PREPARING FOR AN ADMINISTRATIVE REVIEW

ADMINISTRATOR’S TRAINING

SY 2015 - 2016

Region 4 Child Nutrition Program Specialists
Welcome

- Housekeeping
- Ground Norms
- Materials
- Agenda

- What is said here, stays here; what is learned here, leaves here!
Acknowledgment 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.
Objectives

- Explore the Administrative Review process
- Discuss areas of review
- Discuss what to expect when completing Off-site Assessments
- Identify documentation required for an Administrative Review
- Review what to expect during On-site Review
Key Terminology

AR – Administrative Review
CAD – Corrective Action Document
CE – Contracting Entity
DOR – Day of Review
MOR – Month of Review
TA – Technical Assistance
TDA – Texas Department of Agriculture
WOR – Week of Review
USDA Laws and Regulations

State of Texas and TDA Policies and Guidelines

Local District Procedures
How often do CEs have an Administrative Review?

CEs are reviewed once during each 3-year cycle.
How many schools are reviewed?

<table>
<thead>
<tr>
<th># Schools in District</th>
<th># Schools Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-5</td>
<td>1</td>
</tr>
<tr>
<td>6-10</td>
<td>2</td>
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<tr>
<td>11-20</td>
<td>3</td>
</tr>
<tr>
<td>21-40</td>
<td>4</td>
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<tr>
<td>41-60</td>
<td>6</td>
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<tr>
<td>61-80</td>
<td>8</td>
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<tr>
<td>81-100</td>
<td>10</td>
</tr>
<tr>
<td>101 or more</td>
<td>12*</td>
</tr>
</tbody>
</table>

*Plus 5% of the schools over 100.
Elementary schools (PK, K-8) with a free average daily participation (ADP) of 100 or more and percent free participation of 97% or more.
USDA Selection Criteria

- Secondary schools (grades 9-12) with a free average daily participation of 100 or more and a percent free participation of 77% or more.
USDA Selection Criteria

- Combination* schools with a free average daily participation of 100 or more and percent free participation of 87% or more.

*K-12, 7-9, 7-12, etc.
Site Selection

- Satellite sites, alternative schools
- High participation sites
- Low participation sites
- New or unusual accountability system
- New school
- School never reviewed by state
The New Administrative Review

- What is the intent?
- What does it monitor?
- How did it change?
What is the Intent?

1. Determine if the CE meets program requirements
2. Provide technical assistance
3. Secure any needed corrective action
4. Assess fiscal action, if fiscal action applies
What does it Monitor?

**Critical Areas of Performance**

- Meal Access and Reimbursement (Performance Standard 1)
- Nutrition Quality and Meal Pattern (Performance Standard 2)

**General Areas of Review**

- Resource Management
- General Program Compliance
- Other Federal Program Reviews
How did it change?

**Off-site Review**
- Assessment tools used to gather CE information
- Documents submitted to TDA

**On-site Review**
- Validate information collected in the off-site assessment tools
- Observe operation in selected schools
Critical Review Areas

Meal Access and Reimbursement

Certification and Benefit Issuance
Critical Review Areas

Meal Access and Reimbursement
- Certification and Benefit Issuance
- Meal Counting and Claiming

Nutrition Quality and Meal Pattern
- Meal Components and Quantities
- Offer versus Serve (OVS)
- Dietary Specifications and Nutrient Analysis
Documentation Reviewed

- Policy statement
- Media release
- Prototype letters
- Applications/Verification
- Application/Benefit Issuance Process
Documentation Reviewed

- Direct Certification
- Head Start/Early Head Start
- Even Start
- Homeless/Runaway/Migrant
- Foster
Verification Process

- Completed by November 15
- Correct method of sampling
- Correct sample size based on October 1st count of applications
- Proper documentation maintained
  - Signed summary report
  - Letter sent to each household verified
  - Verification Record for each household verified
  - Copy of verified application
Verification Process (cont’d.)

