

What to Expect of Your Administrative Review

School Year 2019-2020

Arizona Department of Education
Health & Nutrition Services
School Nutrition Programs

Professional Standards
Learning Code: 3260
Length: 1 hour

“What to Expect of Your Administrative Review” is intended for the School Food Authorities in the state of Arizona. All regulations are specific to operating the National School Lunch Program under the direction of the Arizona Department of Education. Information provided is current as of release date to meet the regulations of USDA and ADE.



July 2019

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

Objectives:

- To provide sponsors of the National School Lunch and School Breakfast Programs who are scheduled to receive an Administrative Review (AR) in the 2019-2020 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.

Comprehension Check

- At the end of this guide there will be comprehension quiz questions to test your knowledge and help you apply what you're learning.
- Be sure to review these quiz questions and the answers, available within the guide.
- This icon will indicate a comprehension quiz question, and the background of the slides will be a light blue like you see on this slide.

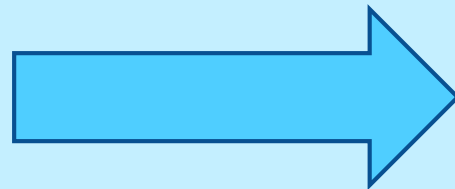


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Administrative Review Background



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 Administrative Review:

- 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 Cycle 3.

What is a Base Year-Only Review?

- Sponsors who are not scheduled to receive an AR in the 2019-2020 school year and who are starting a Base Year for Special Assistance Provision 2 or 3 will receive a Base Year-Only Review in SY 2019-2020.
 - You will receive separate, specific notification if you are receiving a Base Year-Only Review.

What if I am in a Special Assistance Provision 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 current school year, some areas of the AR will not apply to you.
- The pages in this presentation with this symbol do not apply to your review:



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

How will I be notified?

- Sponsors receiving an AR in SY 2019-2020 will be notified via certified letter in May 2019.
 - 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 2019-2020 will also be posted on ADE's website here:
<http://www.azed.gov/hns/nslp/ar/>

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 in ADEConnect, or call 602-542-8700 and select option 2 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?

- Review the *Administrative Review Summary Report* from the last AR.
 - The summary report has the findings from the last AR. Review this report to make sure ALL findings have been corrected. This will help you avoid repeat findings.
 - If you do not have the summary report, contact your assigned NSLP Specialist.

Where can I get help?

- ADE School Nutrition Programs has also planned and scheduled many workshops, webinars and trainings for this summer and fall.
 - Some are web-based, some are 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/hns/nslp/trainingps/> 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 and/or termination of performance-based reimbursement (extra 7 cents).
- Keeping thorough records is the best way to show the reviewer you are in compliance.

What Will Be Reviewed?



Off-Site (Pre-Review Checklist Items)
&
On-Site (Day of Review Checklist Items)

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.

More on Performance Standard 2: *Meal Components & Quantities*

- **Repeated findings/violations for the following will result in fiscal action:**
 - **Vegetable subgroups:** if one or more subgroups are not offered
 - The vegetable subgroups are: red/orange, dark green, beans/peas, starchy, other
 - **Milk variety & type:** if only one type of milk is offered, or if an unallowable milk type is offered without an approved exemption on file
 - At least two types of milk must be offered
 - Allowable milk types are fat-free unflavored, fat-free flavored, low fat (1%) flavored & low-fat (1%) unflavored
 - **Quantities:** if insufficient daily and/or weekly quantities of any meal components are offered
 - The meal components are: meat/meat alternate, grains, fruit, vegetables, milk
 - **Whole grain-rich:** insufficient whole grain-rich foods, or whole grain-rich foods are not offered
 - Half of weekly grains offered must be at least 50% whole grain-rich.
 - *ADE will not assess fiscal action in SY 19-20 for whole grain-rich findings, but be aware that this may change in future years.*

More on Performance Standard 2: *Meal Components & Quantities*

- Missing meal components for lunch may result in termination of performance-based reimbursement (extra 7 cents).

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, unpaid meal charge policy verification, Free and Reduced-Price Policy Statement
- Meal Components & Quantities
 - Reimbursable meal signage, OVS
- Resource Management
- Civil Rights
- On-Site Monitoring
- Local Wellness Policy
- Competitive Foods/Smart Snacks
- Professional Standards
- Water
- Food Safety & Buy American
- 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 2019

- You will receive notification that you are scheduled to receive an AR in SY 2019-2020.

