

Getting Ready for the Administrative Review: Common Findings for Child Nutrition Programs

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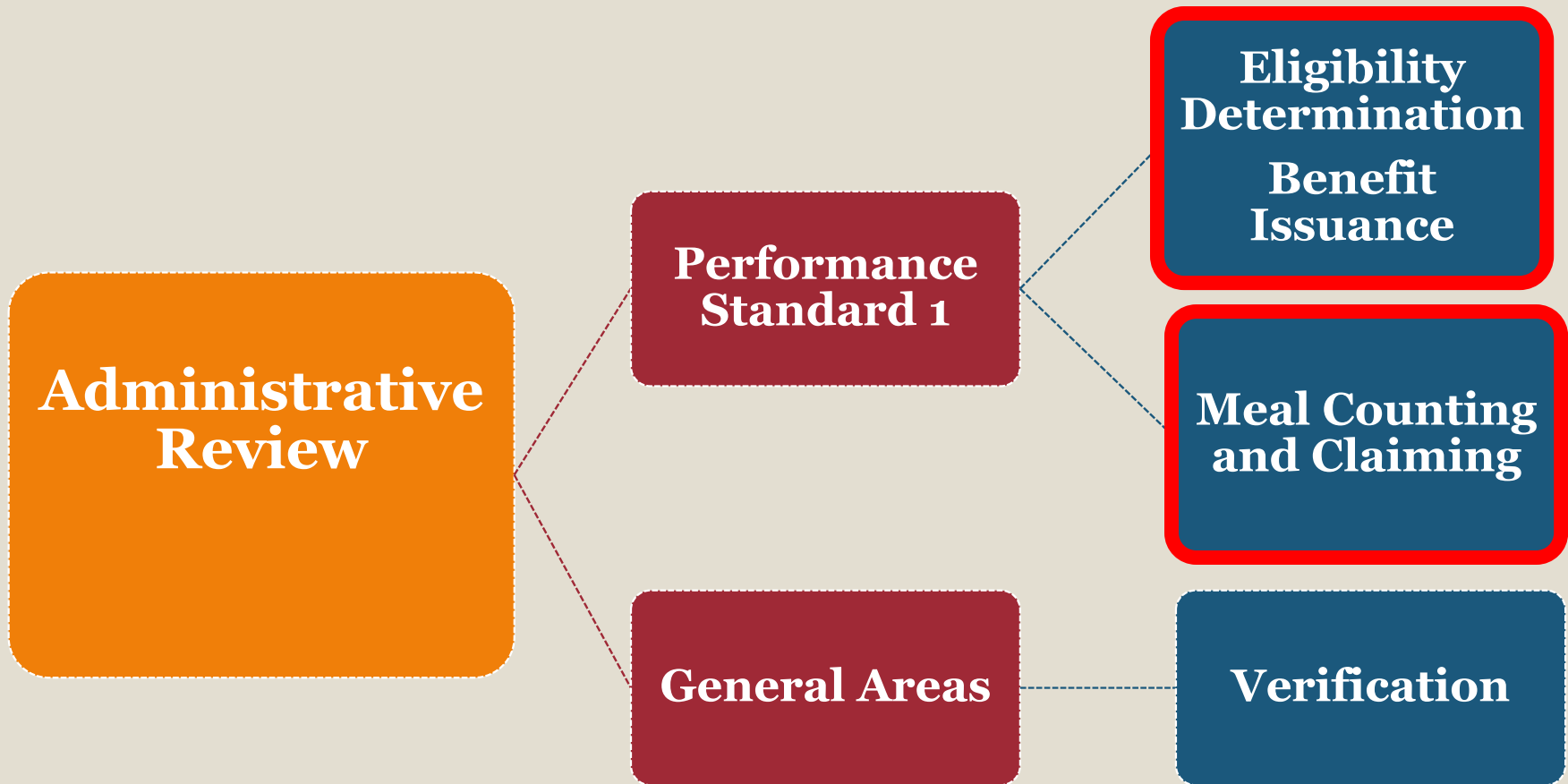
New Administrative Review Structure

