

What to Expect: National School Lunch Program Administrative Review for Seamless Summer Option Operators School Year 2021-2022

ONLINE COURSE

Revised November 2021

Professional Standards Learning Code: 3260



Arizona Department of Education (ADE)

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS).

Intended Audience

This training is intended for **School Food Authorities (SFAs)** preparing for their **National School Lunch Program (NSLP) Administrative Review** while operating the **Seamless Summer Option (SSO)**.

Professional Standards

Information to include when documenting this training for Professional Standards:

Training Title: What to Expect: National School Lunch Program Administrative Review for Seamless Summer Option Operators School Year 2021-2022

Learning Code: 3260

Length: 1 hour



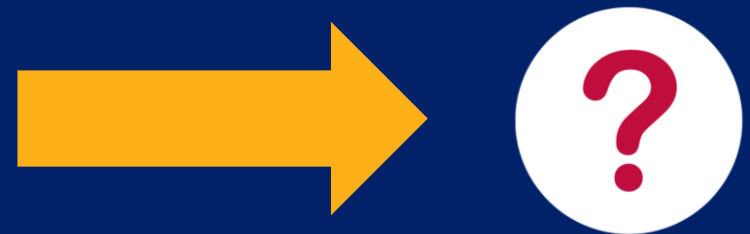
Objectives

At the end of this training, attendees will:

- understand the State agency monitoring requirements for SFAs undergoing an NSLP Administrative Review (AR) when operating SSO;
- know what to expect of the review process;
- be familiar with all formal correspondence that will be initiated by the HNS Reviewer; and
- understand potential review outcomes and actions to be taken after the review.



- Throughout 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 answers available within the guide.
- This icon will indicate a comprehension quiz question and the background of the slides will be blue like you see on this slide.



**What to Expect:
National
School Lunch
Program
Administrative
Review for
Seamless
Summer Option
Operators
School Year
2021-2022**

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Section 1

State Agency Monitoring Requirements



State Agency Monitoring Requirements

Intent of the Administrative Review

The Administrative Review (AR) is set in place to ensure program compliance and for State agencies to provide technical assistance. The intent of the AR is to:

- determine if program requirements are being met;
- provide technical assistance specific to the School Food Authority (SFA);
- help SFAs determine how corrective action will be implemented into their operation to assure technical assistance is understood and impactful; and
- assess fiscal action (if applicable).

State Agency Monitoring Requirements

Administrative Review

The Arizona Department of Education (ADE) is required to conduct ARs of all SFAs operating the National School Lunch Program (NSLP) **at least once during each 3-year review cycle**. During the AR, ADE will review all Child Nutrition Programs (CNP) the SFA is operating during the year of review. The following programs are included in the AR:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Afterschool Care Snack Program (ASCSP)
- At-Risk Afterschool Meals (At-Risk)
- Special Milk Program (SMP)
- Fresh Fruit & Vegetable Program (FFVP)
- Seamless Summer Option (SSO)

State Agency Monitoring Requirements

Review of Other Programs

ADE will review all CNPs operated at the site(s) selected for review.

- ADE will only review **Afterschool Care Snack Program** or **Special Milk Program** if a site selected for review operates one or more these programs. If none of the sites selected for the AR operate these programs, the State agency is not required to review these programs.

At-Risk Afterschool Meals and the **Fresh Fruit and Vegetable Program** must be reviewed as a part of the AR. If none of the sites selected for the AR operate At-Risk or FFVP but the SFA operates the programs elsewhere, ADE will conduct a review of these programs at the sites operating them.

