An Overview of the ADMINISTRATIVE REVIEW of USDA School Nutrition Programs 2017-18

School & Community Nutrition
IN Department of Education
Welcome

• Silence Cellphones
• Step out for conversations
• Introductions

Question to ponder:

What is the total amount of federal dollars your school/school corporation receives annually for participation in the School Nutrition Programs you oversee?
Today’s Agenda

- Overview of the Improved Process
- Benefits, Access and Reimbursement
- Meal Pattern and Nutritional Quality
- General Program Compliance
- General Program Reviews
- Resource Management
- Post Review Activities
- Q&A

What does your school meal look like?
Child Nutrition Administrative Review
Mission Statement

The PRIORITY of the State Agency and School Food Authority should always be to ensure that all students have equal access to and can receive a nutritionally-balanced, reimbursable meal, including offerings of full components as required in the USDA meal pattern.
Administrative Review Approach

HHFKA 2010 called for more effective and efficient review process

AR process now

✓ Incorporates school breakfast, meal pattern, dietary specifications, and the 6-cent performance-based reimbursement
✓ Follows 3-yr review cycle starting July 1, 2013
  (2017-18 is year 2 of the 2\textsuperscript{nd} 3 year cycle)
✓ Provides offsite monitoring approach
✓ Allows for effective training
✓ Encourages on going technical assistance
## Administrative Review Structure

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Allows State Agencies to Maximize Resources

New AR Review

- Conducted both off-site and on-site
- Involves greater detail in all program areas
- Follow-up reviews scheduled when required

New Review Approach

- Uses risk indicators to target areas at greatest risk of error
- Attains more balanced workload and preparation time
- Provides more on-site technical assistance
Administrative Review Timeline

- Review notification
- Pre-review questions/documents submitted
- Entrance conference
- On-site review
- Technical Assistance
- Exit Conference
- Report Published
SFA Review Notification

• Superintendent/Principal and FS contact receive review notification email from State Agency

• Email has instructions for Pre-Review Questionnaire and Resource Management Risk Assessment to be completed and returned immediately to field staff
  • Field staff may follow up with questions on either of these documents

• SFAs await further instruction from Field Specialist
Off-Site Assessment Questionnaire Purpose

☑ School & Community Nutrition (SCN) and the Local Education Agency (LEA) work together and combines compliance/monitoring with technical assistance

☑ LEA provides information to SCN Field Specialist and will hopefully better understand all compliance/monitoring areas under the responsibility of the local school food service department

☑ SCN Field Specialist has more time to review documents thoroughly, conduct reviews more consistently, and provide ongoing technical assistance to the LEA
Pre-Review Procedures by State Agency

Once Off-Site Assessment Questions submitted to School Nutrition Specialist:

- LEA documentation is reviewed
- Site Selection takes place
- Additional questions asked about each site to determine site highest at risk for errors in menu compliance and dietary specifications
- Instructions sent for preparation of Benefit Issuance Roster
Preparing Benefit Issuance Roster

POS List of students approved for free/reduced meals corporate wide

• Excel format, 4 or 5 columns, including:
  ✓ Student Last Name, First Name
  ✓ Student Status: DC, MC-F, MC-R, Foster, Migrant*, Homeless*, F or R based on application
    * As designated by liaison
  ✓ School
  ✓ Approval or eligibility date

DO NOT INCLUDE
• paid students
• students attending CEP schools or provision schools
• No duplicate names
Documents Support Claims

Documents provided to SA during a review are required for all submitted claims for reimbursement, every month, every year.

- Benefit Issuance Document for Month of Review is the only additional document that must be prepared specifically for the review.

- State Agency cannot accept any documents that are on a shared site, such as Google Docs. Export the document, save it as a PDF on your own computer and then attach it to an email.