- Confirmation Review conducted or Confirmation Review Waiver on file
- Follow up conducted and documented on application and Verification Record
Critical Review Areas

Meal Access and Reimbursement

Meal Counting and Claiming

Series 300
Attachment B: Meal Count & Collection Procedures

Identifies the procedures the CE will use to implement the following program requirements:

- Determination of a child’s eligibility date to receive free or reduced-price meals in a uniform manner
- Medium of exchange method or payment method for free, reduced-price, or paid meals
- Method for maintaining an accurate master or roster list of eligible children and documenting changes to the list
- Strategy used at the point-of-service to code a reimbursable meal and prevent overt identification
- Method of counting and claiming reimbursable meals
Attachment B: Meal Count & Collection Procedures

- Updated in TX-UNPS as procedures or legislation changed
- Each site must be listed and procedures identified
- Identify all meal count/collection procedures including BIC, ASCP, field trips, and any alternative meal service

HB 3562
School district must allow students to receive a meal with a negative account balance.
Critical Review Areas

- Nutrition Quality and Meal Pattern
- Meal Components and Quantities
Documentation Reviewed

- Food Production Records
- CN labels, Product Analysis, Manufacturer’s Statement
- Standardized Recipes
Critical Review Areas

Nutrition Quality and Meal Pattern

Offer versus Serve (OVS)
Critical Review Areas

Nutrition

Quality and Meal Pattern

Dietary Specifications and Nutrient Analysis
General Review Areas

Resource Management

- Maintenance of the Nonprofit School Food Service Account
- Paid Lunch Equity
- Revenue from Nonprogram Foods
- Indirect Costs
- USDA Foods
General Review Areas

- Civil Rights
- School Food Authority On-site Monitoring
- Local School Wellness Policy
- Verification
- Reporting and Recordkeeping
- Food Safety
- Water
- Competitive Foods
- School Breakfast and Summer Food Service Program Outreach

Series 800, 900, 1000, 1600
General Review Areas

Other Federal Program Reviews

- Afterschool Care Program (ASCP)
- CACFP At-Risk Snack / Supper Program
- Seamless Summer Option (SSO)
- Fresh Fruit and Vegetable Program (FFVP)

Series 1700, 1800, 1900
Additional Review Areas

Special Provisions Options

- Community Eligibility Provision (CEP)
Administrative Review Timeline

Off-site review begins 8-12 weeks prior to the on-site review.

Off-site review ends 2-4 weeks prior to the on-site review.

TDA conducts the on-site review.

TDA sends the CE a CAD.*

CE sends TDA a completed CAD.*

TDA closes the review.

TDA conducts a follow-up review.*

* If applicable.
Administrative Review Process

Step 1: TDA sends the CE an announcement letter.

Step 2: TDA selects sites to review.

Step 3: The CE completes the off-site assessment.

Step 4: TDA conducts the entrance conference.

Step 5: TDA conducts the on-site review.

Step 6: TDA conducts the exit conference.

Step 7: TDA completes the CAD and sends it to the CE.

Step 8: TDA approves the CE’s complete and corrected CAD.

Step 9: TDA closes the review.
How will it change for me?

- I will take part in an off-site and on-site review.
- I may interact with more than one TDA monitor.
- I will communicate more with TDA before the day of review.
- I will apply corrective action at all sites.
The Off-site Review

The off-site review requires collaboration between the off-site monitor and the CE staff and will require a lot of communication.

- Answer the Off-site Assessment Tool questions
- Upload documents into TX-UNPS as attachments
- Answer other questions or provide additional information, as requested
What do I need for the Off-site Review?

- Time
- Access to my staff*
- Access to technology
- Organization
- Documentation

* If applicable.
What Documentation is reviewed Off-site?

- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming
- Meal Components and Quantities
- Dietary Specifications and Nutrient Analysis
- SBP and SFSP Outreach
- Afterschool Care Program (ASCP)
Off-site Review Timeline

8-14 weeks prior to the review

- TDA makes off-site review questions available.
- TDA conducts the introductory phone call.

6-8 weeks prior to the review

- TDA conducts a second phone call.

First operating day of the Month of Review (MOR)

- The CE generates and uploads the benefit issuance list and list of verified students.
- TDA selects a sample and requests applications for households from the sample.
Off-site Review Timeline

- The CE provides the requested days of meal counts once days have occurred.
- The CE provides the requested week of FPRs, Menus, and Menu Worksheets once menus have been offered.

Between the first day and last day of the MOR

- The CE provides the completed Daily Record/Accuclaim Form for the MOR 2 weeks prior to the review.

Last day of the MOR

- TDA conducts the final phone call.

2 weeks prior to the review
CEs must

• demonstrate compliance with regulations
• maintain appropriate documentation for child nutrition programs
On-site Administrative Review

The on-site compliance monitor(s) will do the following:

1. Validate any off-site review questions and information collected.
2. Observe meal preparation.
3. Observe posted signs (OVS, Food Safety, Civil Rights, etc.).
4. Survey meal service areas.
5. Review any remaining documentation for the review areas.
### What Areas are reviewed On-site?