5-12 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.
 - Send your previous Administrative Review Summary Report.
- 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.

5-12 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/hns/nslp/ar/>
- It helps your reviewer to:
 - Gain perspective on how your program is operated (e.g. 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.

5-12 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.

5-12 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.

*** All legally separate sites will be reviewed.

5-12 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 2018 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

5-12 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 (“Required Pre-Review Documentation”)
 - Some must be provided to the reviewer while conducting the on-site visit (“Required Day of Review Documentation”)

5-12 weeks prior to on-site visit

Pre-Review Checklist Items

- ***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.

5-12 weeks prior to on-site visit

Required Pre-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

Template notification letters can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/forms/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 2. A copy of the Benefit Issuance Document (BID) for the first operating day of the review period.
 - Note: The BID may be requested prior to other required pre-review checklist items.
 - The BID is required to select Eligibility Certification Documentation.

Step by Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website a:
<http://www.azed.gov/hns/nslp/trainingps/online/>

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



5-12 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.



5-12 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.



5-12 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.



Required Pre-Review Checklist Items

- 3. Eligibility Certification Documents for selected students.
 - Household applications, direct certification match lists, homeless/migrant/runaway lists, etc.
 - Please consult with your reviewer on sample to be provided.
 - These were most likely examined during the off-site review, but they should be available if needed.

Step by Step Instruction: How to Process Household Applications (SY 19-20) can be found on ADE's website at: <http://www.azed.gov/hns/nslp/trainingsps/online/>

Step by Step Instruction: How to Identify Household Applications That Are Error-Prone can be found on ADE's website at: <http://www.azed.gov/hns/nslp/trainingsps/online/>

Step by Step Instruction: How to Conduct Direct Certification can be found on ADE's website at: <http://www.azed.gov/hns/nslp/programguidance/>

***Please provide COPIES, not original applications.



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 4. Ten household applications from the current school year that were denied free or reduced-price benefits.

***Please provide COPIES, not original applications.



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 5. A copy of the verification notification letter sent to households letting them know they were selected for verification.

Template verification notification letters can be found on ADE's website at: <http://www.azed.gov/hns/nslp/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.



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 6. A copy of the letter provided to verified households letting them know their benefits have changed as a result of verification.

Template verification notification letters can be found on ADE's website at: <http://www.azed.gov/hns/nslp/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.



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 7. A list of the students who were selected for the most recently completed verification process.

Guidance on Verification can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/verification/>

***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.



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 8. Confirmation Review Waiver.
 - Required if your verification confirming official is a technology-based system.
 - Per HNS# 56-13: Verification Confirmation Review.
 - The waiver must be on school letterhead addressed to your assigned School Nutrition Programs Specialist prior to starting the Verification process.
 - The request must include the name of software used and an explanation of how the software demonstrates a high degree of accuracy.

Guidance on Verification can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/verification/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 8. A copy of your current Unpaid Meal Charge Meal Charge Policy.
- Not required if ALL SITES are non-pricing.
- Unpaid Meal Charge Policy Memos can be found on ADE's website at:
<http://www.azed.gov/hns/memos/>
 - SP 29-2017
 - SP 29-2017a
 - SP 23-2017
 - HNS 14-2017



5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 10. A copy of your current Free and Reduced-Price Policy Statement.
- Free and Reduced Price Policy Statement can be found on ADE's website at: <http://www.azed.gov/hns/nslp/forms/>
- **If applicable to your operation, please also include:**
 - Addendum- Provision 2
 - Addendum- Provision 3
 - Addendum- Community Eligibility Provision (CEP)
 - Addendum- Non-Pricing
 - Addendum- RCCI without Day Students

6-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 11. 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.
- Guidance on Meal Pattern Requirements can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/mealpattern/>

5-12 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

More about menu documentation...

