

# WHAT TO EXPECT DURING YOUR ADMINISTRATIVE REVIEW

DESE Food and Nutrition Services

# Schedule for Today

- Overview of the New Review Process
- Specific Areas of the Review
- Off-Site Assessment Tool
- On-site Visit
- Follow-up Procedures after On-Site
- Closing of the Review



# Reinvention Goals

- The Healthy Hunger-Free Kids Act of 2010 calls for a more effective and efficient review process
  - Incorporate school breakfast, the new meal pattern and dietary specifications, menu certification, and other Federal Programs
  - Implement a 3-yr review cycle (cycle began July 1, 2013)
  - Provide for off-site monitoring approaches
  - Provide ongoing technical assistance



# 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	LEA On-site Monitoring	Seamless Summer Option
Meal Counting & Claiming	Offer versus Serve	Revenue from Nonprogram foods	Local Wellness Policy	Fresh Fruit & Vegetable Program
		Paid Lunch Equity	Smart Snacks	Special Milk Program
		Indirect Costs	Water	
			Food Safety	
			SBP & SSO Outreach	

# Pre-Visit Procedures

- Authorized Representative and Food Service Director will be notified
  - May be the same person in some LEAs.
- Sites for review are selected, SBP will be reviewed at 50% of sites selected for NSLP review
- Pre-visit information is requested
- LEA documentation is reviewed



# Pre-Visit Procedures, Con't.

- Meal Compliance Risk Assessment Tool completed for sites selected for review
- Site with highest score will determine which site will receive a targeted menu review
  - Dietary Specifications Assessment Tool
    - Lunch and Breakfast



# Pre-Visit Procedures, Con't.

- Submit the Benefit Issuance Document (BID) to Nutrition Program Specialists (NPS)
  - Free and Reduced Price students for entire district
  - Statistical Sample Generator
- Complete the off-site assessment tool
  - Resource Management Tool **must** be completed and submitted to SA **4** weeks prior to review
    - Received less than 4 weeks in advance, then triggers a comprehensive resource management review



# Pre-Visit Menu Documents

- Submit menu documentation for each site selected for review
  - Menu and planned production records for month of review for Lunch and Breakfast (if applicable)
    - May be asked to submit standardized recipes, nutrition fact labels, CN labels and/or product specifications prior to on-site or may be reviewed during on-site
  - Complete certification worksheet
    - Certification worksheet from a USDA approved software is acceptable



# Off-Site Assessment Tool

- Accessible through DESE Web Applications
- LEAs scheduled for a review in 2014-2015 have access to the off-site questions
  - Must have submit capabilities to complete the off-site assessment
- Includes questions on a number of monitoring areas and is intended for completion prior to the on-site visit



# Off-Site Assessment Question Sets

- Certification and Benefit Issuance
  - Question set 100s
- Verification
  - Question set 200s
- Meal Counting and Claiming
  - Question set 300s
- Dietary Specification and Nutrition Analysis
  - Question Set 600s – (completed by State Agency)
- Resource Management
  - Question Set 700s



# Off-Site Assessment Question Sets

- 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



# Off-Site Meal Compliance Risk Assessment Tool

- Meal Compliance Risk Assessment Tool
  - Completed for each site selected for on-site review.



## Off-site Assessment

①	1 In addition to the National School Lunch Program, which of the following Child Nutrition Programs operate at the site?		 
	School Breakfast Program	<input checked="" type="radio"/> Yes <input type="radio"/> No	15.0
	Seamless Summer Option	<input type="radio"/> Yes <input type="radio"/> No	0.0
	Afterschool Snack Program	<input type="radio"/> Yes <input type="radio"/> No	0.0
	Fresh Fruit and Vegetable Program	<input type="radio"/> Yes <input type="radio"/> No	0.0
	Special Milk Program	<input type="radio"/> Yes <input type="radio"/> No	0.0
②	2 What are the age/grade groups served in the school?		 
	Pre-K	<input checked="" type="radio"/> Yes <input type="radio"/> No	0.0
	K-5 only (or K-1, K-2, K-3, K-4)	<input checked="" type="radio"/> Yes <input type="radio"/> No	0.0
	6-8 only ( or 6-7, 7-8)	<input type="radio"/> Yes <input type="radio"/> No	0.0
	9-12 only (or 10-12)	<input type="radio"/> Yes <input type="radio"/> No	0.0
	K-8	<input type="radio"/> Yes <input type="radio"/> No	0.0
	6-12	<input type="radio"/> Yes <input type="radio"/> No	0.0
	K-12	<input type="radio"/> Yes <input type="radio"/> No	0.0
③	3 Were Performance Standard 1 or Performance Standard 2 violations identified at the previous administrative review or during follow-up activities?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
④	4 How many reimbursable meal service lines are in operation? If the site does not have traditional lines, indicate how many different locations students may select from vegetable subgroup offerings.		 
	1	<input type="radio"/> Yes <input type="radio"/> No	0.0
	2-3	<input type="radio"/> Yes <input type="radio"/> No	0.0
	4+	<input type="radio"/> Yes <input type="radio"/> No	0.0
⑤	5 Do students serve themselves foods via food bars, serving stations, and/or salad bars?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
⑥	6 Does the site utilize cycle menus?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
⑦	7 Are meals served at alternate meal service locations?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
⑧	8 Is the school a HealthierUS Challenge award recipient certified January 1, 2010 or later?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
⑨	9 Does the site have a new kitchen manager, cook, or site manager?	<input type="radio"/> Yes <input type="radio"/> No	0.0  
Risk Score:			15.0



# Off-Site Dietary Specifications Tool

- Dietary Specifications Tool has two components and must be completed for each site selected for review for lunch and breakfast if applicable.
  - Off-site Assessment portion must be completed by LEA prior to review.
  - On-site Assessment portion will be completed by Nutrition Program Specialists during the review.



