

What to Expect: Summer Food Service Program Administrative Review



Health and Nutrition Services
Arizona Department of Education





Disclaimer

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS). The content in this training is intended for professionals operating one or more USDA Child Nutrition Programs in Arizona under the direction of ADE. The information in this training is subject to change. Attendees are encouraged to access professional development materials directly from the training library to prevent use of outdated content.

Intended Audience

This training is intended for Community Organizations (COs) and School Food Authorities (SFAs) operating the Summer Food Service Program (SFSP) receiving an Administrative Review. All regulations are specific to operating the SFSP under the direction of ADE.

Objectives

At the end of this training, attendees will:

- understand the State agency monitoring requirements for entities undergoing an SFSP Administrative Review (AR);
- 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.

TRAINING HOURS

A training certificate will be available at the end of this course. This training does not count toward Professional Standards requirements

Training Title: What to Expect:
Summer Food Service Program
Administrative Review

Key Area: N/A

Learning Code: N/A

Length: 30 Minutes

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WHAT TO EXPECT:
SUMMER FOOD SERVICE PROGRAM ADMINISTRATIVE REVIEW

Section One: State Agency Monitoring Requirements



Intent of the Administrative Review

The administrative review is set in place to ensure program compliance and for State agencies to provide technical assistance.

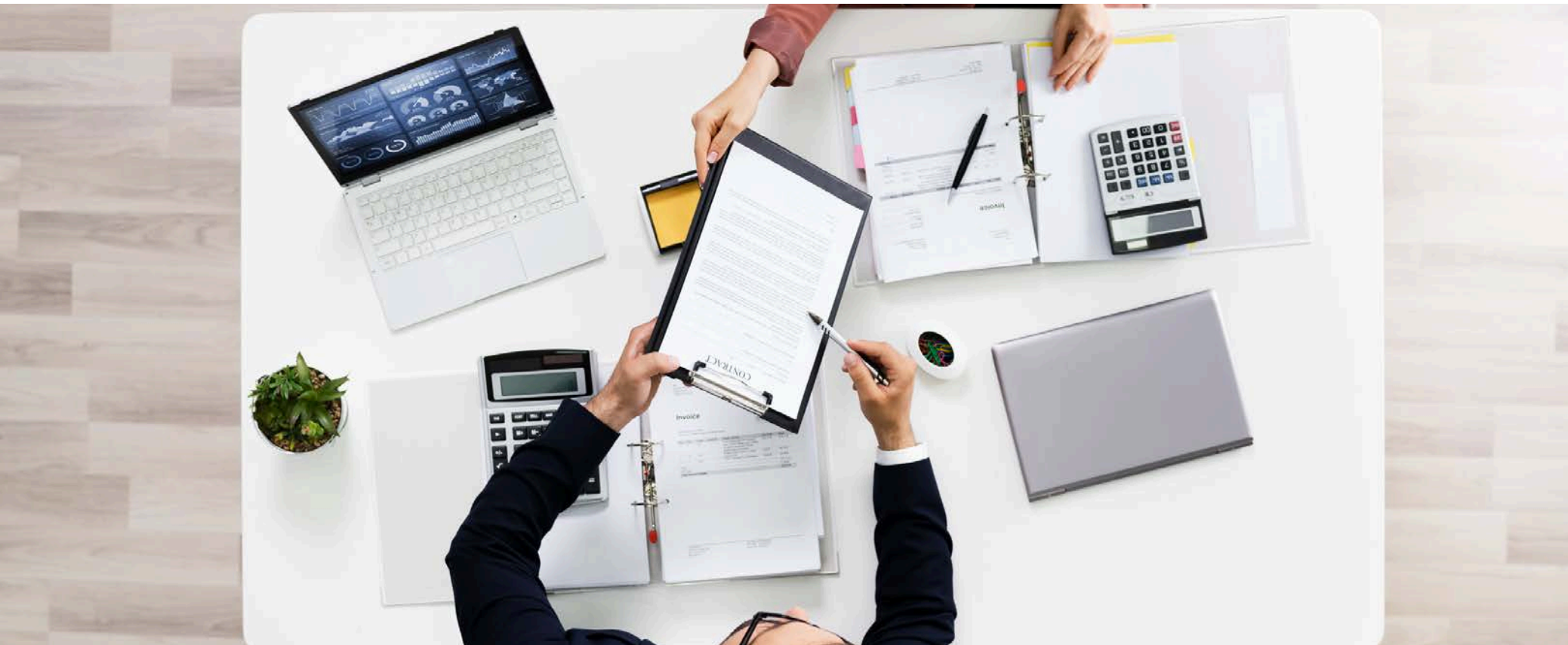
The intent of the administrative review is to:

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



Administrative Review

ADE is required to review no less than half the total number of approved SFSP sponsoring entities every year based on the State agency's site selection criteria. If half of the total number of approved SFSP operators is not met with the site selection criteria, additional sponsoring entities will be selected. The sponsoring entity with the highest projected reimbursement will be selected to meet the requirement.



SFSP State Agency Monitoring

HNS is required to review:

- new operators at least once during the first year of operation;
- operators with significant operational issues the previous year;
- all operators once every three years; and
- operators that were previously terminated and have reapplied.

Minimum Number of Sites to Review

State agencies must review a minimum number of sites depending on the size of the sponsoring entity. Single-site sponsoring entities receive a site assessment during every review. Multi-site sponsoring entities receive site assessment(s) for at least 10% of their approved sites. 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 FOR SFSP
1-10	1
11-20	2
21-30	3
31-40	4



Entities with 2-10 sites that operate both congregate and non-congregate meal service will receive **two** site reviews. Single-site entities operating congregate and non-congregate meal service will receive only one site review.

Site Priority Selection

As previously stated, the State Agency will review at least 10 percent of each sponsoring entity's sites, with priority given to the following:

- Sites that are operating non-congregate meal service(s);
- Sites that are operating meal service(s) that exceed a 3-hour time period;
- The maximum number of meals approved to serve under 12 CFR 225.6(h)(1) and (2);
- Method of obtaining meals (i.e., self-preparation or vended meal service);
- Time since last site review by State agency;
- Type of site (e.g., open, closed enrolled, camp);
- Type of physical location (e.g., school, outdoor area, community center);
- Affiliation with the sponsor, as defined in 12 CFR 225.2.

Scheduling the Administrative Review

The SFSP operates under the Program Year (PY), October- September. Traditionally, operators will participate for only a few months of the PY (during the summer months). Since reviews must be conducted while SFSP is in operation, ADE will schedule all sponsoring entities who are required to receive a review to receive an in-person SFSP review during operating months.

Typical Months of SFSP Operations and SFSP Review during the PY.

October
November
December
January
February
March
April
May
June
July
August
September

THE STATE AGENCY WILL PROVIDE WRITTEN NOTIFICATION OF THE REVIEW FINDINGS (ADMINISTRATIVE REVIEW SUMMARY AND REPORT) TO THE SPONSOR ADMINISTRATOR WITHIN 30 DAYS OF THE EXIT CONFERENCE.

Review

Correspondence

SPONSORING ENTITIES SCHEDULED TO RECEIVE AN ADMINISTRATIVE REVIEW WILL RECEIVE AN EMAIL FROM THEIR REVIEWER NOTIFYING THEM OF THE UPCOMING REVIEW.

The email will provide the Confirmation Memo & Checklist and will include the date of the on-site visit.

Quiz Time

True or False: All sponsoring entities receiving an administrative review will be notified of the date their review will be conducted.

A True

B False



Quiz Time

True or False: All sponsoring entities receiving an administrative review will be notified of the date their review will be conducted.

A True

B False

Sponsoring entities receiving an administrative review will be notified of their upcoming administrative review for the current program year. The notification will include the date of when the administrative review will be conducted.



