

# Preparing for the Administrative Review 2016-2017

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# Professional Standards for State and Local Nutrition Program Personnel (Final Rule)

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- Effective July 1, 2015
- This webinar will contribute up to **1.5** Training Hours toward the Professional Standards training requirements
- Required to track the number of training hours earned each year and maintain documentation of the trainings attended
- SED prototype tracking excel document for School Nutrition Directors
- USDA Learning Topic Codes: 3200 and 3260

# Regulatory Authority

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- 7 CFR

- Part 210– National School Lunch Program
- Part 215– Special Milk Program
- Part 220– School Breakfast Program
- Part 235– State Administrative Expense
- Part 245– Free and Reduced Price Eligibility
- Part 3052- Audit Requirements
- 2 CFR Part 200- Procurement

- Public Law 111-296 (Healthy, Hunger-Free Kids Act of 2010)

- 2 CFR Chapter I, and Chapter II, Parts 200, 215, 220, 225, and 230- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule

- Supersedes and streamlines requirements from OMB CIRCULARS A-87; A-122

- All United States Department of Agriculture (USDA) and New York State Education Department (SED) guidance, memos, and instructions

# Administrative Review

- **Review Frequency**

- Every School Food Authority (SFA) must be reviewed every 3 years
- Cycle 2, Year 1 began July 1, 2016

- **Review Period**

- Most recent claim for reimbursement

- **Number of Sites to be Reviewed:**

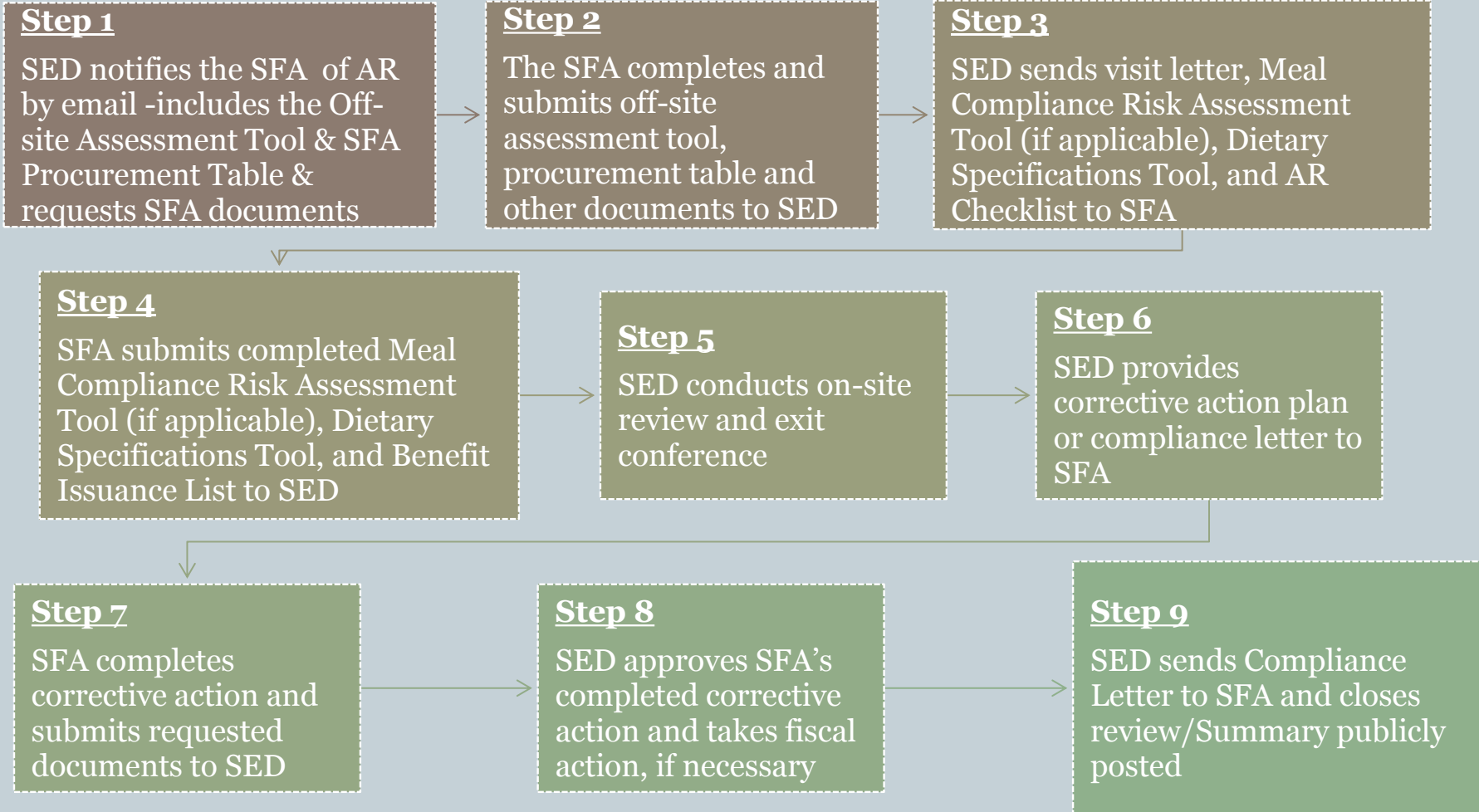
<b>Number of Sites in SFA</b>	<b>Min. Number of Sites to Review for NSLP</b>	<b>Number of Sites in SFA</b>	<b>Min. Number of Sites to Review for NSLP</b>
1 to 5 .....	1	41 to 60.....	6
6 to 10.....	2	61 to 80.....	8
11 to 20.....	3	81 to 100.....	10
21 to 40.....	4	101 or More.....	12*