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Section 1	Section 2	Section 3	Section 4	Section 5
<p>Access & Reimbursement</p> <ul style="list-style-type: none"> • Eligibility Determination • Benefit Issuance • Direct Certification • Verification • Meal Counting, Claiming and Reimbursement 	<p>Nutritional Quality/Meal Pattern</p> <ul style="list-style-type: none"> • Meal Components • Offer versus Serve • Dietary Specifications and Nutrient Analysis 	<p>Resource Management</p> <ul style="list-style-type: none"> • Resource Management • Nonprofit School Food Service Account • Paid Lunch Equity • Revenue from Non-program Foods • Indirect Costs • USDA foods 	<p>General Program Compliance</p> <ul style="list-style-type: none"> • Civil Rights • SFA On-site Monitoring • Local Wellness Policy • Competitive Foods • School Env. Report Card • Water • Food Safety • SBP & SSO Outreach 	<p>Other Federal Program Reviews</p> <ul style="list-style-type: none"> • Afterschool Care Snack Program • Seamless Summer Option • Fresh Fruit and Vegetable Program • Special Milk Program

Access and Reimbursement Overview

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Eligibility >>> Benefit Issuance

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Eligibility

Household Apps
Direct Certification

Benefit
Issuance

Roster
Medium of
Exchange



Access and Reimbursement

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School Food Authority (SFA)

- Certification of Eligibility
 - Benefit Issuance
 - Eligibility Determination
 - Direct Certification
 - Verification
- Meal Counting and Claiming
 - Site – Level Review
 - SFA – Level Review

Access and Reimbursement

CERTIFICATION AND BENEFIT ISSUANCE FINDINGS

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- Eligibility Status Incorrect
- Misunderstanding of What is a Complete Application

Eligibility and Benefits Issuance

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- Who has access to benefit issuance?
 - During issuance of benefits- Updates to System?
 - Transfer of benefits?
 - Back-up system (e.g., emergencies)?
- Is a routine back up roster at the POS ? If multiple POS, back up roster at each?



Direct Certification Findings



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- Is there a description of the SFA's procedures for extending DC eligibility to all children in the FNS, TANF or FDPIR household?
- Have all siblings of a DC confirmation been coded correctly?
- Have you kept a copy of the letter used by the SFA to notify households of direct certification?

Direct Certification Findings



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- Does your POS system notate if a child is DC?
- If a child was approved as Free (example)) but later was changed to DC, is the POS/or manual roster updated?
- (This will not change Community Eligibility, but will impact the Verification count of the number of applications to verify.)

Verification

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Verification Summary Report (FNS 742 Report) Questions

Department of Agriculture, Food and Nutrition Service School Food Authority (SFA) Verification Collection Report				
State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP). All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.				
According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0026. The time required to complete this information collection is 45 minutes per response, including the time to review instructions, search existing data resources, gather the data needed and complete and review the information collection.				
State Agency Name:	SFA ID#:	Type of SFA: <input type="checkbox"/> Public <input type="checkbox"/> Nonprofits/Private	School Year: From: 20 To: 20	
SFA Name:	SFA City:	SFA Zip code: [][][][][][]		
Section 1 Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students	**All SFAs must report Section 1**		A. Number of Schools OR Institutions	B. Number of Students
	1-1: Total schools (Do not include RCCIs):			
	1-2: Total RCCIs (Do not include schools counted in 1-1):			
	1-2a: RCCIs with day students (Report ONLY day students in 1-2aB)			
	1-2b: RCCIs with NO day students:			
Section 2 SFAs with schools operating alternate provisions	**ONLY SFAs with alternate provisions must report Section 2**		A. Number of Schools AND Institutions	B. Number of Students
	2-1: Operating Provision 23 in a BASE year for NSLP and SBP:			
	2-2: Operating Provision 23 in a NON BASE year for NSLP and SBP:			
	2-2a: Provision 23 students reported as FREE in a NON BASE year:			
	2-2b: Provision 23 students reported as REDUCED PRICE in a NON BASE year:			
	2-3: Operating the Community Eligibility Option:			
Section 3 Students approved as FREE eligible NOT subject to verification	**ALL SFAs must report Section 3 or check box 3-1 if applicable**		B. Number of FREE Students	
	3-1: <input type="checkbox"/> Check the box only if all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP (i.e. NON BASE year Provision 23 for all schools)			
	3-2: Students directly certified through Supplemental Nutrition Assistance Program (SNAP): Do not include students certified with SNAP through the letter method.			
	3-3: Students directly certified through other programs: Include those directly certified through Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K-Even Start, or non-applicant but approved by local officials. DO NOT include SNAP students already reported in 3-2.			
	3-4: Students certified categorically FREE eligible through SNAP letter method: Include students certified for free meals through the letter from the SNAP agency.			
Section 4 Students approved as FREE or REDUCED PRICE eligible through a household application	**ALL SFAs collecting applications must report Section 4**		A. Number of Applications	B. Number of Students
	4-1: Approved as categorically FREE Eligible: Based on those providing documentation (e.g. a case number for SNAP, TANF, FDIPIR on an application)			
	4-2: Approved as FREE eligible: Based on household size and income information			
	4-3: Approved as REDUCED PRICE eligible: Based on household size and income information			
T-1: Total FREE Eligible Students Reported: [][][][][][]		T-2: Total REDUCED PRICE Eligible Students Reported: [][][][][][]		

○ Accuracy of Verification:

- Sample Size
- Reporting

Questions?