State Agency Monitoring Requirements

Minimum Number of Sites to Review

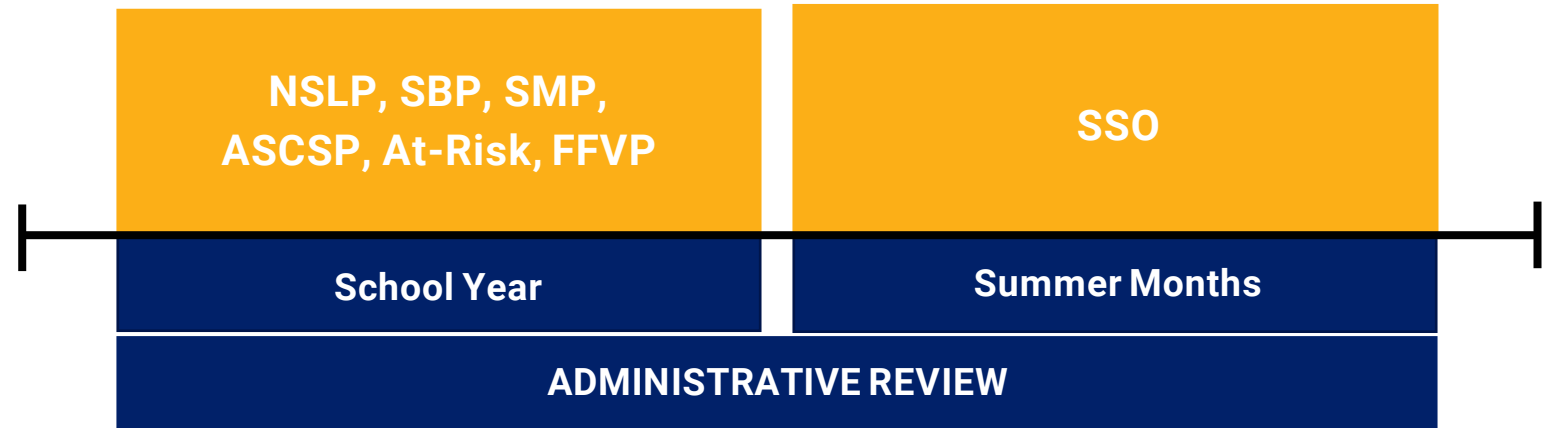
At minimum, State agencies must review a minimum number of schools depending on the size of the SFA. The HNS Reviewer will use the chart below to determine the number of site(s) to review.

Number of Sites	Minimum Number of Sites to Review
1 to 10	1
11 to 20	2
21 to 30	3
31 to 40	4
41 to 60	6
61 to 80	8
81 to 100	10
101 or more	12

State Agency Monitoring Requirements

Scheduling the Administrative Review

Traditionally, ADE schedules an AR during the school year and a separate review of SSO during the summer months following the school year. This ensures all CNPs being operated within a program year have been monitored. The AR is not considered complete until all CNPs have been reviewed.



State Agency Monitoring Requirements

Anticipated Scheduling of the AR in SY 21-22

United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) allowed State agencies to monitor SSO during SY 20-21 for SFAs that opted in to operating SSO throughout the school year. These reviews only included the review requirements of the SSO and contributed towards the SSO portion of the AR.

In order for State agencies to complete the AR monitoring requirements of these SFAs, State agencies would need to conduct the remaining portion of the AR in SY 21-22 for NSLP and other CNPs, if applicable.



State Agency Monitoring Requirements

Waiver to Allow Scheduling of ARs in SY 21-22

USDA released [COVID-19: Child Nutrition Response #85](#) which allowed schools to operate SSO rather than NSLP for the entire school year. This has resulted in SFAs operating SSO during the school year that still need to receive an AR for NSLP operations to fulfill the review requirement.

Fortunately, USDA released [COVID-19: Child Nutrition Response #97](#), which allows State agencies to conduct the remainder of the AR while SFAs operate SSO during SY 21-22. Once the SFA receives this portion of the review this year, the AR will be considered closed and SFAs can expect their next AR to occur in SY 24-25.



State Agency Monitoring Requirements

Required Contact

Notification of the Administrative Review – SFAs scheduled to receive an AR in SY 21-22 were provided a certified letter in June 2021.

- This letter does not provide specific dates for when the review will occur.

Findings of the Administrative Review Summary – The State agency is required to provide written notification of the review findings to the SFA's Superintendent Contact and SFA Contact (as indicated on the CNPWeb sponsor application), no later than 30 days after the exit conference occurs.

True or False: SFAs receiving an AR during SY 21-22 will receive an SSO Review during the summer in 2022.

- A) True
- B) False



True or False: SFAs receiving an AR during SY 21-22 will receive an SSO Review during the summer in 2022.

- A) True
- B) False**

SFAs receiving an AR during SY 21-22 had received an SSO Review in SY 20-21; therefore, they do not need to go through the SSO portion of the AR again. Once the AR is complete, the review will be considered closed until the next 3-year cycle.

State Agency Monitoring Requirements

Scope of the Administrative Review

State agencies must review both critical areas and general areas.

Critical Areas:

- **Performance Standard 1** – All free, reduced-price, and paid school meals claimed for reimbursement are served only to children eligible for school meals and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.
- **Performance Standard 2** – Reimbursable lunches and breakfasts meet the meal requirements, as applicable to the age/grade group reviewed.

