

Administrative Review Off-site Assessment Tool

General Instructions/Intent

The *Off-site Assessment Tool* encompasses questions about and requests for information from the School Food Authority (SFA) with regard to several of the monitoring areas of the Administrative Review. This tool is designed to decrease the amount of time needed for the on-site portion of the review, as well as provide both the State Agency (SA) and SFA with essential information to help the reviewer focus on any areas of non-compliance and target any technical assistance that may be necessary while on-site.

The Tool is intended to be completed off-site prior to the on-site portion of the administrative review, and used by the SA as a method to gather some of the information necessary to complete the administrative review. Some of the requested information may already be on-file at the SA, while other areas may require input from the School Food Service Director, or other appropriate SFA points of contact. The SA may contact the SFA for input on these questions using whatever method is most appropriate (email, phone call, etc.), and should work collaboratively with the SFA to gather all requested information. Electronic submission of documentation is encouraged wherever possible. The SA may begin completing the *Off-site Assessment Tool* as far in advance of the on-site review as is deemed necessary. If the tool is utilized as intended, the reviewer should be prepared to provide any technical assistance that may be necessary during the on-site portion of the review.

Resource Management is the only section in which the completion of an off-site assessment is required. The SA must secure the SFA's answers to the Resource Management questions contained in the *Off-site Assessment Tool* prior to reviewing Resource Management. The goal of collecting the SFA's answers in the Resource Management section of the *Off-site Assessment Tool* is so that the SA can determine if a Comprehensive Resource Management Review will be needed for any of the four Resource Management areas. If a comprehensive review is necessary, the SA must work with the SFA to determine if the comprehensive review of any Resource Management areas will occur on-site or off-site. If the SA will be unable to secure the necessary documentation to conduct the review off-site, the SA must conduct the Resource Management Comprehensive review on-site. All other sections of the *Off-site Assessment Tool* may be completed on-site at the discretion of the SA. Regardless of format and timing, all responses to all other sections must be completed no later than the first day of the on-site portion of the review.

In addition to the completion of the *Off-site Assessment Tool*, the SA is required to select sites for review (see Site Selection Procedures in Administrative Review Manual). Once site selection has been completed, SA must complete the *Meal Compliance Risk Assessment Tool* for each site selected for review. The site with the highest score is most at risk for noncompliance with the required meal pattern and must receive a targeted menu review (see Dietary Specifications and Nutrient Analysis module for options to complete targeted menu review). If the SA chooses to use the *Dietary Specifications Assessment Tool* to complete the targeted menu review, an off-site review of documentation is required.

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During the off-site assessment phase, the SA should document any technical assistance provided and any corrective action implemented by the SFA. Regardless of when corrective action occurs, all findings must be documented in the final report.

Section II: Meal Access and Reimbursement

Reminders:

The SA should attempt to answer questions using available data before contacting the SFA.

In addition to completing the questions on the *Off-site Assessment Tool*, the SA should follow the instructions for selecting the students for certification and benefit issuance review as described in the Certification and Benefit Issuance Module in the Administrative Review Manual.

The SA must ensure that the information the SFA provides to answer these questions mirrors the current free and reduced-price policy statement on file with the SA.

The SA should notify the SFA that all verification materials must be available at the SFA's central office for the on-site portion of the review.

Section III: Meal Pattern and Nutritional Quality

Reminders:

In order to complete this section of the *Off-site Assessment Tool*, the SA must complete the *Meal Compliance Risk Assessment Tool* for **each of the sites selected for review** (see site selection procedures in Administrative Review Manual). The results of the *Meal Compliance Risk Assessment Tool* will determine which site shall receive the targeted menu review, using one of the four options as described in the Administrative Review Manual. Please note that pre-K meals following the CACFP meal pattern should not be included in the dietary specifications.

Prior to the on-site portion of the review, the SA should notify the SFA that each site selected for review must be prepared to provide meal pattern compliance documentation demonstrating that daily/weekly meal component requirements for one week of the review period are met. If appropriate, SA can request this documentation from the SFA prior to the beginning of the on-site review.

Reviewers may examine any food crediting documentation, including but not limited to food labels, product formulation statements, CN labels, and bid documentation to ensure meal pattern compliance. (This documentation will be examined for all reviewed sites. For the site selected, this documentation will also be used for the targeted menu review process.)

For efficiency, the SA should review the same menus, production records, and standardized recipes from the week the SA reviewed in the Module: Meal Components and Quantities as selected for the targeted menu review.

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NOTE: If the SA has chosen Option #1 (Completion of the *Dietary Specifications Assessment Tool*) for completing the targeted menu review, the required documentation must be submitted to the SA within a sufficient timeframe to allow the SA to properly assess the documentation and determine the risk level of the site selected for the targeted menu review.

