

Administrative Review Top Findings

USDA Foods:
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TEXAS DEPARTMENT OF AGRICULTURE
COMMISSIONER SID MILLER





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.

Outline



I. Introduction



II. Finding Summary



III. Top Findings & Recommendations



IV. TANS



V. Reminders and Questions



Things to Consider



- How can TDA support you during the Administrative Review Process?
- Which findings reveal gaps in your process?
- Who within your team needs to be involved in the Administrative Review Process?
- How can your organization strengthen internal controls to prevent repeat findings?
- What are your expected outcomes?

Guess the Top Finding Section

Inventory

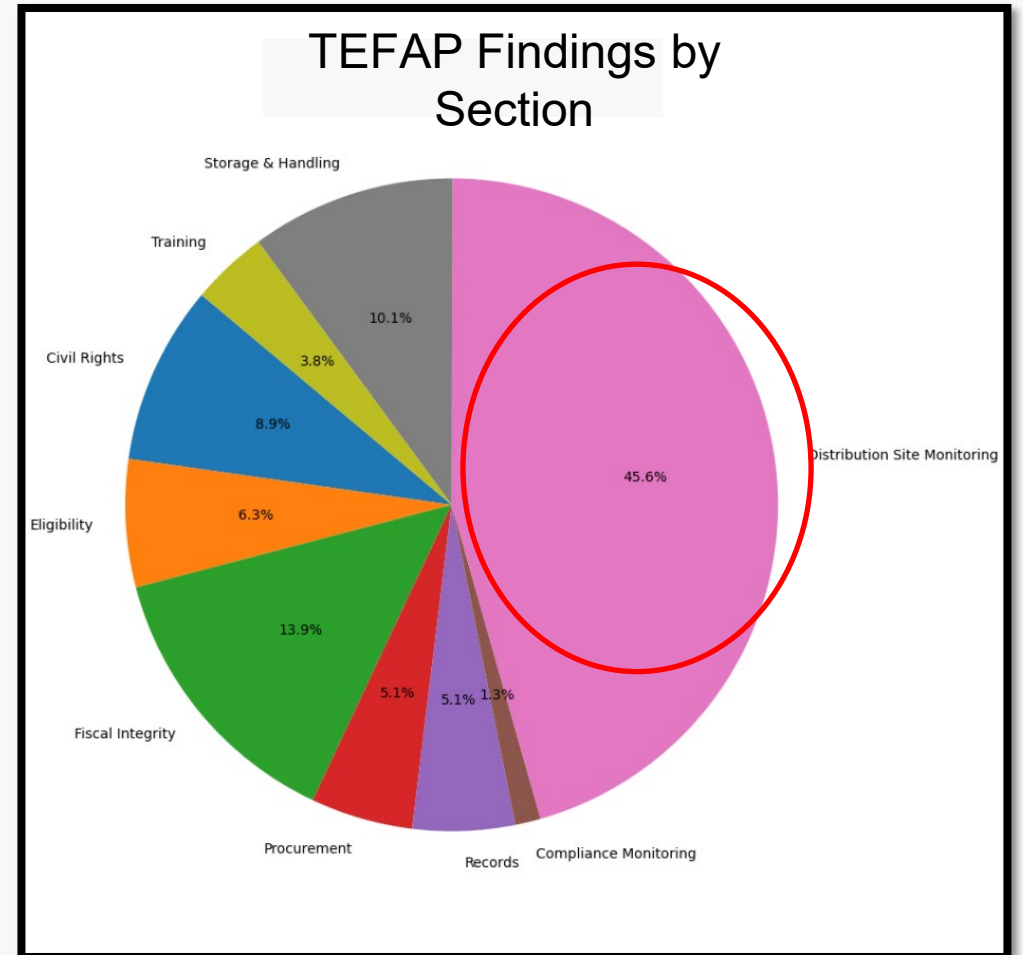
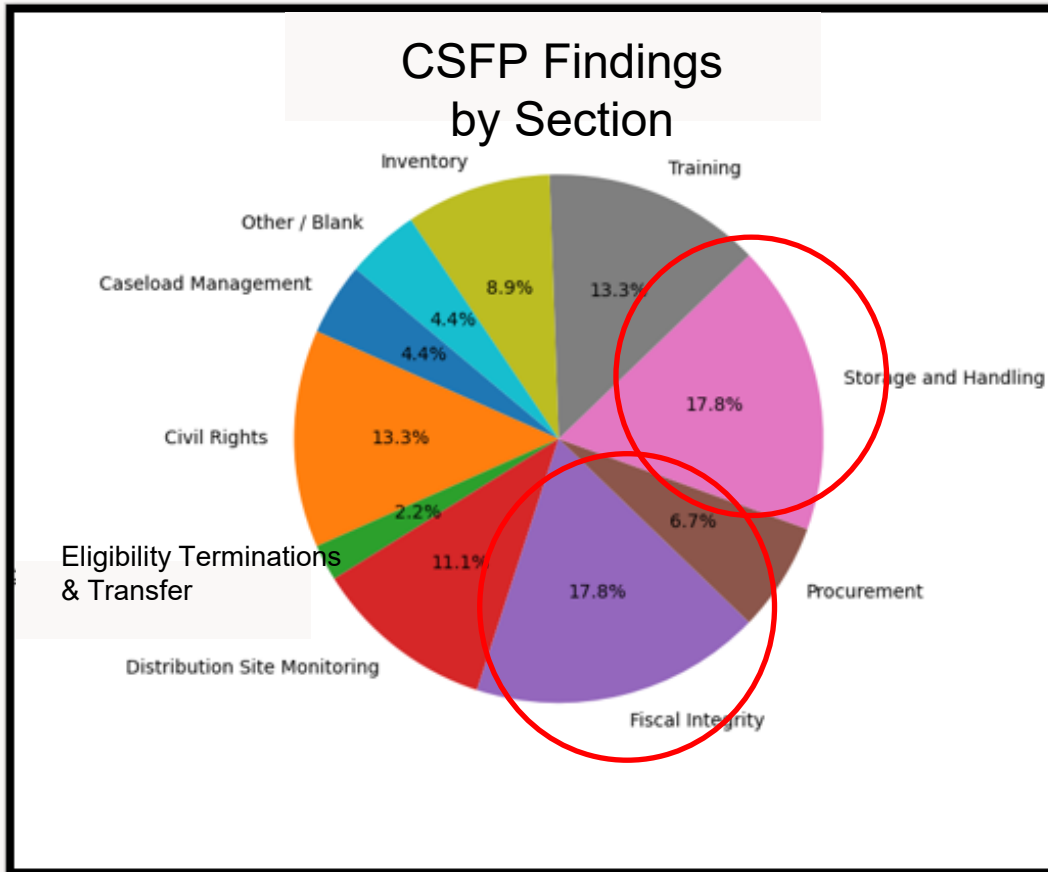
Sites

