

WHAT TO EXPECT DURING YOUR ADMINISTRATIVE REVIEW

DESE Food and Nutrition Services

August 2014

Missouri Department
of Elementary and Secondary Education

Schedule for Today

- Overview of the New and Improved 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, 6-cent performance-based reimbursement, and other Federal Programs
 - Implement a 3-yr review cycle (cycle began July 1, 2013)
 - Provide for offsite monitoring approaches
 - Provide effective training and 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 | 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 | |

Review Period

- Most recent month claim submitted, must include ≥ 10 operating days
- A week from that month will be selected for **menu review** (we will talk more about the menu review later in this presentation)



Month of the On-Site

- Month of the on-site review includes the Day of Review (current open claim)
- Usually the month following the review period (most recent closed claim)
- Occasionally a month in-between, due to date of claim submission



Pre-Visit Procedures

- Authorized Representative and Food Service Director will be notified
 - May be the same person in some SFAs.
- Off-Site Assessment Tool is discussed
- Sites for review are selected
- Pre-visit information is requested
- SFA documentation is reviewed



Off-Site Assessment Tool

- Accessible through DESE Web Applications
- Includes questions on a number of monitoring areas and is intended for completion prior to the on-site visit
- SFAs scheduled for a review in 2014-2015 have access to the off-site questions
- Regional Nutrition Program Specialist will contact the Authorized Representative 4-6 weeks in advance to schedule the on-site review



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
- SFA On-site Monitoring
 - Question set 900s
- Local School Wellness Policy
 - Question set 1000s
- School Breakfast and Seamless Summer Option
 - Question set 1600s



School Nutrition Programs



Missouri
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School Year: 2013 - 2014

100 - Certification and Benefit Issuance

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Off-site Assessment

T 100 Who is the determining official for certifying household applications (Name and/or position title)?

Bookkeeper

T 101 Is the SFA required to conduct an Independent Review of Applications?

Yes No

Comments:

Empty text area for comments with a vertical scrollbar on the right side.

T 110 Who at the SFA receives the direct certification documents from the state or local agency and who is responsible for issuing and updating the benefit list?  

Name/title of person receiving Direct Certification documents from SA:

SNAP

TANF

FDPIR

Homeless

Migrant

Foster Children

Head Start

Even Start

Name/title of person issuing Direct Certification benefits to students:

SNAP

TANF

FDPIR

Homeless

Migrant

Foster Children

Head Start

Even Start

T 113 **!** Does the benefit issuance system identify how eligibility was determined? (e.g., through application, direct certification, etc.)  

Yes No

Comments:

T 114 **!** Who has access to the benefit issuance system and/or documentation? (Names and/or position titles)  

T 115 **!** How are benefits issued and distributed to students? (e.g., via electronic system with code numbers for students, ticket system)  



T 116 **!** How are eligibility determinations transferred to the benefit issuance document?



T 117 **!** How are benefit issuance document(s) transferred to the point of service system?



200 - Verification

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Off-site Assessment

T 200 Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report).  

a. Did the SFA choose the correct verification sample size?

Yes No

b. Did the SFA verify the correct number of applications based on their verification sample size?

Yes No

c. Was the most recent report timely and accurate?

Yes No

If no, is this a recurring problem?

Yes No

Comments:

T 201  Who serves as the SFA's verifying official? (Name and/or position title)  

T 202 Who serves as the confirming official? (Name and/or position title or software used is acceptable)  



T 204 Has the SFA completed the SA's verification training?

Yes No

List who and when.



School Nutrition Programs



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School Year: 2013 - 2014

300 - Meal Counting and Claiming

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Off-site Assessment

T 300 Does the SFA use an electronic or manual system to count and consolidate reimbursable meals?   

T 301 How does the SFA's point of service system identify a student's eligibility? Include all types of distinct counting methods (e.g., check-off list for grades 1-3, tickets for grades 4-8).  

T 302 Does the SFA have a backup system to their primary meal counting and claiming system should the primary system fail/not operate?   

Yes No

If YES, describe backup system.

T 305

What are the SFA's meal counting and claiming procedures for the following situations (as applicable):



a. Offer vs. Serve?

b. Incomplete/Non-Reimbursable Meals?

c. Second Meals?

d. Visiting student meals?



