

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

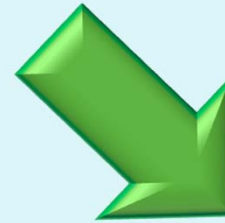
WOR – Week of Review



USDA Laws and
Regulations

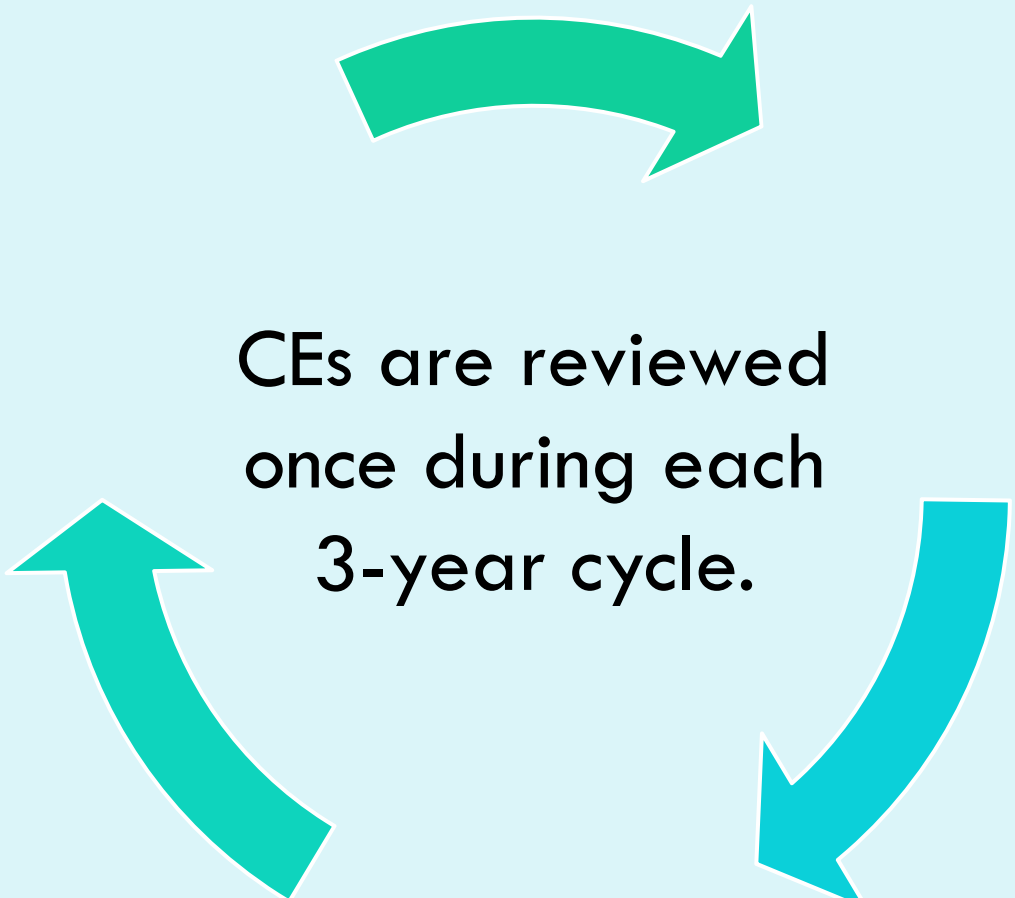


State of Texas
and TDA Policies
and Guidelines



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?

