

THE REINVENTED ADMINISTRATIVE REVIEW (AR)



The National School Lunch Program

Acknowledgment Statement:

2

You understand and acknowledge that

- the training you are about to receive does not cover the entire scope of the program; and that
- you are responsible for knowing and understanding all handbooks, manuals, alerts, notices and guidance, as well as any other forms of communication that provide further guidance, clarification or instruction on operating the program.

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Outline

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- Module 1: Introduction
- Module 2: Off-site Review
- Module 3: On-site Review
- Module 4: Post Review

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Objectives



By the end of this video participants should be able to do the following:

- Identify off-site, on-site and post-review elements
- Prepare documentation required for the Administrative Review (AR)
- Prepare for the Administrative Review (AR) according to USDA regulations and TDA policy and procedures

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Module 1: Introduction

- The New Administrative Review 101

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Existing Knowledge

Where do you rate your readiness for the AR process?

- Wax candle
- Incandescent bulb
- Fluorescent bulb
- LED bulb



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Let's review some terminology...

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- CE- Contracting Entity
- CRE- Coordinated Review Effort
- AR- Administrative Review
- TDA- Texas Department of Agriculture
- TA- Technical Assistance
- MOR- Month of Review
- WOR- Week of Review

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The New Administrative Review

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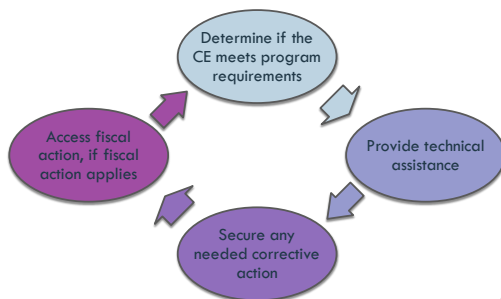
- What is the intent?
- What does it monitor?
- How will it change?
- Where do I get help?

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What is the Intent?

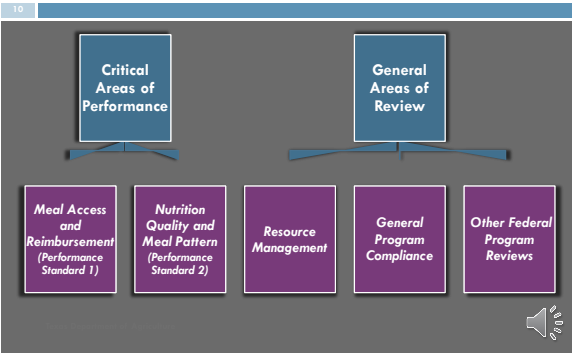
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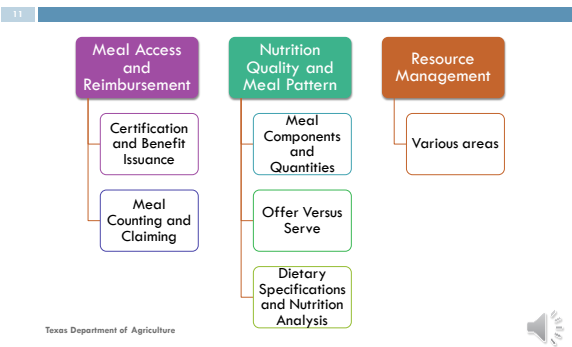
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What does it Monitor?



Review Areas



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Review Areas (continued)

General Program Compliance

- Civil Rights
- School Food Authority On-site Monitoring
- Local School Wellness Policy
- Verification
- Reporting and Recordkeeping
- Food Safety
- Water
- Procurement
- Professional Standards
- Competitive Food Services (SMART Snacks)
- School Breakfast and Summer Food Service Program Outreach

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Review Areas (continued)

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Other Federal Program Reviews

- Afterschool Snack Program
- Seamless Summer Option (SSO)
- Fresh Fruit and Vegetable Program (FFVP)
- Special Milk Program (SMP)

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I will participate in an off-site and on-site review.

I will use technology to provide TDA with documentation and to answer questions.

I will communicate with TDA and provide information before the on-site review.

I will apply any corrective action at all sites.

I will participate in a breakfast review.

How will it change for me?

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Where Do I Get Help?

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ESCs

TDA SOPS

www.squaremeals.org

Texas Department of Agriculture's Food and Nutrition

Mission: Feeding the hungry and promoting healthy lifestyles.

Food and Nutrition

www.fns.usda.gov

United States Department of Agriculture
Food and Nutrition Service

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Assessment Tools

- ❑ Off-site Assessment Tool
- ❑ Meal Compliance Risk Assessment Tool
- ❑ On-site Assessment Tool
- ❑ Dietary Specifications Assessment Tool
- ❑ Resource Management Risk Indicator Tool

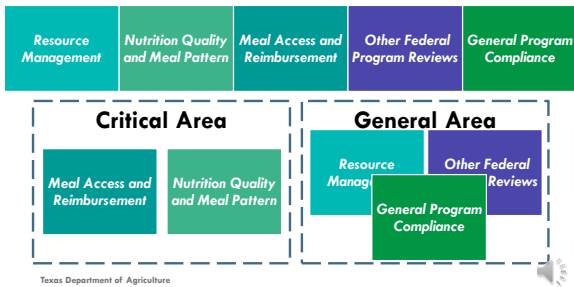




Review

Instructions: Decide Critical or General.

