The Administrative Review—What to Expect On-site
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.
- 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”.
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 to receive these
- History for last 5 years on
  - DOE WEBSITE - - https://www.educateiowa.gov
PK-12

Accreditation and Program Approval

Advanced Learning Opportunities

Award and Exchange Programs

Content Areas

Early Childhood

Educational Technology

Educator Quality

Every Student Succeeds Act

Learner Supports

No Child Left Behind

Nutrition Programs

Options for Educational Choice

School Business and Finance

School Facilities

School Leader Update

School Transportation

Special Education

Standards and Curriculum

Student Assessment

Title Programs
Nutrition Programs

School Meals

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
- Team Nutrition
- USDA Foods
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
Monthly Memos and Updates - Schools

On this page...

- 2017
- 2016
- 2015
- 2014
- 2013
- 2012

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
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

Preparation for an Administrative Review

The Bureau of Nutrition and Health Services uses the Administrative Review to measure compliance with National School Lunch (NSL) and School Breakfast Program (SBP) regulations outlined in the Federal Recessional Policy Act of 2010. The regulations referenced Critical Areas of performance, Performance Standard 1 (PS1) and Performance Standard 2 (PS2), and other General Areas Review. Corrective actions required in the program do not comply with state and federal standards. The rules governing the state for the Critical Areas.

The following checklist is to help complete the required materials needed for the Administrative Review:

- Indicate documentation needed for the entire Review.

Critical Area – PS1

Certification and Benefit Issues:
- Are free and reduced meal applications and benefits issued correctly?
  - Benefits issuance list (list of students eligible for Free and Reduced Price meals in the formal document) must be updated prior to the review.
- Direct Certification lists and documentation of any extended categorical eligibility to household members not on the list.
- Category eligibility lists (nontaxable, migrant, runaway, foster, head start, child care) must be updated prior to the review.
- Income eligibility application (free, reduced, denied, withdrawal, and verification applications).
- Income eligibility must be completed in the year.
- Income eligibility for free meals is based on the tax year 1998.
- Reduced price eligible students are not eligible for reduced price meals.

Meal Counting and Displaying:
- Does the program for counting meals consistently track correct counts?
  - Do all food service lines have an accurate count on the display?
- Did counts for the day and month of review by eligibility status listed in the eligibility category for each meal for the month of the review, taken at least once a month during the review?

Critical Area – PS2

Nutritional Quality and Meal Pattern:
- Does the menu meet the state and federal requirements for both breakfast and lunch?
  - Menu and Meal Production Records
  - Other supporting documentation (recipes, CN labels, manufacturer specifications, etc.)

General Areas

Verification:
- Has verification been conducted and reported by November 30?
  - Verification report
  - Letters of notification for selected and results of verification eligibility
  - Verification documentation submitted by households

Resource Management:
- How are resources used or the Bureau Consultant to conclude the Off-Site Resource Management Questionnaire?
  - Financial Audit
  - USDA Food/Leaves Tool
  - USDA Non-program Resource Tool

Civil Rights:
- Does the program comply with Civil Rights regulations? Are all meals available to students without discrimination?
  - Public Release
  - Non-discrimination statement on program materials
  - "Civil Rights Act, 1964": portion in a visible public location
  - Civil Rights training records
  - Medical Statements for students with special dietary needs

School Wellness Policy:
- Is there a school wellness policy in place? Has the policy been reviewed to ensure that it meets all requirements?
  - School Wellness policy

Compliance Process:
- Do all staff and students at school follow the guidelines for the school meals program?
  - Documentation of compliance
  - Nutrition calculator printouts
  - USDA Smart Snacks in the School Act

Water:
- Do all students have access to water during meal service?

Food Safety:
- Are food prepared, served, and stored in a safe manner?
  - Hazard Analysis Critical Control Point (HACCP) plan
  - Food Service Establishment Inspections or Letters of notification
  - Copy of most recent Food Safety inspection report and logs

Reporting and Recordkeeping:
- Are records kept as required?
  - Three years (plus the current year) for program documentation

Nutrition Staff Professional Standards:
- Are training records available for all staff engaged?

School Breakfast and Summer Food Service Program Overview:
- Has the program met the requirements for summer food service?
  - Breakfast and summer food service outreach to households (Applicable)
  - Summer meals to households (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!
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
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
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.

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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, 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.

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FOR FURTHER ASSISTANCE & QUESTIONS…

NUTRITION WEBSITE FOR DE: HTTPS://WWW.EDUCATEIOWA.GOV/PK-12/NUTRITION-
PROGRAM

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Questions???
MONTHLY WEBINAR

What’s New in School Nutrition?

4th 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