# Schools in District	# Schools Reviewed
1-5	1
6-10	2
11-20	3
21-40	4
41-60	6
61-80	8
81-100	10
101 or more	12*

USDA Selection Criteria

- 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.**



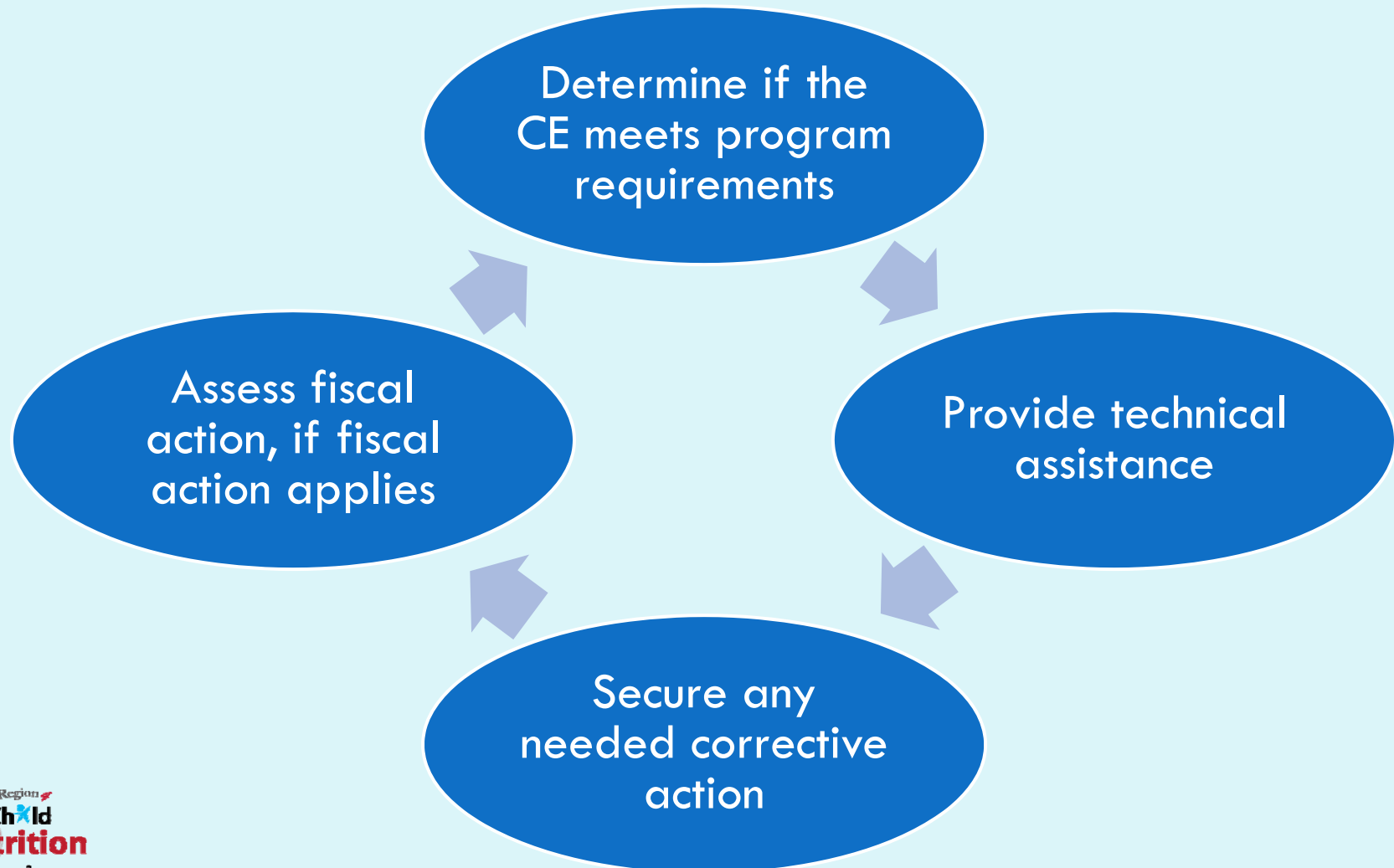
Site Selection

- ❑ 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?



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

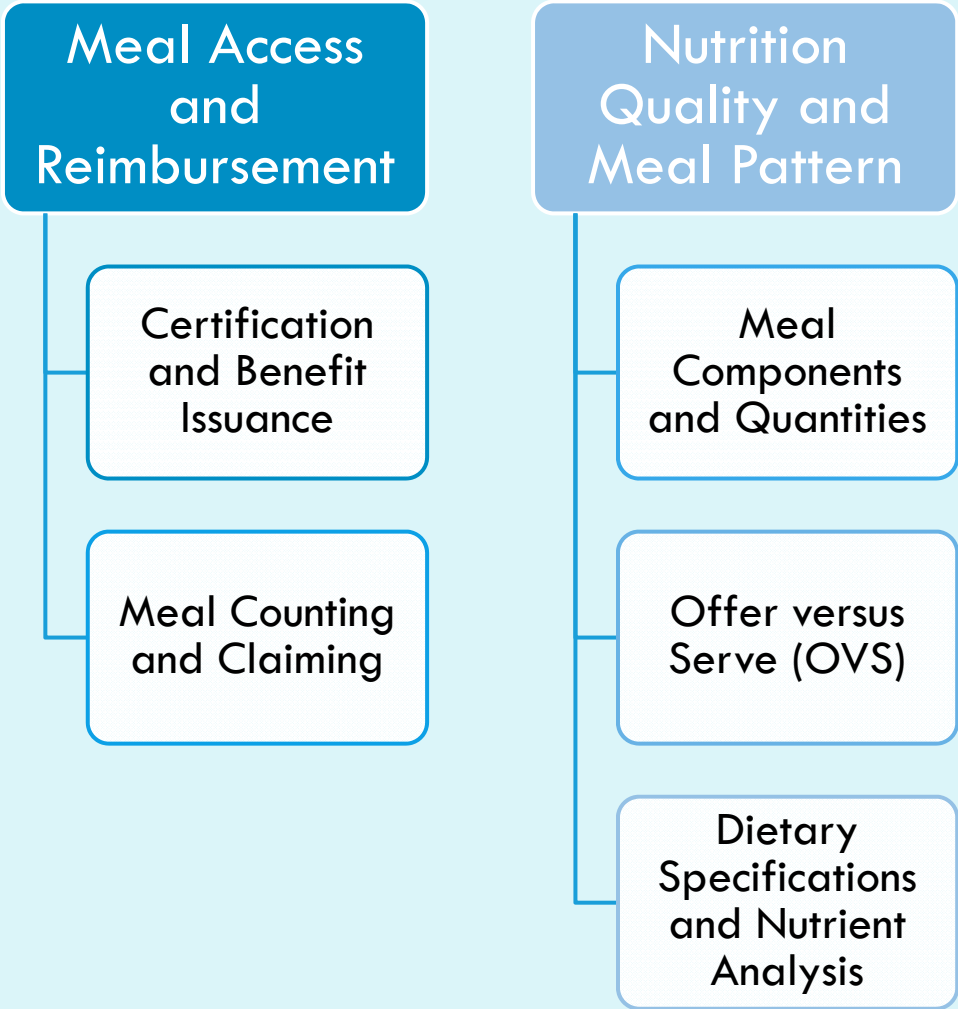
- Validate information collected in the off-site assessment tools
- Observe operation in selected schools