General areas:

- These areas include but are not limited to: Free and reduced-price process, civil rights, SFA on-site monitoring, reporting/recordkeeping, food safety, competitive food services, water, program outreach, resource management, and other areas.

State Agency Monitoring Requirements

Scope of the Administrative Review for SSO, SY 21-22

State agencies will continue to review both critical areas and all general areas that are still applicable to SSO operations for SFAs that opted into the waiver to operate SSO during SY 21-22.

Critical Areas:

- Performance Standard 1 – **AR will not include certification and benefit issuance.** AR will still confirm that all school meals claimed for reimbursement are served to eligible participants and the process for counting meals results in accurate claims.
- Performance Standard 2 – Reimbursable lunches and breakfasts meet the meal requirements, as applicable to the age/grade group reviewed.

General Areas:

- All areas apply **except for free and reduced-price processes such as verification, requirements for pricing paid lunches, and professional standards training requirements.**

State Agency Monitoring Requirements

Other Waivers Impacting Scope of the AR for SSO

The waivers below may result in AR requirements that are not applicable. SFAs who elected to operate under the waivers will receive a review with the modifications below.

Waiver	Modified AR Requirements
COVID-19 Response #92: Nationwide Waiver to Allow OVS Flexibility for Senior High Schools	<p>Offer vs. Serve: If the SFA elects to operate this flexibility, the reviewer will not assess if OVS was implemented for high schools.</p>
COVID-19 Response # 93: Nationwide Waiver of Area Eligibility in Afterschool Programs in School Year 2021-2022	<p>ASCSP/At-Risk: If the SFA elected to operate ASCSP or At-Risk at a site that does not meet eligibility requirements, the reviewer will not assess the site’s area eligibility requirements.</p>
COVID-19 Response # 98: Nationwide Waiver of Local Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Program	<p>Local Wellness Policy: If the SFA opted into this waiver, ADE will not review compliance with the triennial assessment requirement but will still collect a copy of the Local Wellness Policy. If the SFA does not opt into this waiver via CNPWeb, the triennial assessment will be included in the AR.</p>
COVID-19 Response # 94: Nationwide Waiver of Onsite Monitoring Requirements in the School Meal Programs – Revised – EXTENSION 3	<p>Onsite Monitoring: If the SFA elects to use this waiver, the off-site component of monitoring is still required to be completed along with supporting documentation for all sites selected for review.</p>

State Agency Monitoring Requirements

Meal Pattern Waiver to Allow Specific Flexibilities

[COVID-19: Child Nutrition Response #90](#) provides operators with flexibilities for meeting certain meal pattern requirements when implementing COVID-19 safety protocols, such as distance learning, that require alternative meal service models.

SFAs must opt in to use this flexibility if unable to meet vegetable subgroups, milk type, milk variety, sodium, age/grade groups and/or whole grain-rich requirements due to alternative meal service operations.

SFAs that utilize this waiver during the Week of Review or Day of Review will need to provide documentation to justify how safety needs during meal service operation prevented them from meeting the meal pattern requirements covered under this waiver.

State Agency Monitoring Requirements

COVID-19 Relief Efforts Impacting Scope of AR

- **School Programs Emergency Operational Costs Reimbursement Program** – ADE will monitor how emergency operational costs have been utilized during the AR. SFAs will be required to provide information on the use of funds that were provided through the Emergency Operational Costs Reimbursement Program.
- **Pandemic-Electronic Benefit Transfer (P-EBT)** – The AR will not monitor or request documentation submitted for P-EBT issuance for SY 20-21 or Summer 2021. The review will not monitor nor review funds received to cover the administrative costs of P-EBT.

Section 2

The Administrative Review Process



The Administrative Review Process

On-Site and Off-Site Requirements of the Review

To conduct an AR, the State agency must gather and assess information off-site and/or on-site, observe the school food service operation during the **Day of On-Site Review**, and use a risk-based approach to evaluate compliance with specific program requirements.

- **Day of On-Site Review:** The day that on-site meal service is observed.

The following slides will review the process ADE has established to conduct an AR.

The Administrative Review Process

Assigned Reviewer

HNS has a team of reviewers that conduct all Child Nutrition Program reviews. SFAs will be assigned one HNS Reviewer to conduct the entire review. SFAs can expect to be in constant contact with their assigned HNS Reviewer throughout the entire review process.

