

# WHAT TO EXPECT DURING YOUR ADMINISTRATIVE REVIEW

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# Schedule for Today

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



# Reinvention Goals

- The Healthy Hunger-Free Kids Act of 2010 calls for a more effective and efficient review process
  - Consolidate the Administrative Review process
  - Incorporate school breakfast, the new meal pattern, and dietary specifications, and the 6-cent performance-based reimbursement
  - Implement a 3-yr review cycle (cycle begins July 1, 2013)
  - Provide for offsite monitoring approaches
  - Provide effective training and ongoing technical assistance



# Maximizing Resources

CRE Approach	New Approach
Primarily Conducted On-Site	Process structured to be conducted off-site and on-site: <ul style="list-style-type: none"><li>• Off-site Assessment Tool</li><li>• Risk Assessment Tools</li></ul>

## New Approach allows for:

- Office staff assistance
- Application of risk indicators
- Better balanced workload and preparation
- More on-site technical assistance

# The “New” Process

Off-Site Assessment Tool

Evaluation Questions



On-Site Review

Validation Questions

# Off-Site Assessment Tool

- Includes questions on a number of monitoring areas and is intended for completion prior to the on-site visit
- Regional Supervisor will contact authorized representative 4-6 weeks in advance requesting this information be provided
- Supervisor will schedule the on-site visit to validate the information provided by the tool
- Will be accessible through the DESE Web Applications beginning SY 13-14



# Off-Site Assessment Tool continued...

- Feedback from USDA testing:
  - Tool encourages DESE SFS and the Local Education Agency (LEA) to work collaboratively and helps shift the process toward the goal of combining compliance/monitoring with technical assistance
  - LEA has more time to provide information to supervisor and also will better understand why they are providing that information
  - Supervisor has more time to review documents thoroughly, conduct reviews more consistently, and provide ongoing technical assistance to the LEA



# Review Period

- Most recent month claim submitted, must include  $\geq 10$  operating days
- Period 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



# Pre-Visit Procedures

- Authorized Representative will be notified
  - Superintendent and food service director are contacted as well (either may be the authorized representative)
- Off-Site Assessment Tool is initiated
- LEA documentation is reviewed
- Pre-visit information is obtained
- NSLP sites for review are selected



# On-Site Review Procedures

- Entrance Conference
  - Authorized representative is briefed on purpose of review, on-site documentation is provided, etc.
  
- On-Site Review
  - Off-Site questions are validated and information is confirmed accurate at this time
  
- Exit Conference
  - Authorized representative is presented with results/findings of review



# Site Selection

- Supervisor will select which sites to visit prior to the on-site portion of the review
- Determined by a process based off of information obtained from LEA at supervisors' request:
  - Site name/type
  - Number of serving days
  - Number of eligible for free meals
  - Number of free meals claimed



# New Administrative Review Structure

Meal Access & Reimbursement	Nutritional Quality & Meal Pattern	Resource Management	General Program Compliance	Other Federal Program Reviews
Certification & Benefit Issuance	Dietary Specs & Nutrient Analysis	Risk Assessment	Civil Rights	After-school Snacks
Verification	Meal Components & Quantities	Nonprofit School Food Service Account	SFA On-site Monitoring	Seamless Summer Option
Meal Counting & Claiming	Offer versus Serve	Revenue from Non-program foods	Local Wellness Policy	Fresh Fruit & Vegetable Program
		Paid Lunch Equity	Competitive Foods	Special Milk Program
			Water	
			Food Safety	
			SBP & SSO Outreach	



# Access and Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting and Claiming

# Off-Site Assessment

- Certification and Benefit Issuance
  - Question set 100s
- Verification
  - Question set 200s
- Meal Counting and Claiming
  - Question set 300s



# On-Site Assessment

- 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
  - Will be requesting a Methods of Collection and Meal Counting Form be completed



# When is Fiscal Action taken?

- Certification and Benefit Issuance. Why is Fiscal Action taken?
  - Applications missing information
  - Miscategorization of certification
  - Benefit Issuance Errors
  - Failure to update verified applications
- Meal Counting and Claiming
  - Inaccurate meal counting or claiming
    - Counting errors include: meal counts to not equal number of meals served to eligible students, second meals were counted, meal counts exceed number of eligible students by category



# Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

# Overview

- Supervisor will assess whether the school:
  - Offers students the required meal components in the required quantities;
  - Gives students access to select required meal components on all reimbursable meal service lines; and
  - Records for reimbursement only meals that contain required components in required quantities



# Meal Patterns & Quantities

- Assess meal pattern compliance
  - Milk, Vegetable subgroups, whole grain rich requirements, etc
- Review breakfast and lunch documentation for compliance
  - Menus/production records
  - Performance-based reimbursement documentation (USDA worksheets) if 6 cent certified
- Week must be 3-7 consecutive days
- Missing meal components/insufficient quantities: will result in the expansion of reviewing documentation from (at least) entire review period



# Pre-visit Documentation Review

- LEA must submit Production Records prior to On-Site visit
  - 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 ,CN labels and nutrition facts labels may also be required per site.



