

How to Prepare for Your Administrative Review

School Year 2016-2017

Arizona Department of Education
Health & Nutrition Services
School Nutrition Programs

Professional Standards
Learning Topic Code 3260



The goal of this presentation:

- To provide sponsors of the National School Lunch and School Breakfast Programs who are scheduled to receive an Administrative Review (AR) in the 2016-2017 school year with information on what will be reviewed in the AR, the AR process, expected timeframes, and the documents they will be asked to provide to an ADE reviewer.
- ***Please note that guidance from USDA on how to conduct the AR may be updated each school year. The information in this presentation represents the most current guidance from USDA on the AR.



Who should view this presentation?

- Individuals responsible for the operation of the NSLP/SBP at LEAs in Arizona.
- The review process, and this presentation, will be divided into modules which represent different areas of the NSLP/SBP. You are encouraged to share these modules with the individuals whose responsibilities most align with those areas.
- Professional Standards Learning Topic Code 3260



Acknowledgements

- **This presentation does not cover requirements/regulations of the NSLP/SBP.**
- **Each sponsor of the NSLP/SBP is ultimately responsible for knowing and understanding all handbooks, manuals, notices, guidance, as well as any other forms of communication that provide further guidance, clarification, or instruction on operating the programs.**



What is the Administrative Review (AR)?

- **The AR is ADE's assessment of your operation of the school nutrition programs:**
 - National School Lunch Program
 - School Breakfast Program
 - Afterschool Snack Program
 - Special Milk Program
 - Fresh Fruit & Vegetable Program
 - Seamless Summer Option
- (You may not operate all of these programs)



The Intent of the AR:

- Determine if you are meeting program requirements
- Provide technical assistance
- Secure any needed corrective action
- Assess fiscal action (if applicable)



Who will receive an AR?

- All sponsors of the NSLP/SBP will receive an AR at least once during each three-year review cycle.
 - We are about to begin Year 1 of the cycle



What is a Base Year-Only Review?

- Sponsors who are not scheduled to receive an AR in the 2016-2017 school year and who are starting a Base Year for Special Provision Option 2 or 3 will receive a Base Year-Only Review in SY 2016-2017.
 - You will receive separate, specific notification if you are receiving a Base Year-Only Review.



What if I am in a Special Provision Option Non-Base Year?

- If ALL schools in your district are operating a Provision 2 or 3 Non-Base Year or Community Eligibility Provision (CEP) during the school year you will receive your AR, pages in this presentation with this symbol do not apply to your review:



- If you do not know if you are operating a Special Provision Option or CEP, please contact your assigned School Nutrition Programs specialist.



How will I be notified?

- Sponsors receiving an AR in SY 2016-2017 will be notified via certified letter in May 2016.
 - The letter will be mailed and emailed to the persons listed as the 'Superintendent Contact' and 'SFA Contact' in CNPWeb.
- A list of sponsors scheduled to receive an AR in SY 2016-2017 will also be posted on ADE's website here: <http://www.azed.gov/health-nutrition/the-administrative-review/>



Where can I get help?

- Your assigned School Nutrition Programs specialist at ADE is available to answer questions.
 - If you don't know who your assigned specialist is, log-in to CNPWeb or call 602-542-8700 and ask to speak with the School Nutrition Programs Specialist of the Day
- Your assigned ADE reviewer will contact you early in the school year and is also available to answer questions.
 - Keep in mind they may not always be readily available if they are conducting other ARs



Where can I get help?

- ADE School Nutrition Programs has also planned and scheduled many workshops and trainings for this summer and fall.
 - Some are web-based, some in-person
- Consider the areas of the program you feel you may need extra help in while viewing this presentation.
 - Visit <http://www.azed.gov/health-nutrition/nslp/training/> to see the training and professional development sessions that are offered and register yourself and/or your staff as soon as you can.



What is the most important part of the review?

- **Everything reviewed is a REQUIREMENT of the NSLP/SBP.**
- **Failure to comply with program requirements or failure to implement required corrective action assigned after the AR will result in program reimbursements being placed on hold.**
- **Keeping thorough records is the best way to show the reviewer you are in compliance.**



What will be reviewed?



Critical Areas of Performance

- These areas tie directly to the reimbursement you receive from ADE.
- Reimbursement is received under the assumption that these core requirements are met; findings in these core areas could mean that ADE must take reimbursement back (fiscal action).