The Administrative Review Process

What to Expect of the Administrative Review SY 21-22

The AR occurs in the following order:

Starting 5 weeks prior to the Day of On-Site Review, the SFA will be notified of the AR and the assigned HNS Reviewer will provide the *Confirmation Memo & Checklists* and *Off-Site Assessment Tool*.

- The SFA will compile and send documents to reviewer by the communicated deadlines.
- The HNS Reviewer will notify the SFA if a review of Resource Management or expanded menu review is required.

Prior to the Day of On-Site Review, logistics of on-site observation(s) will be discussed.

On the Day(s) of On-Site Review, an Entrance Conference, on-site observation(s) for all site(s) selected and an Exit Conference will be conducted.

Within 30 days of the Exit Conference, the SFA will receive an *Administrative Review Summary Report*.

The Administrative Review Process

Notification of the Scheduled Review

At least five weeks prior to the day of on-site meal service observation, the HNS Reviewer will notify the SFA that the review has been scheduled. At this time, the HNS Reviewer will provide two documents:


- **Confirmation Memo & Checklists** – Outlines the details of the AR and lists documentation required to be submitted to the HNS Reviewer prior to the on-site review
- **Off-Site Assessment Tool** – Provides the HNS Reviewer with information on how the program operates prior to the on-site review

The Administrative Review Process

Confirmation Memo

The intent of the **Confirmation Memo** is to indicate which site(s) will be reviewed and the timeframe in which the review will occur. Included in the Confirmation Memo are checklists of documents that will need to be sent to the reviewer by the provided deadlines. All requested documents will have a deadline prior to or on the Day of On-Site Review.

The HNS Reviewer will provide the Confirmation Memo via email to the SFA's Superintendent Contact and SFA Contact the month prior to the on-site review.



Arizona Department of Education
Health & Nutrition Services Division

[DATE]

[SUPERINTENDENT CONTACT NAME & TITLE]
[SFA CONTACT NAME & TITLE]
[SFA NAME]
[SFA MAILING ADDRESS]
[CITY, STATE, ZIP]

Dear [SUPERINTENDENT & SFA CONTACT NAMES]:

Per our previous communication, [SFA NAME] is required to partake in an Administrative Review of the National School Lunch Program (NSLP), School Breakfast Program (SBP), After-school Snack Program (ASPL), At-Risk After-school Meals, Special Milk Program (SMP), and Fresh Fruit & Vegetable Program (FFVP) during the 2021-2022 school year. The day of review will be [DATE SELECTED FOR REVIEW] to conduct a review for the month of [MONTH OF REVIEW]. The site(s) selected for the Administrative Review is/are [SITE(S) SELECTED FOR REVIEW].

The Administrative Review assesses compliance with Federal and state regulations in areas such as meal counting and claiming, meal pattern, resource management, and civil rights in order to confirm that the Federal funding received is being used effectively. Additionally, the Administrative Review provides an environment for the State agency to provide SFA-specific technical assistance.

Please review all enclosed documents:

- **Off-Site Assessment Tool** will help your reviewer gain perspective on how your program is operated. This should be completed and returned by [BLUE DATE].
- **Required Phase 1 Documentation** checklist outlines the materials that should be organized and sent by [DATE WITHIN MONTH OF REVIEW].
- **Required Phase 2 Documentation** checklist outlines the materials that should be organized and sent by [END OF THE SIX WEEK OF SCHOOL MONTH].
- **Required Phase 3 Documentation** checklist outlines the materials that should be organized and ready available on [DATE OF REVIEW].
- **Previous Administrative Review Report** from School Year [SCHOOL YEAR OF PREVIOUS AR].

Please note that during the previous Administrative Review in School Year [SCHOOL YEAR OF PREVIOUS AR], [violations were found. Repeat violations during this upcoming Administrative Review will result in fiscal action and may result in termination of performance-based reimbursement (extra 7 cases). It is

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SY 21-22
Confirmation Memo

The Administrative Review Process

Checklist

The pages following the Confirmation Memo include checklists containing lists of required documents grouped in three phases. Each phase will have a unique deadline for the SFA to submit incrementally rather than all at once.