\* 12 plus 5 percent of the number of sites over 100. Fractions must be rounded to the nearest whole number.

\* Breakfast will be reviewed in 50% of the sites selected for review

# Outline of the Administrative Review Process

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# Administrative Review Components

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- **Meal Access & Reimbursement**

- Certification & Benefit Issuance
- Verification
- Meal Counting & Claiming

- **Meal Pattern & Nutritional Quality**

- Meal Components & Quantities
- Offer VS. Serve
- Dietary Specifications & Nutrient Analysis

- **Resource Management**

- Maintenance of Nonprofit Child Nutrition Account
- Paid Lunch Equity
- Revenue from Non-Program Foods
- Indirect Costs

- **Procurement Review**

- **General Program Compliance**

- Civil Rights
- SFA On-site Monitoring
- Local School Wellness Policy
- Smart Snacks in School
- Professional Standards
- Water
- Food Safety, Storage & Buy American Provision
- Reporting & Record Keeping
- School Breakfast Program (SBP) & Summer Food Service Program (SFSP) Outreach

- **Other Federal Programs (if applicable)**

- Afterschool Snacks
- Fresh Fruit and Vegetable Program
- Special Milk Program

# Pre-visit Procedures

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- SFA submits the following to SED by **November 15, 2016**:
  - Completed “Off-Site Assessment Tool”
  - Completed “SFA Procurement Table” tab of “Procurement Tool”
  - 2015-2016 Paid Lunch Equity Tool
  - 2015-2016 Non-program Foods Tool
  - 2015-2016 Procurement Policy
  - 2015-2016 Paid list/summary of expenses by vendor
  - Local Wellness Policy
  - Meal Charge Policy (if established)

**Email to [CN@nysed.gov](mailto:CN@nysed.gov)**

# Meal Access & Reimbursement

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CERTIFICATION & BENEFIT ISSUANCE  
VERIFICATION  
MEAL COUNTING & CLAIMING





# Certification and Benefit Issuance

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- **Review of SFA systems**
  - Determining eligibility
    - Applications, Direct Certification, Denied Applications
  - Issuing Benefits
    - Point of Service Document
  - Notification of determination
    - Approval/Denial/Direct Certification
  - 30 Day Carryover
  - Updating benefits
  - Record Keeping
- **Student Certification Review**



# Certification & Benefit Issuance

## Pre-Visit Procedures

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- **SFA-wide Benefit Issuance List**
  - Only free and reduced price eligible students
  - Include:
    - ✦ Student name & benefit status
    - ✦ School name
    - ✦ Method of Certification method (i.e. DCMP, income app, etc),
    - ✦ Date of Certification
    - ✦ Total number of eligible students
    - ✦ Verification (if selected)
  
- **SED selects student certifications for review**
  - All free and reduced-price students;  
or
  - A statistically valid sample

# Benefit Issuance Sample Document

Last Name	First Name	School	Eligibility Determination	Certification Method	App #	Eligibility Date	Selected for Verification?
Adams	John	School 2	Z	Income App	1	9/5/2016	yes
Blair	Bonnie	School 2	Y	Eligibility	Letter	9/2/2016	
Emerson	Edward	School 1	Y	DCMP - SNAP		8/28/2016	
Jones	James	School 1	Y	Foster	3	9/5/2016	yes
Smith	Sam	School 1	Y	DCMP - Medi		8/28/2016	
Smith	Timothy	School 1	Y	DCMP - Medi	Ext.	8/28/2016	

# Student Certification Review

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- **Certification Documents**
  - Household Applications
  - Direct Certification Matching Process (DCMP)
    - ✦ Original DCMP lists
  - Extension of benefits
    - ✦ Enrollment record and source of extension
  - Eligibility Letter
  - Homeless, migrant, runaway documentation
  - Foster Child documentation
  - Head Start enrollment records