Section IV: Resource Management

Reminders:

This section is designed to capture information from the SFA about its financial operations during the Resource Management (RM) Review period. Using the SFA's responses to the *Off-site Assessment Tool* for the RM Review period, the SA will apply specific risk indicators to the SFA and determine whether a Resource Management Comprehensive review of any one, or multiple area(s), is warranted. The SA must secure the SFA's answers to the questions included in the Resource Management section of the Off-site Assessment Tool. The SA should then review all of the information provided, which may include supplemental information provided by the SFA, and complete the Resource Management Risk Indicator Tool. While FNS does not require SFAs to include comments when they answer the questions in the Off-site Assessment Tool, State agencies may require SFAs to provide them or to provide additional documentation. As a best practice, State agencies should use the information provided in the comments to better understand SFA financial management practices and to evaluate the accuracy of the SFA's answers. The results of the tool will inform the SA if a comprehensive RM review of any section(s) is necessary.

The Resource Management review period used by the State agency to assess compliance with the Resource Management section of the Administrative Review may consist of either the previous school year or last audited school year. When reviewing the SFA's implementation of the Paid Lunch Equity and/or the Revenue from Nonprogram Foods, the State agency may review the current school year instead of the previous or last audited school year if sufficient financial data is available. The State agency must indicate for the SFA in the *Off-site Assessment Tool* which Resource Management review period the SFA should use when answering questions 700-712.

Important: Any failure, whether by the SFA or SA, to adhere to assessing the SFA's need for comprehensive reviews in any of the four areas prior to the Resource Management Review requires that a Resource Management Comprehensive Review of all areas will be conducted.

Recommended: The State agency is strongly encouraged to utilize specialized staff to the extent practicable to collect and evaluate responses in this section.

Risk Indicators for Resource Management:

When evaluating the responses to questions 700-712, follow the risk assessment for the Resource Management module in the *Administrative Review Manual* to determine whether a resource management comprehensive review of any or all areas is necessary. Some sections contain multiple questions that may indicate risk (referred to as a "risk indicator"). State agencies are not required to conduct a Resource Management comprehensive review unless an SFA receives

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risk indicators in any of the Resource Management areas. For State agencies conducting Resource Management reviews on-site, if the Resource Management Risk Indicator Tool is not completed off-site prior to the Resource Management review, a comprehensive review of all four Resource Management areas is required.

As a best practice, all State agency reviewers, including those reviewers who do not conduct Resource Management reviews, should be familiar with the questions in the *Off-site Assessment Tool* and how SFAs receiving an Administrative Review answered them. During the on-site review of the breakfast and lunch meal services, the on-site reviewer should assess if the information provided by the SFA as part of the Off-site Assessment Tool – Resource Management section is consistent with the reviewer’s observations of the SFA’s meal services. For instance, if the SFA indicated it charged the target weighted average paid lunch price at all of its school sites and thus did not receive a risk indicator under the Paid Lunch Equity, the on-site reviewer should look at the paid lunch price charged during site reviews to see if the lunches were consistently priced at or above the target average weighted paid lunch price. If there appear to be any discrepancies between the information reported by the SFA and the reviewer’s on-site observations, the SA must follow up with the SFA to determine if a RM Comprehensive Review is necessary in RM areas that did not initially receive a risk indicator. For example, if an on-site reviewer notices adults being served meals at a Community Eligibility Provision (CEP) school but the SFA indicated it did not sell adult meals in the *Off-site Assessment Tool* by answering “not applicable” to questions 710 and/or 711, the on-site reviewer should discuss the discrepancy with the SFA to determine if the SFA answered the questions incorrectly. If the on-site reviewer is conducting the RM review, the reviewer should either change the SFA’s answer(s) in the Off-site Assessment Tool and corresponding RM Risk Indicator Tool to questions 710 and/or 711 to “yes” if the SFA answered the question(s) incorrectly or, if an off-site reviewer is conducting the RM review, the on-site reviewer should communicate the information to the off-site RM reviewer so that the RM reviewer can follow up with the SFA.

Section V: General Program Compliance

Reminders:

The SA may assist the SFA with the completion of this section, if necessary. If this section is not returned to the SA for evaluation prior to the on-site review, this section and applicable documentation must be available for SA review at the start of the on-site portion of the review.

Section VI: Other Federal Programs

Reminders:

This section is intended to be completed by the SA. If this section is not completed by the SA prior to the on-site review, this section must be completed by the SA during the on-site portion of the review.

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If the SA elects to conduct the claim validation for the Fresh Fruit and Vegetable Program during the off-site phase, complete questions 1900 - 1902 of the *On-site Assessment Tool*.

Separate review forms have been provided for the review of the Afterschool Snack Program, Special Milk Program, and Seamless Summer Option. The SA may complete any applicable portion of those forms off-site at their discretion. Any section of the applicable forms that are not completed prior to the on-site portion of the review must be completed during the on-site portion of the review if necessary.

Section IX: Special Provision Options

The intent of this section is for the SA to understand the Special Provision Option policies and procedures in place at the SFA. The review addresses the implementation and operation of Provision 1, 2, and 3 sites and sites operating CEP.

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Section IX: Special Provision Options