What are the critical and general areas of the review?



Review *Instructions: Decide Yes or No.*

Which of the following are related to the Meal Access and Reimbursement portion of the review?

	Meal Components and Quantities	Offer Versus Serve
Certification and Benefit Issuance	Civil Rights	Meal Counting and Claiming

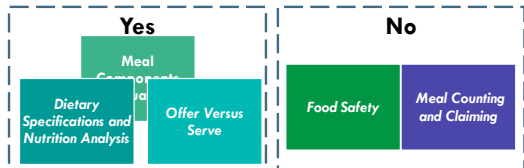


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Review *Instructions: Decide Yes or No.*

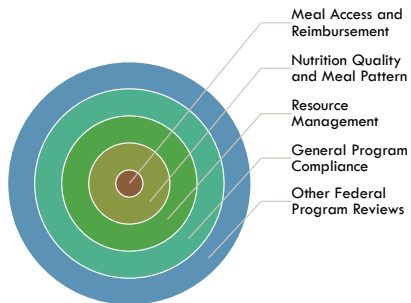
Which of the following are related to the Nutrition Quality and Meal Pattern portion of the review?

	Meal Components and Quantities	Offer Versus Serve
Dietary Specifications and Nutrition Analysis	Food Safety	Meal Counting and Claiming



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Off-site Review Areas



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Why an Off-site Review?



Allows CEs to receive TA before the on-site review



Minimizes review tasks on-site



Allows TDA to understand CE operations before the on-site review



Indicates areas of risk

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Risk-based Assessment Tools

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Meal Compliance Risk Assessment Tool

Designates one site for a "targeted menu review"

Dietary Specifications Assessment Tool

Assigns a risk-level for not meeting the dietary specifications

Resource Management Risk Indicator Tool

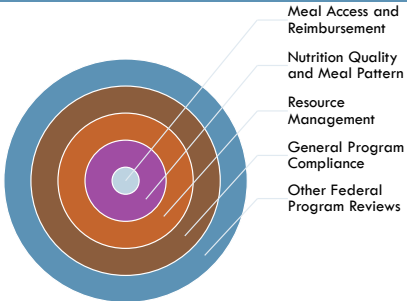
Identifies whether TDA will conduct a Comprehensive Resource Management Review

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On-site Assessment Tool Areas

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Why an On-site Review?



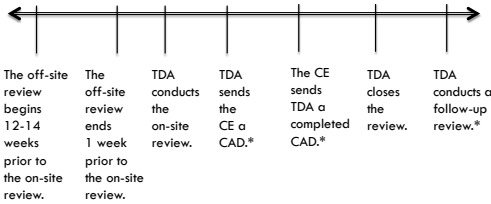
- Validates information collected during the off-site review
- Allows TDA to observe school nutrition program operations at selected sites within a CE
- Allows TDA to evaluate the CE for compliance with program requirements

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Administrative Review Timeline

3-year administrative review cycle

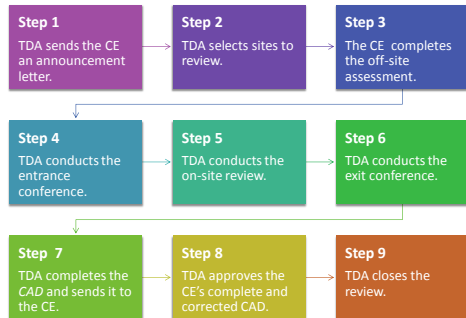


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*If Applicable



Administrative Review Process



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What Documentation will TDA Review Off-site?

- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming
- Meal Components and Quantities
- Dietary Specifications and Nutrient Analysis
- Local School Wellness Policy
- Civil Rights
- SBP and SFSP Outreach
- Afterschool Snack Program
- Special Milk Program

Note: TDA reserves the discretion to review anything (other review areas, documentation, sites, etc.) pertaining to the child nutrition program at any time.

What Documentation will TDA Review On-site?

- Counting and Claiming
- Meal Components and Quantities
- Dietary Specifications and Nutrient Analysis
- OVS
- Comprehensive Resource Management Review
- Competitive Foods
- Procurement
- Professional Standards
- Civil Rights
- SFA On-site Monitoring
- Food Safety
- Water
- Reporting and Record Keeping
- Fresh Fruit and Vegetable Program (FFVP)

Note: TDA reserves the discretion to review anything (other review areas, documentation, sites, etc.) pertaining to the child nutrition program at any time.