# Household Applications

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- **Validate Student Certification by examining:**

- Eligibility Determination
- Correspondence with households
- Notification letters
- Eligibility transferred to Point of Service Benefit Issuance Document

- **Common Missing Info:**

- Signature
- Last four digits of a SS# or the “No SSN” box selected
- Names of **all** household members
- SNAP, TANF or FDPIR case number

- **Common Mistakes:**

- Benefit incorrectly transferred to point of service document
- Invalid Case # listed
- Not all incomes reported used to calculate household income

# Special Situations: Certification Review

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- **RCCIs/Jails**
  - With Day students- Certification Documents & Benefit Issuance Document
  - Resident students – Resident eligibility list including name, dob, admission/discharge time and date
  
- **Provision 2**
  - Base year- Benefit issuance document & student certification review
  - Non base year- Not applicable
  
- **CEP**
  - Review of claiming percentages

# Notification of Eligibility

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- Free or Reduced Price Benefits Approval
- Denial Notification
  - Reason for denial of benefits
  - Right to appeal
  - Instructions on how to appeal
    - ✦ Hearing Official's name and contact information
  - Ability to re-apply for free and reduced price benefits at any time during the school year
- Attachment X- SED Policy Booklet
- Direct Certification
  - The child is eligible for free benefits
  - No further application is necessary
  - An explanation of extended eligibility and how to notify the LEA of any additional children in the household not listed on the notification
  - Option to decline benefits
- Attachment XI- SED Policy Booklet

# Certification & Benefit Issuance Errors

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- **Corrective Action Plan**
  - Required for Findings/Errors
- **Common Findings:**
  - Application Errors
  - DCMP not conducted on time/3 times per school year
  - Benefit Issuance Errors
  - Missing/Incorrect information on notification letters
- **Fiscal Action**
  - Miscategorized certifications
  - Benefit Issuance Errors
  - Failure to update verified applications
  - Applications missing information
    - **Not including applications which fail to indicate no income**



# Independent Review of Applications

17

- Required for SFAs with high levels of certification and benefit issuance errors
- Second Review of Applications
  - Signature of an adult household member
  - Last four digits of a social security number or an indication of “none”
  - Names of all household members, including the children for whom the application is made
  - Income amount received by each household member, identified by the individual who receives it
- FNS 874

# Verification

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- **SFAs Verification Procedures**
  - Timeline
  - Verification Sample Pool
    - Calculated correctly & as of October 1<sup>st</sup>
  - Verification Method used
    - Error Prone, Random, Focused
  - Number of Applications selected
    - Based on Sample Pool & Verification Method
  - Confirmation Review (if applicable)
  - Notification to Family
  - Verified Applications & documents to confirm eligibility
  - Results of Verification



# Review of Verification Documents

Review is Scheduled For...	Verification Review
<i>A timeframe prior to the completion of verification and the submission of the Verification Collection Report (FNS 742) for the current school year.</i>	<ul style="list-style-type: none"><li>• Previous year's Verification Collection Report (FNS 742)</li><li>• Previous year's verified applications</li></ul>
<i>A timeframe that falls <b>before</b> the Verification Collection Report (FNS 742) for the current school year has been submitted to the State Agency but after verification has been completed by the SFA.</i>	<ul style="list-style-type: none"><li>• Previous year's Verification Collection Report (FNS 742)</li><li>• Validate previous year's Verification Collection Report (FNS 742)</li><li>• Use current year verified applications for review.</li></ul>
<i>A timeframe after the current school year Verification Collection Report (FNS 742) has been submitted.</i>	<ul style="list-style-type: none"><li>• Current school year's Verification Collection Report (FNS 742)</li><li>• Current year verified applications for review.</li></ul>

# Verification

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- For each Verified Application
  - Copy of the original application
  - Documentation of confirmation review (if applicable)
  - All correspondence, including:
    - Verification Notification letter
    - Documentation of follow-up attempts & conversations with the family
    - Letters received from household
    - All documentation used to verify the applications
    - Results of Verification letter

# FNS-742- Verification Collection Report

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- Submitted on the Child Nutrition Management System by December 15<sup>th</sup>
- Each section completed accurately
  - Number of applications selected match the number reported
  - Verification Method used reported accurately
  - Results of Verification reported accurately
  - Applications verified for cause reported accurately

Attachment G (Page 1 of 4) CMB APPROVED NO. 0584-0026  
Expiration Date: 04/30/2016