Critical Review Areas

**Meal Access
and
Reimbursement**

**Certification
and Benefit
Issuance**

Critical Review Areas



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**

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

General Program Compliance

- 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

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)

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.*

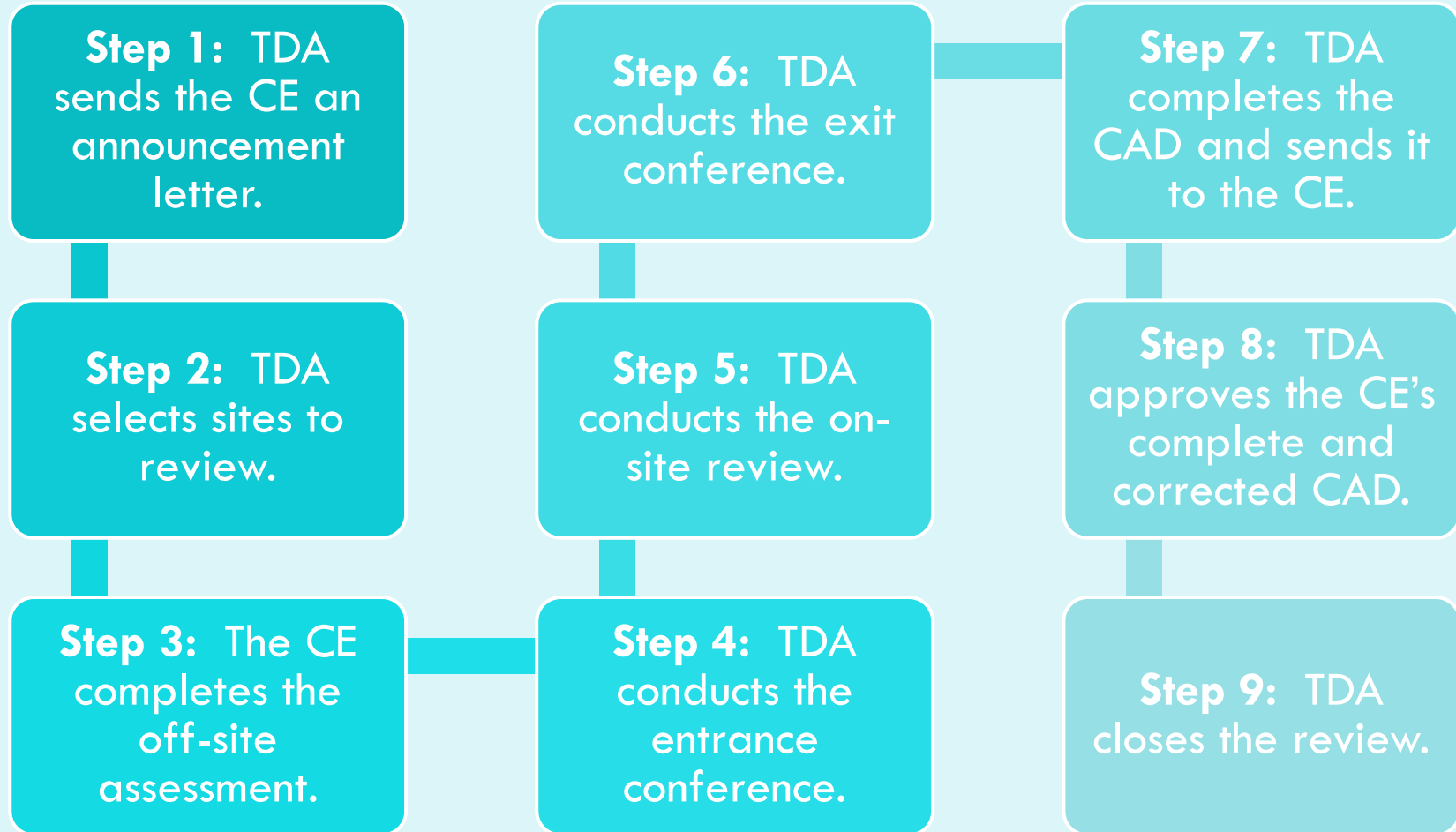
CE sends TDA a completed CAD.*

TDA closes the review.

TDA conducts a follow-up review.*

* If applicable.

Administrative Review Process



How will it change for me?