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Meal Counting and Claiming

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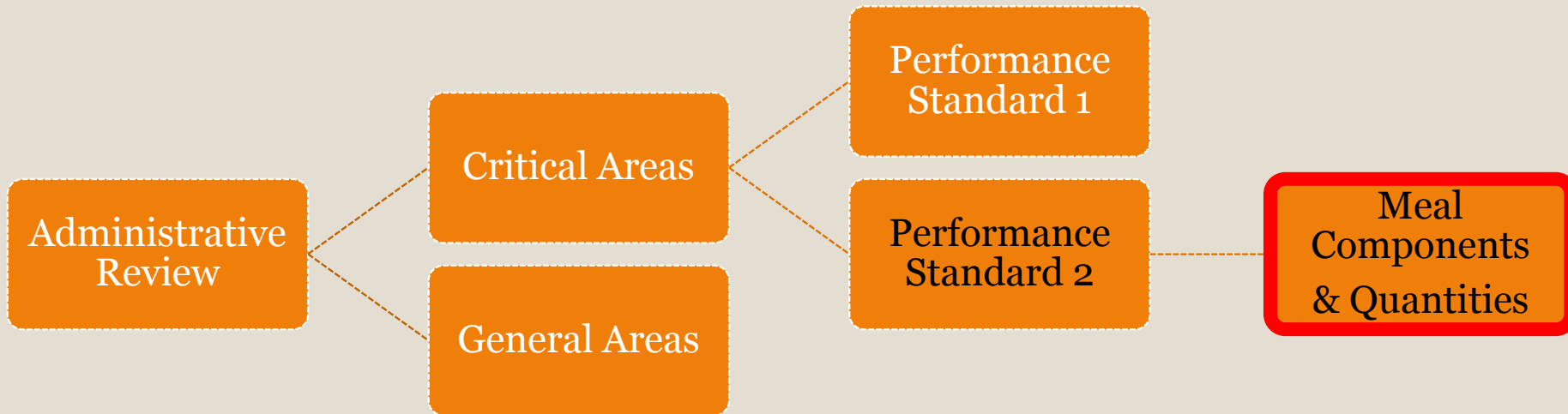
Do you have?

- Electronic vs. Manual
- Point of Service Back-up
- System Training Standards
- Operating Procedures



Performance Standard 2

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Production Records

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- Current and complete Production Records must be maintained on-site at the school for each meal service each day
- Must document that all meal components are offered in quantities appropriate for age/grade groups served
- Missing Production Records **will** result in immediate Fiscal Action.
- FINDINGS: Incomplete, inaccurate records are not maintained daily, insufficient quantity of food planned, planned serving size observed was less than what was actually served, leftovers not recorded.



Meal Pattern Requirements

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- Specific to age/grade group
- Specific requirements for
 - milk
 - vegetable subgroups
 - dietary specifications
 - whole grains



Menu Substitutions

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- Must be recorded on Production Record
- “Like” substitutions strongly encouraged
- Assess whether daily/weekly requirements are met
- Meals compliant if requirements met



Milk Requirements

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- At least two varieties of fluid milk
 - Fat-free, flavored or unflavored
 - Low-fat, unflavored
 - FINDINGS:



- Not offering milk substitutions for true allergies,
- Offering water in place of a milk substitution

Vegetable Subgroup Requirements

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- Schools must offer vegetables from five vegetable subgroups over the course of a week:

- Dark green
- Red/orange
- Starchy
- Beans
- Other



FINDINGS:

- Insufficient portion per group/ week
- Subgroup substitutions

Whole Grain-Rich Requirements

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- All grains offered over the week must be whole grain-rich in SBP (As well as in NSLP)

FINDINGS:

- Not all grains are whole grain-rich.



