrees sold
 - Smart snacks
- Adult meals
 - Teachers, parents, children that are not enrolled, other visitors
- If any of the above are sold, a comprehensive review is required

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Any sales of nonprogram foods currently triggers a comprehensive review in this area.

You will send in your statement of revenue and expenses/balance statement and your nonprogram sales and revenue data for the prior school year. See handouts in purple for examples. Also, documentation to support how your school determines all nonprogram foods prices will be requested.

Adult meals – as long as your adult meal is exactly the same as your oldest menu grade group (for most schools grades 9-12), using the simplified adult meal price outlined in CANS Memo #56.2 will cover this requirement. If your Adult Meal includes extra servings then a cost analysis must be completed to ensure that the cost of the program foods are covered by the adult paid price.

A la cart food sales that are not a part of the program reimbursable meal – Ex: sherbet, bottles of water, cookies, etc. The raw material cost of the foods, packaging, labor must be covered by the sales price.

Second entrees or meals that are sold can be tricky one for most schools.

- If your school has the ability to do a cost analysis on each and every entrée or meal sold in addition to the reimbursable meal, please complete and document that analysis.
- If your school does not have the ability to complete a cost analysis on each entrée or

meal sold in addition to the reimbursable meal, a reference period check may be used to gauge if your second entrée or second meal prices are set high enough. This is based on guidance in FNS policy memo SP20-2016 (<https://fns-prod.azureedge.net/sites/default/files/cn/SP20-2016os.pdf>)

- We had our regional office federal folks out for a visit last week and we asked them to review an Excel tool that we created to help our schools through this reference period assessment. They gave us their blessing, but we need to spiff it up for public posting. If you want an early draft shoot DOE.SchoolLunch@state.sd.us an email and we can send you an early copy.

We will take a peek at this reference period concept in our activity coming up! First let's take a look at the USDA Nonprogram Food Tool that must be completed annually.

USDA FOOD AND NUTRITION SERVICE

Nonprogram Revenue Calculator

Enter the cost for reimbursable meal, cost of nonprogram food, and total food costs.

<u>Cost for Reimbursable Meal Food</u>	
<u>Cost of Nonprogram Food</u>	
<u>Total Food Costs</u>	
<u>Total Nonprogram Food Revenue</u>	
<u>Total Revenue</u>	
Minimum portion of revenue from nonprogram food	
Minimum Revenue Required from the Sale of Nonprogram Food	
Additional Revenue Needed to Comply	\$ -

1. Cost for Reimbursable Meal Food

2. Cost of Nonprogram Food

3. Total Food Costs

4. Total Nonprogram Food Revenue

5. Total Revenue

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On the last page of your activity you have a copy of this tool.

The data needed for the tool is:

1. Cost for Reimbursable Meal Food – This information may not be readily available at your school.
2. Cost of Nonprogram Food – This information may not be readily available at your school.
3. Total Food Costs – You have this information!
4. Total NonProgram Food Revenue – You have this information!
5. Total Revenue – You have this information!

So let's go through an activity to find out those costs that are not readily available. Please remember, this is a Admin Review training so we cannot go into extreme detail in this training – we simply do not have the time. However, there is help available or coming soon. The Financial Management course offered in July in Pierre spends time on this very topic to ensure your school is compliant with the nonprogram food requirement. Or early in SY17-18 or over the summer if we can find the time between training and applications we will record and post a webinar that walks schools through using a reference period to assess nonprogram food revenue requirements.

Nonprogram Foods ACTIVITY!

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Large Groups/2 tables together – 6-12 people. Does everyone have a Business Manager in their group?

Nonprogram Activity – Purple

For the **Best** information: Complete the USDA Nonprogram Food Tool for one program year.

Acceptable Reference Period is as small as a week (must be at least 5 consecutive days, or 4 consecutive days if you are a 4-day per week school). Week must be a typical representation of menus/entrees sold. Some schools find it easier to track costs by one month – that is also acceptable. **CAUTION:** Do not pick a bad weather week, special menus, or days when there is something out of the normal going on. This data is important to assess your compliance. And this process may be repeated during the review if required by review findings/risk assessment.

Let's do Monday together: First your school will have to figure out what are you selling a second entrée, a second meal? What comes with that? Include all of the actual FOOD Costs involved in each food item offered in your sold second entrée or meal. For this activity we are only allowing the sales of a second entrée.