I will take part in an off-site and on-site review.

I will communicate more with TDA before the day of review.

I may interact with more than one TDA monitor.

I will apply corrective action at all sites.

The Off-site Review

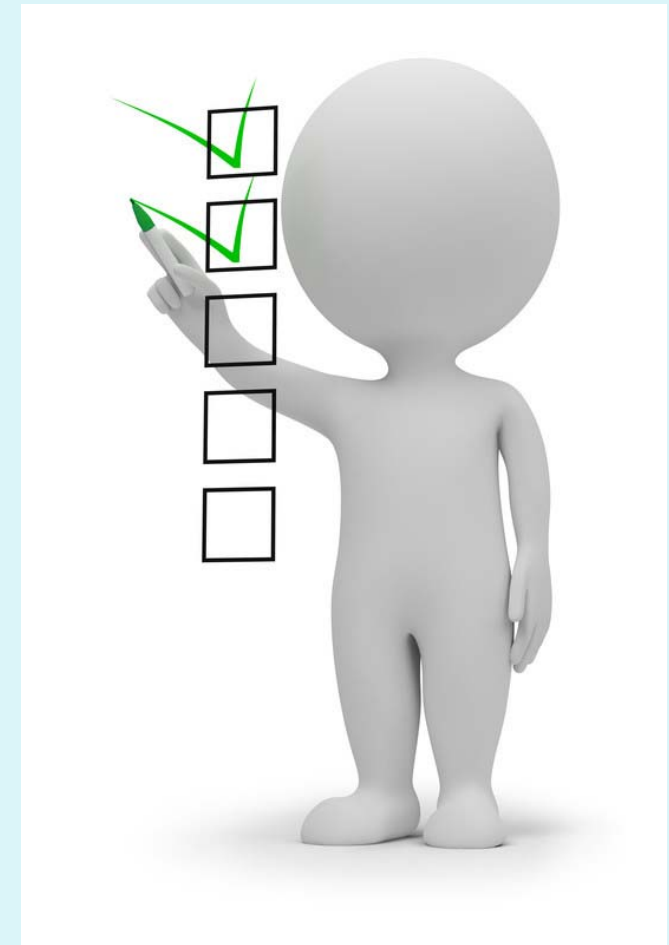
The off-site review requires collaboration between the off-site monitor and the CE staff and will require a lot of communication.

- ❑ 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.

