

# The Administrative Review— What to Expect On-site

## WHAT'S NEW IN SCHOOL NUTRITION-

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CENTRAL

Monthly Webinar

SEPTEMBER 26, 2016

# WELCOME!!

- To a monthly live link to the Bureau of Nutrition and Health Services for new and not so new school nutrition managers.
- To a forum for you to ask questions and get answers.

# HOUSEKEEPING

- Handouts emailed and will be posted on website
- All participants are muted. A square icon with a dark background, featuring a white microphone symbol with a red diagonal slash through it, indicating that audio is muted.
- To ask a question, click on Questions & Answers

If at any point during the webinar you have a question please click on the Questions and Answers button to bring up the Q&A box. Type your question and click "Send".

The screenshot displays a webinar interface. At the top, there are two buttons: 'Audio Settings' and 'Questions and Answers'. A red arrow points to the 'Questions and Answers' button. Below this, the word 'Publisher' is visible. A search bar for online templates is present, with suggested searches for 'Brochure', 'Label', 'Card', 'Certificate', and 'Flyer'. A 'Q&A' dialog box is open, featuring a large text input area and a 'Send' button. A red arrow points to the dialog box. At the bottom of the dialog, there is a checkbox for 'Send Anonymously' and a 'Send' button. The background shows a blurred view of a presentation slide.

# THIS WEBINAR AND TRAINING DOCUMENTATION FOR SCHOOL NUTRITION PROFESSIONAL STANDARDS

Document the time you spend watching this webinar or other webinars presented by our Bureau.

Documentation of Participation in handouts

Learning Objectives for today are under Administration

3260 Prepare for Administrative Reviews

# MONTHLY MEMO REVIEW

- Sent to designated Authorized Representative and Food Service Director in IowaCNP
- Contact [patti.harding@iowa.gov](mailto:patti.harding@iowa.gov) to receive these
- History for last 5 years on  
■ [DOE WEBSITE - - https://www.educateiowa.gov](https://www.educateiowa.gov)



# IOWA

## Department of Education



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### PK-12

- Accreditation and Program Approval
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# IOWA

## Department of Education



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## Nutrition Programs

### On this page...

- [Federal Civil Rights Statement](#)
- [Iowa Nondiscrimination Statement](#)

### Contact(s)

Janelle Loney  
 515-281-5356  
[janelle.loney@iowa.gov](mailto:janelle.loney@iowa.gov)

The Bureau of Nutrition and Health Services administers several programs that provide healthy food to children. Each of these programs helps fight hunger and obesity by reimbursing organizations such as schools, child care centers, and after-school programs for providing healthy meals to children.

The Iowa Department of Education's mission for Nutrition Programs is to facilitate and promote quality USDA Child Nutrition Programs that will benefit the education, health, and well-being of the citizens of Iowa. Please find links to each program below:

- [Child and Adult Care Food Program](#)
- [Fresh Fruit and Vegetable Program](#)
- [National School Lunch Program](#)
- [School Breakfast Program](#)
- [School Wellness](#)
- [Special Milk Program](#)
- [Summer Food Service Program](#)
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# IOWA

## Department of Education



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## School Meals

Below are common resources and tools utilized in the National School Lunch and School Breakfast Programs.

**[Civil Rights](#)** - Manual and presentation to provide training to staff. It includes handouts, worksheets, attendance records and resources.

**[Diet Modification Request Form](#)** - All requests for dietary changes will need a completed Diet Modification Request Form. School Nutrition Programs must make dietary substitutions and modifications when related to a disability when signed by a licensed prescribing medical professional. While schools must meet dietary needs related to a disability, other non-disability requests may be made at the discretion of the local school food service program.

- [Diet Modification Request Form](#)
- [Diet Modification Request Form - Spanish Translation](#)
- [Diet Modification Form Question and Answer](#)

**[Fluid Milk Substitutions](#)** - Certain soy milk companies and varieties contain needed nutrients to meet the definition of nutritionally adequate. Regulations no longer allow school authorities to substitute orange juice for fluid milk in all circumstances.

**Forms** - USDA requires accurate daily meal counts. The Edit Record and the Self-Monitoring Form for On-site reviews are tools to ensure accurate reporting.

- [Edit Record for Meal Counts Individual Bldg](#)
- [Self Monitoring Form for Onsite Reviews](#)

### Contact(s)

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### School Meals

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## Monthly Memos and Updates - Schools

### On this page...

- [2017](#)
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Each month new memos, reminders of tasks or reports that are due, and new information are delivered to the Authorized Representative and Food Service Director identified for the School Food Authority (SFA). Previously it was included with the warrants when they were mailed and now it is emailed since payments are directly deposited.

Be sure to read the Bureau Notes each month for timely messages about the attachments.

The messages emailed will also be posted here so mark your calendar to check here regularly in case your email message becomes blocked.