- CN Labels and Product Formulation Statements
[Recorded Webinar](#) & [Webinar Slides](#)
- Production Record Overview
[Recorded Webinar](#) & [Webinar Slides](#)
- Using Appropriate Serving Utensils
[Recorded Webinar](#) & [Webinar Slides](#)

can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 12. 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.
- Public Media Release Template can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/forms/>
- Not required for RCCI's without day students

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 13. A copy of the completed Civil Rights Compliance Form for the current school year.
- Step by Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at: <http://www.azed.gov/hns/nslp/trainingsps/online/>
- Civil Rights Compliance Form for NSLP can be found on ADE's website at: <http://www.azed.gov/hns/civilrights/>
- Civil Rights Compliance Form for RCCI's can be found on ADE's website at: <http://www.azed.gov/hns/nslp/rcci/>

***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.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 14. A copy of your complaint procedures (if they are written) for processing complaints alleging discrimination in the school meal programs.
- Methods must meet the following requirements:
 - Procedures must note whether an allegation is made verbally or in person;
 - The staff member receiving the allegation must transcribe the complaint;
 - Procedures for receiving a complaint cannot prevent a complaint from being accepted;
 - Procedures must identify the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights).
 - Additionally, the procedures must not indicate that they attempt to resolve the complaint themselves, nor can the complaint process be a prerequisite for accepting a complaint.
- Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at: <http://www.azed.gov/hns/nslp/trainingsps/online/>
- Guidance on Civil Rights can be found on ADE's website at: <http://www.azed.gov/hns/civilrights/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 15. 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.
 - Civil Rights Compliance in Child Nutrition Programs can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/trainingsps/online/>
 - Instructors may use this PowerPoint to train their staff on civil rights. Instructors are encouraged to modify this training template to be applicable to their organization.

Required Pre-Review Checklist Items

- 16. Medical Statement for Students with Special Dietary Accommodations Template.
 - SFAs must obtain a written medical statement from a State licensed health care professional in order to receive reimbursement for meal modifications when the modified meal does not meet meal pattern requirements (7 CFR 210.10).
 - Per SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As), question 15, the State agency or SFA may not require that the written medical statement provide a specific diagnosis by name or use the term “disabled” or “disability.”

Medical Statement for Students with Special Dietary Accommodations
can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/forms/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 17. Copies of on-site monitoring forms conducted prior to February 1st for each site selected for review breakfast and lunch.
- Internal On-Site Monitoring Form – Lunch can be found on ADE’s website at: <http://www.azed.gov/hns/nslp/forms/>
- Internal On-Site Monitoring Form – Breakfast can be found on ADE’s website at: <http://www.azed.gov/hns/nslp/forms/>
 - If your review is happening prior to February 1st, you may provide the forms used in the prior school year.

***This is NOT required if you only have one site.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 18. A copy of your LEA's most currently updated Local Wellness Policy.
- 19. 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.

Guidance on the Local Wellness Policy can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/lwp/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 20. Copies of menus, production records, standardized recipes, nutrition fact labels, ingredient labels, and product formulation statements or CN labels for all foods and beverages sold a la carte during meal services.
 - Provide these for all foods and beverages sold for the week of review.

Required Pre-Review Checklist Items

- 21. Nutrition documentation for all foods and beverages served or sold at any time during the school day which are not part of the school meal program (reimbursable meals and a la carte).
 - This does include vending items provided by school food service AND other school entities (such as the school store).
 - Provide these for all foods and beverages sold for the week of review.
 - Documentation will be used to ensure that Smart Snacks requirements are met and may include:
 - Alliance for a Healthier Generation Smart Snacks Calculator printouts, recipes, product specifications, purchase orders, receipts, or other documentation.
- [Online Course: Smart Snacks and Competitive Foods Standards in Arizona](http://www.azed.gov/hns/nslp/trainingps/online/) can be found on ADE's website at: <http://www.azed.gov/hns/nslp/trainingps/online/>
- Guidance on Smart Snacks can be found on ADE's website at: <http://www.azed.gov/hns/nslp/smartsnacks/>

***This does not include fundraising items.

Required Day of Review Checklist Items

- 22. Buy American Exception for ALL non-domestic products purchased/served on the day of review.
 - Buy American FAQ, Recorded Webinar and Webinar Slides can be found on ADE's website at: <http://www.azed.gov/hns/sfp/>
 - Buy American Exception Form can be found on ADE's website at: <http://www.azed.gov/hns/nslp/forms/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 23. 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.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 24. 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.
 - If training hours have not been met this school year for all or some program employees, provide trainings scheduled to meet the annual requirements (including training title/subject, date to be completed, creditable time/length of training, etc.).

Guidance on Professional Standards can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/trainingsps/>

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 25. Documentation to support LEA's total enrollment as of October 1, 2019.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 26. Copies of the three 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.
 - ADE is aware that the inspection agencies generally do not view schools as high-risk food service operations, and sometimes do not recognize service-only sites as food service establishments because they do not actually engage in meal preparation activities. However, this does not change the requirement for all institutions that meet the definition of “school” under the NSLP and SBP, to obtain two inspections.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 27. A copy of your written food safety plan.