<table>
<thead>
<tr>
<th>Counting and Claiming</th>
<th>Food Safety</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meal Components and Quantities</td>
<td>Local Wellness Policy</td>
</tr>
<tr>
<td>Dietary Specifications</td>
<td>Water</td>
</tr>
<tr>
<td>Offer versus Serve</td>
<td>Reporting and Recordkeeping</td>
</tr>
<tr>
<td>Competitive Foods</td>
<td>Seamless Summer Option (SSO)</td>
</tr>
<tr>
<td>Comprehensive Resource Management Review</td>
<td>Fresh Fruit and Vegetable Program (FFVP)</td>
</tr>
<tr>
<td>Civil Rights</td>
<td>SFA On-site Monitoring</td>
</tr>
</tbody>
</table>
Counting and Claiming

- Observe meal service at the Point of Service
- One meal per eligible student per meal period (breakfast, lunch, snack) per day
- Counts correctly combined and recorded
- No overt identification
- Compare to Policy Statement (Attachment B)
Point-of-Service (POS)

- Staff at the POS is responsible for:
  - ensuring a reimbursable meal is selected.
  - accurately recording meals served using a designated coding and counting procedure.
  - verify only one reimbursable meal per student, per meal period is served.
Daily Record/Accuclaim Form

- Ensures CE has an accurate counting & claiming system in place
- Identifies potential claiming inaccuracies
Daily Record/Accuclaim Form

- Students Served
- Adults Served
- ADP
- Attendance Factor
Meal Components and Quantities

- All required components are available in correct portion sizes on every serving line
- All items are offered before the POS
- Food Production Records (FPRs) are complete and accurate
- DOR and WOR requirements
Functions of a FPR: Compliance Tool

- To support meal claims submitted for reimbursement
- To prove that new nutrition standards were met
Food Production Record
Defined

- **What** – A required daily document that records all reimbursable meals served
- **Who** – Any school that participates in the School Nutrition Program
- **Why**
  - Support meals claimed for reimbursement
  - Help manage the food service operation
  - Demonstrate compliance with the new nutrition standards
- **When** – Pre-production and during meal service
The Three TDA Prototypes

- On-Site Production Kitchen
- Central Kitchen
- Receiving Kitchen
# Daily Food Production Record - On-Site Production

## 1. CE: ________________________

## 2. SCHOOL: ____________________

## 3. MEAL PREPARATION SITE: _______________________

## 4. MEAL SERVICE:  
- [ ] BREAKFAST  
- [ ] LUNCH  
- [ ] SNACK

## 5. Food-based

## 6. STUDENTS SERVED: ____________

## 7. DATE: _______________________

## 8. OFFER VS. SERVE:  
- [ ] YES  
- [ ] NO

## 9. Meat/Meat Alternate

## 10. Vegetable

## 11. Fruit

## 12. Grain/Breads

## 13. Milk

## 14. Other(s)/Condiments

## 15. Meal Contribution

## 16. Recipe #

## Planned Portions & Serving Sizes

<table>
<thead>
<tr>
<th>Food Item</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Adults</th>
<th>A la Carte</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>K-5</td>
<td>6-8</td>
<td>9-12</td>
<td>K-12</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>18. # Portion Size</td>
<td>19. # Portion Size</td>
<td>18. # Portion Size</td>
<td>19. # Portion Size</td>
<td>18. # Portion Size</td>
<td>19. # Portion Size</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## 20. Total Amount Prepared - lbs., #10 cans, ea., cases, quarts, gallons, pans

## 21. Leftovers

## 22. COMMENTS

---

**Note:** This form is used to record daily food production details for on-site production. It includes sections for meal service, planned portions, serving sizes, and various food categories. The form also includes areas for meal contribution, recipe numbers, and meal preparation site details.
### Daily Food Production Record - On-Site Production

1. CE: ________________________
2. SCHOOL: ____________________
3. MEAL PREPARATION SITE: ____________________
4. MEAL SERVICE: □ BREAKFAST  □ LUNCH  □ SNACK
5. Food-based
6. STUDENTS SERVED: ____________
7. DATE: _______________________
8. OFFER VS. SERVE: □ YES □ NO
9. Meat/Meat Alternate
10. Vegetable
11. Fruit
12. Grain/Breads
13. Milk
14. Other(s)/Condiments

#### Planned Portions & Serving Sizes

<table>
<thead>
<tr>
<th>Food Item</th>
<th>Meal Contribution</th>
<th>Recipe #</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Age/Group</th>
<th>Adults</th>
<th>A la Carte</th>
<th>Total Amount Prepared - lbs., #10 cans, ea., cases, quarts, gallons, pans</th>
<th>Leftovers</th>
<th>Comments</th>
</tr>
</thead>
</table>

