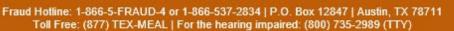
The Administrative Review Process: TEFAP & CSFP









Outline



I. Introduction



II. Administrative Review Process



III. Corrective Action Document (CAD) Process



IV. Administrative Review Closure

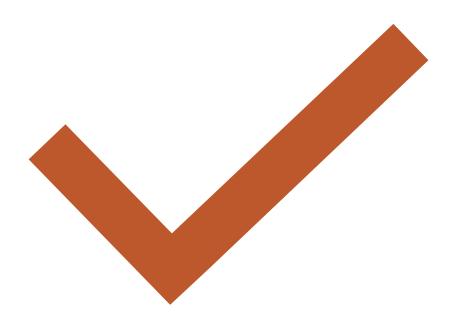


V. Training Team: TANS Live Demo



VI. Reminders and Questions

Acknowledgement Statement:



You understand and acknowledge that:

- The training you are about to take 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.

I. Introduction

Introduction: Terminology/Acronym:

- > **AR:** Administrative Review
- **CAD:** Corrective Action Document
- **DOR:** Date of Review
- **►MOR:** Month of Review
- **▶ORG:** Organization (Formerly Contracting Entity (CE))
- > SA: State Agency / Texas Department of Agriculture (TDA)
- **►SDAs:** Subdistributing Agencies
- ► **TANS:** Texas Automated Nutrition System web-based system replacing TX-UNPS
- **► UAM:** User Access Manager

Introduction: Things to Consider

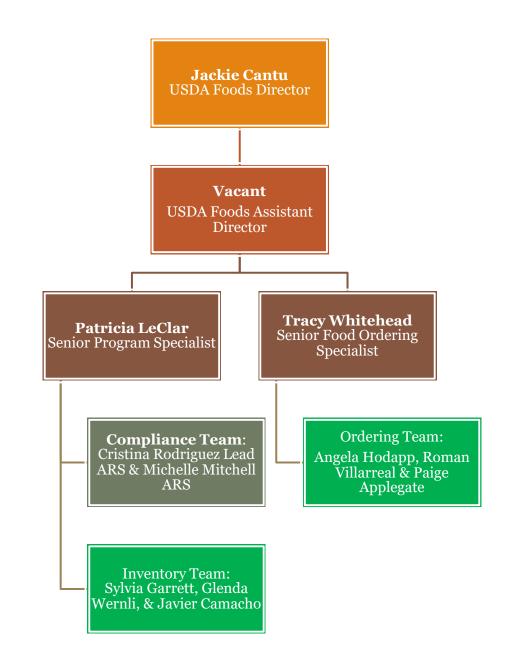


Changes: AR Process, TANS System Updates, Desk AR List

> Identify:

- Determine which staff will participate in the AR process.
- Confirm that each identified individual has a unique TANS username.
- Compliance: Verify that all related documents, procedures, and processes are current and compliant.
- **Point Person:** Designate a primary contact responsible for meeting deadlines and coordinating internal communication.

Introduction: USDA Foods Team



Introduction: Compliance Team



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II. Administrative Review Process

Administrative Review Process: TEFAP Code of Federal Regulations (CFR)

7 CFR 251.11, the State agency must monitor the operation of the program to ensure that it is being administered in accordance with Federal and State requirements.

Organizations Monitor:

The state must review at least 25% of its Organizations (ORG) each year.

* Each ORG. must be reviewed no less than once every four years.

Site Monitoring:

The state must conduct an annual review of 20 sites that receive TEFAP during the distribution of commodities and/or meal service, and eligibility determinations.

Reviews cover: Eligibility determinations, food ordering procedures, storage and warehousing practices, inventory controls, approval of distribution sites, reporting and recordkeeping requirements, and civil rights.

If deficiencies are found through the review, the State agency must submit a report of the findings to the CE and ensure that corrective action is taken to eliminate the deficiencies identified.

Administrative Review Process: CSFP Code of Regulation (CFR)

01

7 CFR 247.34—The State must perform an on-site review of its organizations and storage facilities at least **once every two years.**

02

Must review: Certification procedures, nutrition education, civil rights compliance, food storage practices, inventory controls, and financial management systems. 03

If deficiencies are identified during the review, corrective action procedures are in place to ensure ORG correct all areas that are out of compliance.

Administrative Review Process: Timeline



Two-part review:

Desk AR and Onsite AR



January:

All requested Desk AR documents are due to TDA



January – April:

SA conducts TEFAP and CSFP Administrative Reviews



By May 31-Beginning of June:

Target date to complete and close out all ARs

*Exceptions may occur

Administrative Review Process

Phase 1: Planning

Phase 2: Review

Phase 3: Close-out

- Identify Organizations due for an AR
- TEFAP/CSFP Site Selections
- Notify Organizations via announcement and date of review letters
- Set up TANS
- Schedule Entrance Conference
- Organizations upload Desk Review documents in TANS

- ARS reviews Desk AR documents in TANS
- Hold Entrance Conference
- Conduct Onsite AR
- Complete the AR tool in TANS
- Hold Exit Conference

- If applicable, create Corrective Action Documents (CAD) in TANS
- If applicable, review and approve CAD in TANS
- Close out AR in TANS
- Send Close Out Letter Notification to organization

Administrative Review Process: Overview

Scheduling & Corrective Request for AR Desk Onsite Exit Action Entrance Desk Review Review Conference Review Conference Document, Closure Documentation if applicable