RETAIN ALL DOCUMENTS SUPPORTING CLAIMS FOR 3 YEARS PLUS CURRENT YEAR
Documentation Review

• LEA must have Production Records for every meal claimed
  □ By age/grade group served
  □ Support claims
  □ Document what was served and leftovers
  □ Food is creditable for portions served
  □ Document that daily and weekly meal component requirements are met
  □ Identify if seconds are offered regularly

• Menus (for the selected school week from the review period)

• Standardized recipes, current CN labels, manufacturer’s or vendor information may also per required per site
Once the off-Site responses and documents are evaluated...

- Field Staff
  - discusses any initial findings and
  - provides technical assistance in order for SFAs to make corrections prior to the on-site review

- On-site Review Scheduled = to validate the information provided by the tool and conduct full program review
A Word About Site Selection

• School Nutrition Specialist will select which sites to visit prior to the on-site portion of the review.

• Determined by information obtained from LEA claims and includes:
  - Site name/type
  - Number of serving days
  - Number of eligible for free meals
  - Number of free meals claimed

• Additional sites may be selected based on other criteria.
When is the Review Period?

• Most recent monthly claim submitted with a minimum of 10 operating days
• And also the month and week of On-Site review
• Special Circumstances
  □ Reviews early in the school year
  □ Year-round, multi-track & provision schools
  □ May require prior approval or special procedures

NOTE: Review Period can expand if major issues are found
On-Site Review Procedures

**Entrance Conference** – Superintendent, Food Service Director, and other key personnel

SFA representatives are briefed on purpose of review, on-site documentation is provided in this 15 minute meeting

**On-Site Review**

Off-Site questions are validated (when necessary) and information is confirmed accurate at this time

**Site reviews** in all program areas will take place along with application/benefit issuance compliance assessment

**Exit Conference** – It is critical that all stakeholders are present

SFA representatives presented with results/findings

Corrective Action is reviewed/discussed

Fiscal Action

SFA is notified of CA due date timeline and results of the review posted on our public website within 30 days of closure
On-Site: Evaluate SFA Meal Access and Reimbursement

- Certification & Benefit Issuance
- Verification
- Meal Counting and Claiming
Specifically: SCN Staff will…

- **Certification and Benefit Issuance**
  - Validate LEA’s procedures from off-site assessment tool
  - Validate Student Certifications
  - Validate Benefit Issuance document
  - Review denied applications

- **Verification**
  - Sample of verified applications is selected to determine compliance with Verification requirements

- **Meal Counting and Claiming**
  - Validate off-site assessment tool questions
  - Validate the counting and claiming process
  - Record errors
  - Observe SFA practices during meal service
On-Site: Evaluate Nutritional Quality & Meal Pattern

- Meal Components & Quantities
- Offer vs. Serve
- Dietary Specifications & Nutrient Analysis
Specifically: SCN Staff will:

Assess whether each review site

- Offers students the required meal components in the required quantities, for all grade groups daily and weekly requirements
- Gives students access to select required meal components on all reimbursable meal service lines; and
- Records as reimbursable only meals that contain required components in required quantities
Meal Patterns & Quantities

• Assess meal pattern compliance
  - Milk varieties, Vegetable subgroups, whole grain rich requirements, etc.

• Review breakfast and lunch documentation for compliance
  - Menus/production records
  - Performance-based reimbursement documentation (USDA worksheets) Week must be 3-7 consecutive days

• Missing meal components/insufficient quantities will expand review to entire review period, and possibly entire year
Meal Pattern Compliance: No excuse

Easily confirmed by using 6 cents certification worksheets USDA or Primero Edge

For Each Age Group:
✓ Confirms daily and weekly compliance in Meats and Grains/Bread
✓ Confirms daily compliance with offering 2 varieties of milk, 1% unflavored and skim unflavored or flavored*
  (RCCIs may use 1% unflavored and 1% lactose reduced milk or 1% buttermilk to meet the 1% requirement for licensing)
✓ Confirms compliance with daily fruit requirement
✓ Confirms whole grain rich compliance* Even with waiver must meet 50% WGR
✓ Confirms compliance with daily and weekly vegetable requirements, including vegetable sub groups
✓ Can also assess calories, saturated fat, sodium (Target 1 levels required)