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**Child Nutrition Services**
## When to Complete a FPR

### Suggestions about when to

<table>
<thead>
<tr>
<th>Pre-production</th>
<th>At time of meal service</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pre-fill</strong></td>
<td><strong>When planning the menu</strong></td>
</tr>
<tr>
<td>CE</td>
<td>Meal service</td>
</tr>
<tr>
<td>School</td>
<td>Date</td>
</tr>
<tr>
<td>Meal preparation site</td>
<td>Food item</td>
</tr>
<tr>
<td>Offer versus serve</td>
<td>Meal contribution</td>
</tr>
<tr>
<td>Recipe #</td>
<td></td>
</tr>
<tr>
<td>Number of planned portions</td>
<td>Students served; adults served; total served</td>
</tr>
<tr>
<td>Planned portion size</td>
<td></td>
</tr>
</tbody>
</table>

*CE: Children’s Environment, Meal service, Total amount prepared, Leftovers, Comments, Students served, adults served, total served.*
Offer versus Serve

- Prior to Meal Service
  - Interview staff to ensure understanding of what constitutes a reimbursable meal
  - Signage is posted

- During the Meal Service
  - Determine whether meals selected by students contain minimum components (NSLP) or food items (SBP)
  - Determine whether each reimbursable meal contains at least ½ cup of fruits or vegetables

* USDA OVS Manual School Year 2015-2016
Identification of a Reimbursable Meal

My Choices My Meal

Must choose at least one 1/2 cup serving of a fruit or veggie.

Make Your Choice

Take at least 3 of the five food Components

One of your choices must be 1/2 cup Fruit or 1/2 cup Vegetable for the meal to be reimbursable.

1. Fruits
Choose fresh, frozen, canned, or dried.

2. Veggies
Varieties include dark green, red/orange, dried beans and legumes and starchy

3. Grains
Choose whole-grain foods when possible.

4. Meats
Meat Alternates
Beef, chicken, turkey, fish, yogurt or cheese.

5. Milk
Fat-free or low-fat (1%) milk, Same amount of calcium and other essential nutrients as whole milk, but fewer calories and less saturated fat.
Smart Snacks in Schools
Effective July 1, 2014

- Foods
- Beverages
- Fundraisers
What are competitive foods?

**Competitive food:** all food and beverages sold to students on the School campus during the School day, other than those meals reimbursable under programs authorized by the NSLA and the CNA.

* Limited to Day of Review (DOR) observation on-site during lunch and breakfast
Where do the standards apply?

**School campus**: all areas of the property under the jurisdiction of the school that are accessible to students during the school day.
School day is the period from the midnight before, to 30 minutes after the end of the official school day.
Texas School Nutrition Policy - Repeal

Repeal effective July 1, 2015 for:

- Deep fat fryer prohibition
- Soft drink prohibition
- Time and Place restrictions
What does this mean?

- Effective July 1, 2015
  - Required to follow federal regulation (Smart Snacks)
  - Exempted fundraisers are allowed.
    - May sell any foods and beverages during the school day as part of a fundraiser for up to 6 days per school year on each school campus.
    - No specially exempted fundraiser foods or beverages are sold in competition with school meals in the food service area during the meal service.
Smart Snacks in Schools

- Check menus and ala carte
- Review all lines for compliance with policy
- Check vending machine products
- Check portion sizes (beverages)
Comprehensive Resource Management

- Maintenance of the Nonprofit School Food Service Account
- Paid Lunch Equity
- Revenue from Nonprogram Foods
- Indirect Costs
- USDA Foods
Civil Rights

- No separation by race, color, national origin, sex, age, or disability in the eating periods, seating arrangements, serving lines or eating areas
Civil Rights

- Download from www.squaremeals.org / NSLP Administration and Forms
- Must be printed 11” x 17” (color)
- Posted in each serving site
Civil Rights

- Staff Training
- Discrimination Complaints
- Nondiscrimination Statement
Students with Disabilities

Definition

A “person with a disability” is any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.
CN Responsibilities

- Schools MUST make substitutions in reimbursable meals for students who are disabled and whose disability restricts their diet.

- Schools must maintain appropriate documentation on file.
CN Responsibilities

- CN is required to offer special meals, at no additional cost, to children whose disability restricts their diet. CN must pay the costs for these substitutions (during meal times).