Guidance on food safety can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/foodsafety/>

- This may be emailed, or saved for the on-site review if too large.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 28. Copies of Afterschool Snack Program Self-Monitoring Review Forms for the current school year.

Afterschool Snack Program Self-Monitoring Review Forms can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/ascsp/>

***This is only required if a site selected for review operates the Afterschool Snack Program.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 29. Copies of Afterschool Snack Program menus, production records, standardized recipes, nutrition fact labels, ingredient labels, and manufacturer product formulation statements or CN labels.

Guidance on the Afterschool Snack Program can be found on ADE's website at: <http://www.azed.gov/hns/nslp/ascsp/>

***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 5 days).

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 30. Copies of At-Risk Afterschool Meals self-monitoring reviews for the current school.
- Guidance on the At-Risk Afterschool Meals Program can be found on ADE's website at: <http://www.azed.gov/hns/atriskafterschoolmealsforsfa/>

***This is only required if a site selected for review operates the At-Risk Afterschool Meals.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 31. Copies of At-Risk Afterschool Meals menus, production records, standardized recipes, nutrition fact labels, and product formulation statements or CN labels.
- Provide these documents for the sites selected for review for 5 days within the review period (your reviewer will specify which week).
- Guidance on the At-Risk Afterschool Meals Program can be found on ADE's website at:
<http://www.azed.gov/hns/atriskafterschoolmealsforsfa/>

***This is only required if a site selected for review operates the At-Risk Afterschool Meals.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 32. Current School Year Calendar.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 33. Copies of School Breakfast Program (SBP) Outreach Material.
- At the beginning of the school year, you must send all households informational packets with free and reduced-price meal applications that, if applicable, notify families that school breakfast is available.
- In addition, schools must send reminders regarding the availability of the SBP multiple times throughout the school year.
- SBP reminders must include: serving times, SBP cost and availability.

5-12 weeks prior to on-site visit

Required Pre-Review Checklist Items

- 34. Copies of Summer Food Service Program Outreach Material (Previous School Year).
- Regardless of whether you administer a summer feeding program, you are required to conduct SFSP outreach before the end of the school year to ensure that eligible families are informed of the availability and location of SFSP meals.

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.

What to Expect on the Day of Review

A decorative graphic consisting of a solid blue horizontal bar that transitions into a white background. On the right side, there are several horizontal lines of varying lengths and colors (blue and white) that create a sense of depth and movement.

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.

The On-Site Visit; Day of Review

- Typically:
 - Entrance Conference
 - Informal, introductions, review of agenda for visit, review information gathered from off-site documentation
 - Meal Service Observation
 - If observing breakfast, the reviewer may do that before the entrance meeting.
 - Reviewer examines day of 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.

Required Day of Review Checklist Items

- 1. Verification file for the most recently completed verification process.
 - Should contain a copy of the verification report, documentation to support the verification process used, and documentation for the applications selected for verification.

***May be for the previous school year if verification has not been completed in the current school year.

Guidance on the Verification Process can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/verification/>



Required Day of Review Checklist Items

- 2. 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.

Required Day of Review Checklist Items

- 3. 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.
 - Include At-Risk Afterschool Meals 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 printouts from electronic meal count systems.

Required Day of Review Checklist Items

- 4. Daily edit check records for the review period for the site(s) being reviewed.
- Active Daily Edit Check Worksheet can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/forms/>
- Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at:
<http://www.azed.gov/hns/nslp/trainingps/online/>

Required Day of Review Checklist Items

- 5. 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 day of 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 printouts from electronic meal count systems.

Required Day of Review Checklist Items

- 6. 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.

Required Day of Review Checklist Items

- 7. Buy American Exception for ALL non-domestic products purchased/served on the day of review.
 - Buy American FAQ, Recorded Webinar and Webinar Slides can be found on ADE's website at: <http://www.azed.gov/hns/sfp/>
 - Buy American Exception Form can be found on ADE's website at: <http://www.azed.gov/hns/nslp/forms/>

Required Day of Review Checklist Items

- 8. Temperature logs (food, dry storage, refrigerator, freezer, milk cooler, etc.) for the site(s) being reviewed for the past 6 months.

Food Safety Monitoring Forms can be found on
ADE's website at:

<http://www.azed.gov/hns/nslp/foodsafety/>

Required Day of Review Checklist Items

- 9. Special Milk Program count records for the review period.