Step 1: Total up the costs for Hot Dog on a Bun with condiments.

Step 2: We can see from our Point of Sale system or second entrée tracking system that 25 Hot Dog Second Entrees were sold.

Step 3: Multiply the Total Cost by the Total Number of Entrees Sold.

That equals your Daily Total Dollar Amount for Second Entrée Sales for Hot Dog on a Bun.

Please complete 2-5 --- And Record your answers on the easel up front. ((If there is an easel))

Together, let's complete #6. Add all of the Daily Total's Together to find the Total Cost of your Non Program Foods (Second Entrees)

Next up, Assessing your Total Cost (both Program and NonProgram Foods) sold for the same days. It is exactly as we figured for the second entrée only we are going to include the actual or a good average cost of all the foods sold as a program/reimbursable meal and the sold second entrée.

To find average milk cost: You add the actual cost of all your different milk types together for example:

Skim Chocolate costs: \$0.35/carton + Skim White costs: \$0.27/carton + White 1% costs: \$0.26/carton = $\$0.8799 \div 3 = \$0.29333 = \$0.29$

If you serve fruit on the line, use your actual cost. If you serve fruit on a food bar, you can find the average cost using the same method used to find the avg cost of milk. And repeat for veg – if you serve your veg on the line use your actual cost per serving. If you use a food bar, find the actual cost per serving for each veg offered and find the average of all veg.

Now you try! Assign 7-11 to groups. --- And Record your answers on the easel up front. ((If there is an easel))

Let's bring the Total Food Cost and the NonProgram Food Cost to page 5 Step 3 to figure out the Reimbursable Meal Cost.

Now let's get those numbers into the USDA Nonprogram Food Tool and **BRING A COPY UP ON THE INTERNET TO ADD DATA TO REAL TOOL.**

GENERAL PROGRAM COMPLIANCE

Civil Rights
On-site Monitoring
Local Wellness Policy
Smart Snacks
Professional Standards
Water
Food Safety
Reporting and Recordkeeping
SBP & SSO Outreach

(47)

Civil Rights

- Offsite tool questions 800-807
- Nondiscrimination statement
- Complaint policy
 - Review CANS NSLP Memo 108
- Civil Rights training
- Racial Ethnic Report
- “And Justice for All” posters
 - Must be posted in feeding area/cafeteria

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Racial Ethnic Report Handout – Orange

“And Justice For All” posters must be visible to program participants – example of what poster looks like – please take one if needed.

Poster must be the actual poster – no print offs from the internet

Civil Rights certificates for CR training

All program materials must use the appropriate non-discrimination statement. It should also be posted on the SFAs website

Onsite Monitoring

- Offsite tool question 900
- Required for all sites if you have more than one serving site
- Lunch AND Breakfast
- Must be completed by Feb 1 each year
- CANS Memo 52.1
 - Required form

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Required for all sites if you have more than one serving site

Lunch AND Breakfast

Must be completed by Feb 1 each year

CANS Memo 52.1

Required form – we will look at onsite?

How many of you have more than one feeding site? Do you want to see the memo/forms?

Local School Wellness Policy

- Offsite tool questions 1000-1006
- Requirements met?
- Reviewed annually?
- Who is involved?
- Is the public aware and encouraged to be involved?
- Assessment completed every three years?

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One of the general areas which will be reviewed is the Local Wellness Policy.

All SFAs participating in the National School Lunch Program are required to have a Wellness Policy. The local wellness policy is an agency requirement, which means that it should not fall on one person's shoulders to implement.

CANS has some great resources posted in the Local Wellness Policy section of the webpage. These resources include:

- USDA's Wellness Policy Final Rule
- Wellness Policy Final Rule Summary – brief, 2-pg breakdown of the final rule
- Wellness Policy Checklist – Made by CANS – provides a checklist for SFAs to use as a self-assessment
- South Dakota Model Wellness Policy – Based on the model policy from Alliance For A Healthier Generation
- USDA's Local Wellness Policy Outreach toolkit – provides resources which can be used to help with required outreach
- Local Wellness Policy Memo SP 24-2017 – Q&A Memo from USDA regarding frequently asked questions

Smart Snacks

- Offsite tool questions 1100-1103
- Foods/beverages sold to students during the school day
 - A la carte items
 - Vending machines
- Food Fundraisers
 - Who keeps track of these?
 - What is SFA policy?
- Discuss best practices
 - Binder for labels and Alliance Calculator results

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Smart Snacks activity – Pink

Smart Snacks rules apply to any food or beverage **SOLD** to students on the school campus during the school day. The *school day* is defined as midnight to 30 minutes after the final bell rings. For example, if you have school on Nov. 7th and your final bell rings at 3:15pm, your school day would be defined as midnight on the morning of the 7th until 3:45pm that afternoon.