- **Phase 1:** Menus and menu documentation for the first full week of operation in the month of review and general operational program documents
- **Phase 2:** Meal counts for the month of review
- **Phase 3:** Menus, menu documentation, and meal counts for the Day of On-Site Review

SFA Name Here
CTDI# Here 3

Please send all requested documentation to [Reviewer's Name] at [Reviewer's Email], or through ADE's Secure File Delivery System

Phase 1 Documentation
To be submitted by **DATE WITHIN MONTH OF REVIEW:**

1. A copy of your current Free and Reduced Price Policy Statement and any applicable addendums. a. If you have revised your Free and Reduced Price Policy Statement as of 2021, notify your reviewer.	<input type="checkbox"/>
2. Copies of lunch and breakfast menus, production records, standardized recipes, Nutrition Facts labels, ingredient labels, and Product Formulation Statements or Child Nutrition (CN) labels for At Least Full Week in Month of Review . Provide these for all menus served at Review Sites . a. You must include a Nutrition Facts label for ALL items served with a reimbursable meal, including condiments and seasonings. b. You must provide crediting documentation (Product Formulation Statement or CN label) for ALL processed products to show how they credit toward a meal pattern component. c. Recipes must be provided for ALL items requiring any length of preparation and must include a yield and serving size. d. Production records must include planned and served quantities and portion sizes for all items served, including salad bars and condiments.	<input type="checkbox"/>
3. Provide a written description of meal pattern waivers utilized for meals served at Review Sites during Review of Review .	<input type="checkbox"/>
4. 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.	<input type="checkbox"/>
5. A copy of the completed Civil Rights Compliance Form for the current school year. a. If your review is happening prior to December 15, you may provide a copy of the form completed in the prior school year.	<input type="checkbox"/>
6. A copy of your complaint procedures for processing complaints alleging discrimination in the school meal programs.	<input type="checkbox"/>
7. Documentation to support that program staff were recently trained on civil rights topics. a. Please show what was provided to staff and when the training occurred.	<input type="checkbox"/>
8. A copy of the form provided to households with students who require special dietary accommodations.	<input type="checkbox"/>
9. Copies of on-site monitoring forms for breakfast and lunch conducted prior to February 1 for Review Sites . a. This is not a requirement for SFAs with only one site. b. If your review is scheduled prior to February 1, you may provide forms completed in the prior school year. c. The on-site monitoring component has been waived under nationwide monitoring waivers for COVID-19. If electing to utilize this waiver, the off-site component is required to be completed along with supporting documentation.	<input type="checkbox"/>

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SY 21-22
Checklists

The Administrative Review Process

Checklist Documentation Due Dates

Many items on the checklists will be tied to specific dates within the assigned review period. The SFA may have to wait for those dates to pass before making copies of the documents to provide to the HNS Reviewer.

- Phase 1 documentation will be required to be submitted on or before the specified date within the month prior to the on-site review.
- Phase 2 documentation will be required to be submitted on or before the specified date near the beginning of the month of the on-site review.
- Phase 3 documentation will be required to be submitted on the Day of On-Site Review.

The Administrative Review Process

Phase 1

Operational Documents:

- Resource Management
- Civil Rights
- On-Site Monitoring
- Local Wellness Policy
- Competitive Foods/Smart Snacks
- Hiring Professional Standards for Food Service Director
- Food Safety and Buy American
- Reporting and Recordkeeping
- SBP and SFSP/SSO Outreach
- SFA Operations
- Adult Meal Price
- Media Release

Menu Documentation for Week of Review:

- Menus, production records, standardized recipes, Nutrition Facts labels, ingredient labels, Product Formulation Statements, and Child Nutrition labels (breakfast and lunch) and description of Meal Pattern Waiver information (if applicable)

The Administrative Review Process

Phase 2

Meal Counts for month of review:

- Meal count records for all selected review sites for the month of review for all CNPs being operated (breakfast, lunch, snack, supper, SMP)
- SMP invoices (if applicable)
- For **closed enrolled sites**, Daily Edit Check records for selected review sites for the month of review (breakfast and lunch)

The Administrative Review Process

Phase 3

Operational Documents:

- Buy American Exception documentation for all products served/purchased for the Day of On-Site Review

Meal Counts and Menu Documentation for Day of On-Site Review

- Meal count records for all selected review sites for the Day of Review (breakfast and lunch)
- Menus, production records, standardized recipes, Nutrition Facts labels, ingredient labels, Product Formulation Statements, and Child Nutrition labels (breakfast and lunch) and description of Meal Pattern Waiver information (if applicable)

The Administrative Review Process

Off-Site Assessment Tool

The Off-Site Assessment Tool is a Word document that the SFA will complete by typing their answers directly into the tool and checking boxes that are applicable to the SFA's operation.

There are a total of eleven modules, each with a series of questions that will inquire about how the SFA operates. Not all modules or questions may be applicable to each SFA.