Department of Agriculture, Food and Nutrition Service <b>School Food Authority (SFA) Verification Collection Report</b>			
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. This form is provided as a worksheet; this data should be reported to the Child Nutrition Management System (CNMS). If you do not access to the CNMS, you contact your Child Nutrition Representative at 818-473-8783. Paper forms will only be accepted by SFAs without CNMS access via fax at 818-473-8016.			
SFA Name:		LEA Code:	School Year: 2014-2015
<b>Section 1</b>	<b>"All SFAs must report Section 1"</b>	<b>A. Number of Schools OR Institutions</b>	<b>B. Number of Students</b>
	1-1: Total schools (Do not include RCCs):		
	1-2: Total RCCs (Do not include schools counted in 1-1):		
	1-2a: RCCs with day students (Report ONLY day students in 1-2a):		
	1-2b: RCCs with NO day students		
<b>Section 2</b>	<b>"ONLY SFAs with alternate provisions must report Section 2"</b>	<b>A. Number of Schools AND Institutions</b>	<b>B. Number of Students</b>
	2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:		
	2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:		
	2-2a: Provision 2/3 students reported as FREE in a NON BASE year:		
	2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:		
	2-3: Operating the Community Eligibility Option:		
2-4: Operating other alternatives for NSLP and SBP:			
2-5: Operating an alternate provision(s) for only SBP or only NSLP:			
<b>Section 3</b>	<b>"ALL SFAs must report Section 3 or check box 3-1 if applicable"</b>	<b>B. Number of FREE Students</b>	
	3-1: <input type="checkbox"/> Check the box only if all schools and/or RCCs in the SFA were not required to perform direct certification with SNAP (i.e. NON BASE year Provision 2/3 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, Free & 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 family providing a letter from the SNAP agency.		
<b>Section 4</b>	<b>"ALL SFAs collecting applications must report Section 4"</b>	<b>A. Number of Applications</b>	<b>B. Number of Students</b>
	4-1: Approved as categorically FREE Eligible. Based on those providing documentation (e.g. state number for DASH, TANF, ICN) 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.		
1-1: Total FREE Eligible Students Reported:		1-2: Total REDUCED PRICE Eligible Students Reported:	

Form FNS-742 (10/12) Previous Editions are Obsolete **SBU** Electronic Form Version Designed in Adobe 10.0 version

(Attachment G)

# Common Verification Errors

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- Wrong number of applications verified
- Incorrect verification method used
- Confirmation Review not conducted (if necessary)
- Benefit Status not updated as a result of verification
- Tax returns used to verify eligibility for families who are not self employed
- Verification Collection Report not completed correctly
- Letters contain incorrect or outdated information
  - Use SED Prototype letters!

# Meal Counting & Claiming

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- **Meal counting and claiming system for NSLP & SBP**
  - Provides an accurate count of reimbursable meals, by category, each day
  - Meal counts are correctly combined and recorded at the site & SFA level
  - Counting & Claiming system yields an accurate claim for reimbursement
- **Internal control system**
  - Edit Checks
  - Back-Up system

# Meal Counting & Claiming

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- **Day of Review**

- Observation at each site selected for review
- Evaluate Point of Service system
- Meals recorded correctly
- Point of Service prevents overt identification
- Review Day of Review Counts compared to Review Period and observation

- **Review Period**

- Most recent month for which claim was submitted
- Review of daily meal counts for review period
  - ✦ SFA and RA level
- Accuracy of meals claimed for reimbursement
- Edit Check of claim



# Meal Counting & Claiming

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- Reimbursement Claim
- Records to substantiate claims from all POS
  - Daily reports
  - Cash register tapes
  - Rosters
  - Monthly Summary sheets
- SFA-wide consolidation of meal counts
- Edit checks

South Park CSD					By Student Building Assignment					
Monthly Claims					01/01/16 - 01/31/16					
School: South Park Elementary										
Date	School Breakfast Program				National School Lunch Program					
	Reimbursable Meals				Non-reimbursable Meals	Reimbursable Meals				Non-reimbursable Meals
	Free	Red	Paid	Total	Total	Free	Red	Paid	Total	Total
1										
2										
3										
4	60	9	11	80		135	28	69	232	9
5	65	10	10	85		131	26	63	220	10
6	70	9	11	90		140	28	62	230	13
7	66	10	14	90		140	27	59	226	20
8	67	10	13	90		141	25	60	226	13
9										
10										
11	59	7	9	75		134	28	48	210	11
12	64	8	14	86		129	24	51	204	13
13	73	9	12	94		140	24	50	214	9
14	68	13	13	94		148	28	71	247	16
15	72	14	9	95		135	24	56	215	15
16										
17										
18										
19	66	9	10	85	1	146	25	66	237	8
20	78	11	12	101		145	25	60	230	17
21	72	12	16	100		140	25	59	224	22
22	72	12	10	94		136	28	56	220	5
23										
24										
25	65	10	11	86		139	27	63	229	7
26	74	10	7	91		147	28	55	230	17
27	67	10	9	86		138	28	50	216	15
28	64	9	13	86		137	24	63	224	13
29										
30										
<b>Totals</b>	1222	182	204	1608	1	2501	472	1061	4034	233