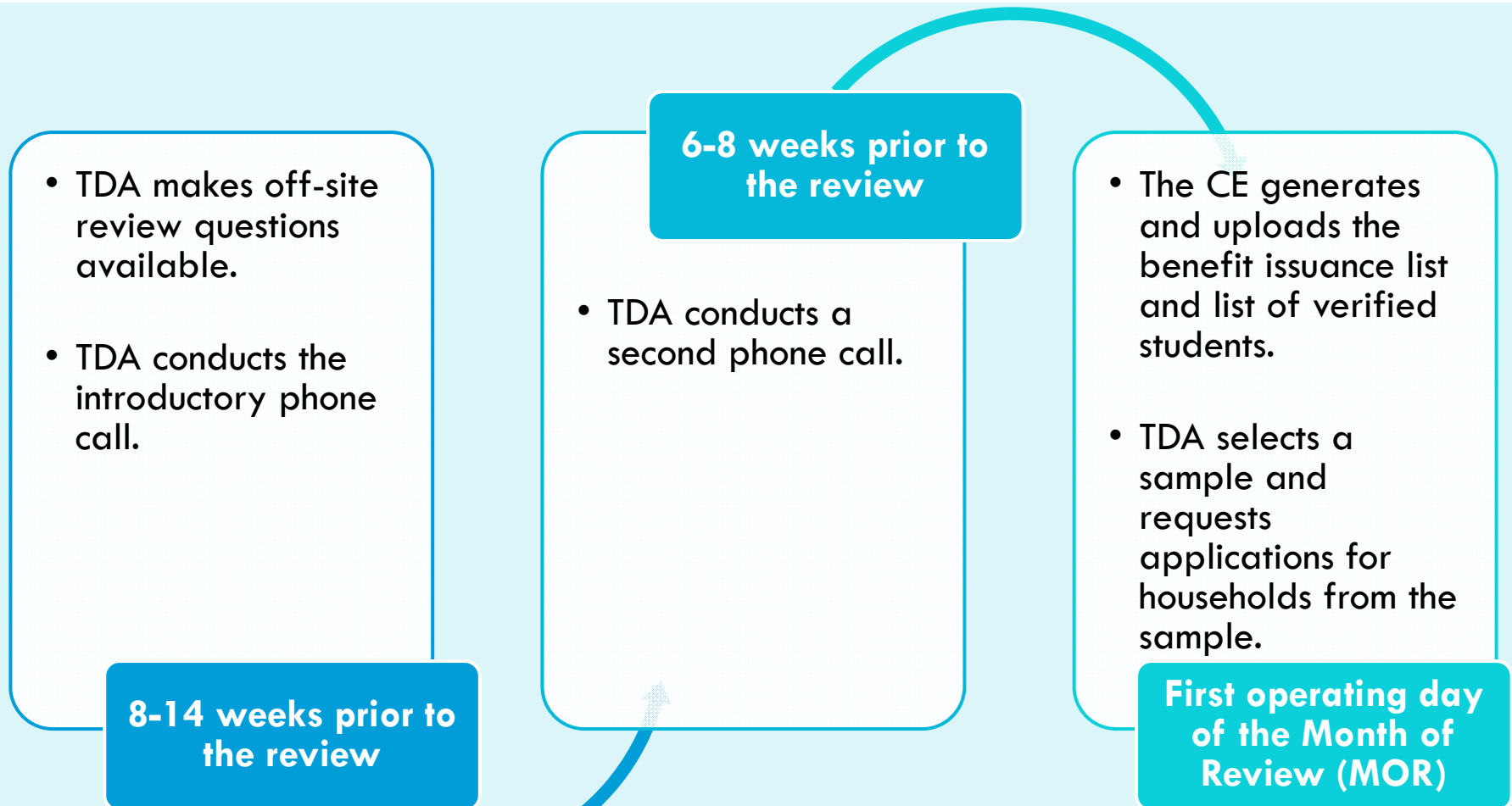


What Documentation is reviewed Off-site?

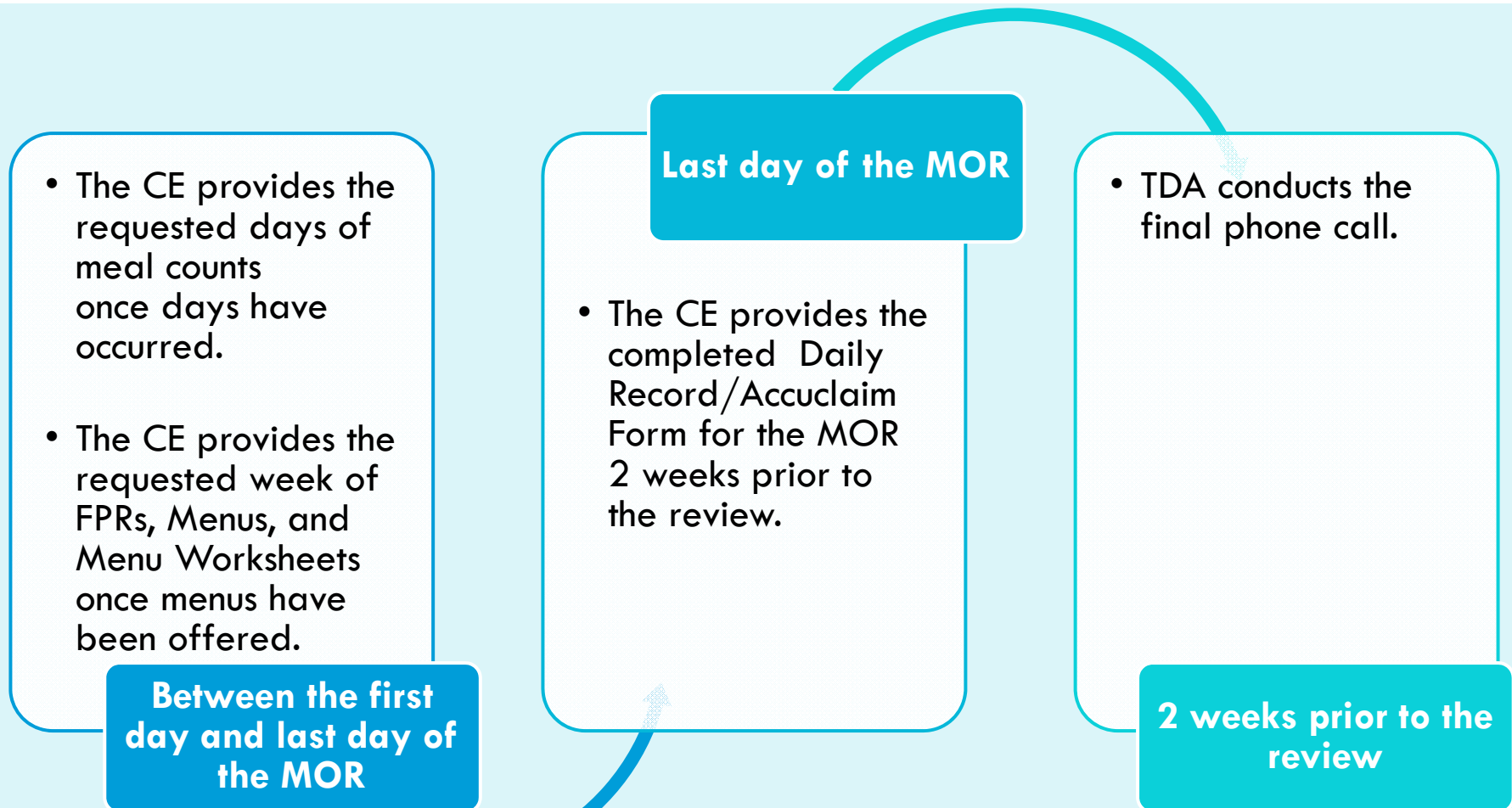
- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming
- Meal Components and Quantities