Critical Areas of Performance

Performance Standard 1

- Certification 
- Benefit Issuance 
- Meal Counting & Claiming

Performance Standard 2

- Meal Components & Quantities
- Dietary Specifications & Nutrient Analysis



Critical Areas of Performance

- **Having adequate records to support compliance in the Critical Areas of Performance is essential!**
 - Eligibility documentation
 - Meal counts
 - Meal pattern records
- **Absence of records will result in meals being disallowed.**



General Areas of Review

- **These areas represent requirements of the program which are not tied directly to reimbursement; findings are addressed with technical assistance and corrective action.**



General Areas of Review

- **Meal Access & Reimbursement**
 - (eligibility certification, benefit issuance, meal counting and claiming, verification)
- **Meal Components & Quantities**
 - (signage, OVS)
- **Resource Management**
- **Civil Rights**
- **On-Site Monitoring**
- **Local Wellness Policy**
- **Competitive Foods/Smart Snacks**
- **Professional Standards**
- **Water**
- **Food Safety**
- **Reporting & Recordkeeping**
- **SBP & SFSP Outreach**
- **Other Federal Programs**
 - (ASP, FFVP, SSO, SMP)



The Review Period

- The most recent month for which a claim for reimbursement has been submitted in the current school year.
- Usually the month preceding the on-site visit date.
- Significant systemic findings may require your reviewer to investigate additional months within the current school year.
- ***Your reviewer will tell you what your review period is.



The Administrative Review Process

Expected Timeframes



May 2016

- **You will receive notification that you are scheduled to receive an AR in SY 2016-2017.**



June-July-August 2016

- Your reviewer will contact you to schedule an on-site visit date.
 - Keep in mind days when school is not in session or when your facility is not serving meals.



6-12 Weeks Prior to On-Site Visit

- **Your reviewer will:**
 - Request your completed Off-Site Assessment Tool.
 - Select which sites will be reviewed.
 - Send you a confirmation letter and document checklists, confirming your on-site visit date and other details.
- **You should expect to be in constant contact with your reviewer from the time the confirmation letter and checklists are provided to you until your on-site visit.**
 - Let your reviewer know the best mode of communication for you.



6-12 weeks prior to on-site visit

Off-Site Assessment Tool

- This multi-page tool can be found on ADE's website at: <http://www.azed.gov/health-nutrition/the-administrative-review/>
- It helps your reviewer to:
 - Gain perspective on how your program is operated (i.e. who processes applications, who conducts verification, how your meal system works).
 - Collect documents you have on file (press release, LWP).
 - Determine risk for the Resource Management area of the review.



6-12 weeks prior to on-site visit

Off-Site Assessment Tool

- Not all questions may apply to you and your operation.
- Complete it early! Ask your assigned specialist for help if you need it.
- Answering all applicable questions may require the help of your business manager, local wellness champion, caterer, management company staff, etc.
- Your reviewer will specify a date by which you must provide them with the completed tool.



6-12 weeks prior to on-site visit

Site Selection

- If you have more than one site for which a claim for reimbursement is submitted each month, your reviewer must determine which site(s) will be part of the AR process.

Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP	Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP
1 to 5	1	41 to 60.....	6
6 to 10.....	2	61 to 80.....	8
11 to 20.....	3	81 to 100.....	10
21 to 40.....	4	101 or More.....	12*

* 12 plus 5 percent of the number of schools over 100. Fractions must be rounded to the nearest whole number.



6-12 weeks prior to on-site visit

Site Selection

- **Your reviewer will use the following criteria to select a site or sites to be part of the AR process:**
 - **October 2015 claim data for each site**
 - **Results of previous reviews**
 - **Recommendations from YOU**
 - **Other claim data**
 - **Sites with a significant number of OIG Hotline and/or parent complaints**
 - **Sites with alternate points of service**
 - **Sites with a mix of age/grade groups**
 - **Sites participating in other school nutrition programs**



6-12 weeks prior to on-site visit

AR Confirmation Letter

- **Will confirm:**
 - On-site review date
 - Site(s) selected for review
 - Review period
- **Will include:**
 - **Checklists of documents:**
 - Some must be provided to the reviewer multiple weeks before the on-site visit (for the “off-site review”).
 - Some must be provided to the reviewer while conducting the on-site visit.