# Meal Counting & Claiming

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## • Corrective Action Plan

- Required for Findings/errors
  - Counting errors
  - Insufficient backup system
  - Insufficient edit checks
  - Claiming errors
  - Alternate POS counting errors
  - Insufficient staff training

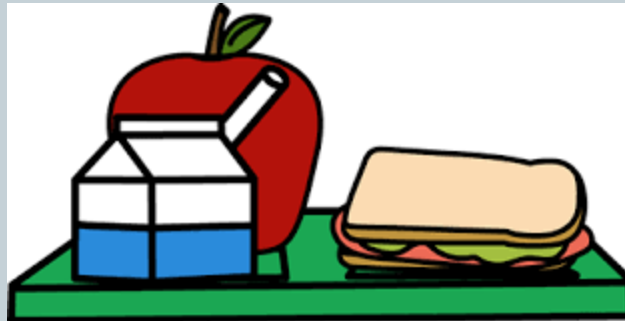
## • Fiscal Action

- Meal Count Combining Errors
  - Fiscal Action for difference between incorrect and correct meals
- Counting Errors
- Meal counts exceeding number of eligible students by category
- Second and/or ineligible meals were counted

# Meal Pattern & Nutritional Quality



MEAL COMPONENTS & QUANTITIES  
OFFER VS. SERVE  
DIETARY SPECIFICATIONS & NUTRIENT ANALYSIS



# Pre-Visit Procedures- Meal Compliance Risk Assessment Tool

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## Meal Compliance Assessment Tool

This tool is to be completed at a minimum for each site that is selected for Administrative Review. After scoring each site, the sites will be ranked according to the total scores. The site with the highest score is most at-risk for non-compliance and must receive an in-depth menu review. **If the SFA participates in SBP, the SA must select the highest scoring school that participates in both NSLP and SBP.**

School Name		
<i>Insert School Site Name Here</i>		
	Answer	Score
1. In addition to the National School Lunch Program, which of the following Child Nutrition Programs operate at the site?		
▪ School Breakfast Program	-SELECT-	0
▪ Seamless Summer Option	-SELECT-	0
▪ Afterschool Snack Program	-SELECT-	0
▪ Fresh Fruit and Vegetable Program	-SELECT-	0.0
▪ Special Milk Program	-SELECT-	0.0
2. What are the age/grade groups served in the school?		
▪ Pre-K	-SELECT-	0
▪ K-5 only (or K-1, K-2, K-3, K-4)	-SELECT-	0
▪ 6-8 only ( or 6-7, 7-8)	-SELECT-	0
▪ 9-12 only (or 10-12)	-SELECT-	0
▪ K-8 overlap	-SELECT-	0
▪ 6-12 overlap	-SELECT-	0
▪ K-12 overlap	-SELECT-	0
3. Were Performance Standard 1 or Performance Standard 2 violations identified at the previous administrative review or during follow-up activities?	-SELECT-	0

# Pre-Visit Procedures- Dietary Specifications Assessment Tool

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## Dietary Specifications Assessment Tool

For each question below, select the number that corresponds to the best description:

- 1 - Always (every day or 5 days/week)
- 2 - Most items or most of the time (3-4 days/week)
- 3 - Some items or some of the time (1-2 days/week)
- 4 - Never (0 days/week)

School Name: \_\_\_\_\_

	Off-site Review of Documentation/SFA Interview to Determine Risk		On-site Observation to Validate Risk	
	Lunch	Breakfast	Lunch	Breakfast
b. Sodium	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. Trans fat	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
2. Only low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored) milk is used for student consumption and in menu recipes.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
3. Low-fat, fat-free milk products are used. This includes yogurt and cottage cheese.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
4. Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
5. Are non-creditable cheese products offered as part of a reimbursable meal? (Non-creditable cheese includes: cheese sauce without a CN label, cheese product, imitation cheese and powdered cheese).	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
6. Reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --

# Meal Components & Quantities

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- **Meal Pattern Requirements for NSLP & SBP**
  - Meals prepared, offered, and served to students meet meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines
  - Every reimbursable meal service line meets the daily and weekly meal pattern requirements for the appropriate age/grade group served
  - Meals claimed for reimbursement contain the appropriate meal components and quantities
- **Day of Review & Review Period**

