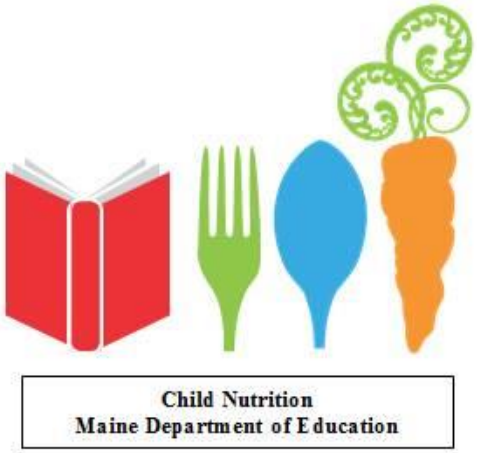

Preparing for Your Upcoming Administrative Review

Sarah Platt, RD, SNS

August 5, 2015

Maine School Nutrition Association

Objectives

- Provide an understanding of the Administrative Review process

- Identify common errors discovered during the Administrative Review process

Child Nutrition
Maine Department of Education

The Big Picture

Off-Site Assessment Tool & Documentation

On-site Review

-

Validate SFA Responses

Child Nutrition
Maine Department of Education

Review Frequency & Schedule

Frequency

- SFA must be reviewed every 3 years

Review Period (Review Month)

- Most recent month claim submitted

Week of Review

- Menu review during the Review Period

Day of Review

- On-site Review

Child Nutrition
Maine Department of Education

Review Areas

Meal Access & Reimbursement	Meal Pattern & Nutritional Quality	Resource Management	General Program Compliance	Other Federal Program Reviews
• Certification & Benefit Issuance • Verification • Meal Counting & Claiming	• Meal Components & Quantities • Offer versus Serve • Dietary Specs & Nutrient Analysis	• Risk Assessment • Nonprofit School Food Service Account • Paid Lunch Equity • Revenue from Non-program Foods • Indirect Costs • USDA Foods	• Civil Rights • SFA On-site Monitoring • Local Wellness Policy • Competitive Foods • Water • Food Safety • SBP & SFSP Outreach	• Afterschool Snacks • Seamless Summer Option • Fresh Fruit & Vegetable Program • Special Milk Program

Pre-Visit Procedures

- Superintendent notified
- Off-site Assessment Tools & Pre-visit Information
- State Agency reviews documentation
- Select sites for on-site review

Child Nutrition
Maine Department of Education

Sample Schedule For Multi-School Review

Day One

- Arrive at Director's office and review applications, verification & paperwork
- Prior to lunch service, arrive at the kitchen to observe documents, production, and meal service
- Verify accountability
- Continue review of paperwork

Day Two

- Arrive at second school and observe breakfast
- Review financials and finish paperwork
- Review FFVP if applicable
- Observe lunch at second school
- Exit interview

Child Nutrition
Maine Department of Education

PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting & Claiming

Verifying that meals claimed for reimbursement were served only to eligible students.

Child Nutrition
Maine Department of Education

PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

Child Nutrition
Maine Department of Education

PS1: Meal Access & Reimbursement

Off-site

- SFA answers questions in Off-site Assessment
- SFA sends electronic benefit issuance file
- SFA send additional documentation

On-site

- Review student eligibility documents
- Review denied applications

Child Nutrition
Maine Department of Education

Benefit Issuance Documentation

Electronic list (Excel) of **all** free and reduced priced students

- All students in the district
- Do not include withdrawn or paid students
- List to be pulled from the Point of Service (POS)
- List should be pulled during the Review Period/Review Month

Child Nutrition
Maine Department of Education

Off-site Benefit Issuance Documentation

Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Walter Beesley	F	DC	Smith ES	9/2/2015
David Hartley	R	Income Application	Harrison MS	8/30/2015
Sarah Platt	F	SNAP Application	Jones HS	9/10/2015
Gail Lombardi	F	Foster	Jones HS	9/2/2015

Child Nutrition
Maine Department of Education

On-site Benefit Issuance Documentation

- Approved meal benefit applications
- Denied meal benefit applications
- Direct certification lists
- Homeless list

Child Nutrition
Maine Department of Education

Common Review Findings

- ✓ Incomplete Applications
- ✓ Miscategorized Applications
- ✓ Incorrect SNAP/TANF number
- ✓ Missing documentation (Keep <u>ALL</u> DC lists)
- ✓ Not converting to annual income when different frequencies of income are reported

$ $ $ $ $ $ $ $ $ $ $ $ $

Child Nutrition
Maine Department of Education

PS1: Meal Access & Reimbursement

Verification

Child Nutrition
Maine Department of Education

Verification

- Was it completed on time?
- Used correct method (error prone)
- Compare verification report to documentation
- Follow-ups were made (use tracking form)
- Notification letter met standards
- Eligibility status changes

Child Nutrition
Maine Department of Education

Verification

Internal Use Only

HOUSEHOLD FILE CONTROL FORM

Head of Household Name: _____

Date Selected: _____ Notification Sent: _____

Response Due: _____ Second Notice Sent: _____

Response Due: _____ Missing Information: _____

_____

DOCUMENT ALL TELEPHONE CONTACTS ON REVERSE SIDE OF THIS PAGE.