Scope of the Administrative Review

The administrative review will focus on the accountability requirements, which may include:

- **Eligibility**
- **Site Agreement**
- **Counting and Claiming**
- **Meal Pattern**
- **Program Costs**
- **Training**
- **Monitoring**
- **Food Safety**
- **Civil Rights**
- **Program Outreach**
- **Recordkeeping**

WHAT TO EXPECT:
SUMMER FOOD SERVICE PROGRAM ADMINISTRATIVE REVIEW

Section Two: The Administrative Review Process



On-Site Requirements of the Review

TO CONDUCT AN ADMINISTRATIVE REVIEW, THE STATE AGENCY MUST:

- gather and assess information off-site and/or on-site; and
- observe the site's food service operation during the day of the administrative review.



Assigned Reviewer

HNS has a team of reviewers that conduct all Child Nutrition Program reviews. Sponsoring entities will be assigned one HNS Reviewer to conduct the entirety of the review.

Sponsoring entities can expect to be in constant contact with their assigned HNS Reviewer throughout the entire review process.



Notification of the Scheduled Review

Prior to the day of the on-site administrative review, the HNS Reviewer will notify the sponsoring entity via email that the review has been scheduled. At this time, the HNS Reviewer will provide the Confirmation Memo & Checklists.

The Confirmation Memo & Checklist outlines the details of the administrative review and lists documentation required to be submitted to the HNS Reviewer by the communicated deadlines, as well as documentation required to be provided to the HNS Reviewer on the day of the review.

Administrative Review Overview

Once the HNS Reviewer has provided the Confirmation Memo & Checklists to the sponsoring entity, the following will occur:

- The logistics of the visit will be discussed
- The sponsoring entity will compile and have documentation ready by the communicated deadlines
- The HNS Reviewer will notify the organization representative if additional documentation will be needed at the time of the on-site review

ON THE DAY(S) OF THE ON-SITE ADMINISTRATIVE REVIEW, AN ENTRANCE CONFERENCE, MEAL OBSERVATION(S) FOR THE SITE(S) SELECTED, AND AN EXIT CONFERENCE WILL BE CONDUCTED.

Within 30 days of the exit conference, the sponsoring entity will receive an Administrative Review Summary and Report.

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 indicated at the top of the checklist. The HNS Reviewer will provide the Confirmation Memo via email to the sponsoring entity's representative prior to the on-site administrative review.



Health & Nutrition Services Division

[DATE]

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

Dear [SPONSOR ADMIN/SUPER & SFA CONTACT NAMES]:

Per our previous communication, [SPONSOR NAME] is required to partake in an Administrative Review of the Summer Food Service Program during the 2022 program year. This review is announced and will be conducted on [DATE SELECTED FOR 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, purchasing, 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 Sponsor-specific technical assistance.

Please review all enclosed documents:

- **Required Phase 1 Documentation** checklist outlines the materials that should be organized and sent by [DATE WITHIN MONTH PRIOR TO ON-SITE].
- **Required Phase 2 Documentation** checklist outlines the materials that should be organized and readily available on [DATE OF REVIEW].

As a reminder, the Arizona Department of Education, Health and Nutrition Services Division offers training opportunities throughout the year. A web-based training overviewing what to expect of your administrative review will be made available on ADE's website at <https://www.azed.gov/hns/covid19>, under the accordion Reviews Conducted by the State Agency.

If you have any questions regarding the review, please contact me at [REVIEWER'S PHONE #] and/or [REVIEWER'S EMAIL ADDRESS].

Sincerely,

[REVIEWER'S NAME AND TITLE]
Health and Nutrition Services Division

This institution is an equal opportunity provider.

Confirmation
Memo

Checklists

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

- Phase 1: Documentation for the review month
- Phase 2: Documentation for the day of review

Please note that sponsoring organizations that only operate within one month will have checklists that differ from the above phases to accommodate the abbreviated operation.

Sponsor Name
CTD#

2

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

Note: Do not provide original documents to the reviewer; all documents should be physical or electronic copies.