Module 2: Off-site Review

- Topic 1: Pre-visit Procedures
- Topic 2: Meal Access and Reimbursement
- Topic 3: Nutrition Quality and Meal Pattern
- Topic 4: Resource Management
- Topic 5: General Program Compliance
- Topic 6: Other Federal Program Reviews



Module 2: Off-site Review

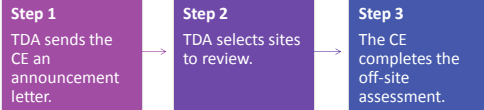
Topic 1: Pre-visit Procedures

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Prior to the Review

Administrative Review Process (Steps 1-3)



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Announcement Letter



Announcement Letter



- ➔ Child Nutrition Director
- ➔ Superintendent
- ➔ ESC

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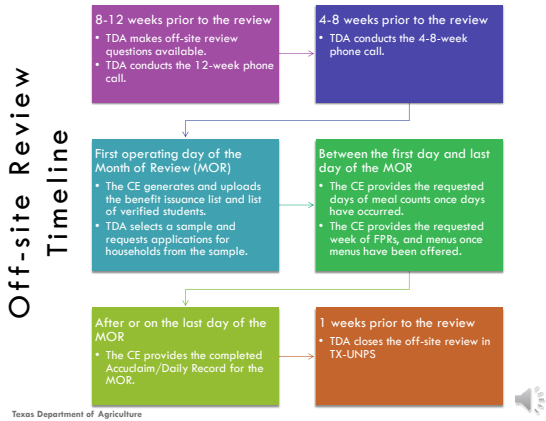




34 Site Selection for Breakfast Sites

TDA will review 50% of the SBPs operating at the sites selected for lunch review with a minimum of one SBP review

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Off-site Review Scope

- Answer the *Off-site Assessment Tool* questions.
- Participate in phone calls or e-mails with TDA.
- Provide documentation that supports the areas of the review.



What do I need for the off-site review?

- Time
- Access to my staff
- Access to technology
- Organization
- Documentation

* If applicable

What kind of technology do I need?

- Computer
- Scanner
- Internet connection
- Basic word processing and Excel skills

How Do I Answer Off-site Assessment Questions?

Questions

- Yes or no
- Information gathering
- Does not apply (N/A)
- Upload supporting documents

Answering Information Gathering Questions



TIP: Look at the big picture and examine the program from the outside in. What are your processes, operational procedures, internal controls and day-to-day tasks?

Off-site Assessment

100 Does the SFA meet one of the following criteria:

- SFA-wide Special Provision/Non-Base Year (Provision 2/3)
- RCCI, without day students
- SFA-wide Community Eligibility Provision



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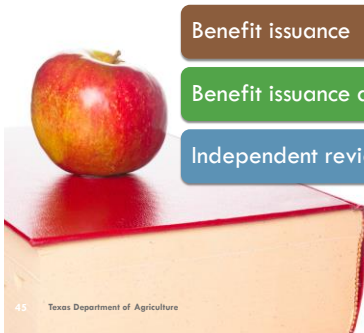


Module 2: Off-site Review
Topic 2: Meal Access and Reimbursement

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Terminology
Certification and Benefit Issuance



Benefit issuance

Benefit issuance document

Independent review of applications

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What is Benefit Issuance?



Certification and benefit issuance is the process used to determine a student's eligibility for free or reduced-price meal benefits used to apply the correct meal benefit level for the student at the point-of-service (POS).



Benefit issuance is the link in the accountability system between the eligibility determination and the benefit delivery.

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What is the Benefit Issuance Document?



Lists names and eligibility status of all children with free and reduced-price status within a CE



Generated from the point-of-service (POS) system used at each site



Lists each child's name once

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What is the independent review of applications?



The independent review of applications is a new process implemented this year.



CE's who are affected will be notified.

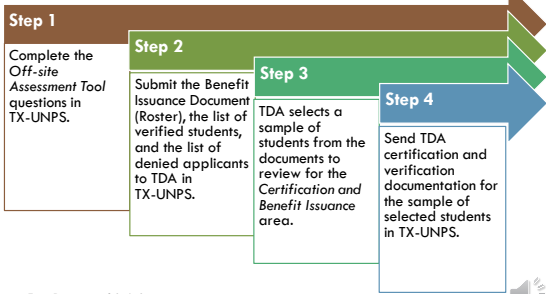


The process will affect very few CEs.

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Off-site Review Steps Certification and Benefit Issuance



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Off-site Assessment Tool Certification and Benefit Issuance



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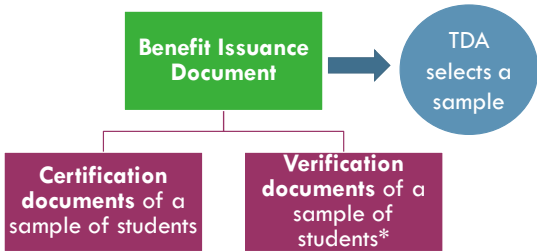
Supporting Documentation Certification and Benefit Issuance

- Notices of categorical eligibility
- Applications and letters to household
- Notices of approval or denial of benefits
- Benefit Issuance Document (Roster)
- Categorical eligibility lists
- List of denied applicants

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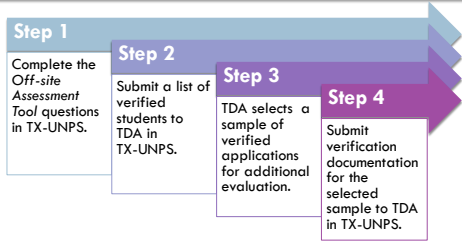
Why the Benefit Issuance Document?