Date Reduction/Termination Notice Sent: _____

Food Stamp/TANF Household — Income Household: $_____ Monthly

Confirmed By -	Confirmed by -
[ ] Predetermined Eligibility List	[ ] Wage stubs
[ ] Food Stamp/TANF Office	[ ] Written documents (Explain below)
[ ] ATP Card	[ ] Collateral Contacts (Explain below)
[ ] Other:_____	[ ] Agency Records
[ ] Eligibility not confirmed	[ ] Other:_____

Explanation:_____

_____

Verification Result:

[ ] No Change [ ] Reduced to Free [ ] Free to Reduced [ ] Ineligible

Reason For Change: [ ] High Income [ ] Refused to Cooperate
[ ] Food Stamp/TANF Eligibility Not Confirmed
[ ] Other - include self denial

Signature of Verifying Official: _____

Date:

Verification Notification and Tracking Forms

www.maine.gov/doe/nutrition/forms/index.html

Child Nutrition
Maine Department of Education

Common Verification Errors

- ✓ Use the correct method
  - Error prone
  - Mark the Error prone applications when approving
- ✓ Double check your math
  - A family application who is on direct cert is NOT included in the number of applications
- ✓ Follow protocol/timeline
- ✓ Eligibility changes

Child Nutrition
Maine Department of Education

PS1: Meal Access & Reimbursement

Meal Counting & Claiming

Child Nutrition
Maine Department of Education

On-Site Documents Needed

- Meal counts by day for the Review Period
  - Breakfast & Lunch
  - All schools in the District
- Edit Checks

Child Nutrition
Maine Department of Education

Meal Counting and Claiming

- Provide an Accurate Count at POS
- Eligibility Category
- Without Overt Identification

Child Nutrition
Maine Department of Education

Meal Counting and Claiming

- Type of System Used
- Back up system
- Training

Child Nutrition
Maine Department of Education

Breakfast in the Classroom (BIC)

- Train teachers
- Monitor the program to ensure requirements are being met
- Must offer two types of milk

Child Nutrition
Maine Department of Education

PS2: Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

Child Nutrition
Maine Department of Education

PS2: Meal Pattern & Nutritional Quality

SFAs agree to:

- Offer students the required meal components in the required quantities
- Allow students to select required meal components on <u>all</u> reimbursable lines
- Record/claim <u>only</u> those meals that contain required components in required quantities

Child Nutrition
Maine Department of Education

PS2: Meal Pattern & Nutritional Quality

Off-site

- Menu
- Production Records
- Component Crediting Documentation
- Recipes, labels, etc.
- Meal Compliance Tool
- Dietary Specifications Tool

On-site

- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site review

Child Nutrition
Maine Department of Education

Off-Site: Meal Components & Quantities

<u>Menu Documents: Breakfast & Lunch</u>

- Menu
- Menu Production Records
- Standardized Recipes – food component contribution, ingredients, serving size, yield
- Crediting Information
  - Nutrition Labels
  - Child Nutrition (CN) Labels
  - Manufacturer's Specification

Review before submitting –

can you determine how everything credits?

Child Nutrition
Maine Department of Education

Offer vs. Serve

- Menu must be posted with instructions on how to select a reimbursable meal – include requirement to select ½ cup f/v
- Staff must be able to recognize a meal
- Two full components and ½ cup fruit/vegetable for all age/grade groups

Child Nutrition
Maine Department of Education

Meal Components & Quantities

<u>Common Findings</u>

- ✓ Insufficient quantities of a component offered
- ✓ Calculation errors when determining meal component contributions
- ✓ OvS not implemented correctly
- ✓ Missing meal components
- ✓ Incomplete production records
- ✓ Field Trips

$ $ $ $ $ $ $ $ $ $ $ $ $

Child Nutrition
Maine Department of Education

Activity

Child Nutrition
Maine Department of Education

Menu Errors

Missing meal components should not happen

- ✓ Double check menu as planned against the requirements
  - ✓ Daily/weekly minimums
- ✓ Know how to credit components
- ✓ Staff must accurately identify a reimbursable meal at the POS
- ✓ Plan a 2/2 every day!