### 2017

- 2016/09/19 - [Verification Training September 20 & 27, USDA Memos on FSMC, Food Corp. and SFSP, FSMC Webinar and What's New Webinar](#)
- 2016/08/24 - [Free and Reduced Price Eligibility determination and access for low-income, transfer and limited English skills students](#)
- 2016/07/06 - [Iowa Application Webinar July 14 & 27, Public Media Release Requirement for FY17, and IowaCNP 17 Open and 16-17 Public Release](#)

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### 2016

- 2016/06/23 - [FY17 School Meal Programs Information, FY17 Application Packet, What's New Webinar](#)



# IOWA

Department of Education



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The search found 3 results in 0.015 seconds.

## Search results

### [Monthly Memos and Updates - Schools](#)

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[Read more](#)

# CURRENT MEMOS

## August 24

- USDA Memos related to assuring access for all students
- Updated Income Eligibility Manual from USDA

## September 16

- Verification webinars
- USDA Memos related to SFSP, FSMC, and Foods Corps
- Iowa webinar for schools considering FSMC

## September 23

- USDA Memos related to Resources for Making Water Available, Use of Share Tables (plus Iowa link), Professional Standards Q & A and Crediting Soy Products

**Questions about Monthly Memos???**

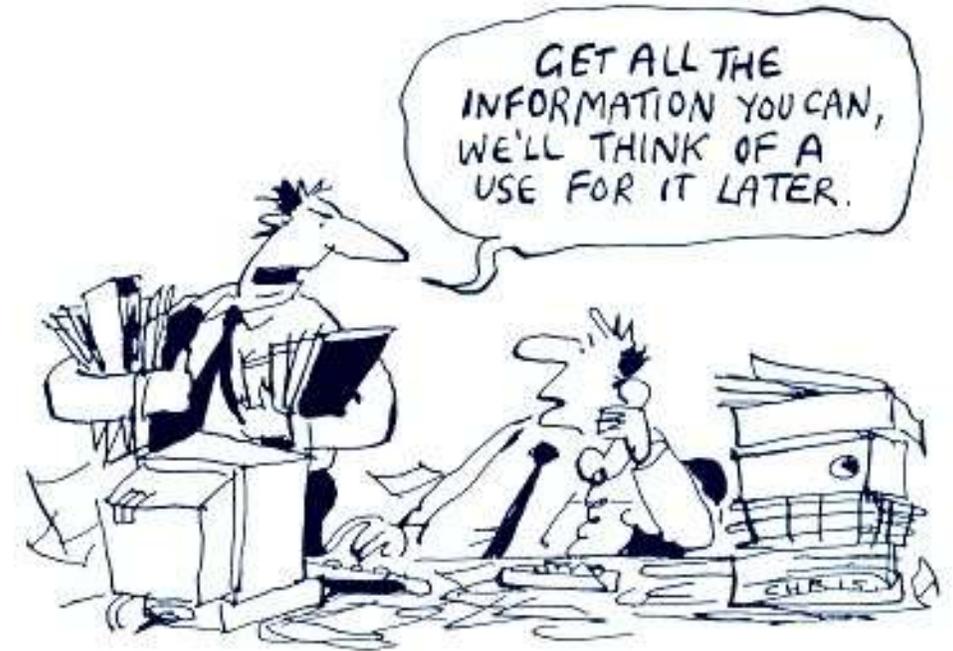
# OVERVIEW OF THE ADMINISTRATIVE REVIEW PROCESS

Pre-visit activities

Off-site assessment procedures

On-site assessment procedures

Post-visit activities



# PREPARING FOR AN AR

## 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 edis 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



# CONSULTANT'S PRE-VISIT ACTIVITIES

## **Select sponsors**

- school districts, private schools, RCCI's that will receive a visit

## **Contact**

- Authorized Representative, Superintendent, Food Service Director and other representatives at each school to determine date of the onsite review.

## **Send confirmation letter**

- The letter of introduction with established date for onsite review, with deadlines for offsite question submission, and other pertinent information

## **Select site**

- or sites for onsite visit depending on the number of buildings in an organization

# OFF-SITE ASSESSMENT PROCEDURES AND OTHER ACTIVITIES

School food authority **completes the off-site assessment tool**

## **Submit Supporting documentation**

- send or attach to the tool on CNP

## **State agency consultant then:**

- reviews information in the off-site assessment tool and all the supporting documentation
- determines if timelines for submitting are met

Final **details for onsite visit** are clarified via emails and phone calls

School food authority **collects documentation** not previously submitted that will be reviewed onsite

# ON-SITE ACTIVITIES

- Observation
- Interviews
- Review certification and verification documents
- Validate review-month claim information
- Review meal compliance documentation
- Validate answers from off-site tools
- Review other documentation not previously submitted
  - includes resource management and general area items
- Technical assistance!



# OBSERVATION



While onsite, the consultant will be observing many things:

- how students receive meals
- how cashiers are doing their job
- how the lunchroom is set up
- how people interact
- how information is shared
- how, where and when a la carte food is sold
- many other things.

# INTERVIEWS

- All staff who have responsibilities related to an aspect of the school nutrition program will have the chance to answer questions.
- Procedures indicated in the off-site assessment tool will be verified by asking questions on-site.
- Students may be asked questions! (*We like talking to students*)
- Teachers may be asked questions too.