***This is only applicable if a site selected for review operates the SMP.

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.

Resource Management Review

Each assigned reviewer will indicate to the LEA which section of this review process applies to them

Resource Management Review

- The intent and scope of monitoring in this section is to apply a systematic approach to ensuring the overall financial health of an SFA's nonprofit school food service.
- Your assigned reviewer will inform you what sections apply to your Administrative Review.
- You will receive a separate checklist for the Resource Management section of the review.
- The monitoring areas include:
 - Maintenance of the Nonprofit School Food Service Account
 - Paid Lunch Equity
 - Revenue from Nonprogram Foods
 - Indirect Costs

Maintenance of the Nonprofit School Food Service Account

Monitoring of this area is intended to ensure the following:

- All nonprofit school food service revenue is used solely for the operation or improvement of the school food service
- Net cash resources are limited to three months' average expenditures, or have a state agency approved plan for spending the amount in excess of three months.
- All expenses of the nonprofit school food service comply with allowable cost restrictions, limiting expenses of nonprofit school food service funds to those costs that are necessary, reasonable, and allocable.
- **For Example 2 CFR 200.439 requires School Food Authorities to obtain prior approval from the state agency for equipment purchases of \$5,000 or more. For purposes of this Federal prior approval requirement, the OMB guidance and Department of Agriculture (USDA) regulations define as "equipment" any item of non-expendable personal property with a useful life of a year or longer and an acquisition cost which equals or exceeds the Federal per-unit capitalization threshold of \$5,000.**
- **To request approval please fill out the Capital Expenditure Pre-Approval Request Form found on ADE's website at: <http://www.azed.gov/hns/nslp/forms/>**

Guidance on Maintenance of the Nonprofit School Food Service Account
can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/rm/>

Required Pre-Review Checklist Items: Maintenance of the Nonprofit School Food Service Account

- Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account (detailed General Ledger or comparable documentation) for the most recently completed school year. For SFAs that commingle their nonprofit school food service account with other school accounts you must provide the reviewer with sufficient information to identify all revenue and expenses of the school food service program.
- This information will be utilized to select a sample of expenses for review.
 - Copy of the most recently completed Food Service Annual Financial Report.
 - Prior approval documentation for any equipment (\$5,000 or more) purchased during the most recently completed school year if applicable.

Required Day of Review Checklist Items: Maintenance of the Nonprofit School Food Service Account

- Supporting documentation for the selected sample of expenses.
- Supporting documentation for the most recently completed Food Service Annual Financial Report.

Paid Lunch Equity

Monitoring of this area is intended to ensure that sufficient funds are provided to the nonprofit school food service account for paid lunches.

Guidance on Paid Lunch Equity can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/rm/>

Required Pre-Review Checklist Items: Paid Lunch Equity

- A completed PLE Tool (check applicability with your reviewer) for the most recently completed school year. (As this is an interactive Excel document, you will need to email this to your reviewer if applicable.)
- If an exemption to the Paid Lunch Equity requirement was granted, please provide a copy of the approval letter.

***This information is not required if all sites are nonpricing.

Required Day of Review Checklist Items: Paid Lunch Equity

- Supporting documentation (board minutes, student handbook(s), website information) that the minimum weighted average paid lunch price at all sites was charged.
- Supporting documentation for all amounts provided on the Paid Lunch Equity Tool.
- Supporting documentation for any non-federal funds used to support paid lunch prices.

***This information is not required if all sites are nonpricing.

Revenue from Nonprogram Foods

- Monitoring of this area is intended to ensure the revenues from the sale of nonprogram foods generate at least the same proportion of revenues as expenses from the purchase of nonprogram foods contribute the SFA's food costs.
- Nonprogram Foods: Foods and beverages sold by the School Food Authority but are not part of the reimbursable meal programs including, but not limited to, a la carte foods (e.g., milk, 2nd entrees, Smart Snacks), catering (e.g., foods/beverages for school board meetings, foods for outside entities & programs), and/or adult meals (e.g., meals for teachers, parents, etc.).
- The Non-Program Food Revenue Tool is used to determine if the percent of total revenue that is generated from nonprogram food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of nonprogram foods."

Guidance on Revenue from Nonprogram Foods can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/rm/>

Required Pre-Review Checklist Items: Revenue from Nonprogram Foods

- A completed Non-Program Food Revenue Tool (check applicability with your reviewer) for the previous school year. (As this is an interactive Excel document, you will need to email this to your reviewer if applicable.)