- Dietary Specifications and Nutrient Analysis
- SBP and SFSP Outreach
- Afterschool Care Program (ASCP)

Off-site Review Timeline



Off-site Review Timeline



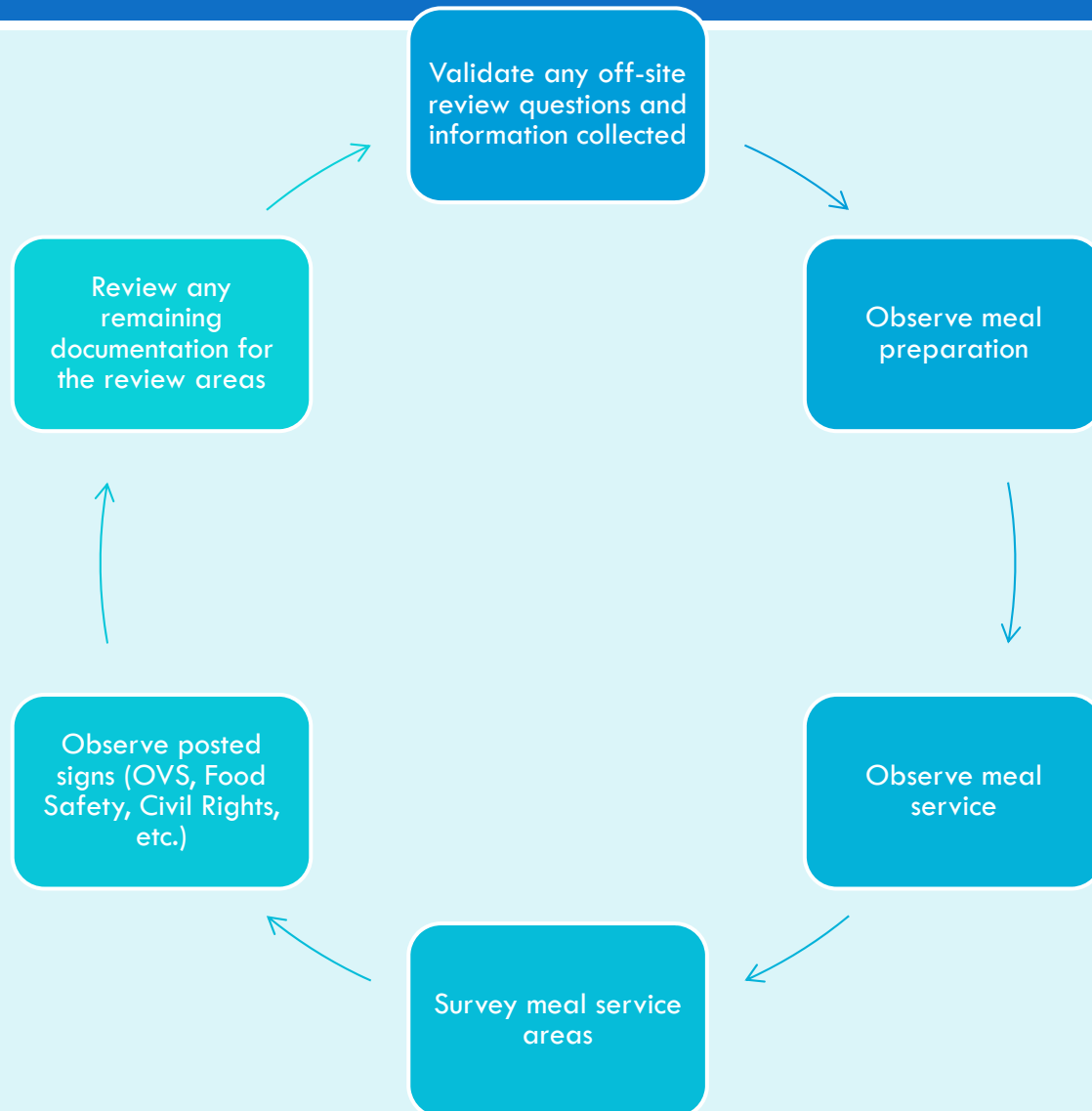
Ensure a Successful Review

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:



What Areas are reviewed On-site?