# Meal Components & Quantities

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## NYSED will:

- Review all menu documentation
  - Menus
  - Production records
  - Recipes
  - Labels and product formulation statements

\*Review Period and Day of Review

- Observe all meal service lines

## NYSED may:

- Conduct a nutrient analysis (on or off-site)
  - Based on results of Diet Specifications Tool
    - ✦ Observation & SFA Response

# Meal Components & Quantities- Documentation Review

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- Documents to provide to SED:
  - Menu
  - Daily Production records
  - Recipes
  - Nutrition Fact and CN labels
  - Product formulation statements
- For **ALL** menu items
  - Including alternate & daily meals
    - Review Period & Day of Review





# Meal Components & Quantities- Observation

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- **Meal Service Observation:**
  - Recipient Agency Level Review
    - ✦ Every reimbursable meal line/location
  - All reimbursable meal service lines offer all of the required meal components and food quantities for the age/grade groups being served
  - Meals claimed for reimbursement contain the required components and quantities
  - Signage is posted and students know how to select a reimbursable meal

# Meal Components & Quantities

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- **Common errors:**
  - Insufficient menu documentation
    - ✦ Recipes, Product Formulation Statements
  - Incomplete production records
    - ✦ No alternate meals listed
  - Insufficient weekly requirements
  - Non-whole grain rich items
  - Access to vegetable subgroups
  - Meal service not structured for different age/grade groups
- **May require technical assistance and corrective action**

# Offer vs. Serve

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- Meal Service Observation:
  - Recipient Agency level review
  - Signage posted
  - All components sufficiently offered
  - Students select adequate components to make a reimbursable meal
  - Staff members at the point-of-service are trained and accurately recognize a reimbursable meal

# Offer vs. Serve

36

- **Common errors:**
  - No signage
  - Signage not displayed for alternate meals
  - Insufficient quantities offered/selected
  - Meals missing components counted for reimbursement
  - Meals missing 1/2 cup fruit or vegetable counted for reimbursement
- **May require technical assistance and corrective action**

# Dietary Specifications & Nutrient Analysis

37

- SED completes the on-site validation portion of the Dietary Specifications Assessment Tool
- RA may be subject to an in-depth nutrient analysis, depending on results of validation



# Meal Pattern & Nutritional Quality

38

## Fiscal Action

- Missing Production Records
- Missing Meal Component
  - Review period and day of review meals
- Students select less than 1/2 cup fruit/vegetable

## Fiscal Action for Repeated Violations

- Vegetable Subgroup
- Milk Type

### State Agency Discretion

(for repeat)

- Insufficient quantities
- Whole grain-rich
- Juice exceeds 50% weekly offering
- Dietary Specifications

# General Program Compliance

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- CIVIL RIGHTS •
- SFA ON-SITE SELF MONITORING •
- LOCAL SCHOOL WELLNESS POLICY AND SCHOOL MEAL ENVIRONMENT •
  - SMART SNACKS IN SCHOOL •
  - PROFESSIONAL STANDARDS •
  - WATER •
- FOOD SAFETY, STORAGE, & BUY AMERICAN •
  - REPORTING & RECORD KEEPING •
- SCHOOL BREAKFAST PROGRAM (SBP) & SUMMER FOOD SERVICE PROGRAM (SFSP) OUTREACH •

# General Program Records

40

- **Public Announcement**
  - Along with locations of where it was sent
- **Parent Letter**
- **Vendor Contract** (if applicable)
- **Meal Charge Policy** (if established)





# Civil Rights

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- “And Justice for All” poster placed in visible location
- All Child Nutrition Program materials must contain the most recent non-discrimination statement
- Required Annual Civil Rights Training
- SFA collection of racial/ethnic data (BEDS Report)
- Students are receiving equal benefits without discrimination at each school during each meal service reviewed

# On-site Self Review Monitoring

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For SFA's with more than 1 building:

- Copy of the SFA's On-Site Review forms
  - \*Breakfast and Lunch\*
- Written documentation of follow-up reviews
- Written documentation to verify Corrective Action has occurred for any findings in the initial SFA review

# Local School Wellness Policy

43

- **SED will Evaluate:**

- Off-site Assessment Tool questions 1000-1006
  - ✦ Provide copy of LWP
- Elements of the LWP
- Stakeholder Involvement
- Stakeholder Participation
- Public Notification
- Measuring Implementation
- Local Designation

- **Day of Review**

- **Supporting Documents:**

- Most Recent LWP
  - Description of how the LWP is publicized
  - List of individuals who participate on the wellness committee
  - Most recent assessment/updates
- **Corrective Action**

# Smart Snacks in Schools

## (All foods and beverages sold in school)

44

- Smart Snacks standards became effective July 1, 2014 and are codified at 7 CFR 210.11.
- Off-site Assessment Tool
  - Questions regarding Smart Snacks
- During the on-site review, SED will observe
  - Nutrition documentation
    - Smart Snack Calculator & Nutrition Label
  - Interview school food service staff & administration
  - Leftover NSLP/SBP entrees

# Professional Standards

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- Effective 7/1/2015
- SED will review documentation to support professional standards requirements for school nutrition staff
  - Hiring standards for new School Nutrition Program Directors hired on or after July 1, 2015
  - Continuing Education/Training for all School Nutrition Program personnel
- Use SED prototype Tracking tool!