Required Day of Review Checklist Items: Revenue from Nonprogram Foods

- Documentation detailing how the SFA accounts for and separates its program food revenues from its nonprogram food revenues.
- Documentation detailing how the SFA accounts for and separates its program food costs from its nonprogram food costs.
- Documentation detailing how the SFA determined its compliance with the nonprogram foods revenue requirements under 7 CFR 210.14(f).
- Supporting documentation for all amounts provided on the Non-Program Food Revenue Tool.
- Supporting documentation for the prices charged for Adult Meals.
- If the school food service provides food and/or beverages for internal school departments, officials, events, meetings, etc. and/or provides food and/or beverages to external organizations, please provide supporting documentation (catering invoices, invoices for food/beverages) for one event or meeting.

Indirect Costs

- Monitoring of this area is intended to ensure indirect costs charged to the nonprofit school food service account are allowable, consistent, and appropriate.

Guidance on Indirect Costs can be found on ADE's website at:

<http://www.azed.gov/hns/nslp/rm/>

Required Pre-Review Checklist Items: Indirect Costs

- Copy of the approved Indirect Cost Rate Agreement for the most recently completed school year.
- Statement of Revenues and Expenses listing revenues and expenditures by category.
- Copy of the Direct Cost Report submitted to the Arizona Department of Education for the most recently completed school year.

Required Day of Review Checklist Items: Indirect Costs

- Supporting documentation for indirect costs charged to the Nonprofit School Food Service Account.

After the Administrative Review



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. 😊

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 via email and certified-mail once the review is completed.

Where do YOU go from here?

- Visit <http://www.azed.gov/hns/nslp/ar/> **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.

You should now have an understanding of:

- What will be reviewed in the Administrative Review
- Administrative Review 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.
- The School Nutrition Programs Specialist of the Day is available to answer questions.
- ADE School Nutrition Programs has also planned and scheduled many workshops, webinars and trainings for this school year.
- NSLP At a Glance Calendar can be found on ADE's website at: <http://www.azed.gov/hns/nslp/>
- NSLP Monthly Checklist can be found on ADE's website at: <http://www.azed.gov/hns/nslp/>

Comprehension Check

A decorative graphic consisting of a solid blue horizontal bar that transitions into a series of white and light blue horizontal lines of varying lengths and thicknesses on the right side.

What is the intent of the Administrative Review?

- A. Determine if you are meeting program requirements**
- B. Provide technical assistance**
- C. Secure any needed corrective action**
- D. Assess fiscal action (if applicable)**
- E. All of the above**



E. All of the above

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



Who should be included on the BID that is provided to the reviewer?

A. Free, Reduced and Paid students

B. Free and Paid Students

C. Free and Reduced Students

D. Reduced and Paid Students



C. Free and Reduced Students

- 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.



You will be deemed 'high risk' if the 700 block of questions of the Off-Site Assessment Tool is not completed prior to the scheduled Administrative Review.

A. True

B. False



A. True

- Your reviewer must be able to determine your risk for non-compliance in the Resource Management area of the review.
- If you fail to provide your reviewer with a completed Off-Site Assessment Tool, you will automatically be deemed 'high-risk' and a Comprehensive Resource Management Review will be conducted.



The Administrative Review is closed the day of the on-site visit.

A. True

B. False



B. False

- 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 via email and certified-mail once the review is completed.
- Once an adequate response of review findings is received and a close-out memo is issued the review is CLOSED. 😊



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 and/or termination of performance-based reimbursement (extra 7 cents).