Child Nutrition
Maine Department of Education

Resource Management

Maintenance of the non-profit school food service account

Paid Lunch Equity

Revenue from non-program foods

Indirect Costs

Claim Form

Child Nutrition
Maine Department of Education

Common Findings

- A la carte should make a profit
- Not reporting costs accurately
- Not Following charging policy
- Cashbook balance does not match the accounting software in the district

Child Nutrition
Maine Department of Education

Adult Pricing

- Must be greater than per meal cost

- Only program adults may receive free meals – not the principal, not the security guard, not the lunch monitor…

Child Nutrition
Maine Department of Education

General Program Compliance

1. Civil Rights
2. Food Safety
3. Local Wellness Policy
4. Competitive Foods
5. Water
6. SFA On-site monitoring
7. Reporting and Recordkeeping
8. SBP/SFSP Outreach

Child Nutrition
Maine Department of Education

Civil Rights

First item we look for and so should you…

- Posted where your customers can see it
- Translations available on FNS website

Child Nutrition
Maine Department of Education

Civil Rights

- "And Justice for All" poster
- Non-discrimination statement
- Procedures for receiving and processing civil rights complaints within FNS programs
- Documentation for annual civil rights training for staff
- Accommodating students with special dietary needs

Child Nutrition
Maine Department of Education

General Program Compliance

Food Safety

Child Nutrition
Maine Department of Education

On-Site Documentation

- Food Safety Plan
  - Should be customized for each site
  - Customizable sample from ICN (NFSMI)
- Recordkeeping: Temperature logs, calibration logs
- Certified Food Protection Manager (ServSafe)
- Ghost trays - are required by DOE
- Hair/beard restraints - WEAR THEM

Child Nutrition
Maine Department of Education

On-Site Documentation

- Health Inspections
  - Must post recent health inspection in visible location
  - Keep on file old health inspections

Child Nutrition
Maine Department of Education

On-Site Observations

Kitchen & Storage areas

- Proper personal hygiene
- Cross contamination prevention
- Temperature monitoring
- Cleaning/sanitizing procedures
- Food stored 6 inches off the floor
- Proper chemical storage

Child Nutrition
Maine Department of Education

Local Wellness Policy

- Copy of LWP for review
- Has it been updated?
- Does it contain all of the required components?

Child Nutrition
Maine Department of Education

Competitive Foods/Smart Snacks

- All foods & beverages sold to students during the school day
- Calories posted at point of decision
- Documentation that products are compliant
- Cafeteria/Vending Machines/School Stores

Child Nutrition
Maine Department of Education

Water

- Free, potable water must be available to students
  - Breakfast
  - Lunch

Child Nutrition
Maine Department of Education

SFA On-Site Monitoring

- For districts with 2 or more schools
- Lunch counting and claiming system must be monitored at <u>each</u> site prior to Feb 1st
- Implement any needed corrective action
- Sample form available on our website

Child Nutrition
Maine Department of Education

Reporting and Record Keeping

Records must be kept for 7 years!

(financial records, claims, production records…)

Child Nutrition
Maine Department of Education

Other Program Reviews

- School Breakfast Program
- Fresh Fruit & Vegetable Program
- Afterschool Snack Program
- Special Milk Program
- Seamless Summer

Child Nutrition
Maine Department of Education

School Breakfast Program

- At the beginning of each school year, notification to households that this program are available.
- Review of offsite paperwork
- Onsite observation

Child Nutrition
Maine Department of Education

Fresh Fruit and Vegetable Program

- Document - keep invoices
- Review the guidelines
  - FRESH not dried, not frozen, not popcorn…
  - Served during the school day, outside of meal times
  - Not provided to adults except for classroom teachers modeling behaviors
- Training
- Advertise/publicize
- Budgeting/claiming errors—video and tool available to help
- Food safety & sanitation in the classroom

Child Nutrition
Maine Department of Education

After School Snack Program

- Eligibility
- Accountability/Meal Counting and Claiming
- Menu & Meal Pattern Documentation
  - 2 components = 1 snack
  - Fruit/Veg is ¾ cup serving
- Training Documentation for staff administering/counting and claiming
- Self-Review twice a year
  - First 4 weeks
  - Prior to end of school year
  - Document

Child Nutrition
Maine Department of Education

Salad Bar After POS

- Requires a waiver from DOE if you are using these items to meet the meal pattern
- A new waiver is required EVERY year
- Student must have a reimbursable meal BEFORE POS
- Request must be detailed!

Child Nutrition
Maine Department of Education

Post Review Activities

- Exit Conference with Superintendent
  - Scope of Review
  - Corrective Action Plan
  - Potential Fiscal Action

- Administrative Review Report within 30 days

- Assess potential fiscal action (if needed)

- Corrective Action
  - To be submitted by deadline
  - Signed by Superintendent
  - Attach documentation if applicable

Child Nutrition
Maine Department of Education

Resources

Checklist

Upcoming Review Training:

September 16, 2015

DOE Staff

Child Nutrition
Maine Department of Education

Questions?

Child Nutrition
Maine Department of Education