## Dietary Specifications Assessment Tool - Lunch

000-000  
**ABC R-V**  
 123 Highway ABC  
 John Smith  
 (000) 000-0000  
 John.smith@school.net

000-000  
**ABC R-V Elem. School**  
 123 Highway ABC  
 ABS, USA 123456

Reviewer: Doerhoff, Dana

### Off-site Assessment

#### Instructions:

For each question below, select the number that corresponds to the best description.

- 1 - Always (every day or 5 days/week)
- 2 - Most items or most of the time (3-4 days/week)
- 3 - Some items or some of the time (1-2 days/week)
- 4 - Never (0 days/week)

1 Do BID specifications for menu items and condiments require vendors to provide information on the following?  

a. Saturated-Fat

Lunch Off-site

b. Sodium

Lunch Off-site

c. Trans-Fat

Lunch Off-site

2 Only low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored) milk is used for student consumption and in menu recipes.  

Lunch Off-site

3 Low-fat, fat-free milk products are used. This includes yogurt and cottage cheese.  

Lunch Off-site

4 Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.  

Lunch Off-site

5 Are non-creditable cheese products offered as part of a reimbursable meal? (Non-creditable cheese includes: cheese sauce without a CN label, cheese product, imitation cheese and powdered cheese).  

Lunch Off-site

6 Reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties.  



# 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
  - Complete a series of on-site questions
  - Meal observation takes place
  
- Exit Conference
  - Authorized representative is presented with results/findings of review



# Meal Access and Reimbursement

Certification & Benefit Issuance

Community Eligibility Provision (CEP)

Verification

Meal Counting and Claiming

# On-Site Assessment – LEAs Without CEP

- Certification and Benefit Issuance
  - Validate LEA's procedures from off-site assessment tool
  - Validate Student Certifications: Review applications, direct certification, etc. and compare to Benefit Issuance Document
  - Review denied applications
- Verification
  - Sample of applications is selected to determine compliance with Verification requirements



# LEAs Participating in CEP Only

- Certification documentation used to determine the Identified Student Percentages (ISP) will be reviewed.
  - Documentation includes:
    - direct certification lists
    - documentation for extension of eligibility
    - homeless/migrant liaisons
- Verification – LEAs operating CEP only - are exempt.



# LEAs With Some But Not All Participating in CEP

- Certification and Benefit Issuance
  - Validate LEA's procedures from off-site assessment tool
  - Validate Student Certifications: Review applications, direct certification, etc. and compare to Benefit Issuance Document
  - Review denied applications
  - At least one CEP site will be selected for an abbreviated review.
    - Abbreviated review – verify the claiming percentages were applied correctly to the monthly claim for reimbursement.
- Verification
  - Must conduct verification for sites not conducting CEP
  - Sample of applications is selected to determine compliance with verification requirements



# Meal Counting and Claiming

- Meal counts at the school level
  - NPS will observe meal service at the POS
  - Review the meal count documentation on the day of review
  - Review meal counts for the review period
- Meal counts at the LEA level
  - Review meal counts for the review period from each school within the LEA.



# When is Fiscal Action taken?

- Certification and Benefit Issuance.
  - Miscategorized certifications
  - Benefit Issuance Errors
  - Failure to update a change in status resulting from verification
- CEP
  - Claiming Percentages are incorrect



# Fiscal Action

- 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.
  - CEP
    - Inaccurate claiming percentage from last ISP is used to claim meals.



# Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

# Overview

- Nutrition Program Specialist will assess whether the school:
  - Offers students the required meal components in the required quantities;
  - Implements Offer vs. Serve by giving students access to select required meal components on all reimbursable meal service lines; and
  - Reimbursable meals meet the dietary specifications & complete a nutrient analysis if necessary.



# 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
  - Menu certification documents
- Week must be 3-7 consecutive days
- Missing meal components/insufficient quantities will result in the expansion of review documentation to the entire review period



# On-site Meal Observation

- 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 meals contain correct components & quantities for grade group
  - Ensure students have access to, and know how to select a reimbursable meal



# Offer vs. Serve (OVS)

## DESE FNS will monitor whether:

- ❑ School is offering enough food on all reimbursable meal service lines
- ❑ Signage is posted explaining selection of food to be considered a reimbursable meal
- ❑ Students are selecting enough components/items to make a reimbursable meal
- ❑ 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 meal contains at least  $\frac{1}{2}$  cup of fruits or vegetables
- Staff accurately judge quantities when school utilizes service stations, theme bars and self serve bars



# Dietary Specifications & Nutrient Analysis

- Reviewer will determine if LEA is serving reimbursable meals according to Dietary Specifications
  - Calories
  - Saturated Fat
  - Sodium
  - *Trans* Fat
- Dietary Specifications tool is High Risk – the Reviewer will conduct a one week weighted nutrient analysis for lunch and breakfast to assess if the reimbursable meal meets the Dietary Specifications.