Phase 1 Documentation

To be submitted by [DATE WITHIN MONTH OF ON-SITE]:

1. Daily meal/snack count documentation for all operating sites during [MONTH OF REVIEW] for all meal/snack services	<input type="checkbox"/>
2. Posted menu(s) for [REVIEW SITES] during [MONTH OF REVIEW]	<input type="checkbox"/>
3. Documentation to support meals served at [REVIEW SITES] during [FIRST FULL OPERATING WEEK DURING MONTH OF REVIEW] a. Production records (if applicable) b. Child Nutrition (CN) labels and/or Product Formulation Statements for commercially prepared entrées c. Nutrition Facts labels for all grain items d. Food purchase receipts e. Vended meal receipts (if applicable)	<input type="checkbox"/>
4. Documentation to support program expenses in [MONTH OF REVIEW] a. Food invoices/receipts b. Labor records/time distribution reports c. Mileage reports d. Expense worksheets e. Caterer procurement documentation (if applicable)	<input type="checkbox"/>
5. Documentation to support training requirements have been met, including: a. Training that was provided b. Dates of training c. Names of personnel (including site assignment)	<input type="checkbox"/>
6. Site Review Forms completed for all operating sites during Program Year 2022 a. If any/all internal monitoring has not been conducted yet, please provide a schedule of when sites will receive a monitoring visit including who will conduct it and the form that will be completed	<input type="checkbox"/>
7. Documentation to support that 2 food safety inspections were received during School Year 2021-2022 or documentation to support that 2 food safety inspections were requested during School Year 2021-22 a. This is only required for school sites that operated NSLP during School Year 2021-2022	<input type="checkbox"/>
8. Health inspections completed during Program Year 2022 summer operations for [REVIEW SITES] a. If health inspections included violations, please provide the corrective action taken	<input type="checkbox"/>
9. Public announcement made regarding summer operations	<input type="checkbox"/>
10. Completed Civil Rights Data Collection form for all operating sites	<input type="checkbox"/>
11. List of enrolled participants and Meal Benefit Income Eligibility Forms for [REVIEW SITES] a. This is only required for camps and non-area eligible enrolled sites	<input type="checkbox"/>
12. Menu Modification Forms for any meal substitutions made at [REVIEW SITES] during [MONTH OF REVIEW]	<input type="checkbox"/>

Sponsor Name
CTD#

3

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s prior to [DAY OF	<input type="checkbox"/>
for Non-[REVIEW SITES]	<input type="checkbox"/>

Administrative
Review Checklist

Checklist Documentation

DOCUMENTATION DUE DATES

Many items on the checklists will be tied to specific dates within the assigned review period. The sponsoring entity representative 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 by the communicated dates on the Confirmation Memo & Checklists within the month of the on-site administrative review.
- Phase 2 documentation will be required to be submitted on the day of the on-site administrative review.

PLEASE NOTE...

Sponsoring organizations that only operate within one month will have checklists that differ from the above phases to accommodate the abbreviated operation.

Phase 1: Off-Site

REQUIRED DOCUMENTATION (FOR ALL OPERATING SITES UNLESS OTHERWISE SPECIFIED):

- Meal count records, menus, and supporting documentation for one week of operation at selected sites
- Meal Benefit Income Eligibility Forms for participants at selected sites (if applicable)
- Program cost documentation
- Site visit forms
- Training documentation
- Food safety inspection documentation for school sites
- Program outreach materials
- Civil Rights Data Collection

Phase 2: On-Site

REQUIRED DOCUMENTATION (FOR SELECTED SITES):

- Meal count records
- Menus and supporting documentation
- Documentation to support non-congregate feeding due to excessive heat (if applicable)

Meal Claim Validation

HNS Reviewers will validate claims for the site(s) selected for on-site review (a minimum of 10% of operating sites). The HNS Reviewer will review the meal count documentation used to consolidate monthly meal counts and will validate at least one month's claim. A complete claim review examines meal claims for all claiming sites in the review month. During the review, the HNS Reviewer will compare the total claim amounts for all sites with the total claimed by the sponsoring entity.

For sites where not all meals served to children are eligible for reimbursement, such as camps, the HNS Reviewer will determine the number of eligible meals served to eligible children.