Other individuals involved in the program may be required for assistance while providing responses; these may include the business manager, caterer, Food Service Management Company (FSMC) staff, etc.

Administrative Review Off-Site Assessment Tool Questions

SCHOOL YEAR: 2021-2022

School Food Authority:

Module: Meal Counting and Claiming

300.	Does your school system use an electronic or manual system to count and consolidate reimbursable meals? If a combination of electronic and manual is used check both boxes.	ELECTRONIC	MANUAL
		<input type="checkbox"/>	<input type="checkbox"/>

Electronic System means meal counts are generated by an automated Point of Service (POS) system that may connect to the claim for reimbursement. Electronic systems have the ability to identify a student's benefit category, tally daily meal counts, transfer daily meal counts to your school system, consolidate meal counts for your school system, and/or submit the claim for reimbursement. The system is limited to virtually NO MANUAL data entry at the POS. Meal counts are kept electronically.

Manual System means meal counts are generated by a manual Point of Service system. Meal counts are manually tallied, consolidated, and transferred to your school system. Consolidation of meal counts by your school system is completed manually. Hard copy records are kept on file.

If your school system has implemented an electronic system, but one or more aspect of the benefit issuance process is conducted manually (e.g., your school system has an electronic POS, but utilizes a roster at an alternate service location and your school system staff manually enters meal counts from the alternate service location), the reviewer will consider it a manual/combination system.

302.	Does your school system have a backup system to their primary meal counting and claiming system should the primary system fail/not operate? If YES, describe backup system in the comments.	YES	NO
		<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Administrative Review Off-site Assessment Tool School Year 2021-2022 1

SY 21-22
Off-Site Assessment Tool

The Administrative Review Process

Adult Meal Pricing While Operating SSO

The Off-Site Assessment Tool will require SFAs to indicate if/how the cost for adult meals was covered by funds other than the nonprofit school food service account, if meal prices were sufficient to cover the overall cost of the meals, and how adult meal prices were calculated. SFAs have two options for establishing pricing for adult meals in SY 21-22:

- Option 1: Determine the cost of providing a meal to an adult. Documentation of this calculation must be maintained by the SFA to support adult meal prices.
- Option 2: Use the free reimbursement rate plus the value of donated foods.

For assistance in establishing adult meal prices please read ADE's memo [HNS 27-2021: Guidance for Adult Meal Prices in School Year 2021-2022](#).

The Administrative Review Process

Compile and Send Review Documents to Reviewer

SFAs are required to email both the Off-Site Assessment Tool and the program documents listed on the Checklist by the communicated due dates.

The HNS Reviewer will acknowledge receipt of the documents and will contact the SFA if the responses and/or documents are inadequate.

At this time, the HNS Reviewer will determine if additional resource management documents or meal pattern documents are required. These documents will be requested prior to the on-site portion of the review.

The HNS Reviewer will not disclose any findings until the Day of the On-Site Review.

The Administrative Review Process

Notification of Resource Management Review

Based on the information provided by the SFA in the Resource Management section of the Off-Site Assessment Tool, a detailed review of the following sections may occur:

- Maintenance of the Nonprofit School Food Service Account
- Revenue from Nonprogram Foods
- Indirect Costs
- Emergency Operational Costs Funding

The HNS Reviewer will notify the SFA prior to the day of review if a Comprehensive Resource Management Review is required and will indicate what additional documentation must be provided.

The Administrative Review Process

Notification of Expanded Menu Review

If the HNS Reviewer determines that meal pattern requirements were not met during the Week of Review (based on Phase 1 documentation provided by the SFA), menu documentation for the entire month of review and possibly additional months within SY 21-22 may be requested.

The Administrative Review Process

Preparing for the Day of On-Site Review

One week prior to the Day of On-Site Review, the HNS Reviewer will work with the SFA to confirm the location and time of the on-site visit. SFAs are expected to provide mealtimes to the HNS Reviewer to ensure meal services of the following are observed:

- Breakfast
- Lunch
- Fresh Fruit and Vegetable Program (if applicable)

The Administrative Review Process

HNS Reviewer Workspace

The HNS Reviewer will need a quiet and somewhat private workspace to review program documents. Please provide the following:

- Internet access
- Electrical outlets
- Typical location of where the main contact will be working throughout the day in case questions arise

The Administrative Review Process

Entrance Conference

Typically, the entrance conference will occur on the Day of the On-Site Review. If the SFA serves breakfast, it may occur after meal service concludes. The entrance conference gives the SFA and HNS Reviewer the opportunity for introductions, a review of the day's agenda, and a time to discuss documents that were gathered off-site.

