

Preparing for an Administrative Review

The Bureau of Nutrition and Health Services uses the Administrative Review to measure compliance with National School Lunch (NSLP) and School Breakfast Program (SBP) requirements outlined in the Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger Free Kids Act of 2010 (HHFKA).

Regulations reference two Critical Areas of performance: Performance Standard 1 (PS1) and Performance Standard 2 (PS2), and other General Areas of Review. Corrective action is required if the program does not comply with review standards. Regulations require fiscal action for the Critical Areas.

Use the following checklist to help compile and organize materials needed for the Administrative Review.

- Indicates documentation needed for the review

Critical Area – PS1

Certification and Benefit Issuance:

Are free and reduced-price applications approved and benefits issued correctly?

- Benefit Issuance List (list of students eligible for Free and Reduced Price meals in the format described below**) This will usually be requested prior to the review.
- Direct Certification Lists and documentation of any extended categorical eligibility to household members not on the list
- Categorically Eligible Lists (homeless, migrant, runaway, foster, Head Start/Even Start)
- Income eligibility applications (free, reduced-price, denied, withdrawn, and verified applications)

**Benefit Issuance List must be organized in this way:

- 1) contain the name and benefit status for all free (F) and reduced price (R) students in SFA and total count of F and R eligible students
- 2) generated from the point of service system used
- 3) not have duplicate names on the list
- 4) include the following for each student—school name, method of approval, date of approval
- 5) not grouped by benefit status (so that random selection can include any status/approval method)

Meal Counting and Claiming:

Does the system for counting meals consistently yield correct claims? Does each food service line have an accurate point of service count?

- Meal counts for the day and month of review by eligibility status (Need totals by eligibility category for each day for the month of the review, often most easily obtained from edit check report.)

Critical Area – PS2

Nutritional Quality and Meal Patterns:

Do meals meet daily and weekly requirements for items/components? Do menus meet the meal pattern and nutrient specifications?

- Menus and Meal Production Records
- Other supporting documentation (recipes, CN labels, manufacturer specifications, etc.)

General Areas

Verification:

Has verification been conducted and reported by November 15?

- Verification report
- Letters of notification for selection and results of verification eligibility
- Verification documentation submitted by households

Resource Management:

Have you worked with the Bureau Consultant to complete the Off-Site Resource Management Questionnaire?

- Financial Audit
- USDA Paid Lunch Equity Tool
- USDA Non-program Revenue Tool

Civil Rights:

Does the SFA comply with Civil Rights provisions? Are all meals available to students without discrimination?

- Public Release
- Nondiscrimination statement on program materials
- “And Justice for All” poster is in a visible public location
- Civil Rights training records
- Medical Statements for students with special dietary needs

SFA On-Site Monitoring:

Has the SFA performed on-site monitoring of meal counting and claiming in all schools by February 1?

- Meal counting/ claiming On-Site Review Form for SFA’s with multiple buildings (Form Download)

School Wellness Policy:

Is there a wellness policy in place? Has the policy been reviewed to ensure that it meets all requirements?

- School/District wellness policy

Competitive Foods:

Do all foods sold to students at school from midnight to half hour after the bell comply with the USDA Smart Snacks/Iowa Healthy Kids Act guidelines?

- Documentation of compliance (nutrition calculator print-outs, labels) with the Iowa Healthy Kids Act and USDA Smart Snacks nutrition standards. (The state and federal standards are the same.)

Water:

Do children have access to free water during meal service?

Food Safety:

Is food prepared, served and stored in a safe manner?

- Hazard Analysis and Critical Control Point (HACCP) plan
- Two Food Service Establishment Inspections, or letters requesting inspections
- Copy of most recent food safety inspection report and logs

Reporting and Recordkeeping:

Are reports submitted and records maintained as required?

- Three years (plus the current year) of program documentation

Nutrition Staff Professional Standards:

Are training records available for all staff as required?

School Breakfast and Summer Food Service Program Outreach:

Has the SFA conducted breakfast and summer outreach?

- Breakfast and summer food service outreach to households (if applicable)
- Summer outreach to households (if applicable)

Procurement: *How are you purchasing goods and services?*

- Bid documents
- Written procurement plan and Standards of Conduct policy

Additional Resources

Eligibility Manual for School Meals: <http://www.fns.usda.gov/school-meals/guidance-and-resources>

Food Safety: <http://www.extension.iastate.edu/foodsafety/>

Nutrition Standards for School Meals: <http://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>

School Wellness Policy: <http://www.fns.usda.gov/tn/local-school-wellness-policy>