# Fiscal Action on Meal Pattern Violations

- If it is found that a meal component is completely missing, fiscal action must be taken



# Fiscal Action - Repeated Violations

- Violations involving vegetable subgroups and/or milk type, corrective action is needed, if this violation is repeated on the next review then it is considered a repeated violation and fiscal action must be taken
- Violations involving food quantities and/or whole grain-rich foods, then corrective action is needed, if this violation is repeated on the next review then it is considered a repeated violation and fiscal action may be taken



# Resource Management

Maintenance of the nonprofit school food service account

Paid Lunch Equity

Revenue from nonprogram foods

Indirect costs

# Resource Management (RM)

- Validate LEAs off-site assessment tool –
  - If NPS cannot validate the assessment tool
    - Comprehensive review will be required.



# Resource Management (RM)

This section consists of a review of four areas integral to the financial health of the LEA's school food service with six indicators to identify if a LEA is at high risk of noncompliance

- The four sections are:
  - Maintenance of the Nonprofit Food Service Account
  - Paid Lunch Equity
  - Revenue from Nonprogram Foods
  - Indirect Costs



# RM – Risk Flags

- There are six indicators of potential risk that fall within the four areas:
  - At least one question is asked under each area; some areas contain multiple questions that may indicate risk flags



# RM – Risk Indicators

1. Size of LEA – 1 question = 1 risk indicator
2. Audits – 1 question = 1 risk indicator
3. Maintenance of Nonprofit Food Service Account – 5 questions = 1 risk indicator
4. Paid Lunch Equity – 3 questions = 1 risk indicator
5. Revenue from Nonprogram Foods – 3 questions = 1 risk indicator
6. Indirect Cost – 1 question = 1 risk indicator



# RM – Risk Indicators

- If risk is identified in three or more of the six risk indicators assessed, the SA must conduct a resource management comprehensive review.





# General Program Compliance

Civil Rights

LEA On-site Monitoring

Local Wellness Policy

Smart Snacks in School

Food Safety

SBP and SFSP/SSO Outreach

# Civil Rights-Overview

- Reviewer will ensure that the USDA, “And Justice for All,” poster is displayed in a prominent location and visible to program students
- Determine that the correct non-discrimination statement is used on program materials
- Determine if denied applications are disproportionately submitted by minority households
- During meal observation on day of review, it will be determined if all program students have equal access to the program without discrimination



# Staff Training on Civil Rights

- Records are required to be kept annually of Civil Rights trainings that are completed by food service staff
  - This includes anyone who works with the Child Nutrition Programs
  
- Trainings can consist of presentations prepared by DESE Food and Nutrition Services or presentations prepared by the LEA



# 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



# Smart Snacks

- One week of menu documentation from the review period to ensure food and beverages sold a la carte during meal services are compliant with requirements.
- Interview school district staff and food service staff to gain understanding of food and beverages sales within the LEA
- Review nutrition documentation for food and beverage items sold in schools.



# Smart Snacks

- NPS must observe all locations where students are able to purchase foods and beverages to ensure:
  - Nutrition documentation provided for review is consistent with foods and beverages being sold
  - Leftover NSLP/SBP entrees are only sold to students the same day or the day after initially served in the NSLP/SBP
- Review exempt fundraiser documentation



# Food Safety

- General areas of review
  - Written food safety plan/HACCP plan
  - Food safety inspections
  - Recordkeeping
  - Storage
- Corrective Action
  - Each area assessed at the site level
  - If all schools compliant, LEA compliant





# Other Federal Program Reviews

Fresh Fruit and Vegetable Program

Afterschool Snack Program

Seamless Summer Option

Special Milk Program

# Afterschool Snack Program

- SNP must examine afterschool snack documentation:
  - Each school selected for the Administrative Review that operates the snack program
  - 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 2014-2015 can expect to be receive a SSO during the 2015 summer.



# FFVP Review

- Three components to the FFVP review process
  - SNP 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





# Post-Review Activities

# Administrative Review Exit Conference

- Conducted on the last day of on-site review
  - Intent of review
  - Documented Corrective Action
  - Corrective Action Plan
  - Fiscal Action (if applicable)



# Administrative Review Report

- Administrative Review Report (i.e., Notification Letter of Review Results
  - Review Summary of each area reviewed
  - Corrective Action Document
  - Fiscal Action (if applicable)
  - Timeframes



# Closing of Review

- Review is officially closed once the CAD is received and approved by NPS



# DESE – Food and Nutrition Services

- <http://dese.mo.gov/financial-admin-services/food-nutrition-services>
  - Administrative State Agency Review



## Questions? Contact Us

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