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Off-site Review Steps Verification



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Off-site Assessment Tool Verification



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Supporting Documentation

Verification

List of verified students

School meal applications for the sample of verified students

Verification Individual Household Report Form for the sample of verified students

Verification letters for the sample of verified students



Provisional Programs and Other Exceptions

Provision 2

Community Eligibility Program

Some Residential Child Care Institutions (RCCIs)



Off-site Review Steps

Meal Counting and Claiming

Step 1

Complete the Off-site Assessment Tool questions in TX-UNPS.

Step 2

TDA selects a sample of days from the month of review (MOR) to review.

Step 3

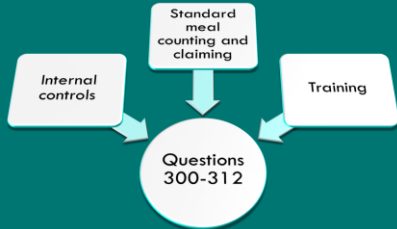
Submit meal counts to TDA for the sample of days selected from the month of review (MOR) in TX-UNPS.

Step 4

Submit the Daily Record (Accuclaim/Edit Check) from the month of review (MOR) in TX-UNPS.



Off-site Assessment Tool Meal Counting and Claiming



Supporting Documentation Meal Counting and Claiming

Daily Record (Accuclaim/Edit Check)
from the month of review (MOR)

Sample of meal counts for breakfast
and lunch from the MOR





Module 2: Off-site Review
Topic 3: Nutrition Quality and Meal Pattern



Off-site Review Steps *Meal Components and Quantities*

Step 1

TDA selects a week from the month of review to review for meal component and quantity compliance.

Step 2

Submit menus and *Food Production Records* to TDA for the week selected from the month of review (MOR) and the week of review (WOR) in TX-UNPS.