- Counting and Claiming
- Meal Components and Quantities
- Dietary Specifications
- Offer versus Serve
- Competitive Foods
- Comprehensive Resource Management Review
- Civil Rights
- SFA On-site Monitoring

- Food Safety
- Local Wellness Policy
- Water
- Reporting and Recordkeeping
- Seamless Summer Option (SSO)
- Fresh Fruit and Vegetable Program (FFVP)

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

Texas Department of Agriculture

Form | Daily Record
June 1, 2015

Daily Record/Accuclaim Form

Contracting Entity (CE) _____ Date _____ Lunch # of Serving Days _____ Sum of Daily Enrollment for Month _____ Attendance Factor (Lunch) **#DIV/!**

Site Name _____ Breakfast # of Serving Days _____ Highest Daily Enrollment for Month _____

Site ID	Lunch Meal Counts					Lunch Accuclaim Yields						Enrollment Meal Counts					
	Served Students				5 Other Types	Served Adults		8 # Approved Free	9 Participation % Free	10 Approved Reduced	11 Participation % Reduced	Served Students				Served Adults	
Reimbursable Meals				6 Free		7 Paid	12 Free					13 Reimbursed	14 Paid	15 Total	16 Free	17 Paid	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
Free	Reimbursed	Paid	Total		Free	Paid					Free	Reimbursed	Paid	Total	Free	Paid	
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31				0.00						#DIV/!				0.00			
Highest Daily	0.00	0.00	0.00	0.00				0.00		0.00	Highest Daily	0.00	0.00	0.00			
Total All Days	0.00	0.00	0.00	0.00	0.00	0.00	0.00				Total	0.00	0.00	0.00	0.00	0.00	
ADP	#DIV/!	#DIV/!	#DIV/!	#DIV/!	#DIV/!	#DIV/!	#DIV/!				ADP	#DIV/!	#DIV/!	#DIV/!	#DIV/!	#DIV/!	

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

1. CE: _____ **Daily Food Production Record - On-Site Production** 6. STUDENTS SERVED: _____

2. SCHOOL: _____ 5. Food-based ADULTS SERVED: _____

3. MEAL PREPARATION SITE: _____ TOTAL SERVED: _____

4. MEAL SERVICE: BREAKFAST LUNCH SNACK 8. OFFER VS. SERVE: YES NO 7. DATE: _____

Food Item	15. Meal Contribution	16. Recipe #	Planned Portions & Serving Sizes										20. Total Amount Prepared - lbs., #10 cans, ea., cases, quarts, gallons, pans	21. Leftovers	22. COMMENTS		
			Age/Group		Age/Group		Age/Group		Age/Group		Adults	A la Carte					
			17. #	19. Portion Size	17. #	19. Portion Size	17. #	19. Portion Size	17. #	19. Portion Size	17. #	17. #					
9. Meat/Meat Alternate																	
10. Vegetable																	
11. Fruit																	
12. Grain/Breads																	
13. Milk																	
14. Other(s)/Condiments																	



1. CE: _____ **Daily Food Production Record - On-Site Production** 6. STUDENTS SERVED: _____

2. SCHOOL: _____ 5. Food-based ADULTS SERVED: _____

3. MEAL PREPARATION SITE: _____ TOTAL SERVED: _____

7. DATE: _____

4. MEAL SERVICE: BREAKFAST LUNCH SNACK 8. OFFER VS. SERVE: YES NO

Food Item	15. Meal Contribution	16. Recipe #	Planned Portions & Serving Sizes										20. Total Amount Prepared - lbs., # 10 cans, ea., cases, quarts, gallons, pans	21. Leftovers	22. COMMENTS		
			Age/Group		Age/Group		Age/Group		Age/Group		Adults					A la Carte	
			17. #	19. Portion Size	17. #	19. Portion Size	17. #	19. Portion Size	17. #	19. Portion Size	17. #	19. Portion Size				17. #	19. Portion Size
9. Meat/Meat Alternate																	
10. Vegetable																	
11. Fruit																	
12. Grain/Breads																	
13. Milk																	
14. Other(s)/Condiments																	



When to Complete a FPR

Suggestions about when to

Pre-production		At time of meal service
Pre-fill	When planning the menu	
CE	Meal service	Total amount prepared
School	Date	Leftovers
Meal preparation site	Food item	Comments
Offer versus serve	Meal contribution	Students served; adults served; total served
	Recipe #	
	Number of planned portions	
	Planned portion size	

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

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

C O U N T

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.

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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.



When do the standards apply?