6-12 weeks prior to on-site visit

Off-Site Review Checklist

- *****Many items on this checklist will be tied to specific dates within your assigned review period; you may have to wait for those dates to pass before you can make copies of the documents and provide them to the reviewer.**
- *****There will be a requested-by date at the top of this checklist; please keep your reviewer updated on your progress in collecting the documents.**



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- 1. A copy of the notification letter sent to households letting them know they were certified for free, reduced-price, or paid meals

OR

- 1. A copy of the notification letter sent to households letting them know meals are being provided at no cost because the school is operating a Special Provision Option Non-Base Year or CEP



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- 2. A copy of the Benefit Issuance Document (BID) for the first operating day of the review period.

Remember, if all schools in your district are operating a Non-Base Year or CEP, pages with this symbol do not apply to you!



6-12 weeks prior to on-site visit



What is the Benefit Issuance Document?

- A paper-based or electronic list generated from the Point of Service (POS) system at each site under the sponsor.
- Your reviewer only needs to review the students eligible for free or reduced-price meals as of the first day of the review period; you will need to filter out or omit the paid students from the copy you provide to the reviewer.
- ***If you have the ability to convert your BID to a Microsoft Excel spreadsheet without compromising its integrity, it will expedite the review process.



6-12 weeks prior to on-site visit



More about the BID...

- The BID you provide to the reviewer must contain free and reduced-price eligible students for ALL sites under the sponsor, not just the site(s) selected for review.
- Each student should only be listed on the BID once.
- The BID should contain at least the student's name, benefit status (free or reduced), method of certification (i.e. income application, direct certification, foster, extended benefits, etc.), and approval date.
- Please indicate if any students on the BID were selected for verification in the current school year.
- Students should not be grouped according to benefit status on the BID.



6-12 weeks prior to on-site visit

What will the reviewer do with the BID?

- This represents part of Performance Standard 1, a Critical Area of the review.
- Based on the total number of free and reduced-priced eligible students on your BID, the reviewer will select a sample of those students to review.
- Once the reviewer makes the selection, they will request copies of the documentation supporting the eligibility for those students (i.e. household applications, direct certification match lists, homeless/migrant/runaway lists, etc.).
 - ***If there are 100 or less total students eligible for free or reduced-price meals, all of those students' eligibility documents will be reviewed.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- 3. Ten household applications from the current school year that were denied free or reduced-price benefits.
 - ***Please provide COPIES, not original applications.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- 4. A copy of the verification notification letter sent to households letting them know they were selected for verification.
 - ***If you have not started verification in the current school year, you should provide your reviewer with the letter used in the previous school year.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- 5. A copy of the letter provided to verified households letting them know their benefits have changed as a result of verification.
 - ***If you have not started verification in the current school year, you should provide your reviewer with the letter used in the previous school year.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **6. A list of the students who were selected for the most recently completed verification process.**
 - ***If you have not completed verification in the current school year, you should provide your reviewer with a list of the verified students in the previous school year.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **7. A copy of your current Free and Reduced-Price Policy Statement.**



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **8. Copies of lunch and breakfast menus, production records, standardized recipes, nutrition fact labels, ingredient labels, and manufacturer product formulation statements or CN labels.**
 - Your reviewer will assign you a specific week to provide these documents for.
 - You must provide the above menu documentation for the specified week for all menus served at each site selected for review.



6-12 weeks prior to on-site visit

More about menu documentation...

- This represents Performance Standard 2, a Critical Area of the review.
- Your reviewer must determine that meal pattern requirements are met for 1 week within the review period.
- You must be able to prove that meal pattern requirements were met with those documents, including how specific menu items contribute to the meal pattern components.
- If your reviewer finds that meal pattern requirements are not met for the 1 week, they may have to look at the whole review period, or even other claim periods in the current school year.
- Your reviewer will assess meal pattern compliance and your food preparation practices off-site and during the on-site visit to determine if a nutrient analysis of the calories, sodium, and saturated fat content of the menu needs to be conducted.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **9. A completed Paid Lunch Equity (PLE) Tool for the current school year.**
 - ***If your sites are non-pricing, this does not apply.
 - This should be emailed to your reviewer.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **10. Calculations or other documentation supporting that revenue from non-program foods requirements are adhered to.**
 - Non-program foods: foods and beverages sold by the School Food Authority but are not part of the reimbursable meal programs (i.e. a la carte items, meals provided to adults)
 - Documentation should include the cost of these foods/beverages and revenues from their sale.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **11. A copy of the public/media release provided to the local media and/or local unemployment offices prior to the start of the school year.**