Supporting Documentation *Meal Components and Quantities*

Menus

Food Production Records



Supporting Documentation *Offer versus Serve*

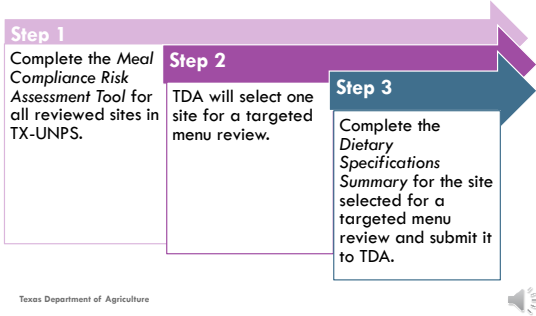
Food Production Records

Menus

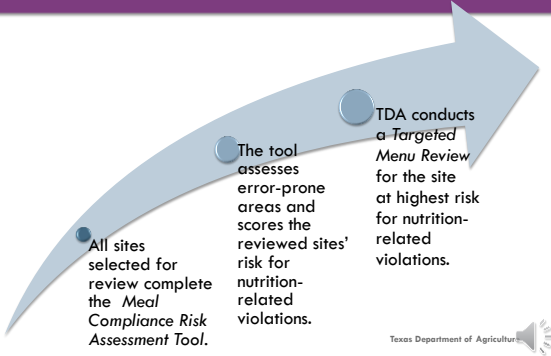


Off-site Review Steps

Dietary Specifications and Nutrient Analysis

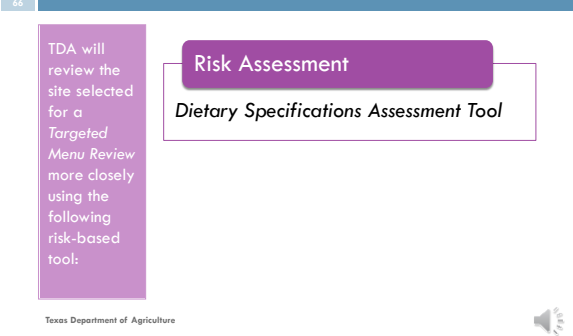


Meal Compliance Risk Assessment Tool



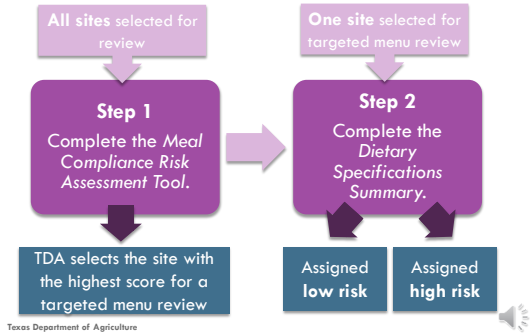
Targeted Menu Review

Dietary Specifications and Nutrient Analysis



Dietary Specifications Tool

Targeted Menu Review: Off-site



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Module 2: Off-site Review

Topic 4: Resource Management

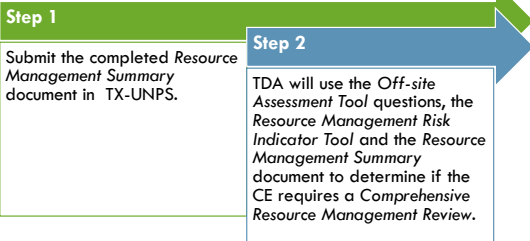


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Off-site Review Steps

Resource Management



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Off-site Assessment Tool

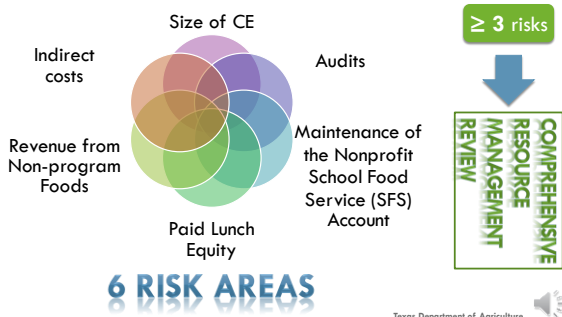
RESOURCE MANAGEMENT RISK AREA

- Size of CE**
• Question 700
- Audits**
• Question 701
- Maintenance of the Nonprofit SFS Account**
• Questions 702-706
- Paid Lunch Equity**
• Questions 707-710
- Revenue from Non-program Foods**
• Questions 711-712
- Indirect costs**
• Questions 713-714

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Resource Management Risk Indicator Tool

Resource Management



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Module 2: Off-site Review

Topic 5: General Program Compliance



Off-site Review Steps

Civil Rights

Step 1

Complete the *Off-site Assessment Tool* questions in TX-UNPS.

Step 2

Provide information to TDA as requested.



Off-site Assessment Tool

Civil Rights

FNS requires CEs to administer program services and benefits in accordance with all laws, regulations, instructions, policies, and guidance related to nondiscrimination in program delivery

Relate to civil rights compliance

Questions 800-807



Supporting Documentation

Civil Rights

CEs describe (in writing) or provide:

Copy of CE's public (media) release

CE's procedures for receiving and handling Civil Rights complaints and any complaints received

CE's most recent civil rights training documentation for staff that includes signatures

Non-discrimination statement (from household letters from *Certification and Benefit Issuance*)



Off-site Review Steps SFA (CE) Onsite-Monitoring

Step 1

Complete the *Off-site Assessment Tool* questions in TX-UNPS.

Step 2

Provide information to TDA as requested.



Off-site Assessment Tool SFA (CE) Onsite-Monitoring

TDA must determine whether each CE with more than one school performs at least one on-site review of the lunch counting and claiming system in use in each school under its jurisdiction by February 1 of each year.

Assesses procedures the CE uses to ensure that all schools are meeting program requirements

Question
900



Off-site Review Steps Local School Wellness Policy

Step 1

Complete the *Off-site Assessment Tool* questions in TX-UNPS.

Step 2

Provide TDA with documentation of the CE's Local School Wellness Policy.



Off-site Assessment Tool Local School Wellness Policy

Assesses compliance with
Local School
Wellness Policy
requirements

Question
1000-
1006



Supporting Documentation Local School Wellness Policy

CEs must describe (in writing) or provide:

Copy of the current *Local School Wellness Policy*

Demonstration that the *Local School Wellness Policy* has been **made available** to the public

Demonstration of **efforts to review** and **update** the *Local School Wellness Policy*

Copy of the **most recent assessment** on the implementation of the *Local School Wellness Policy*



Off-site Review Steps Food Safety

Step 1

Provide information to TDA as requested.



Off-site Review Steps

SBP and SFSP Outreach

Step 1

Complete the *Off-site Assessment Tool* questions in TX-UNPS.

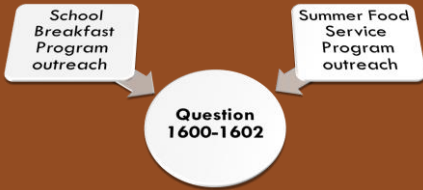
Step 2

Provide information to TDA as requested.



Off-site Assessment Tool

SBP and SFSP Outreach



Module 2: Off-site Review

Topic 6: Other Federal Programs



Off-site Review Steps

Afterschool Snack Program

Step 1

Provide information and documentation to TDA as requested.

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Supporting Documentation

Afterschool Snack Program

Sample of meal counts

5 days of Food Production Records (FPR)

Self monitoring records

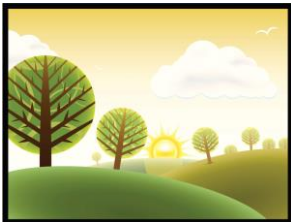
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Off-site Review

Seamless Summer Option (SSO)

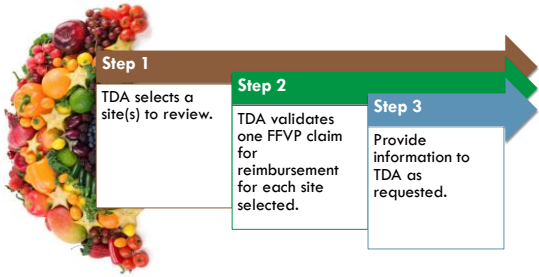
TDA reviews the SSO program during summer as a separate review. The SSO program review may impact the AR review if there are findings.