*Flexibilities extended in 2017-18 PY
During On-site Meal Review

SCN Field Specialist will:

• Prior to Meal Service
  - Ensure all reimbursable meal lines offer all required components
  - Observe meal preparation

• During the Meal Service
  - Observe a percentage of meal service for each line
  - Determine if meal contain components & quantities for age/grade group
  - Ensure students have access to, and know how to select a reimbursable meal
Offer vs. Serve (OVS)

SCN Field Specialist will monitor whether school is:

- Offering full components on all reimbursable meal service lines
- Posting signage on serving line
- Ensuring students are selecting enough components/items to make a reimbursable meal
- School staff are accurately judging quantities on self-serve bars
- POS staff are trained to recognize a reimbursable meal
OVS Critical Reminders

✓ Meals must contain minimum of 3 food components (NSLP) or food items (SBP) as the students exit the meal service line

✓ Each reimbursable meal must contain at least ½ cup of fruit and/or vegetable (lunch or breakfast)

✓ Staff must properly distinguish reimbursable meals from a la carte purchases

Students must always be able to select full portions of all components
Dietary Specification & Nutrient Analysis

SCN Field Staff will:

• Determine if LEA is serving reimbursable meals according to Dietary Specifications
  □ Calories
  □ Saturated Fat
  □ Sodium
  □ Trans Fat

• Assess if one week weighted nutrient analysis is required for each established age/grade group and menu type offered at a lunch and breakfast for one site selected in the LEA using risk evaluation (MCRAT)
Fiscal Action for Benefit and Claiming and Counting Errors

• Certification and Benefit Issuance errors
  - Applications missing information
  - Miscalculation/miscategorization of certification benefits
  - Benefit Issuance Errors
  - Failure to update verified applications

• Meal Counting and Claiming
  - Inaccurate meal counting or claiming
    - Counting errors include: meal counts do not equal number of meals served to eligible students, second meals were counted, meal counts exceed number of eligible students by category
Fiscal Action for Meal Pattern Violations

• If meal component is **completely missing**, fiscal action must be taken for not following the meal pattern.

• For **repeat violations** involving vegetable subgroups and/or milk type, the SA must take fiscal action (and not subject to $600 disregard)

• For **repeat violations** involving food quantities and/or whole grain-rich foods, the SA has discretion to apply fiscal action
General Program Compliance

- Civil Rights
- Local Wellness Policy
- Food Safety
- Smart Snacks
- USDA Foods
- Buy American Provision
- Water
- Reporting and Recordkeeping
- SBP and SFSP Outreach
- School Meal Environment

“Um, Can you repeat the part of the stuff where you said all about the things?”
Food Safety

• General areas of review
  □ Written food safety plan – UPDATED annually; kitchen equipment logged
  □ Annual staff training
  □ Food safety inspections
  □ Recordkeeping
  □ Storage

• Corrective Action
  □ Each area assessed at site level
  □ If all schools compliant, LEA compliant
  □ Corrective Action prescribed as necessary
Proper Food Safety Training

Food safety plans, if followed provides:

- Evidence that school corporation follows written protocols
- Safe eating environment for students
- Protection for employees
  - Understand proper food safety practices
  - Understand how to operate and clean all kitchen equipment

Consequences of not following a food safety plan:

- Foodborne illness
- Employee injuries
Evidence of Food Safety Training

Employees will:

• Wear hair restraints and closed-toed shoes
• Use thermometers and temperature logs
• Have clean, trimmed nails, free from polish
• Wear food safe gloves when serving and change frequently
• Work only one side of the dishroom (clean or dirty) at a time
• Not allow anyone to loiter in kitchen if not food safety trained
• Avoid spread of communicable disease
• Understand concerns of cross contamination
• Keep any nonprogram foods separated in fridge and freezers
Civil Rights Compliance