Fiscal
Integrity

Training

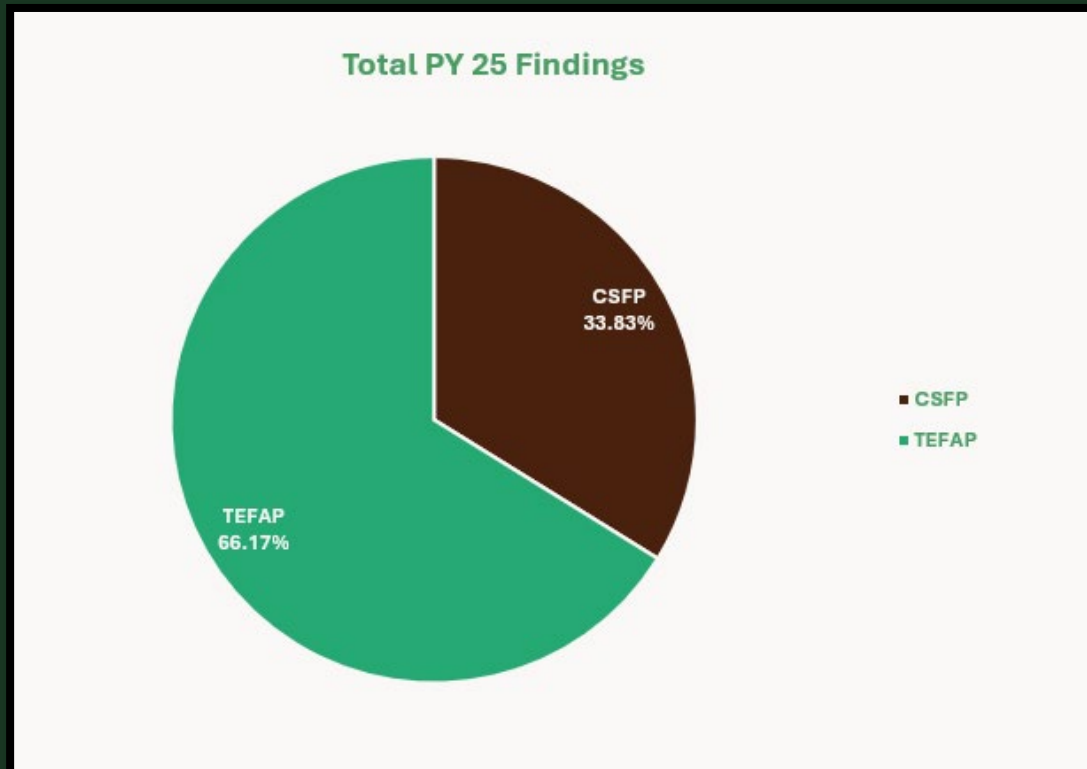


PY 25 Findings by Section & Program





PY 25 Finding Metrics by Program:



Data Summary:

- TEFAP
 - Organizations Reviewed: 5
 - Sites Reviewed: 20
- CSFP
 - Organizations Reviewed: 8
 - Sites Reviewed: 8

Total Findings:

- TEFAP: 88
- CSFP: 45

TOP TEFAP & CSFP Findings



Programs

Warehouse

Finance



Programs

1. Eligibility & Enrollment

- Household applications
 - Requesting additional information without a disclaimer
 - Missing federally required criteria

- Unallowable proxy regulations
 - Not requiring proxy ID
 - No written statement

2. Documentation

- Missing or incomplete documentation
 - (pest control, signed distribution invoices, temperature logs)

- Use of outdated forms
 - (Participant Rights Responsibility, income guidelines, applications)



Programs

3. Training

- Sign-in sheets are incomplete
- Annual program and warehouse training for internal and site staff not conducted

4. Monitoring

- No formal review schedule for the previous or current program year
- Sites not actively monitored within their required timeframe
- Monitoring forms inadequate or missing key elements: eligibility, food storage, record keeping, confidentiality, and/or identifying findings and corrective actions.



CSFP: Programs

1. Written Notifications & Timeframes

- 10-day eligibility, ineligibly, and/or waitlist notification
- 15-day notification for certification expiration, ineligibility during the certification period, dual participation

2. Forms

- Not providing a copy of the Participant Rights & Responsibility to the participant
- Not providing the Written Notice of Beneficiary Rights to the participant
- Electronic systems for eligibility are missing federally required criteria

3. Caseload Management

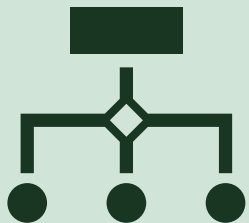
- Not tracking seniors correctly
- April FNS 191 numbers not aligning with participation numbers reported on the FNS 153



Programs Recommendations

1

Strengthen Internal Process



2

Training



3

Best Practices

- Periodically review site-level documentation to identify missing or incomplete records
- Ongoing refresher sessions or updates when procedures, regulations, staff change
- Use monitoring results to identify recurring issues and implement systematic improvements





Warehouse – TEFAP & CSFP

1. Inspection & Sample Count

- Temperature logs
 - Not checked or recorded at least every other day
 - Not maintained per recordkeeping requirements
 - Dry storage temperature not recorded
- Perpetual inventory does not align with TDA's sample physical count

2. Storage & Handling:

- Bills of Lading (BOL) not receipted in WBSCM within required timeframe or entered incorrectly
- Health inspections not completed within required timeframe or are outdated/missing
- Warehouse Facility Review missing required components



Warehouse – TEFAP & CSFP

3. Inventory

- USDA losses not reported to TDA, regardless of amount or value

CSFP Only:

- CSFP boxes do not align with corresponding menu and/or CSFP Guide Rate
- Not submitting the FNS 153 accurately or on time
- Sites storing CSFP boxes not reporting end of month boxes to organization

TEFAP Only:

- FNS 155 not submitted accurately or on time



Warehouse Recommendations



Training

- WBSCM processes and timeframes
- Reference Handbooks, Section 3 USDA Foods



Compliance & Oversight

- Conduct regular internal warehouse compliance checks
- Identify gaps promptly and provide corrective actions
- Reinforce adherence to reporting deadlines



Best Practices

- Encourage cross-training between site and internal staff to ensure consistency
- Schedule periodic refresher training sessions to reinforce procedures



Finance: Fiscal Integrity – TEFAP & CSFP

1. Unallowable Expenses charged

- Late payment fees
- Expenses not tied to the program
- Credits not applied
- Team engagement Costs
 - Holiday cards, gift cards, T-shirts, flowers
- Indirect Costs charged directly
 - Employees working across multiple programs
 - Electronic intake systems used by multiple programs



Finance: Fiscal Integrity – TEFAP & CSFP

2. Discrepancies

- Expense Reimbursement worksheet amounts don't align with TXUNPS (now TANS) claim entries
- Program pounds on the report don't match indirect cost calculations

3. Missing documentation

- Total Pounds distributed reports are missing
- Expenses lack supporting invoices or receipts

4. Late financial submissions

- Not submitting documentation within required desk administrative review deadline.



Finance Recommendations

1

Compliance & Oversight:

- Maintain the allowable vs. unallowable expense list in compliance with federal regulations
- Implement an approval workflow to verify that all expenses are program-related before charging to the federal program
- Require justification for all expenses to confirm program relevance

2

Best Practices:

- Implement cross-check procedures between claim entries and internal worksheets before submission.
- Conduct monthly internal reviews to detect and correct errors early.
- Assign finance staff to review program pounds, costs charged, and indirect allocations to ensure accuracy and compliance



Finance: Procurement – TEFAP & CSFP

1. Documentation

- Missing or incomplete procurement plan
- Missing or incomplete inventory forms

2. Policy & Compliance:

- Incorrect procurement methods in plan
- Incomplete or incorrect code of conduct
- Absence of bid protest procedures

3. Threshold

- Undefined procurement method thresholds
- Incorrect aggregate threshold



Procurement Recommendations

1

Compliance & Policy

- Align Procurement Plan and methods with approved guidelines
- Refer to the CSFP/TEFAP Handbooks, Section 7 Financial Management
- Identify and clearly define correct aggregate thresholds

2

Oversight

- Conduct regular internal compliance reviews
- Ensure clear understanding of desk administrative review deadlines and requirements



Desk Review Process Observations





Observations & Findings

1

Documents not submitted within the required timeframe

2

Documents not submitted at all.

3

Submitted documents do not match the requirements outlined in the Desk AR template provided by TDA



TANS Observations





Observations

1

Documents are not being uploaded according to the correct desk review criteria.

2

After editing claims or applications, users must click **Submit** for TDA PES to review and approve the information.

3

Claims:

- TEFAP Not entering the site and participant information
- CSFP: Not entering site and caseload distributed, and elderly numbers

4

Application: Site Information

- Site is not TEFAP or CSFP
- Address is incorrect
- Hours of Operation are incorrect

Recommendations

- Refer to TANS training on SquareMeals.org:
<https://squaremeals.org/FandN-Resources/Systems-Hub/TANS/TANS-Resources-and-Training>
- Report Bugs to TDA

Past TANS Trainings		
Topic	Details	Access
<u>FDP Application Submission</u>	Live session covering application submission for TEFAP, CSFP, FMNP, and SFMNP in TANS	Click here to view the recorded session.
<u>FDP – TEFAP/CSFP Compliance Demonstration</u>	Live session covering compliance submission for TEFAP and CSFP in TANS	Click here to view the recorded session.
<u>FDP – TEFAP/CSFP Claims Demonstration</u>	We will demonstrate how to navigate accessing the TEFAP/CSFP Claims submission process in TANS.	Click here to view the recorded session.



Recap:

- Ensure consistent, compliant program operations
- Reduced repeat findings
- Stronger internal controls and standardizing processes
- Improving internal and site staff trainings



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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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