T 308 Have alternate points of service been approved by the SA?

Yes No N/A

Comments:



700 - Resource Management

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Risk Level: TA or Corrective Action Required

Off-site Assessment

Size of SFA

T 700 Is the SFA's enrollment 40,000 students or more?
 Yes No



Comments:

Audits

T 701 Did the SFA have any financial findings related to the child nutrition programs on previous administrative reviews or audits within the past three years?
 Yes No



Comments:

702 Did the SFA conduct a year-end review of total revenues and expenses to determine the school food service nonprofit status?   

Yes No

Comments:

703 Did the SFA identify year-end expenses in excess of revenues?  

Yes No

Comments:

704 If the SFA had excess revenues at the end of the year, were surplus funds transferred out of the school food service account to support other operations and/or to achieve a zero balance?  

Yes No N/A

Comments:

705 Did the SFA, in the most recent fiscal year, complete a process to measure its compliance with the requirement to limit net cash resources to a level at or below three months average expenditures?  

Yes No

Comments:

706 Did the SFA maintain supporting records that document its compliance with the above process?  

Yes No

Comments:



Paid Lunch Equity (Note: Select N/A for each question if SFA is a RCCI or non-pricing entity)

T 707 Did the SFA use the USDA Paid Lunch Equity tool to evaluate paid lunch prices?



- Yes No N/A

Comments:

T 708 Did the SFA increase its paid lunch prices if the tool indicated an increase in the paid lunch price was required?



- Yes No N/A

Comments:

T 709 Did the SFA use non-Federal funds to support its paid lunch prices?



- Yes No N/A

Comments:

T 710 Did the SFA submit its most frequently charged paid lunch prices to the SA?



- Yes No N/A

Comments:

Revenue from Non-Program Foods

- 711** Did the SFA use the USDA Nonprogram Food Revenue Tool or a USDA-approved alternative method to calculate its nonprogram food costs and nonprogram food revenues?   

Yes No N/A

Comments:

- 712** Was the SFA's proportion of total revenue from the sale of nonprogram foods to the total revenue of the school food service account equal to or greater than the proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account?  

Yes No

Total Nonprogram Food Revenue / Total Program Revenue \geq Total Nonprogram Food Cost / Total Food Cost

Comments:

Indirect Costs

- 713** Were indirect costs charged to the SFA's nonprofit school food service account?   

Yes No

Comments:

- 714** Were indirect costs charged to the SFA's nonprofit school food service account at the SA-approved rate?  

Yes No

Comments:



USDA Foods

T 715 Did the School Food Authority receive its USDA Foods from a purchasing agency, cooperative or distributor?   

Yes No

Comments:

T 716 Did the School Food Authority or School Food Authority's purchasing agency or cooperative divert USDA Foods for processing?  

Yes No

Comments:

T 717 Did the SFA contract with a Food Service Management Company or other entity that provided food service?  

Yes No

Comments:

800 - Civil Rights

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Off-site Assessment

T 800 What is the non-discrimination statement used for appropriate Program materials (please provide exact language)?   

T 801 Does the School Food Authority have a Public Release?
 Yes No   

Provide a copy of the SFA's Public Release

T 802 Is there a need for services for Limited English Proficient (LEP) households?
 Yes No N/A   

If yes, what services does the SFA provide?

T 803 What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs? If procedures are written, provide a copy.   



T 806

When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e., cafeteria staff, F/R application approval staff) and their supervisors? Provide supporting documentation for the responses.



a. Who attended these trainings?

b. What topics were covered by the training?



School Nutrition Programs



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School Year: 2013 - 2014

900 - SFA On Site Monitoring

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Off-site Assessment

T 900 How does the SFA ensure that all schools are meeting program requirements? For example, how and when is monitoring conducted?



School Nutrition Programs



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School Year: 2013 - 2014

1000 - Local School Wellness Policy

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Off-site Assessment

T 1000 Does the SFA have a Local School Wellness Policy? Provide a copy.
 Yes No



T 1001 How does the public know about the Local School Wellness Policy? Provide documentation to support the response (or appropriate web address(es)).



T 1002 When and how does the SFA review and update of the Local School Wellness Policy occur? Provide documentation to support the response (or appropriate web address(es)).