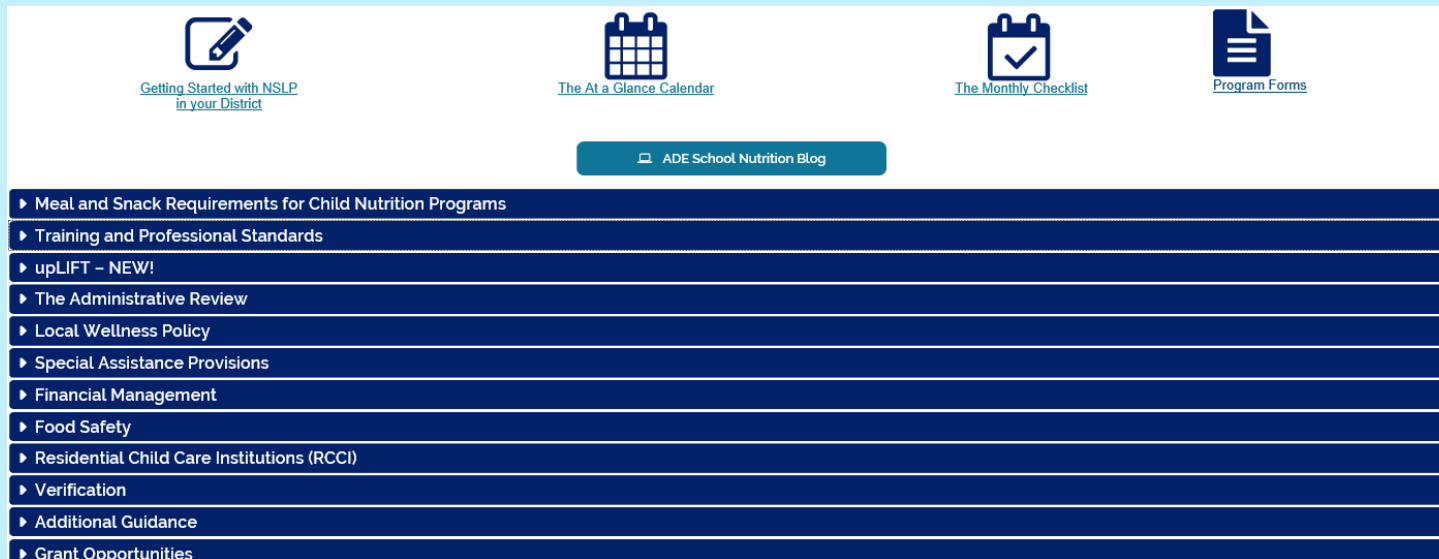
A. True

B. False



A. True

- Please make sure to keep up-to-date on ALL PROGRAM REQUIREMENTS
 - Keep in contact with your assigned NSLP Specialist
 - Read NSLP Memos <http://www.azed.gov/hns/memos/>
 - Register for online and in-person trainings/workshops/webinars
 - Visit ADE's NSLP homepage on a regular basis <http://www.azed.gov/hns/nslp/>



The screenshot shows the homepage of the ADE School Nutrition Blog. At the top, there are four main navigation icons: a pencil for 'Getting Started with NSLP in your District', a calendar for 'The At a Glance Calendar', a calendar with a checkmark for 'The Monthly Checklist', and a document for 'Program Forms'. Below these is a central button for 'ADE School Nutrition Blog'. A dark blue sidebar on the left contains a list of menu items, each with a right-pointing arrow:

- ▶ Meal and Snack Requirements for Child Nutrition Programs
- ▶ Training and Professional Standards
- ▶ upLIFT – NEW!
- ▶ The Administrative Review
- ▶ Local Wellness Policy
- ▶ Special Assistance Provisions
- ▶ Financial Management
- ▶ Food Safety
- ▶ Residential Child Care Institutions (RCCI)
- ▶ Verification
- ▶ Additional Guidance
- ▶ Grant Opportunities



Repeated findings/violations for the following will result in fiscal action:

- Vegetable subgroups: if one or more subgroups are not offered.
- Milk variety & type: if only one type of milk is offered or if an unallowable milk type is offered without an approved exemption on file.
- Quantities: if insufficient daily and/or weekly quantities of any meal components are offered

A. True

B. False



A. True

Please review your previous Administrative Review Report and ensure ALL meal pattern requirements are met.



Congratulations!

You have completed the Online Course: **What to Expect of Your Administrative Review**

In order to count this training towards your Professional Standards training hours, the training content must align with your job duties.

- Information to include when documenting this training for Professional Standards:
 - Training Title: *What to Expect of Your Administrative Review*
 - Learning Code: 3260
 - Key Area: 3000- Administration
 - Length: 1 hour
- *Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.*

Requesting a training certificate

Please click on the link below to complete a brief survey about this training. Once the survey is complete, you will be able to print your certificate of completion from Survey Monkey. **This will not appear in your Event Management System (EMS) Account.*

<https://www.surveymonkey.com/r/OnlineHowToGuides>

The information below is for your reference when completing the survey.

Training Title: ***What to Expect of your Administrative Review***

Professional Standards Learning Code: **3260**

Length: **1 hour**

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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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