

# School Nutrition Programs (SNP) Administrative Review Findings Lessons Learned

## Avoiding the Pitfalls!

The Texas Department of Agriculture (TDA) provides this information to assist you, as a Contracting Entity (CE), in identifying potential problems. Avoiding these pitfalls will help you comply with program requirements and receive full reimbursement for eligible expenses. Most of all, preventing these common findings will help you and TDA achieve the goal of ensuring that healthy meals and snacks are provided for children.



## Preventing Common Administrative Review Findings

- Develop a system to keep all the required documents and forms organized.
- Create processes and schedule a time to maintain and complete all required documentation.
- Train employees on the process implemented and assign duties to follow through with the process.



TEXAS DEPARTMENT OF AGRICULTURE  
**COMMISSIONER SID MILLER**

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)



Food and Nutrition Division  
Summer Meal Programs

This product was funded by USDA.  
This institution is an equal opportunity provider.



Updated 7/12/2022  
[www.SquareMeals.org](http://www.SquareMeals.org)

# Meal Components and Quantities

## ***Educational Institutions***

- CEs reviewed did not meet meal pattern requirements for the review period.
- CEs reviewed did not meet the daily quantity requirements for the age/grade group being offered.

## ***Private Non-Profits***

- CEs reviewed did not meet meal pattern requirements for the review period.
- CEs reviewed did not meet the daily quantity requirements for the age/grade group being offered.

## ***Government Agencies***

- CEs reviewed did not meet meal pattern requirements for the review period.
- CEs reviewed did not meet the daily quantity requirements for the age/grade group being offered.

## ***Examples***

- Portion sizes were not documented or were documented incorrectly on Food Production Records.
- Food Production Records indicate repeated, systemic insufficient daily quantities of vegetables, and fruits, along with daily and weekly contributions of grains and meat/meat alternates.
- CEs did not provide Child Nutrition Labels (CN) or Product Formulation Statements to validate meal pattern contribution.

## ***Effects on the CE***

- TDA may require an approvable corrective action plan, may disallow meals, and may reduce the claim accordingly.

## ***Suggested Steps to Take***

- Provide meal pattern training to all staff involved in the Food Service Program.
- Establish a time to complete Food Production Records and to update any CN Labels as needed.
- Assign a staff member to check records for accuracy.

# Revenue from Non-Program Foods

## ***Educational Institutions***

- CEs did not ensure meals served to adults are sufficiently priced to cover the overall cost of the program meals.

## ***Private Non-Profits***

- CEs did not ensure meals served to adults are sufficiently priced to cover the overall cost of the program meals.

## ***Examples***

- Current rates were not being used to calculate adult meals in the Adult Meal Calculator.
- Severe Need rates were not included in Method 2 of the Adult Meal Calculator calculations.

## ***Effects on the CE***

- TDA may require a copy of the corrected General Ledger indicating reimbursement to the non-profit school food service account for all insufficiently priced adult meals.

## ***Suggested Steps to Take***

- Develop and implement step-by-step processes/procedures to ensure program accountability.
- Develop a process to verify the reimbursement rates at the start of each program year.
- Develop a system to keep all the required documents and forms organized. Schedule time to maintain the paperwork.

# Local Wellness Policy

## ***Educational Institutions***

- CEs did not assess the implementation of the Local Wellness Policy every 3 years and retain documentation demonstrating the assessment.

## ***Private Non-Profits***

- CEs did not assess the implementation of the Local Wellness Policy every 3 years and retain documentation demonstrating the assessment.

## ***Government Agencies***

- CEs did not assess the implementation of the Local Wellness Policy every 3 years and retain documentation demonstrating the assessment.

## ***Examples***

- CEs did not complete a triennial assessment of their Local Wellness Policy.
- CEs did not submit a COVID-19 waiver before the due date of June 30, 2021, to utilize the flexibility provided by USDA.
- CEs did not submit any documentation showing the required elements of an assessment of the Local Wellness Policy requirement.

## ***Effects on the CE***

- TDA may require an approvable corrective action plan if the CE does not comply with the Local Wellness Policy.

## ***Suggested Steps to Take***

- Develop a process to ensure the policy is updated every 3 years and records of the assessment are being retained.
- Develop a system to keep all the required documents and forms organized. Schedule time to maintain the paperwork.

# Certification and Benefit Issuance

## ***Educational Institutions***

- CEs did not accurately approve household applications.

## ***Private Non-Profits***

- CEs did not accurately approve household applications.

## ***Examples***

- Incorrect number of households were listed on applications.
- Applications were missing household signatures.
- Applications were missing Social Security Numbers.
- Income was miscalculated causing incorrect eligibility determinations.

## ***Effects on the CE and Claim***

- TDA may require an approvable corrective action plan, may disallow meals, and may reduce the claim accordingly.

## ***Suggested Steps to Take***

- Develop a system to process all household applications with completion and accuracy checkpoints for required elements of the form.
- Train employees on the process implemented and assign duties to follow through with the system.

# Civil Rights

## ***Educational Institutions***

- CEs did not have documentation that staff was trained in Civil Rights.
- CEs did not publish a public release to media outlets notifying households of the availability of the School Nutrition Programs.
- CEs did not ensure that parents or guardians of students, potential participants, and the public are informed on how to submit a complaint.
- CEs did not use the most current nondiscrimination statement on program materials.

## ***Private Non-Profits***

- CEs did not have documentation that staff was trained in Civil Rights.
- CEs did not publish a public release to media outlets notifying households of the availability of the School Nutrition Programs.
- CEs did not ensure that parents or guardians of students, potential participants, and the public were informed on how to submit a complaint.
- CEs did not use the most current nondiscrimination statement on program materials.

## ***Government Agencies***

- CEs did not have documentation that staff was trained in Civil Rights.
- CEs did not publish a public release to media outlets notifying households of the availability of the School Nutrition Programs.
- CEs did not ensure that parents or guardians of students, potential participants, and the public are informed on how to submit a complaint.
- CEs did not use the most current nondiscrimination statement on program materials.

## ***Examples***

- CEs did not state that the complaint could be verbal, in writing, or in person, and did not state who would transcribe the complaint.
- CEs did not submit a public release to any media outlet; or CEs completed a public release for the school year but did not submit to the media.
- Not all School Nutrition staff attended Civil Rights training; or documentation of the most recent Civil Rights training was not maintained.
- Not all signage, forms, or websites contained the correct Non-Discrimination Statement (NDS).

## ***Effects on CE***

- TDA may require an approvable corrective action plan.

## ***Suggested Steps to Take***

- Schedule annual Civil Rights training before the SNP operations begin. Develop a system to ensure that all staff are trained annually, and that all documentation is maintained.
- Develop a checklist of annual Civil Rights tasks (submit a public release, review all NDS, etc.) and assign specific staff to complete.

# Meal Counting and Claiming

## ***Educational Institutions***

- CEs did not ensure that the counts by category were correctly used in the claim reimbursement.

## ***Private Non-Profits***

- CEs did not ensure that the counts by category were correctly used in the claim reimbursement.

## ***Examples***

- The site-based meal counts did not correspond to the CEs edit check documents.
- CEs did not make sure they correctly claimed meals by eligibility categories.

## ***Effects on the CE***

- TDA will require Corrective Action for noncompliance. TDA may disallow meals and require an adjustment to the claims for the over or under claims.

## ***Suggested Steps to Take***

- Always take the meal count at the point of service when the meal is served to ensure meals are claimed by the correct eligibility category.
- Establish a specific place to keep all forms when they are completed.
- Set a reminder to update the count records daily.
- Assign a staff member to review records for accuracy.