Administrative Review Process: Scheduling

Scheduling:

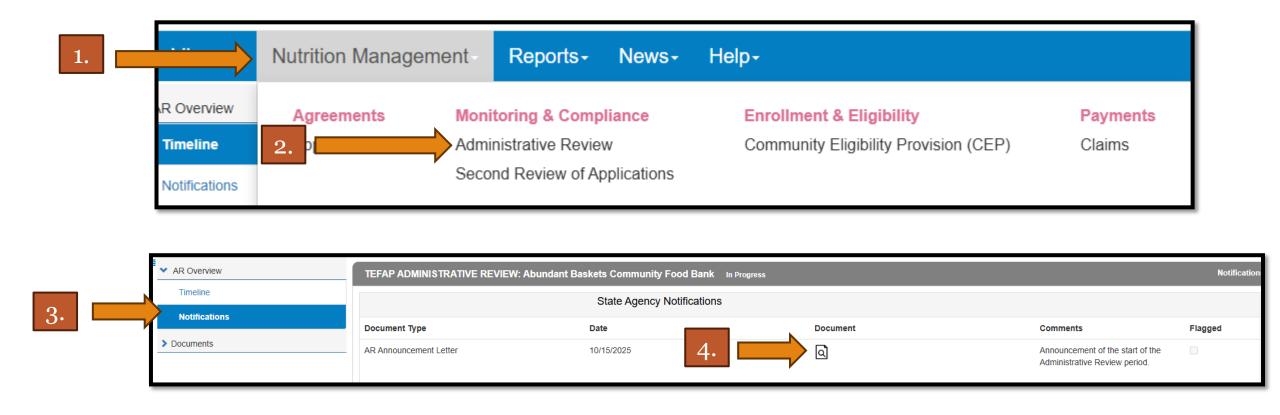
• The ARS will send the Announcement & Date of Review letters to each organization that is due for a review.

Letters includes:

- Federal program(s) due for a review
- TEFAP & CSFP Desk Review List
- Due dates/submission deadlines

Copies:

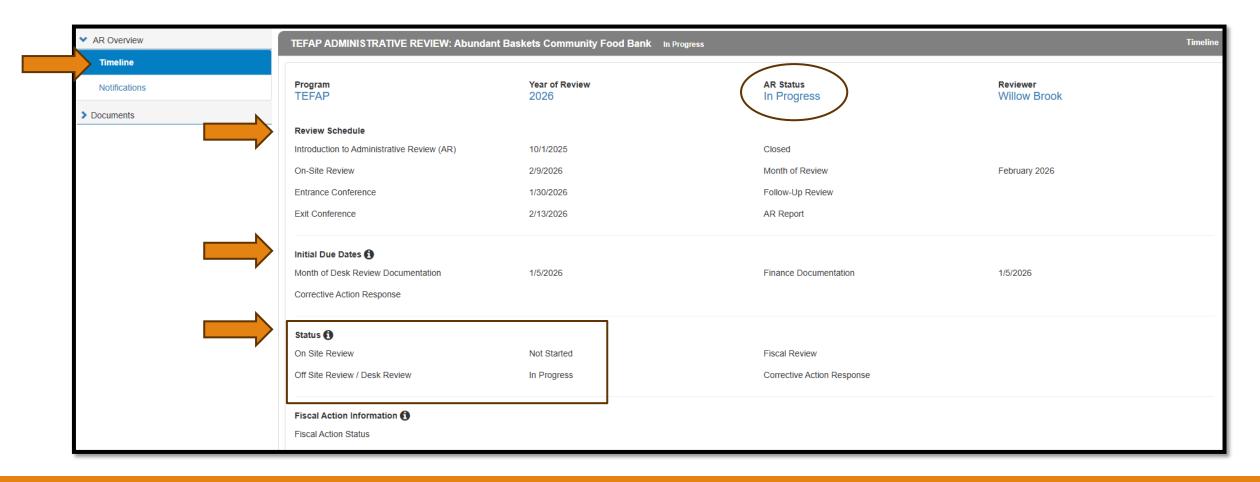
- You may save the email as a copy and/or
- Letters will be stored in TANS under Notifications



TANS: Notifications

> All formal letters can be found under:

TANS > Nutrition Management> Administrative Review>Notifications



TANS: Timeline

- > ARS Review Schedule
- > Initial Due Dates
- > Status of the Review

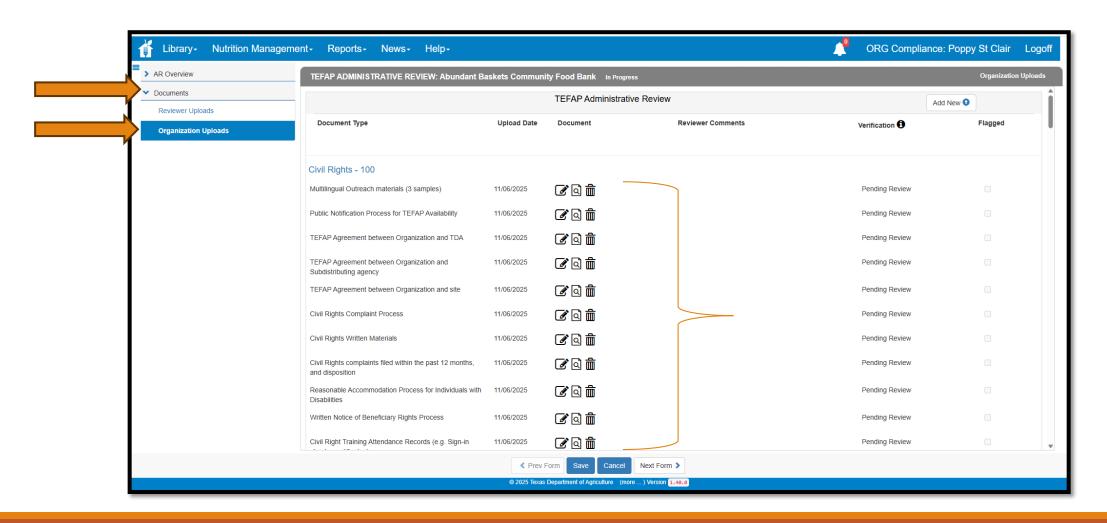
Administrative Review Process: Overview



Administrative Review Process: Request for Desk Review Documentation:

- 1. Organization must use the respective program's <u>Desk Review List</u> document
- 2. Rename each document according to the corresponding prompt number or question listed in the Desk Review document.
- 3. Submit & upload all requested documents to TDA via TANS
- 4. If an item does not apply to your Org., submit as Not Applicable "N/A". Do not leave any fields blank.

Section	Number	Document c produ
100 Civil Rights	102 & 104	Multilingual Outreach materials (3 samples)
100 Civil Rights	103	Public Notification Process for TEFAP Availability
100 Civil Rights	106	TEFAP Agreement between Organization and TDA
100 Civil Rights	107	TEFAP Agreement between Organization and Subdistributing agency
100 Civil Rights	108	TEFAP Agreement between Organization and site
100 Civil Rights	109 & 112	Civil Rights Complaint Process
100 Civil Rights	110	Civil Rights Written Materials
100 Civil Rights	111	Civil Rights complaints filed within the past 12 months, and disposition
100 Civil Rights	113	Reasonable Accommodation Process for Individuals with Disabilities
100 Civil Rights	115	Written Notice of Beneficiary Rights Process



TANS: Organization Uploads

➤ Location where the Organization will upload required TEFAP/CSFP AR Desk Documents

Administrative Review Process: TEFAP Desk Review

*Section names and section numbers may have changed

Programs: Organization & Subdistributing Agency

- 100- Civil Rights
- 200- Eligibility
- 300- Compliance Monitoring*
- 400- Record Keeping & Complaints*
- 500- Private Distribution Model*

Warehouse: Organization & Subdistributing Agency

- 700- Warehouse Storage & Handling
- 900-Inventory*

Finance: Organizations only

- 1000- Fiscal Integrity*
- 2000- Procurement*

Administrative Review Process: CSFP Desk Review

*Section names and section numbers may have changed

Programs:

Organizations & Subdistributing Agency

- 100- Civil Rights
- 200- Eligibility*
- 300- Compliance Monitoring*
- 400- Record Keeping and Complaints
- 500- Notifications*
- 600- Caseload Management*
- 700-Nutrition Education & Health Services*
- 800-Private Distribution Model*

Warehouse:

Organizations & Subdistributing Agency

- 900- Warehouse Storage & Handling
- 1000- Inventory*

Finance:

Organizations & Subdistributing Agency

- 3000- Fiscal Integrity*
- 4000- Procurement*

- **1. Section:** Identifies the specific compliance area being reviewed.
- **2. Number:** Corresponds to the question number in the desk review.
- **3. Document Upload:** Lists the required document(s) and specifies the proper file naming format for uploading into TANS.
- **4. Instructions:** Provides guidance on what information or details should be included in each document.
- 5. Changes: Highlights any updates or differences from the previous year's desk review.

*Note: Do not upload documents using last year's numbering. Sections may have been renumbered or questions removed from the review.

Administrative Review Process: Desk Review List Guide

1	2	3	4	5
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Section	▼ Number	Document Upload	Instructions	Changes
100 Civil Rights	102 & 104	Multilingual Outreach materials (3 samples)	Upload (3) examples of program information provided to participants and applicants in English and other languages (e.g., handouts, flyers, notifications, etc.).	No changes
100 Civil Rights	103	·	Upload Process used to inform participants of TEFAP availability, rights, complaint procedures, and nondiscrimination policies. Include alternative formats if available.	No changes
100 Civil Rights	106		assurances of compliance with all applicable nondiscrimination laws and policies.	No changes
100 Civil Rights	107		Upload the most current signed agreement between the Organization and subdistributing agency that includes written assurances of compliance with all applicable nondiscrimination laws and policies. If not applicable, state "N/A".	Previously in Section 200, Eligibility; moved to Section 100 Civil Rights
100 Civil Rights	108	TEFAP Agreement between Organization and site	Upload the most current signed agreement between the Organization and selected site(s) for review that includes written assurances of compliance with all applicable nondiscrimination laws and policies.	Previously in both Section 100 (Civil Rights) and Section 200 (Eligibility); it will now appear only in Section 100.
100 Civil Rights	109 & 112	Civil Rights Complaint Process	Upload your written procedures for receiving, processing, and resolving civil rights complaints.	No changes
100 Civil Rights	110	· · ·	Upload written materials provided to participants that explain how to file a civil rights complaint (e.g., USDA Complaint form).	No changes
100 Civil Rights	111		If any civil rights complaints were filed within the past 12 months, upload documentation showing how they were accepted, investigated, and resolved. If no complaints were filed, state "No complaints filed".	No changes
100 Civil Rights	113		Upload documentation or a policy explaining how the organization ensures reasonable accommodations are provided to participants with disabilities.	No changes
100 Civil Rights	115		Upload process outlining how participants are informed of their Beneficiary Rights. This should include: How the information is distributed (e.g., handouts), and/or how it is displayed (e.g., signage at sites or other prominent locations)	No changes
100 Civil Rights	116	Civil Right Training Attendance Records (e.g. Sign-in sheets, certificates)	Upload documentation confirming that Civil Rights training was completed within the past 12 months by staff and volunteers at the Organization, subdistributing agencies, and sites (e.g., sign-in sheets or training certificates). Please include the following: 1. A list of site staff from the site Administrative Review selection. 2. A list of Organization staff who administer the TEFAP program. 3. TDA will select a sample of staff from both the sites and the Organization. The Organization will be responsible for providing GVII Rights training records for the individuals selected.	
100 Civil Rights	117	Civil Rights Training Materials (e.g., PowerPoint, handouts, etc.)	Upload the civil rights training materials used, ensuring they include all required topics: nondiscrimination, complaint procedures, accommodations for LEP and persons with disabilities, etc.	Previously in Section 300-Training; moved to Section 100 Civil Rights
200 Eligibility	201	Pre-approval Site Visit Documentation (1 completed copy)	Upload documentation and a written description outlining the Organization's process for pre-approving sites	No changes