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

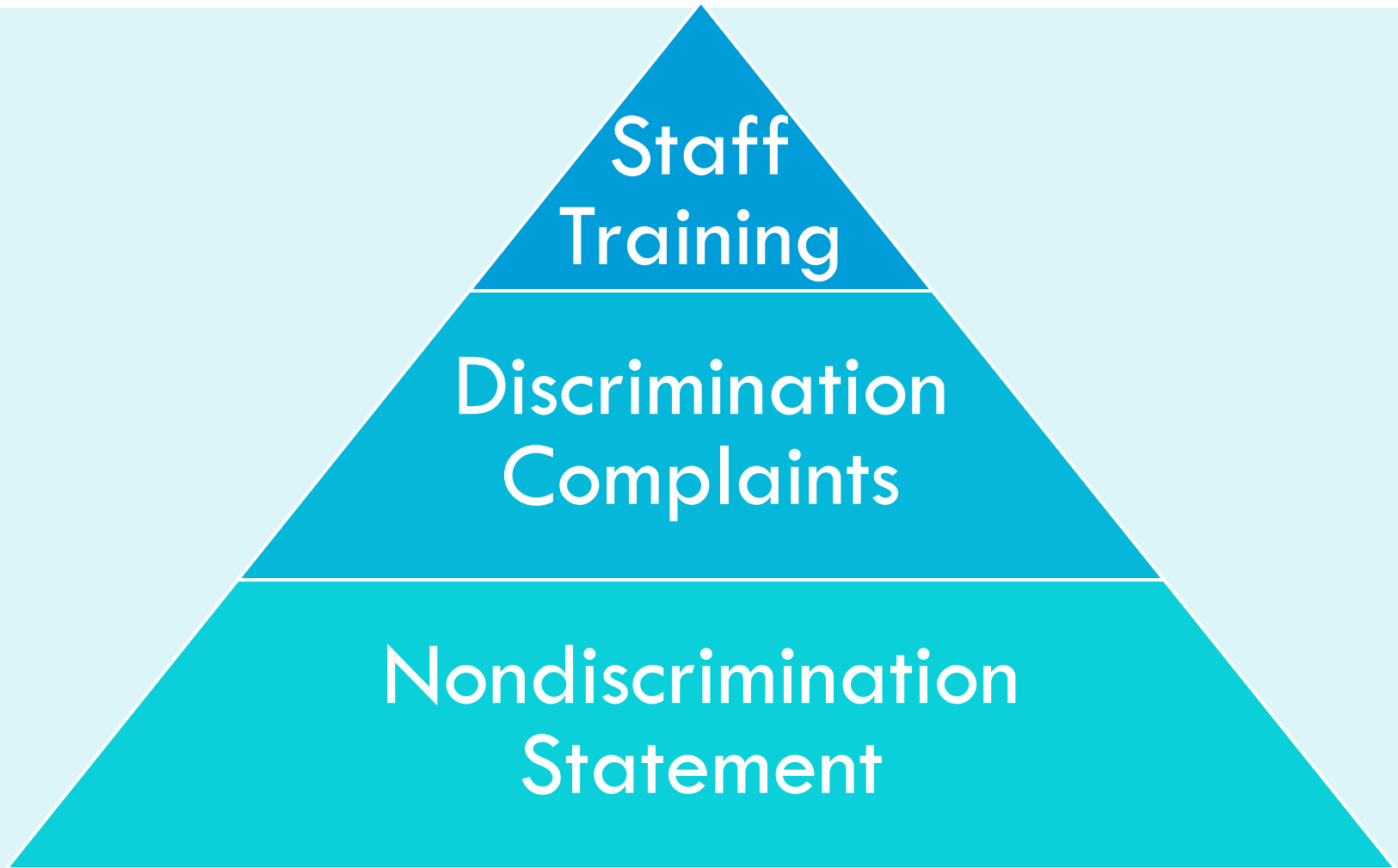


Civil Rights

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



Civil Rights



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

What to Expect



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

What to Expect

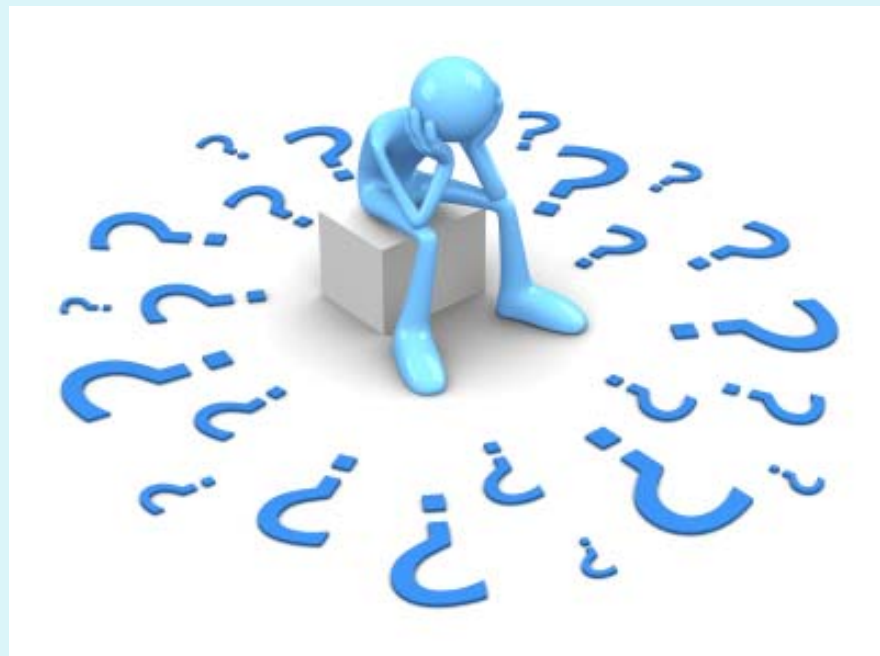
Monitor will ...

- 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
- Region 4 Child Nutrition Services
 - www.esc4.net/nutrition
- Team Nutrition
 - www.fns.usda.gov/tn
- Texas Department of Agriculture (TDA)
 - www.squaremeals.org
- USDA Food and Nutrition
 - www.fns.usda.gov

Questions





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