# Water Availability

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- The Healthy Hunger Free Kids Act of 2010 required that potable water be available where breakfast and lunch is served
- Water is in addition to milk – it is not in competition with milk or a beverage choice
- SFA cannot charge for water
- Drinking fountain outside café may be used as long as students have free access
- Observed on-site

# Food Safety

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- On-site assessment at every recipient agency selected for review
- Includes: Written food safety (HACCP) plan, valid health permit, food safety inspections, recordkeeping, temperature logs and storage practices
- The letter requesting at least two food safety inspections each school year from the health department will be reviewed
- A copy of the most recent health inspection report must be posted in a location that is visible to the public
- Please ensure that all buildings operating under your SFA's jurisdiction are in compliance with the New York State Sanitary Code for Food Service Establishments which can be accessed at:

[http://www.health.ny.gov/regulations/nycrr/title\\_10/part\\_14/subpart\\_14-1.htm](http://www.health.ny.gov/regulations/nycrr/title_10/part_14/subpart_14-1.htm).

# Food Storage

48

- On-site assessment at every recipient agency selected for review
- On-site storage facilities may include freezers, refrigerators, dry good storage rooms etc.
- Off-site storage facilities would include SFA contracted or self-operated warehouses
- SED reviewer is permitted to use his or her own discretion regarding any potentially harmful observations related to proper food storage



# Buy American

49

- The requirement to Buy American is very important part of the Richard B. Russell National School Lunch Act (NSLA)
- On-site and Off-site assessment at every recipient agency selected for review
- **SED Monitoring:**
  - Solicitation and contract documents
  - Product labels
  - Invoices/receipts
- Follow the link below to retrieve more information on Buy American Provision:  
<http://portal.nysed.gov/portal/page/portal/CNKC/NeedToKnow/SP24-2016os.pdf>

# SBP & SFSP Outreach

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- **SBP**

- Off-site #1600
- Supporting Documentation:
  - ✦ Notification prior to or at the beginning of the school year
  - ✦ Reminders throughout the school year



- **SFSP**

- Required before the end of the school year for **all SFAs** regardless if the SFA operates its own SFSP
  - No Exceptions
- Supporting Documentation
  - June Menu
  - Plan to advertise
    - “Find Summer Meals in Your Community” websites
    - No Kid Hungry Text Line
    - USDA National Hunger Hotline

# Reporting & Record Keeping

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- All reports must be accurate and submitted on time to SED
  - Annual Renewal
  - Health Inspection Report
  - SNAP/Medicaid Certified Entry
  - Verification Collection Report
  - Cash Analysis (if applicable)
- Maintain records for 3 years plus the current year

# General Areas

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## Corrective Action Plan

- Required for Findings/Errors
- Formal corrective action plan response required from SFA

## Fiscal Action

- May withhold payments if corrective action plan not submitted or implemented as required

# Resource Management



# Resource Management



- The intent and scope of this section is to apply a systematic approach to ensure the overall financial health of the SFA's nonprofit school food service
- Includes four areas integral to the financial health of the SFA's school food service

## RM Review Period:

The SFA's most recently completed school year



# Resource Management Monitoring Areas



1. Maintenance of the Nonprofit School Food Service Account
2. Paid Lunch Equity
3. Revenue from Non-program Foods
4. Indirect Costs

**SFA will be notified of the RM section(s) that require a comprehensive review**



# Maintenance of the Nonprofit School Food Service Account



- Ensure SFA is maintaining and using its nonprofit school food service account according to regulatory requirements
- Documents you must provide include:
  - Operating Statement of revenues and expenses
  - General Ledgers, Journals,
  - Documentation of revenue and expenses
    - ✦ Bank Statement(s), canceled checks, purchase orders and invoices, payroll records



# Paid Lunch Equity



- The SFAs must comply with the requirements for pricing paid lunches (7 CFR 210.14(e))
- Paid Lunch Equity Tool
  - Were paid lunch prices evaluated
  - Did the SFA raise prices (if required)