Update: Desk Review #108 will be reviewed onsite. ORG will not upload any documents for this question

Section	▼ Number ▼	Document Upload	Instructions	PY 26 AR Changes
100 Civil Rights	102 & 104	Multilingual Outreach materials (3 samples)	Upload (3) examples of program information provided to participants and applicants in English and other languages (e.g., handouts, flyers, notifications, etc.).	No changes
100 Civil Rights	103	Public Notification Process for TEFAP Availability	Upload Process used to inform participants of TEFAP availability, rights, complaint procedures, and nondiscrimination policies. Include alternative formats if available.	No changes
100 Civil Rights	106	TEFAP Agreement between Organization and TDA	Upload the most current signed agreement between the Organization and TDA that includes written assurances of compliance with all applicable nondiscrimination laws and policies.	_
100 Civil Rights	107	TEFAP Agreement between Organization and Subdistributing agency	Upload the most current signed agreement between the Organization and subdistributing agency that includes written assurances of compliance with all applicable nondiscrimination laws and policies. If not applicable, state "N/A".	Section Change: Previously located in Section 200 Eligibility; now moved to Section 100 Civil Rights
100 Civil Rights	108	TEFAP Agreement between Organization and site	Upload the most current signed agreement between the Organization and selected site(s) for review that includes written assurances of compliance with all applicable nondiscrimination laws and policies.	Section Change: Previously located in Section 100 Civil Rights and Section 200 Eligibility; it will now appear only in Section 100 Civil Rights
100 Civil Rights	109 & 112	Civil Rights Complaint Process	Upload your written procedures for receiving, processing, and resolving civil rights complaints.	No changes
100 Civil Rights	110	Civil Rights Written Materials	Upload written materials provided to participants that explain how to file a civil rights complaint (e.g., USDA Complaint form).	No changes
100 Civil Rights	111	Civil Rights complaints filed within the past 12 months, and disposition	If any civil rights complaints were filed within the past 12 months, upload documentation showing how they were accepted, investigated, and resolved. If no complaints were filed, state "No complaints filed".	No changes
100 Civil Rights	113	Reasonable Accommodation Process for Individuals with Disabilities	Upload documentation or a policy explaining how the organization ensures reasonable accommodations are provided to participants with disabilities.	No changes
100 Civil Rights	115	Written Notice of Beneficiary Rights Process	Upload process outlining how participants are informed of their Beneficiary Rights. This should include: How the information is distributed (e.g., handouts), and/or how it is displayed (e.g., signage at sites or other prominent locations)	No changes
100 Civil Rights	116	Civil Right Training Attendance Records (e.g. Sign-in sheets, certificates)	staff and volunteers at the Organization, subdistributing agencies, and sites (e.g., sign-in sheets or training certificates). Please include the following: 1. A list of site staff from the site Administrative Review selection. 2. A list of Organization staff who administer the TEFAP program. 3. TDA will select a sample of staff from both the sites and the Organization. The Organization will be responsible for providing Civil Rights training records for the individuals selected.	Section Change: Previously located in Section 300 Training; now moved to Section 100 Civil Rights
100 Civil Rights	117	Civil Rights Training Materials (e.g., PowerPoint, handouts, etc.)	Upload the civil rights training materials used, ensuring they include all required topics: nondiscrimination, complaint procedures, accommodations for LEP and persons with disabilities, etc.	Section Change: Previously located in Section 300 Training; now moved to Section 100 Civil Rights
200 Eligibility	201	Pre-approval Site Visit Documentation (1 completed copy)	Upload documentation and a written description outlining the Organization's process for pre-approving sites and subdistributing agencies prior to their operation of the TEFAP program. Include documentation that the Organization conducts pre-approval visits, such as a completed visit reports, checklists, or approval forms.	No changes

Administrative Review Process: Desk Review:

Cross-walk Example 2

100 Civil Rights	116	Civil Rights Training Attendance	Upload documentation confirming that Civil Rights	Section Change:
100 Olvic Hights	110			
		, , ,		Previously located in
		certificates)	staff and volunteers at the Organization,	Section 300 Training;
			subdistributing agencies, and sites (e.g., sign-in sheets	now moved to Section
			or training certificates). Please include the following:	100 Civil Rights
			1. A list of site staff from the site Administrative	
			Review selection.	
			2. A list of Organization staff who administer the	
			TEFAP program.	
			3. TDA will select a sample of staff from both the sites	
			and the Organization. The Organization will be	
			responsible for providing Civil Rights training records	
			for the individuals selected.	