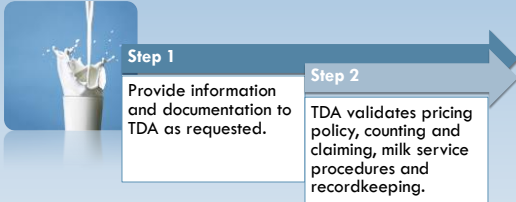
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Off-site Review Steps Fresh Fruit and Vegetable Program



Off-site Review Steps Special Milk Program



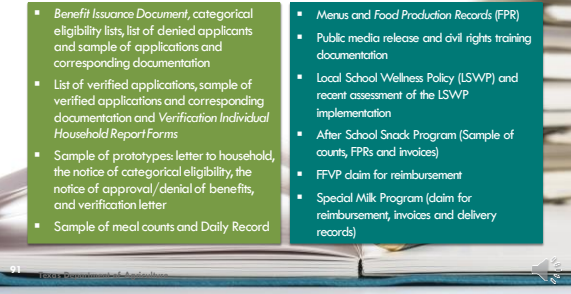
Supporting Documentation Special Milk Program

- CE's claim for reimbursement
- Invoices
- Delivery Records



Lets Review!

What documents are required for the off-site review?
Come up with a list of as many as you or your group can remember!



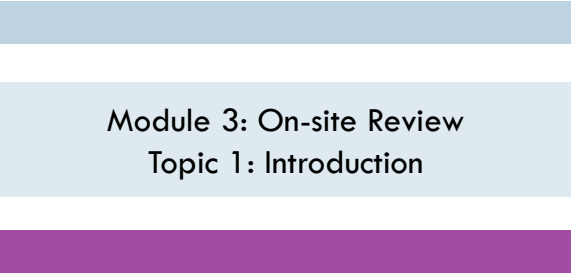
- *Benefit Issuance Document*, categorical eligibility lists, list of denied applicants and sample of applications and corresponding documentation
- List of verified applications, sample of verified applications and corresponding documentation and *Verification Individual Household Report Forms*
- Sample of prototypes: letter to household, the notice of categorical eligibility, the notice of approval/denial of benefits, and verification letter
- Sample of meal counts and Daily Record
- *Menus and Food Production Records (FPR)*
- Public media release and civil rights training documentation
- Local School Wellness Policy (LSWP) and recent assessment of the LSWP implementation
- After School Snack Program (Sample of counts, FPRs and invoices)
- FFVP claim for reimbursement
- Special Milk Program (claim for reimbursement, invoices and delivery records)



On-site Review

- ❑ Topic 1: Introduction
- ❑ Topic 2: Entrance Conference
- ❑ Topic 3: On-site Review
- ❑ Topic 4: Exit Conference

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Module 3: On-site Review

Topic 1: Introduction

How do I Pass the On-site Administrative Review?

CEs must demonstrate **compliance with regulations** that govern school nutrition programs.

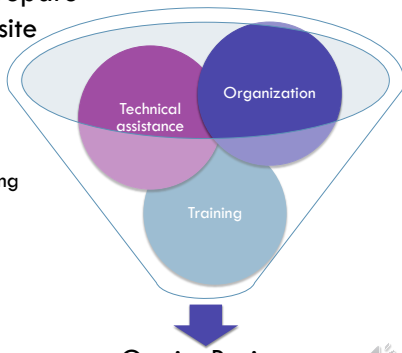
CEs must maintain **appropriate documentation** to demonstrate compliance with regulations.

CEs should read **regulations** and **policy memos**, attend **training** and request **technical assistance** to help CEs maintain compliance.

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How do I Prepare for the On-site Review?

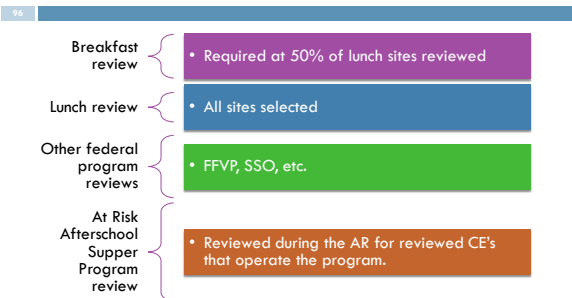


*Your ESC provides training and technical assistance

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On-site Administrative Review

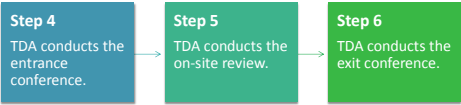


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Day of Review (DOR)

Administrative Review Process (Steps 4-6)



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Module 3: On-site Review

Topic 2: Entrance Conference

Entrance Conference

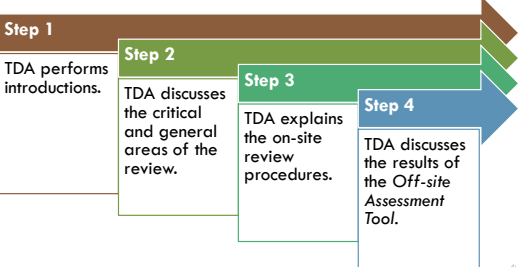
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On-site Assessment Steps

Entrance Conference

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On-site Review

Meal Counting and Claiming


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TDA will observe meal service at the POS.