- CN is **not** required to provide meal services to students with disabilities when the meal service is not normally available to the general student body, unless a meal service is required under the child’s IEP.
CN Responsibilities

- Food allergy intolerances or religious preferences are NOT generally disabilities UNLESS life threatening (anaphylactic reactions)
- Accommodation MAY be made BUT IS NOT required
- In many cases, allergies can be dealt with through “Offer versus Serve” or by providing additional selections
Onsite Reviews

- Each CE with **more than one** feeding site must perform an onsite review of the meal counting and recording procedures in each site serving LUNCH prior to February 1 of each school year.
Food Safety: HACCP Documentation

- FND104
- Implementation of HACCP Plan
- Monitoring logs
- Weekly checklists
- SOPs and flow charts available at each site
- Training Documentation
  - Ongoing
  - Maintain Weekly Checklist
Food Safety: Health Inspections

- Health Inspection Report posted in public view
- Two health inspections are required per year per serving site
- Health inspections are entered into TX-UNPS as part of the application/agreement renewal
Local Wellness Policy

Every local education agency (LEA) participating in the National School Lunch Program is required to develop a local wellness policy for all schools under its jurisdiction.
Local Wellness Policy: Documentation

- Each CE must have a board-approved Wellness Policy
- Each CE must have an implementation plan
- The CE should be actively working towards completing the plan/policy and documenting activities
- Annual evaluation/monitoring
- Notice to the public/reporting
Potable Water

- Must be made available free of charge
  - Lunch service
  - Breakfast service (in the cafeteria)

- Encouraged for
  - Alternative breakfast service (BIC)
  - Afterschool Care Program (ASCP)
Afterschool Care Program (ASCP)

- MAY be observed during the first review. Records will be reviewed.
- WILL be observed on a follow-up review.

Documentation Reviewed:
- Food Production Records
- Count Sheets/Rosters
- Enrichment Activity
- On-site Monitoring Checklist
CACFP At-Risk Program

- WILL be observed during the first review. Records will be reviewed.
- Documentation Reviewed:
  - Food Production Records
  - Count Sheets/Rosters
  - Enrichment Activity
  - On-site Monitoring Checklist
Seamless Summer Option (SSO)

- Compliance assessed same as NSLP and SBP
  - Performance Standard 1, Performance Standard 2, General Areas
- TDA will review at least 1 site as part of the Administrative Review
  - Site selected may be any SSO site, not necessarily a site selected for the regular Administrative Review
Fresh Fruit and Vegetable Program (FFVP)

- Observe at least 1 location
- Ensure
  - Availability to all enrolled children
  - Free of charge
  - Offered within the school day, but outside meal service times
  - Include nutrition education in daily curriculum
  - Uses only allowable items
  - Follow HACCP principles
Exit Conference

- Meet with Superintendent or other School Official and Child Nutrition Personnel
- Discuss the Contracting Entity’s (CE) findings
- Timeframe for the completion of corrective action and any documentation the CE may be expected to provide
- Technical assistance for deficiencies cited
Corrective Action

- TDA enters the CAD in TX-UNPS
- Response from the Contracting Entity (CE) due within established time frame
  - May require technical assistance from ESC Child Nutrition Program Specialist
On-Site Observation
What to Expect

Monitor will …

- check to make sure all menu items are offered to all students
- check to see that portion sizes served match the FPR
- observe that all meals claimed are reimbursable
What to Expect

Monitor will …

- determine that offer versus serve is being followed correctly
- follow any meals that leave the cafeteria (alternative meal service)
- review all HACCP documentation
What to Expect

Monitor will …

- observe food preparation prior to meal service
- observe whether standardized recipes are utilized during meal preparation
- observe all reimbursable lines during all serving periods
What to Expect

Monitor will …

- observe that a variety of milk is offered from unflavored 1% and no-fat flavored/unflavored milk

- observe that potable water is available free to all students, during breakfast (in the cafeteria) and lunch meal service
Monitor will ... 

- review production records for the week from the DOR to determine that enough food was prepared in the appropriate quantities for meals served and claimed for reimbursement
What to Expect

Monitor will …

- request the daily lunch count by category (free, reduced, paid) at the end of the lunch period
- observe that Health Inspection is posted in public view
Monitor will …

- observe that the “And Justice for All” poster is in public view
- observe foods and beverages sold meet Smart Snacks requirements
Resources

- Institute of Child Nutrition (formerly NFSMI)
  - [www.theicn.org](http://www.theicn.org)
- Region 4 Child Nutrition Services
  - [www.esc4.net/nutrition](http://www.esc4.net/nutrition)
- Team Nutrition
- Texas Department of Agriculture (TDA)
  - [www.squaremeals.org](http://www.squaremeals.org)
- USDA Food and Nutrition
Questions
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Our services are provided through the Texas Department of Agriculture’s Food and Nutrition Division funded by the U.S. Department of Agriculture, Food & Nutrition Service.