# REVIEWING CERTIFICATION AND VERIFICATION DOCUMENTS

- Eligibility information from the, POS, point of service system
- Free and Reduced price eligibility application documentation
- Homeless, migrant, and any other documentation of free status
- Verification documentation
- Alternate claiming documentation (*CEP, Provision claiming*)



# VALIDATING REVIEW-MONTH CLAIM INFORMATION

- Daily point of service information for each day of the review-month
- Any summary of the information that subtotals the free, reduced price and full pay student and adult numbers
- Edit check information that demonstrates that required edit checks were conducted



# REVIEWING MEAL COMPLIANCE DOCUMENTATION

- Validate the Dietary Specifications Assessment Tool
- Look at the review-month menu
  - select one week for in-depth information
- Look at recipes, all types of labels for food items used that week
  - including product formulation statements and CN labels
- at food production records and information
- If there are problems, expand the documentation examination to the entire month
  - may need to collect further information to do a nutrient analysis



# OTHER DOCUMENTATION EXAMINED

If the resource management risk indicator tool indicates a comprehensive review is required, consultant will look at specific expense and income information such as:

- Written financial procedures
- Statement of revenue and expense
- Account balance information
- Nonprogram food revenue tool documentation and tracking method information
- Direct/indirect cost information
- A sample of expenses
- Indirect cost rate agreement and documentation of classification of indirect costs, support documents for billing indirect costs

# GENERAL PROGRAM AREA DOCUMENTATION

- Civil rights
  - Public release
  - Training documentation
  - Racial/ethnic data collection
  - Civil rights poster correctly used
  - Special dietary needs statements
  - Use of non-discrimination statement on materials distributed
- On-site monitoring for school systems/districts with more than 1 building
  - On-site monitoring documentation including of breakfast program



# GENERAL PROGRAM AREA DOCUMENTATION, CONT.

- Local School Wellness Policy

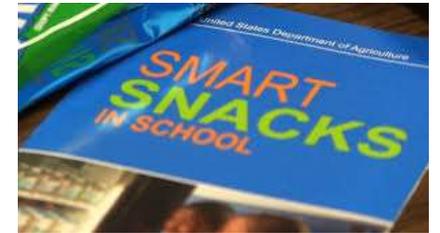
- Most current policy
- Documentation that it was made available to public
- Documentation of efforts to review and update, meeting minutes
- Copy of the most recent assessment

- Smart Snacks in School/HKA documentation

- One week of menu documentation to see food sold a la carte in lunch line
- Nutrition documentation for a minimum of 10% of food and beverages sold, obtained from persons responsible for sales

- Professional standards

- Training tracking documentation, training documentation (agendas, certificates, sign in sheets, employee lists)



# GENERAL PROGRAM AREA DOCUMENTATION, CONT.

- Food Safety/HACCP Program

- Examine written food safety plan
- Check temperature logs



- Reporting and Recordkeeping

- Three plus years of required records are stored properly

- Summer Food Service and School Breakfast Program Outreach

- Samples of outreach conducted for each of these programs

# OTHER FEDERAL PROGRAM REVIEW DOCUMENTATION

- Afterschool Snack Program

- Menu and food production records for review-month
- Snack service counts for each day of review-month
- Two self-reviews completed per year



- Fresh Fruit and Vegetable Program

- Cost information to validate the claim for reimbursement for selected month

- Special Milk Program

- Examine counting and claiming documentation
- Milk orders and delivery statements
- For 'paid' milk, charging children appropriately and eligibility information

# POST REVIEW PROCEDURES



## **Exit conference** *(time arranged while on-site)*

- Includes summary of findings and discussion of deadlines for corrective action
- Offer of technical assistance for any area including violations
- Discussion of documentation the SFA will provide with corrective action
- Explanation of how fiscal action will occur if applicable

# POST REVIEW PROCEDURES, CONTINUED



## **Administrative Report and further actions**

- Provided to Superintendent, Authorized Representative and Food Service Director in writing
- Should be issued by Consultant within 30 days of end of exit conference
- SFA has 30 calendar days to reply with corrective action if required
- Findings will be posted on Iowa Department of Education website when review is closed

# ADMINISTRATIVE REPORT CONTENTS

Required changes/findings

Technical assistance provided

Commendations and noteworthy program activities



# USDA NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) Mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights

1400 Independence Avenue, SW

Washington, D.C. 20250-9410;

(2) Fax: (202) 690-7442; or

(3) Email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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# FOR FURTHER ASSISTANCE & QUESTIONS...

NUTRITION WEBSITE FOR DE: [HTTPS://WWW.EDUCATEIOWA.GOV/PK-12/NUTRITION-PROGRAMS](https://www.educateiowa.gov/pk-12/nutrition-programs)

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**Questions???**



# MONTHLY WEBINAR

What's  
New in  
School  
Nutrition?

January						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
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3	4	5	6	7	8	9
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17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

2010

4<sup>th</sup> Monday at 2:00 pm

# UPCOMING TRAINING OPPORTUNITIES

- September 27 Verification Process Webinar
- October 12 Verification Reporting Webinar for Most
- October 18 RCCI Verification Reporting
- October 24 What's New in School Nutrition- Step by Step through the Procurement Plan