Meal Components & Quantities

Fiscal Action

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- Missing Meal Components
 - Immediate fiscal action **required**
- Vegetable Subgroup
- Milk Type
- Quantities
- Whole-grain Rich



Fiscal Action: Repeat Violation

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- For Meal Components & Quantities a REPEAT VIOLATION includes:
 - any repeated finding at the SFA level
 - any findings at a subsequent AR
 - a repeat violation of any of the same meal component requirements (milk type, vegetable subgroup, whole-grain rich) or quantities.

Questions?

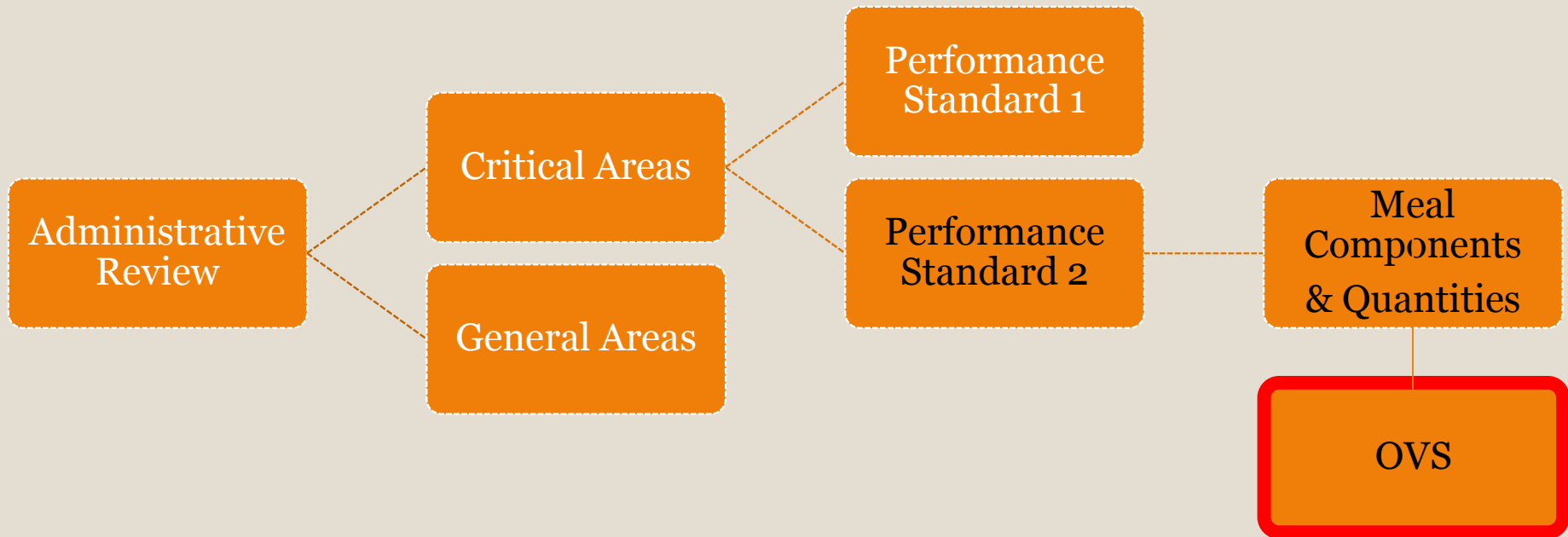
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Offer vs. Serve

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Review Area: Performance Standard 2



Overview

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- All components sufficiently offered
- Students select adequate components for reimbursable meal
- Reimbursable meal must include $\frac{1}{2}$ c Fruit and/or Vegetable... for Lunch & Breakfast
- Lunch: Must take 3 of 5 food items
- Breakfast: May decline 1 item
- Is required signage posted, visible and easy to understand?
Does sign have Civil Rights information?

FINDINGS :

Signage not posted, Lunch/Breakfast, Civil Rights statement not on signage

Students not taking a Fruit/Vegetable item

Last lunch shift is not offering all food components.