At a minimum, the Food Service Director is required to participate in the entrance conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.

The Administrative Review Process

Exit Conference

The exit conference will occur at the conclusion of the on-site visit. It will be more formal than the entrance conference because the entire review—including off-site and on-site observations, technical assistance, potential fiscal action, and next steps—will be discussed in detail.

At a minimum, the Food Service Director is required to participate in the exit conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.

The Administrative Review Process

Administrative Review Summary Report

The Administrative Review Summary Report is a written summary of any review findings, technical assistance, required corrective action, and fiscal action (if applicable) provided to the SFA by the HNS Reviewer.

Within 30 days of the exit conference, the reviewer will send the Administrative Review Summary Report to the Superintendent Contact and SFA Contact via email and certified mail.

Section 3

Responding to Review Findings



Responding to Review Findings

Responding to the Administrative Review Summary

The SFA must review the Administrative Review Summary Report and is responsible for ensuring all corrective action and fiscal action are received by the given deadline.

Should these post-review actions not be completed by the deadline, **reimbursements will be placed on hold until the actions are complete.**

Responding to Review Findings

Corrective Action

Corrective action may include written descriptions of changes made within the operation, documentation to demonstrate understanding of program regulations, and/or certificates showing training was completed.

A written response must be provided by the deadline indicated in the Administrative Review Summary Report. The response must be on school letterhead, be signed by an authorized representative listed on the Food Program Permanent Service Agreement (FPPSA) and must address all required corrective action items listed in the report. It is best practice to submit corrective action prior to the deadline in case any revisions are required.

The SFA will receive a Close-Out Memo when sufficient corrective action is submitted.

Responding to Review Findings

Fiscal Action

The critical areas of the AR are tied to reimbursement funds. During an AR, if it is found that reimbursement was paid for non-reimbursable meals or that meals were claimed by incorrect eligibility, fiscal action will be assessed and recovered through future claims.

The Administrative Review Summary Report will provide the total amount of fiscal action that was assessed due to review findings.

Responding to Review Findings

Repeat Findings that Lead to Fiscal Action

A repeat finding occurs if an SFA received a meal pattern finding in the previous AR (3 years prior) for vegetable subgroups, milk variety and milk type, food quantities and the same type of meal pattern finding occurs again in the current AR.

Example 1:

- Vegetable Subgroups: If one or more subgroups are not offered within a week

Example 2:

- Milk Variety and Type: If only one type of milk is offered, or if an unallowable milk type is offered without an approved exemption on file

Example 3:

- Food Quantities: If insufficient daily and/or weekly quantities of any meal components are offered

Responding to Review Findings

Waiver to Assess Fiscal Action

Due to [*COVID-19: Child Nutrition Response #100*](#), ADE will not assess fiscal action for missing components violations or for repeating violations involving milk type, vegetable subgroups, and quantities that were the result of food supply problems.

SFAs are required to provide supporting documentation for the Week of Review and the Day of Review if they were unable to meet meal pattern requirements due to food supply problems.

- If this documentation is sufficient and meets the intent of the waiver, the violation will still be considered a review finding and fiscal action will not be assessed.
- If this documentation is not sufficient and does not meet the intent of the waiver, the violation will be a finding and will result in fiscal action if the violation is a repeat finding.

Please note that SFAs do not opt into [*COVID-19: Child Nutrition Response #100*](#).

Responding to Review Findings

Meal Pattern Waiver to Allow Specific Flexibilities

Due to [COVID-19: Child Nutrition Response #90](#), ADE will not be assessing fiscal action for specific meal pattern requirements not met due to the SFA needing to modify their meal service operations for safety/exposure reasons.

SFAs are required to provide supporting documentation for the Week of Review and the Day of Review if they were unable to meet meal pattern requirements due to modified meal service operations for safety/exposure reasons.

- If this documentation is sufficient and meets the intent of the waiver, the violation will not be considered a review finding and fiscal action will not be assessed.
- If this documentation is not sufficient and does not meet the intent of the waiver, the violation will be a finding and will result in fiscal action if the violation is a repeat finding.

Responding to Review Findings

Performance-Based Reimbursement

Prior to being able to claim meals through the NSLP, SFAs are certified to be in compliance with the new meal patterns. For completing this required Certification of Compliance, an increased reimbursement of 7 cents is provided to the SFA for each lunch claimed to help improve the quality of school meals.