TDA will review meal counts for the DOR.

TDA will determine if counting and claiming procedures meet regulations.

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Special Considerations

Meal Counting and Claiming

Under certain circumstances, TDA may follow a different review process for meal counting and claiming.

Provision 2, Provision 3, and Community Eligibility Provision

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On-site Review

Meal Components and Quantities

105

TDA will observe meal service.


TDA will observe alternate meal service locations (classroom, ISS, etc.).

TDA will review food production records for day of review.

TDA will review CN labels, recipes, product specification sheets, etc. for the WOR and the week selected from the MOR.

TDA will determine if sites meet meal component and quantity regulations at all service lines.

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Supporting Documentation *Meal Components and Quantities*

Completed Food Production Records

Child Nutrition (CN) Labels

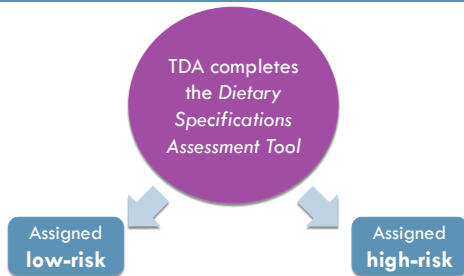
Nutrition Facts Labels

Product Formulation Statements

Recipes



What Was Done Off-site? *Dietary Specifications & Nutrient Analysis*



On-site Review *Dietary Specifications & Nutrient Analysis*

- TDA will observe meal preparation and service.
- TDA will review food storage room contents and check labels.
- TDA will evaluate menus, production records, recipes, etc. that supports meals offered.
- TDA will determine if CEs are high or low risk for not meeting the dietary specifications.
- TDA will ensure that high risk CEs receive a nutrient analysis.



On-site Targeted Menu Review Complete Dietary Specifications Tool

TDA must validate the answers to the Dietary Specifications Summary, conducted off-site, for the site selected for a targeted menu review.

On-site review **does** indicate low-risk

On-site review **does not** indicate low-risk

Nutrient analysis **not required** and targeted menu review is complete

Nutrient analysis **required**

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On-site Review Smart Snacks

110

TDA will observe meal preparation and service

TDA will observe any areas where foods are sold on the school campus.

TDA will review documentation for competitive foods.

TDA will determine if foods sold meet the standards for all foods sold in schools.

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Supporting Documentation SMART Snacks

SMART Snacks calculator
information sheets

List of approved SMART Snacks

Nutrition Facts Labels

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On-site Review

Procurement

112

TDA will review Procurement practices on-site .

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On-site Review

Civil Rights

113

TDA will review program materials.

TDA will observe posted signs.

TDA will observe the meal service.

TDA will determine if CE's demonstrate civil rights compliance.

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On-site Review

SFA On-site Monitoring

114

TDA will review documentation of the CE's on-site monitoring activities.

TDA will determine if the CE demonstrates compliance with SFA on-site monitoring requirements.

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Supporting Documentation *SFA On-site Monitoring*

Completed onsite monitoring forms if the CE has more than one site.



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On-site Review

Water

TDA will observe lunch and breakfast meal services.

TDA will determine if free potable water is available for consumption by program participants.

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On-site Review

Food Safety

TDA will observe meal service.

TDA will survey food storage and preparation areas.

TDA will examine posted signs and other documentation that demonstrate compliance with food safety regulations.

TDA will review the CE's HACCP plan and proof of training.

TDA will determine if sites for all programs follow the food safety program and HACCP principles.

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Supporting Documentation

Food Safety

CEs must describe (in writing) or provide:

Hazard Analysis Critical Control Point (HACCP) plan

Proof of food safety training

Two most recent health inspections (one posted visibly)



On-site Review

Reporting and Recordkeeping

TDA will review documentation of the CE's reporting and recordkeeping.

TDA will determine if reports are submitted as required by TDA and maintained with other program records for a period of 3 years after submission of the final *Claim for Reimbursement* for the fiscal year.

ISDs and Charter schools need to follow TEA guidelines and keep documents for 5 years.



What Was Done Off-site?

Resource Management

TDA collected answers to the *Off-site Assessment Tool* questions.