# On-site Meal Observation

- Prior to Meal Service
  - Will ensure all reimbursable meal lines offer all required components
  - Will observe meal preparation
- During the Meal Service
  - Will observe a percentage of meal service for each line
  - Will determine if meal contain components & quantities for age/grade group
  - Will ensure students have access to, and know how to select a reimbursable meal



# Offer vs. Serve (OVS)

## DESE SFS will monitor whether:

- ❑ School is offering enough food on all reimbursable meal service lines
- ❑ Signage is posted on the service line
- ❑ Students are selecting enough components/items to make a reimbursable meal
- ❑ Food service staff are accurately judging quantities on self-serve bars
- ❑ Food service staff at the POS are trained and can recognize a reimbursable meal



# OVS On-site Meal Observation

- Meals selected by students contain a minimum of 3 food components (NSLP) or food items (SBP) as the students exit the meal service line
- Each reimbursable lunch meal contains at least ½ cup of fruits or vegetables
- Staff properly distinguish reimbursable meals from a la carte purchases



# Dietary Specifications & Nutrient Analysis

- Supervisor will determine if LEA is serving reimbursable meals according to Dietary Specifications
  - Calories
  - Saturated Fat
  - Sodium
  - *Trans* Fat
- Supervisor will assess if a 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 in the LEA
- Determined by using the Meal Compliance Assessment Tool



# Fiscal Action on Meal Pattern Violations

- If it is found that a meal component is completely missing, fiscal action must be taken by the State Agency (SA)
- For repeated violations involving vegetable subgroups and/or milk type, the SA must take fiscal action
- For repeated violations involving food quantities and/or whole grain-rich foods, the SA has discretion to apply fiscal action



# Resource Management

Maintenance of the nonprofit school food service account

Revenue from non-program foods

Indirect costs

USDA Foods

# Off-Site Assessment Tool

## Resource Management: Question set 700s

- Maintenance of Nonprofit School Food Service Account
  - Questions 702 – 706
- Paid Lunch Equity (PLE)
  - Questions 707 – 710
- Revenue from Non-program Foods
  - Questions 711 – 712
- Indirect Costs
  - Questions 713 – 714
- USDA Foods
  - Questions 715 - 717





# General Program Compliance

Civil Rights

Local Wellness Policy

Food Safety

# Off-Site Assessment Tool: Section V

- Civil Rights
  - Question set 800s
- LEA On-site Monitoring
  - Question set 900s
- Local School Wellness Policy
  - Question set 1000s
- School Breakfast and Seamless Summer Option
  - Question set 1600s



# Food Safety

- General areas of review
  - Written food safety plan
  - Food safety inspections
  - Recordkeeping
  - Storage
- Corrective Action
  - Each area assessed at the site level
  - If all schools compliant, LEA compliant
  - Corrective action will be prescribed as necessary



# Civil Rights-Overview

## Off-site Assessment

- **Supervisor obtains LEA responses to the Off-site Tool**
- **If necessary, clarification provided**
- **If noncompliant, the supervisor provides technical assistance and if necessary, prescribes corrective action**

## On-site Assessment

- **If necessary, corrective action will be validated on-site if non-compliance was detected by Off-Site Assessment Tool**
- **Supervisor will ensure that the USDA “And Justice for All” Poster is displayed in a prominent location and visible to program students**
- **During meal observation on day of review, it will be determined if all program students had equal access to the program without discrimination**
- **Determine that the correct non-discrimination statement is used on program materials**
- **Determine if denied applications are disproportionately submitted by minority households**

# Staff Training on Civil Rights

- Records are required to be kept annually of Civil Rights trainings that are completed by food service staff
- Trainings can consist of presentations prepared by DESE SFS or presentations prepared by the LEA itself



# Local Wellness Policy

- LWP portion of administrative review changed to address HHFKA and FNS Memo SP 42-2011
  - Deficiencies handled through technical assistance only
    - No final rule
    - Limited implementation guidance
  - Assess progress and provide implementation suggestions
  - No LWP = Corrective Action
- Complete Off-site Assessment tool questions





# General Program Reviews

Fresh Fruit and Vegetable Program

Afterschool Snack Program

Seamless Summer Option

# Off-Site Assessment Tool: Section VI

- Other Federal Programs
  - Indication of any additional federal programs that will be examined during the review
    - Afterschool Snack Program
    - Seamless Summer Option
    - Fresh Fruit and Vegetable Program
    - Special Milk Program



# FFVP Review

- Three components to the FFVP review process
  - Supervisor will establish the FFVP review sample size
  - Claim validation
    - One month's claim is validated per site
    - Any month can be selected
    - Status of administrative costs will be checked
  - FFVP meal service observation
    - Occurs at each FFVP site selected
- Fiscal Action will be used to recover any payments in whole or in part, that is inconsistent with FFVP requirements



# Afterschool Snack Program

- Reviewer 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
    - General Areas



# Seamless Summer Option (SSO)

- LEA's that are participants in SSO and have been selected for an Administrative Review in SY 2013-2014 can expect to be reviewed on this program
- Guidance and regulations have not been changed (yet) in this area of the AR process





# Post-Review Activities

# Post Review Procedures

## □ Administrative Review Exit Conference

- Intent/Scope
- Documented Corrective Action
- Corrective Action Plan
- Fiscal Action

## □ Administrative Review Report (i.e., Notification Letter of Review Results

- Review Findings
- Timeframes
- Corrective Action/CAP
- Fiscal Action



## Questions? Contact Us

[dese.mo.gov](http://dese.mo.gov)

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