Any a la carte items sold as well as any items in vending machines are subject to smart snacks rules if they are sold within the defined school day. If you have a vending machine that is on a timer that can be set so the vending machine only allows items to be sold at certain times but is turned off from midnight to 30 minutes after the final bell, then the items sold in the vending machine do not have to be smart snack compliant.

Food fundraisers must have a designated person that is in charge of tracking them. Each organization within a school is only allowed to have one exempt (non-smart snack compliant) fundraiser per year.

As a part of the review, we will ask for smart snacks documentation as well as documentation for exempt fundraisers if applicable to you. A best practice for smart snacks items is to keep a picture of the actual label of the product as well as the smart

snacks calculator results that you have printed. This helps the reviewer to see how you entered the product in to determine compliance.

SMART SNACKS ACTIVITY!

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Type products into smart snack calculator and show how it works

https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/

Professional Standards

- Offsite tool questions 1200-1211
- FSD, Manager, Full-time, Part-time, Other
- Training must be documented and tracked
- Training is tracked annually, unless carrying over hours-then two years
- Documentation will be submitted to CANS during review

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Each food service staff is required to complete hours of professional training. Food Service Director is 12 hours, Manager is 10, other full time is 6 hours, and part time is 4 hours.

CANS website has a training tracker tool to use, or other means of keeping time tracked. Increments of 15 minutes, includes CANS calls, webinars, trainings, reading articles apply.

You may carry over hours if you have additional, but State Agency must be informed that you are using carryover.

During an AR visit, the tracking document will be requested by reviewer.

Professional Standards cont.

- All SFAs have 1 FSD
- If you have FSMC-must have two FSD
 - 1 for SFA, 1 for FSMC
- Hiring Requirements should be reviewed at hiring
- If FSD does not meet hiring requirements, salary is an unallowable cost
- Hiring request on CANS/NSLP webpage

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What are hiring requirements?

If an SFA completes a hiring request, and it is approved, wages cannot be paid out of the School Lunch Fund until the new hire has become compliant with requirements and met any other requirements from the State Agency.

Water

- Verified during onsite visit
- Must be available at no charge with no limits
- Must be available at breakfast
- Must be available at lunch

55

Required at Breakfast AND Lunch. Can be a water fountain that is in the lunchroom or pitcher of water with cups.

Food Safety/Buy American

- Written food safety plan at each serving location
 - Reviewed annually
- Health inspections-posted
- Daily temp logs & checklists
- Food Safety Checklist
- Does your plan reflect your practice?

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Another General Area which is observed during the review is Food Safety and Buy American.

Food Safety Plans, also known as the SOPs, are required to be at all sites that food is prepared and/or served.

- This includes single buildings with multiple kitchens/serving areas within the building.

The food safety plans and SOPs must be reviewed annually, and signed/dated.

The most recent health inspection must be posted.

Temperature logs must be completed and documented daily; thermometer calibrations must be completed and documented at least weekly.

The food safety checklist must be completed in the frequency as identified on the checklist.

- If your school has strong food safety practices in place, the food safety checklist may be completed monthly – just make sure to update the frequency on the top of the checklist.

Always make sure that the practices in place are in line with what the food safety plan identifies.

We will look at Buy American on the following slide.

Buy American

- Required that all food be domestic
- Look at foods in storage during onsite visit
- Review documentation for nondomestic items during onsite visit



Christine Anderberg
 Director of Merchandising & Procurement | Variety Foods, LLC
 4200 E. Producer Lane | Sioux Falls SD 57104 | 605-339-9221 x506 | 605-337-4667 Direct

----- Forwarded message -----

From: **Kelly McDaniels**
 Date: Mon, Jan 23, 2017 at 3:37 PM
 Subject: RE: Mandarin oranges and tropical fruit and pineapple

Canned mandarins, pineapple and tropical fruit are not grown in the US. Mandarins are from Spain and China, pineapple from China, Indonesia, Viet Nam, Philippines, etc. The last domestic packer was Maui of Hawaii and they went to just fresh around 15 years ago. PCP and Del Monte offer pineapple and mandarins but they aren't grown here.