# Revenue from Non-program Foods

- Revenue from Non-Program Food enhances the program's bottom line
- USDA Nonprogram Food Revenue Tool
- Adult Selling Price





FOOD AND NUTRITION SERVICE

<b>Nonprogram Revenue Calculator</b>		
Enter the cost for reimbursable meal, cost of nonprogram food and total revenue		
<a href="#">Cost for Reimbursable Meal Food</a>		
<a href="#">Cost of Nonprogram Food</a>		
<a href="#">Total Food Costs</a>	\$	-
<a href="#">Total Nonprogram Food Revenue</a>		
<a href="#">Total Revenue</a>		
Minimum portion of revenue from nonprogram funds		0%
Minimum Revenue Required from the Sale of Nonprogram Foods	\$	-
Additional Revenue Needed to Comply	\$	-

<http://portal.nysed.gov/portal/page/portal/CNKC/NeedToKnow/Nonprogram%20Revenue%20Tool.xls>

# Indirect Costs



- SFA's must follow fair and consistent methodologies to identify and allocate allowable indirect costs to school food service accounts
- SFA's must use the current SED approved indirect cost rate
  - You will need your indirect cost agreement and supporting documentation if reviewed.

# Procurement Review



- Procurement Table
  - SFA staff
  - Vendor names
  - Goods/services provided
  - Total amount paid and number of purchases to vendor
  - Number of bids received
- Procurement Policy/Standards
- Code of Conduct
- Paid list/summary of expenses by vendor for 2015-2016
- In-depth review of selected procurements
- Review of written procurement procedures



# Procuring Equipment



- Use appropriate procurement methods
- Prior approval required
- Approved Equipment List
  - Attestation Statement

# Other Federal Program Reviews

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AFTERSCHOOL SNACKS  
FRESH FRUIT & VEGETABLE PROGRAM  
SPECIAL MILK PROGRAM



# Afterschool Snacks

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- Verify school eligibility
  - Educational or Enrichment Activity
- Ensure an accurate counting and claiming system
- Make sure snacks meet snack service and nutritional requirements
  - Menus
  - Production records
- Self review of snack program twice per year
  - The SFA must conduct the first review during the first four weeks that the school is in operation each school year
- Civil Rights and Food Safety



# Fresh Fruit and Vegetable Program

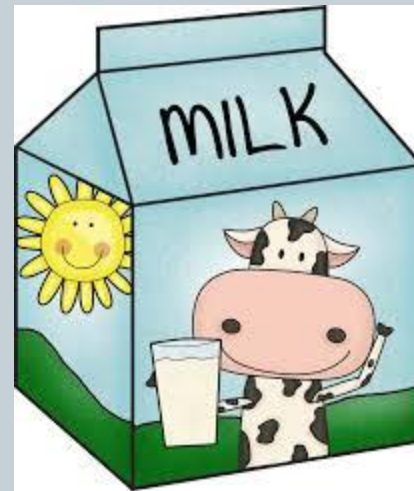
65

- **On-site claim validation**
  - Cost documentation (i.e. invoices, payroll records)
- **On-site operation review**
  - Available to all children, free of charge, offered during correct times
  - Outreach to families
  - Offers allowable fruits/vegetables and accompaniments
  - Food safety practices

# Special Milk Program

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- Special Milk Program documentation will be reviewed
  - Pricing policy
  - Counting and claiming procedures
  - Milk service procedures
  - Recordkeeping



# Other Federal Programs

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## Corrective Action Plan

- Required for Findings/Errors
- Formal corrective action plan response required from SFA

## Fiscal Action

- Missing meal components
- Unsupported costs and/or unallowable costs
- Certification errors
- Counting and claiming errors
- Missing Production Records (Snack)

# Post Review

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- **Exit Conference**
  - Preliminary findings/technical assistance
  - Required corrective action
- **Review Summary Letter/Corrective Action Plan (CAP) Form**
  - Written notification of all review findings and technical assistance
  - Corrective action plan and timeframe
  - SED expects the SFA to provide documents requested
- **Fiscal Action**
- **Review Summary made Public**

# Public Notification of Review Findings

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- Summary of the Administrative Review Report for each SFA posted on the State Agency publicly available website
  - Must include at minimum:
    - ✦ Access and Reimbursement
    - ✦ Meal pattern and the Nutritional Quality
    - ✦ School Nutrition Environment
    - ✦ Civil Rights
    - ✦ Program Participation
- SED will post all TA, observations and findings from the review



# Questions???



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For more information, please visit:

New York State Child Nutrition Knowledge Center  
([www.cn.nysed.gov](http://www.cn.nysed.gov))

USDA – Food and Nutrition Service  
(<http://www.fns.usda.gov/school-meals/child-nutrition-programs>)

# Contact Information

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