Off-site Assessment evaluation

• SCN Field Specialist obtains LEA responses to the Off-site Tool
  • If necessary, clarification provided
  • If noncompliant, finding is assessed/technical assistance is provided/corrective action determined

All students should have access to all meal choices without discrimination.
Civil Rights On-Site Assessment

Reviewer will:

• Validate corrective action if non-compliance was detected by Off-Site Assessment Tool

• Ensure USDA “And Justice for All” Poster prominently displayed in and visible to program students

• Conduct meal observation to determine if all students had equal access to the program without discrimination

• Determine correct nondiscrimination statement used on program materials

• Determine if denied applications are disproportionately submitted by minority households
Civil Rights – Training Reminder

One staff required to annually take IDOE SCN Civil Rights training

• Annually trains all staff who have contact with program students
  • Food Service staff with contact to students
  • Other schools staff – cafeteria aides, janitors

• Records must be kept annually of Civil Rights (3 years + current year)

• Staff trainings can consist of presentations found on DOE website or presentations prepared by the LEA

• Trainings must include where to document Civil Rights complaints and procedures staff must follow
Reminder: Disciplining Students

USDA requires students be offered all meal choices available

School employees cannot limit a student’s meal choices for any disciplinary reason:
- In-school detention during lunch
- Withholding choices due to behavioral issues in cafeteria

School employees can:
- Require student to eat in a different location or at a different time
- Require the student to select from a written menu instead of going through the serving line
Local Charging Policy

Must be clearly written and address situations when students on reduced or paid status do not have funds to pay for meal

- Policy must be communicated annually to
  - All households with students in school corporation
  - School corporation employees responsible for enforcing policy

- AR Compliance is measured by confirming
  - Written policy in place
  - Written policy has been communicated to all school corp households
  - School corporation is enforcing policy as written to all households, without discrimination
Reminder

Any student with money in hand to pay for a reimbursable meal must be served a meal, even if they have a balance.

SFA may:
- Restrict a la carte sales
- Apply any change due to student account

Example: Has $5 for $2.75 lunch = $2.25 applied to account
Local Wellness Policy Final Rule

• Requires all LEAs have a Wellness Policy
• Wellness Policy must be updated with the most recent requirements
• LEA must assess the local Wellness Policy a minimum of every 3 years
• May use SA provided template, LEAs may make up their own
• Evaluation template provided in pre-review email
Professional Standards Requirement

• USDA requires all SFAs to meet certain training requirements for all food service employees
• Training requirements vary by job duties
• Carryover of only half of the required hours is allowed if the employee has completed extra hours

Note: Food Service Directors not meeting required Professional Standards Hiring Requirements cannot have salary paid for from the food service account
Additional USDA Program Reviews

- Fresh Fruit and Vegetable Program
- Afterschool Snack Program
- Seamless Summer Option

Fiscal Action for any of these programs falls under NSLP
FFVP Review

• Schools participating in FFVP can expect to have site visits during the Administrative Review

• SFAs may also have a program review conducted in conjunction with the Administrative Review where applicable
Afterschool Snack Program

SCN Field Specialist will:

• Determine if LEA retains final administrative and management responsibility for meeting all afterschool snack requirements

• Assess compliance in the following areas:
  □ Eligibility
  □ Accountability/Meal Counting and Claiming
  □ Meal Pattern/Production Records
  □ Monitoring – At least once in first 4 weeks plus an additional time
  □ General Areas
Seamless Summer Option (SSO)

- Allows schools to serve meals in the summer
- Sites MUST follow NSLP meal pattern, including veg subgroups, milk varieties, WGR
- Academic summer schools using SSO must be OPEN and advertise to community
- Sites using SSO will be reviewed the summer before and immediately after the year of scheduled AR
- Must be approved in advance of SSO claiming start date
- Guidance and regulations have not changed
NEW to AR Process: Resource Management