- 1. Section 100- Civil Rights
- 2. Desk Review prompt number #116
- 3. Document Upload
- 4. Instructions
- 5. PY 26 Changes: Section Change

Administrative Review Process: Desk Review:

Cross-walk Example 3

300- Compliance Monitoring	308	Sites and Subdistributing	and/or tracking system used to manage and track site and subdistributing agency reviews for both the prior and current program years. Your submission should include:	Section Renumbered: Previously Section 500 Compliance Monitoring; now renumbered to Section 300 Compliance Monitoring
			•Status (e.g., completed, scheduled, rescheduled).	

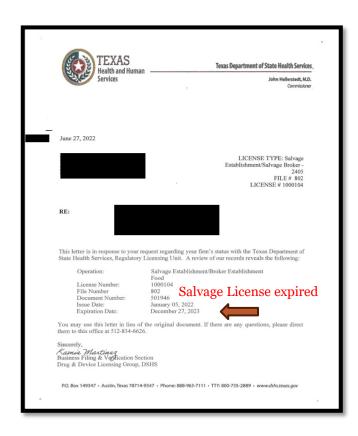
- 1. Section 300- Compliance Monitoring
- 2. Desk Review prompt number #308
- 3. Document Upload
- 4. Instructions
- 5. PY 26 Changes: Renumbered

Administrative Review Process: Desk Review:

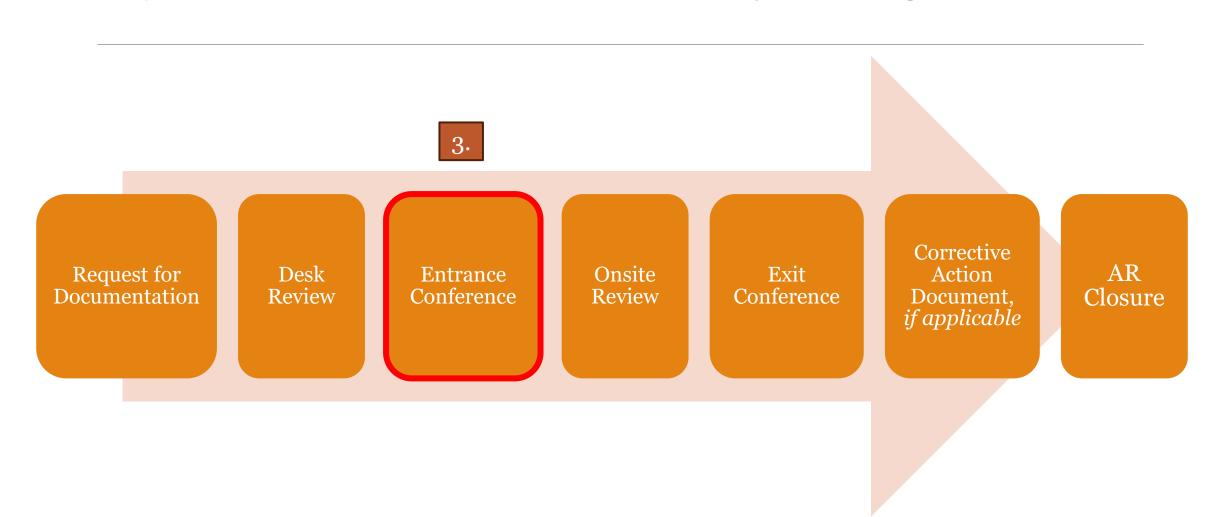
Cross-walk Example 4

700-Warehouse 7 Storage & Handling	701		Upload a copy of the Organization's current salvage license. Note: Expired licenses will not be accepted—please ensure the license is valid and up to date.	No Changes
--	-----	--	--	------------

- Section 700-Warehouse Storage & Handling
- 2. Desk Review prompt number #701
- 3. Document Upload
- 4. Instructions
- 5. PY 26 Changes: No Changes



Administrative Review Process Overview



Administrative Review Process: Entrance Conference



Scheduling:

1-2 weeks prior to the onsite portion of the Administrative Review.



Conference Call:

Conducted virtually via Microsoft Teams.



Onsite Review Schedule:

Go over dates/times & staff required.



Site(s) Selection:

Will be announced onsite.

Administrative Review Process: Entrance Conference



30 TEFAP and CSFP
Participant Applications
Overview: The Organization will
work with the selected site to ensure
copies are made.