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **12. A copy of the completed Civil Rights Compliance Form for the current school year.**
 - ***The deadline to complete this form each year is December 15; if your review is happening prior to December 15 you may provide the completed form for the previous school year.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **13. A copy of your complaint procedures (if they are written) for processing complaints alleging discrimination in the school meal programs.**
 - If your procedures are not written, be prepared to explain them to your reviewer when they are on-site.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **14. Documentation to support that program staff were recently trained on civil rights topics.**
 - Please show what was provided to staff, when the training occurred, and how you documented that all staff received the training.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **15. Copies of on-site monitoring forms conducted prior to February 1st for each site selected for review.**
 - ***This is NOT required if you only have one site.
 - If your review is happening prior to February 1st, you may provide the forms used in the prior school year.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **16. A copy of your LEA's most currently updated Local Wellness Policy.**
- **17. A copy of the most recent assessment that was conducted on your LEA's Local Wellness Policy, including when the assessment occurred and who was involved.**



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **18. Copies of menus, production records, standardized recipes, nutrition fact labels, and ingredient labels for all foods and beverages sold (for all grades) and/or served (for grades K-8) which are not part of the school meal program.**
 - This includes a la carte and vending items provided by school food service AND other school entities (such as the school store).
 - This does not include fundraising items.
 - Provide this information for all applicable food and beverage items provided during a week within the review period (your reviewer will specify which week).
 - Documentation may include Alliance for a Healthier Generation calculator print-outs.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **19. Documentation to support compliance with hiring standards requirements for NEW School Nutrition Program Directors hired on or after July 1, 2015, if applicable.**
 - This does not apply if the person designated as the Director was hired prior to July 1, 2015.
 - Documentation could include the highest level of education achieved by the Director, years of school nutrition program experience, and prior food safety training.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **20. Documentation to support compliance with training requirements for ALL school nutrition program employees.**
 - Documentation should include the name(s) of staff, date hired, title/position, a brief list of core duties/responsibilities, employment status (i.e. full-time, part-time, acting, substitute), average hours worked per week, and training records (including training title/subject, date completed, creditable time/length of training, agenda, certificate of completion, etc.).
 - Provide training record information for all trainings that have been completed or scheduled.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **21. Copies of the two most recent food safety inspection reports conducted by your local health department, or documentation of your attempts to receive two food safety inspections.**
 - Provide this for each site being reviewed.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **22. A copy of your written food safety plan.**
 - This may be emailed, or saved for the on-site review if too large.



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **23. Copies of Afterschool Snack Program self-monitoring reviews for the current school year.**
 - *****This is only required if a site selected for review operates the Afterschool Snack Program**



6-12 weeks prior to on-site visit

Off-Site Review Checklist Items

- **24. Copies of Afterschool Snack Program menus, production records, standardized recipes, nutrition fact labels, ingredient labels, and manufacturer product formulation statements or CN labels.**
 - ***This is only required if a site selected for review operates the Afterschool Snack Program
 - Provide these documents for the sites selected for review for a week within the review period (your reviewer will specify which week).



4 Weeks Prior to On-Site Visit

- Your reviewer must be able to determine your risk for non-compliance in the Resource Management area of the review.
- This is determined from your responses to the Resource Management section of the Off-Site Assessment Tool (beginning with Q700).
- If you fail to provide your reviewer with complete answers in this section, you will automatically be deemed 'high-risk' and a Comprehensive Resource Management Review will be conducted.



4 weeks prior to on-site visit

What is a Comprehensive Resource Management Review?

- School Nutrition Programs will assign specialized staff to complete this portion of the review, if necessary.
- This is a thorough look at how you are managing your resources, particularly the funds coming into the non-profit school foodservice program.
- Documents and records are from the most recently completed fiscal year and may include:
 - Statement of revenues and expenses
 - General ledger
 - PLE Tool from the previous school year
 - Indirect cost documentation



1 Week Prior to On-Site Visit

- **Your reviewer will confirm a meeting time and place for the on-site visit, meal service times, and directions.**



Workspace for Your Reviewer

- Your reviewer will need a quiet, somewhat private workspace to review your program documents.
 - Electrical outlets are helpful.
 - Let them know if they can expect to connect to wireless Internet.
 - Do what you need to do to operate your program while the reviewer is on-site but let them know where they can find you for questions.



The On-Site Visit

- **Allows the reviewer to validate the information gathered during the off-site review.**
- **Allows the reviewer to observe meal service at selected sites.**
- **Allows the reviewer to determine program compliance.**
- **Allows the reviewer to provide you with on-site, one-on-one technical assistance.**



On-Site Review Checklist Items

- **1. Eligibility Certification Documents**
 - Household applications, direct certification match lists, homeless/migrant/runaway lists, etc.
 - These were likely examined during the off-site review, but they should be available if needed.