- Maintenance of the nonprofit school food service account
- Revenue from Non-program Foods
- Indirect Costs
- Paid Lunch Equity
Maintenance of Nonprofit Food Service Account

SFA must:

• Accurately track all revenues and expenses

• Monitor transfers in and out of account

• Ensure fund balance does not exceed 3 months average expenditures

• Get State Agency approval for any equipment purchase over $5,000

• Provide internal controls to ensure only allowable costs were charged to food service account
Revenue from Nonprogram Foods

All foods/supplies paid for from the food service account must be accounted for:

- Includes items sold a la carte, Smart Snacks, catering
- Meals for adults not collected at POS

Food Service cannot provide anything for “FREE”
Paid Lunch Equity and Indirect Costs

**Paid Lunch Equity**
- All SFAs must provide PLE at time of program renewal
- Must be in compliance with what tool shows as required
- New schools must meet PLE requirements before approval

**Indirect Costs**
- Indirect costs charged to food service must be supported by IDOE School Finance formula and calculations must be kept to support transfer of funds
- Private schools limited to 10%
- FSMC limited to 10% of first $25,000
After the Review:

- Administrative Review Exit Conference

- Corrective Action Collected for most findings ON SITE

- Within 30 days results of review must be posted on IDOE public website

- Mailed Administrative Review Report (i.e., Notification Letter of Review Results)
But wait there’s more…
NEW Procurement Review

• USDA now requires the review of procurement practices of an SFA minimum of once every 3 years

• All SFAs receiving an AR will also receive a separate Procurement Review

• Procurement reviews cover an entire program year; therefore PY 2018 procurement reviews will cover the SFA procurement practices for PY 2017
Procurement: What is it?

Procurement – the required process for using federal funds to make purchases for child nutrition programs

Every SFA MUST have a written procurement policy
   Must include
       Employee Code of Ethics
       Buy American Provision

Every SFA MUST
   Document all purchases made with federal funds
   Keep all invoices, correspondence for 3 years plus current year at a minimum
**Procurement Simplified**

Each Purchase falls into following 1 of 3 categories:

- If $3,500 or less - SFAs must show evidence of making purchases equally from more than 1 source – No quotes required if spreading/rotating USDA dollars equally among vendors

- If $150,000 or less – SFAs must obtain quotes from at least 3 vendors for each purchase

- If greater than $150,000 – competitive bids or requests for proposal rules must be followed
Top 10 Tips for Successful AR

10. **READ**: All emails from the SA are important, especially from your field staff and the Weekly Updates from Allie

9. **ATTEND**: Attend/Send staff to trainings offered by SA starting with critical areas. Meal Pattern, Procurement, Application Approval, Food Safety, Wellness Policy, Smart Snacks take priority over Culinary & Smarter Lunchroom trainings.

8. **LEARN**: Know all of the job duties proficiently in all program areas where your staff are responsible

7. **TRAIN**: Hold trainings for staff in all areas of school nutrition programs

6. **REVIEW**: Conduct internal program reviews; evaluate and hold staff accountable for their jobs and the trainings they attend
5. **PREPARE:** Ensure all paperwork required for every site claim is completed correctly and filed with monthly records

4. **NOTIFY:** All SFA staff should know importance of compliance with federal regulations and that reviewers will be coming on-site

3. **ORGANIZE:** Use information provided to get paperwork in order, organize applications & production records into folders or binders

2. **POWER UP:** Get staff excited about the AR; don’t dread it; use it as a learning experience and a gauge

1. **OWN IT:** Use AR as time to expand knowledge about child nutrition programs and to make improvements in work habits and environment to improve meals to students
Remember School Nutrition Mission!

The PRIORITY of the State Agency and School Food Authority should always be to ensure that all students have equal access to and can receive a nutritionally-balanced, reimbursable meal, including offerings of full components as required in the USDA meal pattern.
Questions? Contact Us.

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