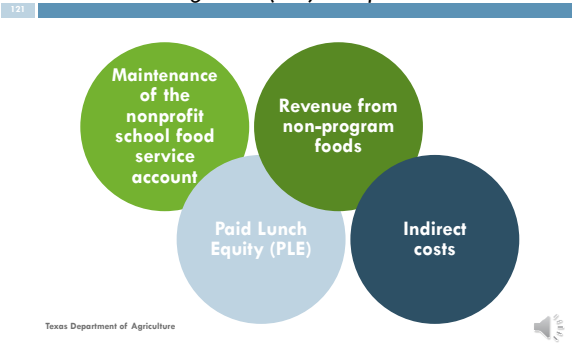
TDA completed the *Resource Management Risk Indicator Tool*.

TDA determined if the CE is required to have a *Comprehensive Resource Management Review*.



Review Areas

Resource Management (RM) Comprehensive Review



On-site Review

Comprehensive Resource Management Review

TDA will interview CE staff and review documentation that reflects the financial state of the child nutrition program (CNP).

- TDA will need to speak to the financial or business manager or other individual within the CE that handles the finances of the CNP.

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Comprehensive Resource Management Review

TDA will determine if a CE does the following:

Uses the nonprofit SFS revenue solely for the operation and improvements of the SFS.

Charges paid lunches according to the federal paid/free reimbursement rates.

Generates revenues from the sale of nonprogram foods that is at least equal to the expenditures from the purchases of nonprogram foods.

Charges only allowable costs to the nonprofit SFS account including indirect costs.

Receives the rebates, discounts, and credits to which the CE is entitled to.

Supporting Documentation Comprehensive Resource Management Review

Statement of revenues and expenses

USDA's PLE Tool

CE's operating statement or statement of activities*

Annual reconciliation for USDA Foods**

240/101/701 General Ledger

Documentation that supports indirect cost rate and actual indirect costs

USDA's Nonprogram Foods Revenue Tool

Sample of 10-50% of the CE's contracts, receipts, invoices, storage records and other USDA foods records

*Or other similar documents

**If the CE employs an FSMC or other purchasing agents

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On-site Review Fresh Fruit and Vegetable Program

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TDA will observe the FFVP for each school selected for review.

TDA will determine if the school operates the FFVP properly on the day of review.

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Module 3: On-site Review Topic 5: Exit Conference

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Discussing Corrective Action

EXIT
CONFERENCE

TDA will discuss the following areas with the CE at the exit conference:

- Identified findings
- Corrective actions required
- Timeframe for the completion of corrective action and any documentation the CE may be expected to provide
- Technical assistance for deficiencies cited

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Discussing General Guidelines

EXIT
CONFERENCE

TDA will do the following at the exit conference:

- Acknowledge the cooperation of all persons involved in the review process
- Explain right to appeal

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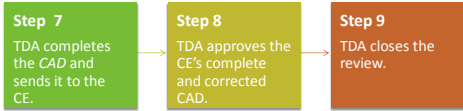
Post-Review

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Post-Review

Administrative Review Process (Steps 7-9)



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Terminology

Post-review

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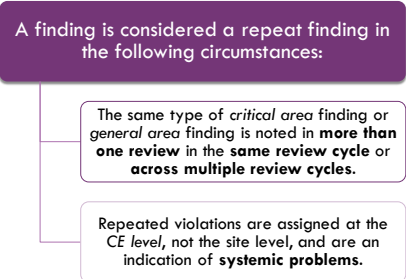
- Repeat finding
- Systemic finding
- Non-systemic finding
- Egregious
- Willful
- Corrective Action Document

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What is a Repeat Finding?

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What is a Systemic Finding?

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A finding is considered a systemic finding if

The finding is based on contributing factors that are **inherent to the routine operation** of the CE (or site) and is likely to occur again in the same review cycle if operational processes are not changed.

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Non-Systemic Vs. Systemic Findings

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Non-Systemic	Systemic
<ul style="list-style-type: none">❑ Contributing factors are unusual❑ Factors are not part of the normal operating procedure❑ System does not require changes to achieve accurate results	<ul style="list-style-type: none">❑ Contributing factors are built into process❑ Error will reoccur if the process is not changed

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Egregious & Willful

Definitions

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Egregious

Defined as conspicuously bad

Willful

Defined as done deliberately or intentionally

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CAD Contents

- Description of the findings(s)
- Description of Corrective Action (CA) a contracting entity should implement
- Description of how contracting entities should fix the finding in the future across all sites

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CAD Contents

- Deadline for the receipt of corrective action
- List of the required supporting documentation

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Follow-up Reviews

The CE receives repeated or systemic critical area or general area findings that are not corrected systemically.

CEs will receive a follow-up review if the CE meets any of these conditions:

The CE has not submitted an adequate CAD.

The CE has been placed on financial hold.

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Fiscal Action

Required

- Critical Areas of the Review**
- PS1: Meal Access and Reimbursement
 - PS2: Nutrition Quality and Meal Pattern
 - \$0.06 reimbursement
- Certain Repeat Findings**

Performance-Based Reimbursement *Meal Components and Quantities*

For errors that result in reclaimed meals



May be directed to...