35 expense invoice/receipt samples Overview

TDA will select expenses from Organization's GL & request to see the invoices during the onsite review

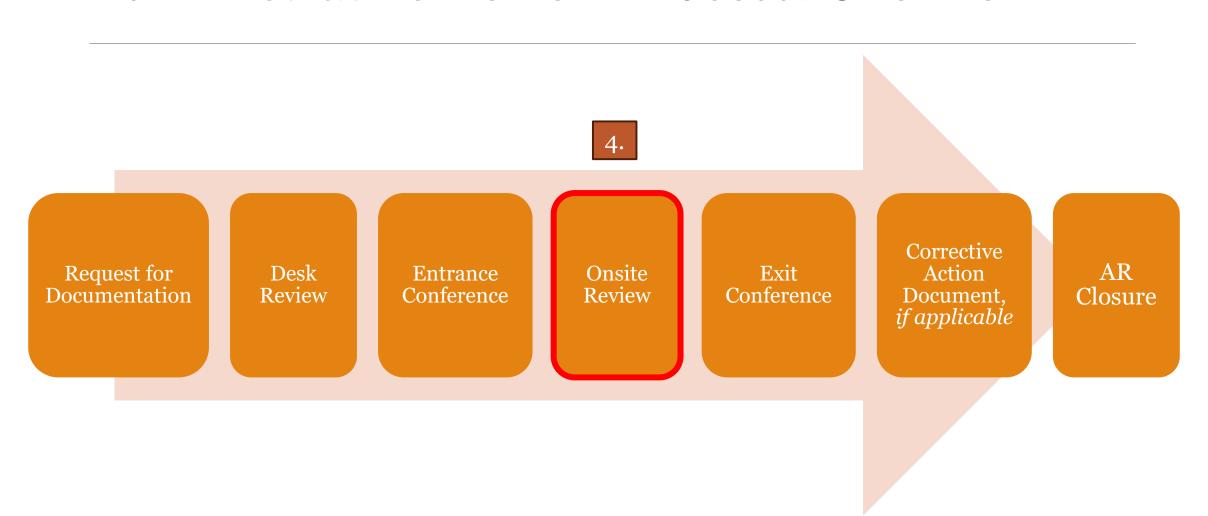


Follow-up questions based on documents provided via TANS review process



Other

Administrative Review Process: Overview



Administrative Review Process: Onsite Review





Warehouse walk-through



Physical Inventory Sample Count



TEFAP/CSFP Site Monitoring



TEFAP/CSFP Records and Postings



Financial Documentation

Administrative Review Process: Overview



Administrative Review Process: Exit Conference

After completing the onsite review of the Organization's facility, TDA will finalize its AR tool in TANS. TBD: An Exit Conference will be conducted on the final day of the onsite review with the organization staff. TDA will discuss all areas identified as compliant or non-compliant and determine if any claims will require amendments.

If applicable, TDA will initiate the Corrective Action Document (CAD) Process to address the findings and required actions.

The Exit Conference document to be signed by TDA and ORG.