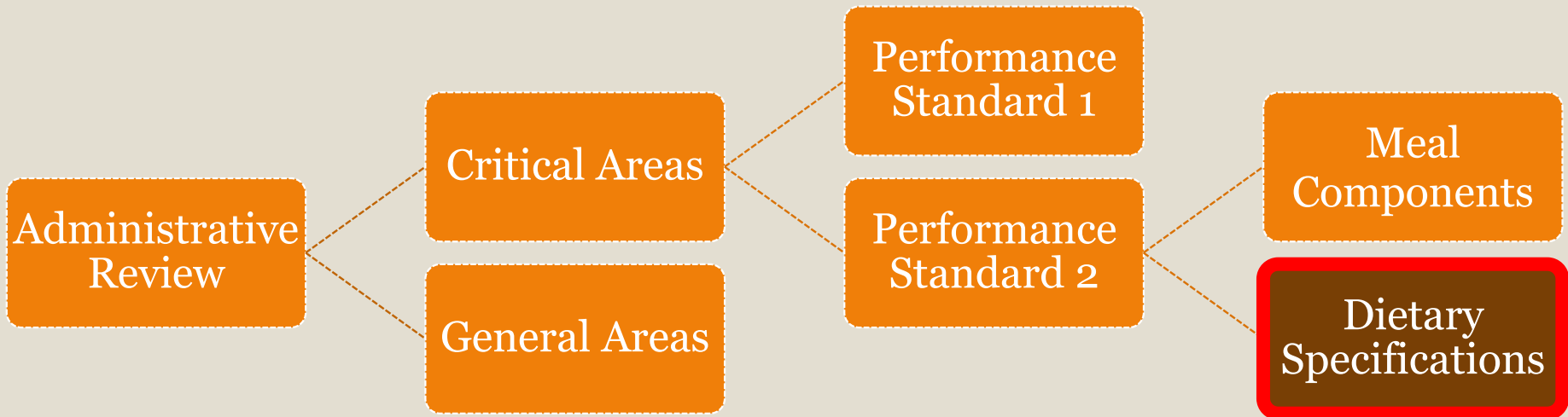
Dietary Specifications & Nutrient Analysis

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Performance Standard 2

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Overview

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- Reviewer will determine if SFA is serving reimbursable meals which meet Dietary Specifications
 - Calories (weekly average range)
 - Saturated Fat (weekly maximum)
 - Sodium (weekly maximum)
 - *Trans* Fat (daily restriction)
- Daily requirement restriction
 - *Trans* fat (not allowed, except minimal amount of naturally occurring)

- FINDINGS:

- Written food/nutrient specification not available or incomplete; product used not the same as specification label.

- Calories are over or under for required age/group

- Sodium limits are too high

- Recipes do not provide for correct serving per age/group.

- Product in storeroom is not product ordered or listed in HACCP recipes.



Fiscal Action for Dietary Specifications Violations

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- Fiscal action is not limited to the review site where the violation is found
 - if the same cycle menu is being served at other sites
- The SA may expand FA to the entire review week, review month, or back to beginning of school year
- All violations will require a Corrective Action Plan

Resource Management

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MAINTENANCE OF NONPROFIT CHILD NUTRITION ACCOUNT
PAID LUNCH EQUITY
REVENUE FROM NON-PROGRAM FOODS
INDIRECT COSTS
USDA FOODS

Why Is Monitoring Resource Management Important?

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- Federal regulations require State Agencies to ensure School Food Authorities (SFAs) account for all revenues and expenditures of their nonprofit Child Nutrition Account.
- Ensures effective and consistent management of program resources.

FINDINGS

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- The SFA accounting system does not track all revenue and expenses.
- SLP-4 reports are not current and/or entered into SCAPS.
- Paid Lunch Equity Tool not current/or used correctly.
- Non-program foods not tracked correctly.

General Program Compliance

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**CIVIL RIGHTS
ON-SITE REVIEWS
LOCAL WELLNESS POLICY
COMPETITIVE FOODS
WATER
FOOD SAFETY
SBO AND SSO OUTREACH
PROCUREMENT**



FINDINGS

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- “And Justice for All” poster not in visible location
- Program materials contain the correct non-discrimination statement; includes websites, menus, letters to parents.
- No documentation of District Staff Civil Rts. Training
- District On-Site Reviews not completed.
- The Local Wellness Policy does not show an Assessment Tool, evaluation date, Committee Meetings, Board approval of minutes.

FINDINGS, continued

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- Water access or cups not available.
- Breakfast Outreach not well documented.
- Summer Program Outreach not well documented.
- Afterschool Snack reviews not completed or on timely basis.

HACCP FINDINGS

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- HACCP books not available, incomplete.
- Yearly Food Safety Team, School Description/Operation Assessment not up-to-date.
- Yearly Evaluation Incomplete
- Food Temperature Logs not kept daily, equipment temperatures not monitored/ available.
- Thermometers not in all equipment/storerooms.
- Dish sink/dishwasher temperatures not recorded.
- Hand wash signs not posted.

Questions?

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THE END

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