If a **missing meal component for lunch** is observed during the AR, this extra performance-based reimbursement is terminated until the month following the approval of corrective action.

- For NSLP meal pattern training, please refer to ADE's [Step-by-Step Instruction: How to Plan a Lunch Menu](#).

Responding to Review Findings

Assessing Fiscal Action

Fiscal action is assessed for the entire AR by combining the fiscal action for the SSO portion of the AR with the additional CNP portions of the AR. If fiscal action during the SSO portion of the AR exceeded \$600, funds for fiscal action were recovered at that time and any additional fiscal findings will be recovered when the remainder of the AR is completed.

- *For example, if \$700 of fiscal action was assessed during the SSO Review and \$100 of fiscal action was assessed during the rest of the AR, ADE will take a total of \$800 back from the SFA after all CNPs being operated have been reviewed.*

Responding to Review Findings

Fiscal Action Disregard

If the total sum of SSO fiscal action is less than \$600, funds will only be recovered if the combined sum of fiscal action from the remainder of the AR exceeds \$600. If the combined sum of the fiscal action is less than \$600, it is disregarded, and the funds are not recovered.

- *For example, if \$100 of fiscal action was assessed during the SSO Review and \$700 of fiscal action was assessed during the rest of the AR, ADE will take a total of \$800 back from the SFA after all CNPs being operated have been reviewed.*
- *For example, if \$100 of fiscal action was assessed during the SSO Review and \$300 of fiscal action was assessed during the rest of the AR, ADE will disregard the total \$400 fiscal action.*

Is the AR closed the day of the on-site visit?

- A) Yes, you will never discuss the AR again.
- B) Yes, the HNS Reviewer will provide the Close-Out Memo once all findings are discussed.
- C) No, the review is not considered closed until adequate responses for all corrective action are received and the Close-Out Memo is issued by the HNS Reviewer.



Is the AR closed the day of the on-site visit?

- A) Yes, you will never discuss the AR again.
- B) Yes, the HNS Reviewer will provide the Close-Out Memo once all findings are discussed.
- C) No, the review is not considered closed until adequate responses for all corrective action are received and the Close-Out Memo is issued by the HNS Reviewer.**

A written summary of the review findings, technical assistance provided during the review, and the required corrective action will be sent via email and certified mail once the review is complete. The review is not considered “closed” until the Close-Out Memo is issued.

True or False: Repeat findings for vegetable subgroups, milk variety & type, and quantities will result in fiscal action.

- A) True, but only if violations are not related to food supply problems.
- B) False, fiscal action will not be assessed for these specific meal pattern violations.
- C) True, fiscal action will be assessed for all repeat findings.
- D) False, fiscal action is not being assessed for any findings in SY 21-22.



True or False: Repeat findings for vegetable subgroups, milk variety and type, and quantities will result in fiscal action.

- A) True, but only if violations are not related to food supply problems.**
- B) False, fiscal action will not be assessed for these specific meal pattern violations.
- C) True, fiscal action will be assessed for all repeat findings.
- D) False, fiscal action is not being assessed for any findings in SY 21-22.

Repeat findings for vegetable subgroups, milk variety and type, and quantities will not result in fiscal action if related to food supply problems; however, fiscal action will be assessed if violations are not attributed to food supply problems.

True or False: 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 the extra 7-cents reimbursement.

- A) True
- B) False



True or False: 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 the extra 7-cents reimbursement.

A) True

B) False

Any findings violating compliance with program requirements must be resolved and sufficient corrective action must be submitted by the due date provided by the HNS Reviewer, or reimbursements will be placed on hold.

Congratulations!

You have completed *What to Expect: National School Lunch Program Administrative Review for Seamless Summer Option Operators School Year 2021-2022*

To request a certificate, please go to the next slide.

In order to count this training toward 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: National School Lunch Program Administrative Review for Seamless Summer Option Operators School Year 2021-2022
- **Learning Code:** 3260
- **Key Area:** 3000-Administration
- **Length:** 1 Hour

Please Note: Attendees must document the amount of training hours indicated regardless of the amount of time it takes to complete it.



Congratulations!

Requesting a training certificate

Please click on the link below to complete a brief survey about this online 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: National School Lunch Program Administrative Review for Seamless Summer Option Operators School Year 2021-2022
- **Professional Standards Learning Code:** 3260





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