TANS AR Tool

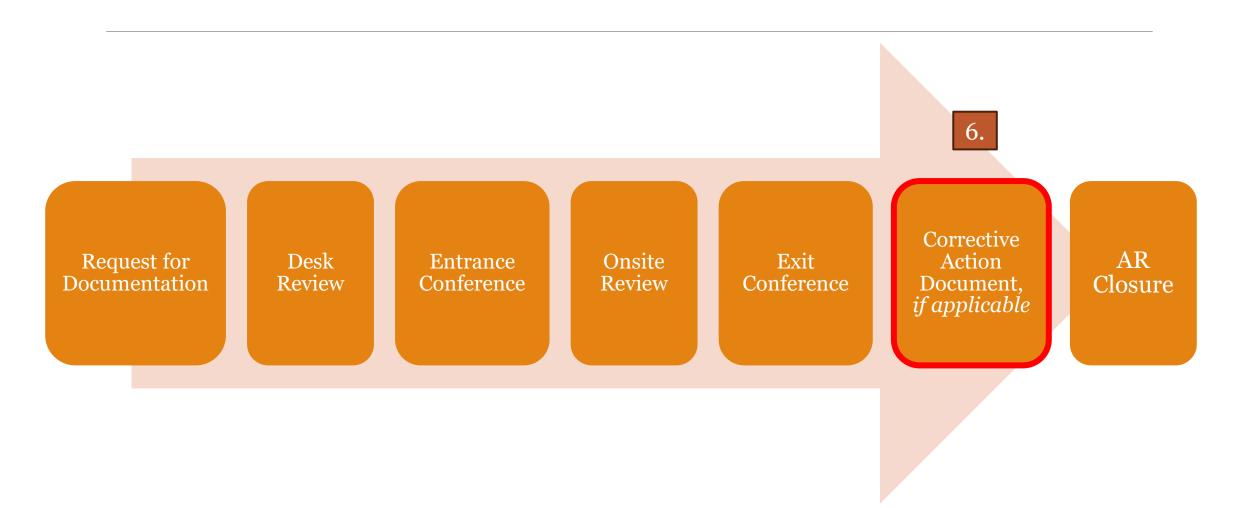
Exit Conference

Areas of compliance/non-compliance

Request for CAD

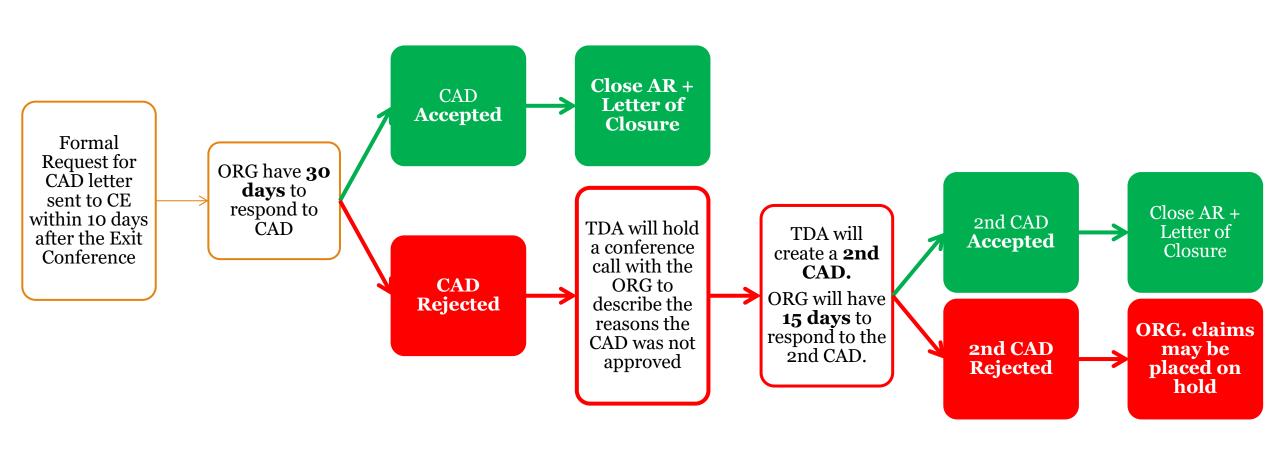
Signatures

Administrative Review Process: Overview

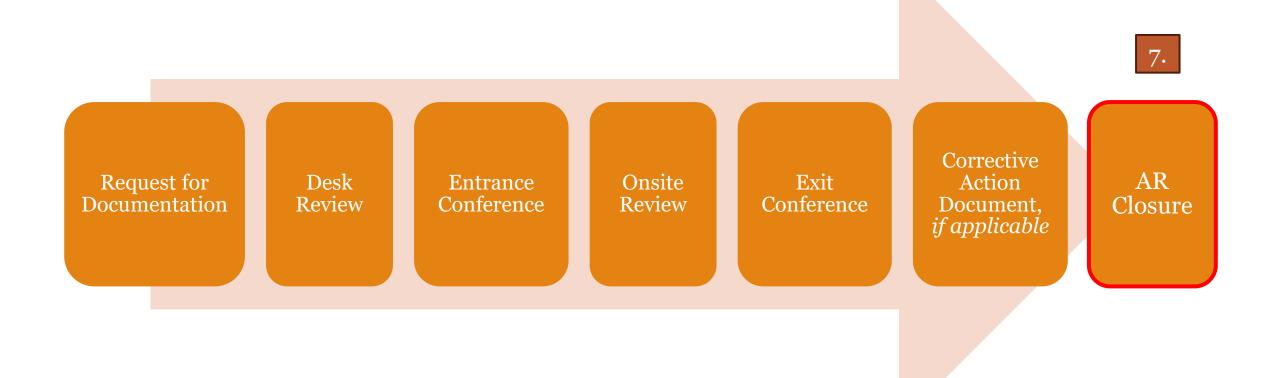


III. Corrective Action Document (CAD) Process & Timeline

Corrective Action Document (CAD) Timeline



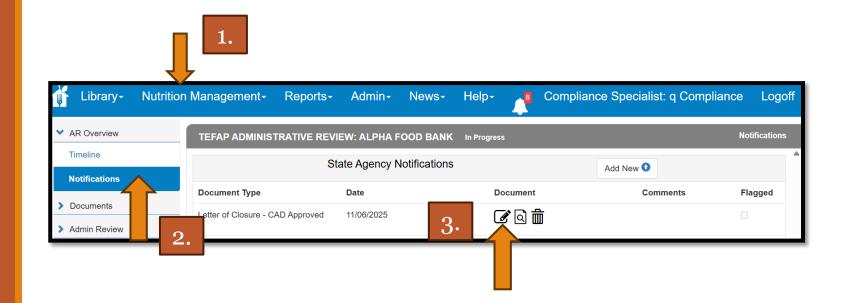
Administrative Review Process: Overview

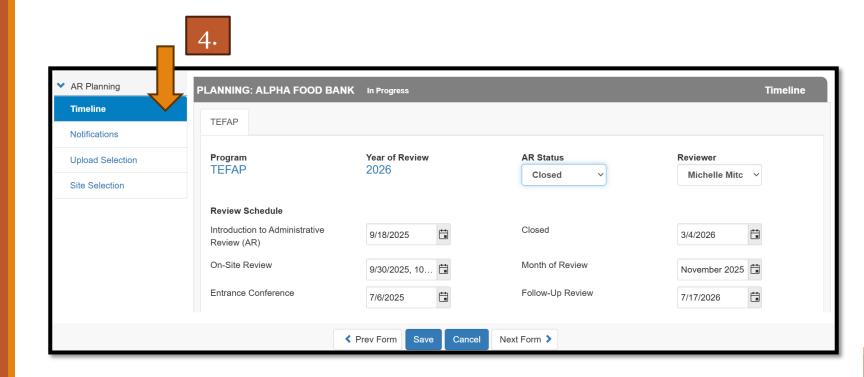


IV. Closing Administrative Reviews

IV. Closing Administrative Reviews: No findings

- AR Closure Letter: If no areas of noncompliance are identified, the organization will receive a Letter of Closure indicating that the review is complete and no further action is required.
- Notifications: The letter will be saved in TANS under 'Notifications'
- AR Status: The status within TANS > Timeline corresponding to each program reviewed will be updated and subsequently closed by the ARS.