Kelly McDaniels
 Bid Manager - Canned Department
 UniPro Foodservice, Inc.

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Since the National School Lunch Program is federally funded, it is expected that the program will utilize domestic products.

Consider looking at food storage to ensure that only domestic product is purchased.

If the menu planner would like to consider purchasing a non-domestic product, documentation must be maintained to justify the purchase.

- Acceptable documentation could include:
 - Communication from a vendor identifying a particular product not produced in the US.
 - Documentation demonstrating significant cost differential between US product and non-domestic product.

Reporting and Recordkeeping

Must keep any and all documentation for a period of three years plus the current year.

- Agreements
- Free/Reduced applications
- Meal counts and all worksheets and edit checks
- Verification records
- Claims
- Menu documents
- Resource management docs and financial information
- Audits
- Procurement

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All records must be kept for three years plus current year.

SBP & SFSP Outreach


- If serving breakfast:
 - Must inform families that breakfast is available
 - Beginning of and during school year
- Summer Food Service Program (SFSP)
 - Must inform families about SFSP locations state-wide and in area
 - End of school year

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Breakfast availability should be announced to families at least twice a year. Poster handout with web address for SFSP that are available. Best practice to inform families near the end of the school year.

(NEW!!!) Unpaid Meal Charges

- Requirement effective July 1, 2017
- Resources on CANS NSLP website under “Unpaid Meal Charge Policy” section



Unpaid Meal Charge Policy	
2017 Guidebook: Overcoming the Unpaid Meal Challenge	Unpaid Meal Charges: Local Charge Policy Requirement (USDA, April 2017 – 38 slides only)
Unpaid Meal Charges: Local Charge Policy Requirement (April 2017- 39 min webinar recording)	Coping with Unpaid Meal Charges (USDA, July 2016 – 29 slides only)
Checklist: Local Meal Charge Policy Considerations for All SFAs	Checklist: Local Meal Charge Policy Communication Requirements for All SFAs
Checklist: Alternate Meal Policy Considerations for SFAs Opting to Provide Alternate Meals	Checklist: Recommended Topics for Delinquent/Bad Debt Policies
SP 23-2017: Unpaid Meal Charges: Guidance and Q&A	SP 47-2016: Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments
SP 46-2016: Unpaid Meal Charges: Local Meal Charge Policies	Link to Unpaid Meal Charges USDA FNS website for more information
SD Example Unpaid Meal Charge Policy 2017	

Examples Handout – Green

We expect the feds to add this section to the review next school year. Here are the requirements:

- SFAs are required to have a written and clearly communicated system to address meal charges local meal charge policy in place no later than July 1, 2017.
- SFAs must develop and implement a written SFA-level policy. SFAs have discretion to vary the policy based on student grade level. The feds refer to this as a policy, but may be a “policy” or “standard practice” that determination is at the discretion of the SFA.
- The policy must be provided in writing to all households at the start of each school year and to households transferring to the school or school district during the school year. It must also be provided to staff responsible for policy enforcement.
- Additional information can be found at:
 - USDA FNS Unpaid Meal Charges website: <https://www.fns.usda.gov/school-meals/unpaid-meal-charges>
 - 2016 Edition: Overcoming the Unpaid Meal Challenge: Proven Strategies from Our Nation’s Schools (memo SP58-2016)
 - Unpaid Meal Charges: Guidance and Q&As (memo SP57-2016)

OTHER FEDERAL PROGRAMS

Afterschool Snack

Seamless Summer Option

Fresh Fruit and Vegetable Program (FFVP)

Special Milk Program

(61)

Afterschool Snack

- Collect documents offsite
 - One week of menus as determined by SFA and reviewer
 - Meal counts and claim docs for one month as determined by SFA and reviewer
- Onsite review optional based on previsit results
- Assess compliance in the following areas:
 - Eligibility
 - Accountability/Meal Counting and Claiming
 - Meal Pattern/Production Records
 - Monitoring
 - General Areas

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Collect documents offsite

One week of menus as determined by SFA and reviewer – just as with NSLP

Meal counts and claim docs for one month as determined by SFA and reviewer

Onsite review optional based on previsit results

Assess compliance in the following areas:

Eligibility

Accountability/Meal Counting and Claiming

Meal Pattern/Production Records

Monitoring

General Areas

Seamless Summer Option

- Review occurs during summer following year of Admin Review
- Follow same regulations as with NSLP and SBP
- Assess compliance in the following areas:
 - Performance Standard 1
 - Performance Standard 2
 - General Areas

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Review occurs during summer following year of Admin Review

Follow same regulations as with NSLP and SBP

Assess compliance in the following areas:

Performance Standard 1 – Meal Counting

Performance Standard 2 - Menus

General Areas – Food Safety, Civil Rights, etc.