1600 - School Breakfast and SFSP Outreach

000-000

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Off-site Assessment

- T 1600** How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?   

- T 1601** How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?   

Off-Site Meal Compliance Risk Assessment Tool

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



Off-site Assessment

| | | |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| T | 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 | |
| T | 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 | |
| T | 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 | |
| T | 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 | |
| T | 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 | |
| T | 6 Does the site utilize cycle menus? | 📄💬 |
| | <input type="radio"/> Yes <input type="radio"/> No 0.0 | |
| T | 7 Are meals served at alternate meal service locations? | 📄💬 |
| | <input type="radio"/> Yes <input type="radio"/> No 0.0 | |
| T | 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 | |
| T | 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 | |



Dietary Specifications Assessment Tool - Lunch

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ABC R-V Elem. School
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 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.  



Documents Required Prior to On-Site

- Benefit Issuance Document (Roster) of students and their eligibility status.
 - When asked to submit this document, submit only free and reduced price students for the entire SFA, and a total number of those free and reduced price students.
- Menu and supporting documentation for a selected week from the review period for sites selected for review.
 - Certification sheets are required (prior 6 cent worksheets)
 - Production records



Production Records

- SFA should ensure that production records are completed by including the following:
 - Age/grade group served
 - Portion sizes served
 - Document that daily and weekly meal component requirements are met
 - Identify if seconds are offered
 - Document what was served and leftovers
 - A la carte and adult meals
 - Support claims



Pre-visit Menu Documentation for Targeted Menu Review

- Menus (for the selected school week from the review period as determined by the reviewer)
- Production records
- Standardized recipes
- CN labels and nutrition facts labels may also be required per site.



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
 - Meal observation takes place

- Exit Conference
 - Authorized representative is presented with results/findings of review





Meal Access and Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting and Claiming

On-Site Assessment

- Certification and Benefit Issuance
 - Validate SFAs 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



When is Fiscal Action taken?

- Certification and Benefit Issuance. Why is Fiscal Action taken?
 - Miscategorized certifications
 - Benefit Issuance Errors
 - Failure to update a change in status resulting from verification
- 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



Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

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)
- 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



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 FNS will monitor whether:

- ❑ School is offering enough food on all reimbursable meal service lines
- ❑ Signage is posted explaining Offer vs. Serve to students
- ❑ 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 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
- Observe students and staff to ensure understanding of OVS.



Dietary Specifications & Nutrient Analysis

- Reviewer will determine if SFA is serving reimbursable meals according to Dietary Specifications
 - Calories
 - Saturated Fat
 - Sodium
 - *Trans* Fat
- Reviewer will assess if a one week weighted nutrient analysis is required for each established age/grade group and menu type offered at lunch and breakfast for one site in the SFA



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



General Program Compliance

Civil Rights

Local Wellness Policy

Food Safety

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 had 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
- Trainings can consist of presentations prepared by DESE Food and Nutrition Services or presentations prepared by the SFA 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



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
 - Corrective action will be prescribed as necessary





Other Federal Program Reviews

Fresh Fruit and Vegetable Program

Afterschool Snack Program

Seamless Summer Option

Special Milk

FFVP Review

- Three components to the FFVP review process
 - Reviewer 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 SFA 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)

- SFAs that are participants in SSO and have been selected for an Administrative Review in SY 2014-2015 can expect to be reviewed on this program
- Guidance and regulations have not been changed in this area of the AR process



Post Review Procedures

- Administrative Review Report (i.e., Notification Letter of Review Results
 - Review findings
 - Corrective Action Document (CAD) and due dates
 - Fiscal Action (if applicable)



Closing of Review

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



DESE – Food and Nutrition Services

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2014-2015 Scheduled Administrative Reviews

The following items will be reviewed during a Administrative Review:

- **Administrative Review**  - New 14-15
- **Off-Site Assessment** 
- **Independent Review of Applications** 
 - **Sp 44-2014** 
- **Corrective Action Document Instructions** 
- **HACCP**
- **SP 42-2011** 
- **Civil Rights**
- **PLE & Nonprogram Food Revenue Tool**
- **Verification Booklet**



Questions? Contact Us

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