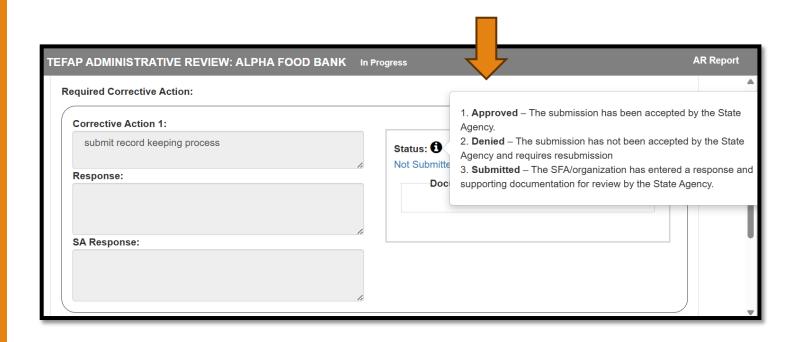


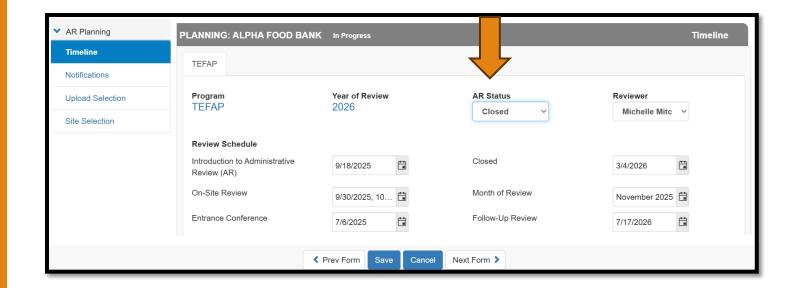


IV. Closing Administrative Reviews: Findings

If any areas of non-compliance are identified:

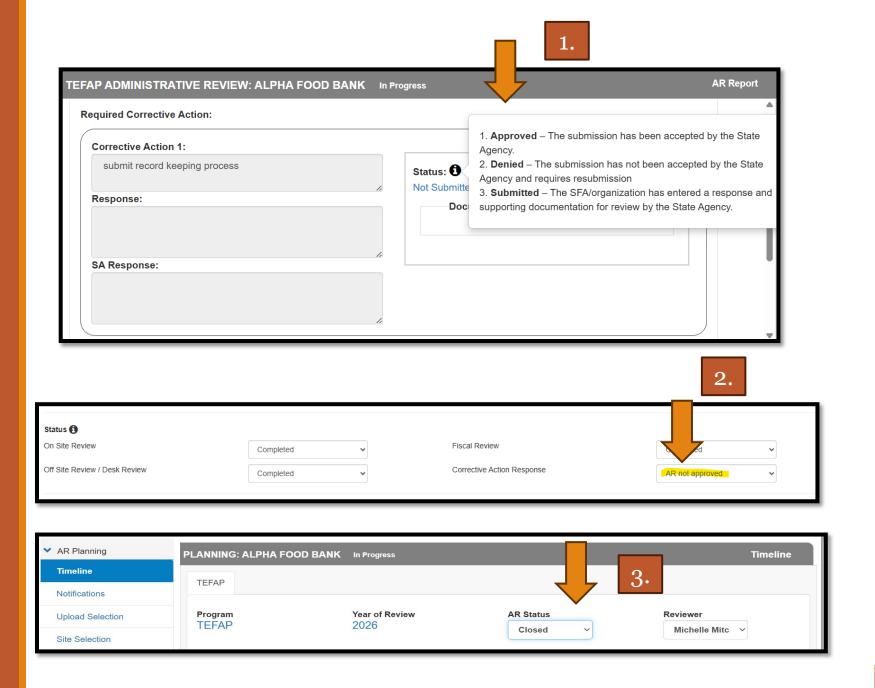
- A First Corrective Action Letter (CAD) will be issued to the organization.
- A Second Corrective Action Letter will be issued if the First CAD is not approved.
- A **Letter of Closure** will be sent once either the First or Second CAD has been accepted & saved in TANS.
- The **AR** will then be closed in **TANS**.





IV. Closing Administrative Reviews: Findings & CAD Not Approved

- If the First or Second CAD is not approved:
 - A conference call will be scheduled.
 - Administrative funds may be placed on hold.
 - Once the organization submits the corrected CAD, a Letter of Closure will be issued, and the AR status will be closed.



Summary

1

Designate a point person to lead the AR process & identify staff that will be involved

2

Upload all Desk AR documents into TANS 3

Review TDA due dates and set internal deadlines to ensure timely completion 4

Start Early—Do not wait until the final day to begin the AR process

Training Group: TANS Live Demo

- > INTRO: TRAINER WILL DISCUSS HOW TO NAVIGATE TANS
- NOTIFICATIONS PAGE
- > TIMELINE
- ORGANIZATION UPLOADS
- > SQ MEAL RESOURCES



Questions?

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. mail:

U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; or

2. fax:

(833) 256-1665 or (202) 690-7442; or

3. email:

program.intake@usda.gov

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Fraud Hotline: 1-866-5-FRAUD-4 or 1-866-537-2834 | P.O. Box 12847 | Austin, TX 78711 Toll Free: (877) TEX-MEAL | For the hearing impaired: (800) 735-2989 (TTY)