Fresh Fruit & Vegetable Program

- Site selection based on number of sites receiving AR and operating FFVP
- Offsite: validate one claim month as determined by SFA and reviewer
 - Is SFA using majority of funds to purchase fresh produce
 - SFA carefully reviews and prorates equipment purchases
 - Labor costs and other costs are minimal

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For those that participate in the Fresh Fruit and Vegetable Program, this program will also be observed during a review.

We must obtain invoices corresponding with one claim month. Make sure that the costs on the claim directly reflect costs identified on the corresponding invoices.

The majority of funds must be used to purchase fresh produce, and equipment purchases must be prorated. Additionally, although labor costs may be claimed, claimed labor should be minimal – maintaining the funds for the purchase of fresh fruits and vegetables.

We will continue on the following slide.

Fresh Fruit & Vegetable Program cont.

- Onsite review mandatory
 - Available to all enrolled children (elementary only)
 - Not available to adults except for teachers in the classroom during service
 - Free of charge to all students
 - Served within school day but outside of meal service
 - No frozen, canned, dried fruits/vegetables, juice, nuts, fruit strips, trail mix, etc.
 - Cooked veg no more than once per week
 - Food Safety

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Unlike Afterschool Snack, reviewers are required to conduct an Onsite Review for the FFVP.

The reviewer will look to see that:

- The program is available to all enrolled elementary children of the participating site
- Not available to adults, except for teachers in the classroom during service
- Students are not charged for FFVP participation
- Served within the school day, outside of meal service
- Only fresh fruits and vegetables are provided
- If a cooked fresh vegetable is provided, this is done no more than 1x/wk, and is accompanied with a nutrition education activity
- Appropriate food safety practices are maintained

On the next slides, we will look at items that are and are not allowable on the FFVP.

What is Allowable for FFVP?

Applesauce



Olives and Pickles?



Apple Slices?



Packaged Baby Carrots?



Raisins?



66

- Applesauce – Not allowable
- Apple slices – Allowable
- Olives and pickles – Not allowable
- Packaged baby carrots – allowable
- Raisins – not allowable

What is Allowable for FFVP cont?

Peeled oranges in a package?



Celery with low fat Peanut Butter?



Canned Green Beans?



Peanuts?



Apples with dip?



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- Pre-peeled oranges – allowable
- Celery w/ low-fat peanut butter – allowable
- Peanuts – not allowable
- Canned green beans – not allowable
- Apples with dip – not allowable

Special Milk Program

- Collect documents offsite
 - Milk prices-invoices
 - Milk counts and claim docs for one month as determined by SFA and reviewer
- Onsite review optional based on previsit results

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Students can only be on SMP if not participating in NSLP or SBP. For example, preschoolers that do not eat at school for breakfast or lunch.

For review, must provide invoices for milk, and the milk counts and claim documents. Reviewer may or may not observe service. Must keep paperwork for 3 years plus current, including hand written milk count sheets.

SPECIAL PROVISION OPTIONS

Provision 2, 3

Community Eligibility Provision (CEP)

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Special provision schools will have their base year paper work reviewed, or if setting a base year their review period may include the entire school year.

Special Provision 2, 3 & CEP

- Federal funding to zero out negative food service account
- Claim %
- All students eat free?

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During a review at a provision 2, 3 or CEP school the benefit issuance section does not apply. Instead, the reviewer will determine if the correct claiming percentages are being used. The percentages set in your base year (for provision 2 and 3) or your ISP set in year one (for CEP). We will also look to ensure that all students that receive a reimbursable meal are eating for free. Your reviewer will also need to look at your food service account to ensure that non-Federal funding is being used if the reimbursement does not cover all of the program costs.

Recap

How did we do?

- Did we give you a better understanding of the Administrative Review?
- Do you better understand why we do this?
- Did you get some of your Offsite Assessment questions answered?
- Do you have any other questions?

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Administrative Review Myths! – Busted?

(72)





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(74)