On-Site Review Checklist Items

- **2. Verification file for the most recently completed verification process.**
 - ***May be for the previous school year if verification has not been completed in the current school year.
 - Should contain a copy of the verification report, documentation to support the verification process used, and documentation for the applications selected for verification.



On-Site Review Checklist Items

- **3. Ensure that claims have been submitted for the review period for the site(s) being reviewed.**
 - ***Make sure you are able to submit the claim for reimbursement for the review period prior to the on-site visit.



On-Site Review Checklist Items

- **4. Breakfast and lunch count records to support the claim for the review period for the site(s) being reviewed.**
 - **Include Afterschool Snack Program count records if applicable.**
 - **This could include paper-based meal roster sheets (including a way to determine the eligibility of each student) and/or meal count print-outs from electronic meal count systems.**



On-Site Review Checklist Items

- **5. Daily edit check records for the review period for the site(s) being reviewed.**



On-Site Review Checklist Items

- **6. Breakfast and lunch count records for the day(s) of the on-site visit for the site(s) being reviewed.**
 - You will not be able to provide these until the meal service has ended for the on-site visit.
 - This could include paper-based meal roster sheets (including a way to determine the eligibility of each student) and/or meal count print-outs from electronic meal count systems.



On-Site Review Checklist Items

- **7. Copies of lunch and breakfast menus, production records, standardized recipes, nutrition fact labels, ingredient labels, and manufacturer product formulation statements or CN labels for the date(s) of the on-site visit for the site(s) being reviewed.**
 - You must be able to show your reviewer how the menu for the on-site visit meets the meal pattern requirements.



On-Site Review Checklist Items

- **8. Copies of menus, production records, standardized recipes, nutrition fact labels, and ingredient labels for all foods and beverages sold (for all grades) and/or served (for grades K-8) which are not part of the school meal program.**
 - This includes a la carte and vending items provided by school food service AND other school entities (such as the school store).
 - This does not include fundraising items.
 - Provide this information for all applicable food and beverage items provided during the on-site visit.
 - Documentation may include Alliance for a Healthier Generation calculator print-outs.



On-Site Review Checklist Items

- **9. Food storage area temperature logs for the site(s) being reviewed for the past 6 months.**



On-Site Review Checklist Items

- 10. The written food safety plan for each site being reviewed.
 - This should be readily available in each site's kitchen.



On-Site Review Checklist Items

- **11. Special Milk Program count records for the review period.**
 - ***This is only applicable if a site selected for review operates the SMP.



The On-Site Visit

- **Typically:**
 - **Entrance Meeting**
 - Informal, introductions, review of agenda for visit
 - **Meal Service Observation**
 - If observing breakfast, the reviewer may do that before the entrance meeting.
 - **Reviewer examines on-site review checklist items.**
 - **Reviewer determines compliance, provides technical assistance, assigns corrective action.**
 - **Exit Conference**
 - More formal, recap of every finding, discussion of successes, discussion of corrective action.
 - Beneficial to have your supervisor present.



Post-Review

- **The reviewer cannot complete the review until they have received all requested documents from you and you have claimed for the month of the day of review.**
- **A written summary of the review findings, the technical assistance that was provided, and the required corrective action will be sent certified-mail once the review is completed.**



Post-Review

- You must provide a written response to the review summary by the prescribed due date.
- Failure to provide an adequate response by the due date will result in reimbursements being placed on hold.
- Once an adequate response is received, the review is CLOSED. 😊



Where do YOU go from here?

- Visit <http://www.azed.gov/health-nutrition/the-administrative-review/> to **download and print the Off-Site Assessment Tool**, set yourself a 3 week deadline to complete it (getting help from other staff in your school/organization as needed)
- **Review the checklist items from this presentation** and begin to understand which items you can begin compiling now (and start compiling!); a 3-ring binder or pocket folder might be helpful as you do this



Wrap-Up

- **You should now have an understanding of:**
 - **What will be reviewed in the AR**
 - **AR process/expected timeframes**
 - **Documents that will be requested.**



Where can I get help?

- Your assigned School Nutrition Programs specialist at ADE is available to answer questions.
- Your assigned ADE reviewer will contact you early in the school year and is also available to answer questions.
- ADE School Nutrition Programs has also planned and scheduled many workshops and trainings for this summer and fall.



For questions SPECIFICALLY regarding this presentation:

- Please email Walter Jacobson at Walter.Jacobson@azed.gov.