Meal Preparation Facility Review

HNS Reviewers will conduct a caterer visit if the sponsoring entity is serving vended meals at their participating sites. The facility review must be conducted at least one time within the review cycle for each vended sponsor and in the instance where multiple sponsors use the same caterer, then a single facility review will satisfy the review requirements for those vended sponsors.



Site Caps

The purpose of a site cap is to ensure that a site does not purchase and/or produce meals outside the capability of the site and the need of the community, thereby reducing waste and protecting the integrity of the program. A site cap may be issued by the HNS Specialist for the following reasons:

- If the estimated number of participants on the site application is unreasonable*;
- sites that use a vendor;
- sites that had prior operational issues; and
- sites that at the time of the observed meal service during an administrative review serve far fewer meals than what was indicated on the estimated number of meals section of the site application.

WHAT'S REASONABLE?*

Reasonableness of the estimated number of participants on the site application will be determined using the [AZ SFSP Site Planner Tool](#).

Compile and Send Review Documents

Sponsoring entities are required to email 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 sponsoring entity if the responses and/or documents are inadequate. At this time, the HNS Reviewer will determine if additional documentation is 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 administrative review.



Day of On-Site Review

Prior to the on-site administrative review, the HNS Reviewer will collect the sponsoring entity's mealtimes from their approved CNPWeb site application(s). The HNS Reviewer will work with the entity representative to confirm the location and time of the on-site visit. The HNS Reviewer will review at least one of the following meals services:

- **BREAKFAST AND/OR;**
- **AM SNACK AND/OR;**
- **LUNCH AND/OR;**
- **PM SNACK AND/OR;**
- **SUPPER**

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**

Entrance Conference

Typically, the entrance conference will occur on the day of the on-site administrative review. If the breakfast service is being observed, it may occur after the meal service concludes.

The entrance conference gives the Entity Representative and HNS Reviewer the opportunity for introductions, a review of the day's agenda, and a time to discuss documents that must be gathered.

At a minimum, the Entity Representative 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.



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 on-site observations, technical assistance, potential fiscal action, and next steps, will be discussed in detail.

At a minimum, the Entity Representative 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.



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 Sponsor Representative by the HNS Reviewer.

Within 30 days of the exit conference, the reviewer will email the Administrative Review Summary Report to the Sponsor Administrator/District Superintendent and Sponsor School Food Authority Contact.



WHAT TO EXPECT:
SUMMER FOOD SERVICE PROGRAM ADMINISTRATIVE REVIEW

Section Three: Responding to Review Findings



Responding to the Administrative Review Summary

The Designated Official 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, it could lead to being declared seriously deficient.



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 the sponsoring entity's 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 Sponsor Administrator/District Superintendent and Sponsor School Food Authority Contact will receive a Close-Out Memo when sufficient corrective action is submitted.



Fiscal Action

Some areas of the administrative review are tied to reimbursement funds. During an administrative review, if it is found that reimbursement was paid for non-reimbursable meals or that meals were claimed by incorrect eligibility, fiscal action (FA) may be assessed and recovered by direct payment or through future claims.

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



Findings that Lead to Fiscal Action

Fiscal action may be taken against any sponsoring entity that fails to comply with the regulatory requirements for participation in the SFSP. Specifically, findings in the areas of meal counting and claiming and meal patterns may lead to fiscal action.

EXAMPLES OF FINDINGS THAT MAY LEAD TO FISCAL ACTION:

- Claiming meals for a participant not enrolled in the Program (for camps and closed-enrolled sites)
- Meals served with missing components
- Meal counts not consecutively marked on the meal count sheet
- Incorrect eligibility (for camps and closed-enrolled sites)

Assessing Fiscal Action

Fiscal action is calculated for the entire administrative review by combining the fiscal action of all the review findings. If fiscal action during the administrative review exceeded \$100, funds for fiscal action will be recovered by direct payment or through future claims.

FOR EXAMPLE...

If \$200 of fiscal action was assessed during the administrative review, this means ADE would recover a total of \$200 from the sponsoring entity after the SFSP has been reviewed.

Fiscal Action Disregard

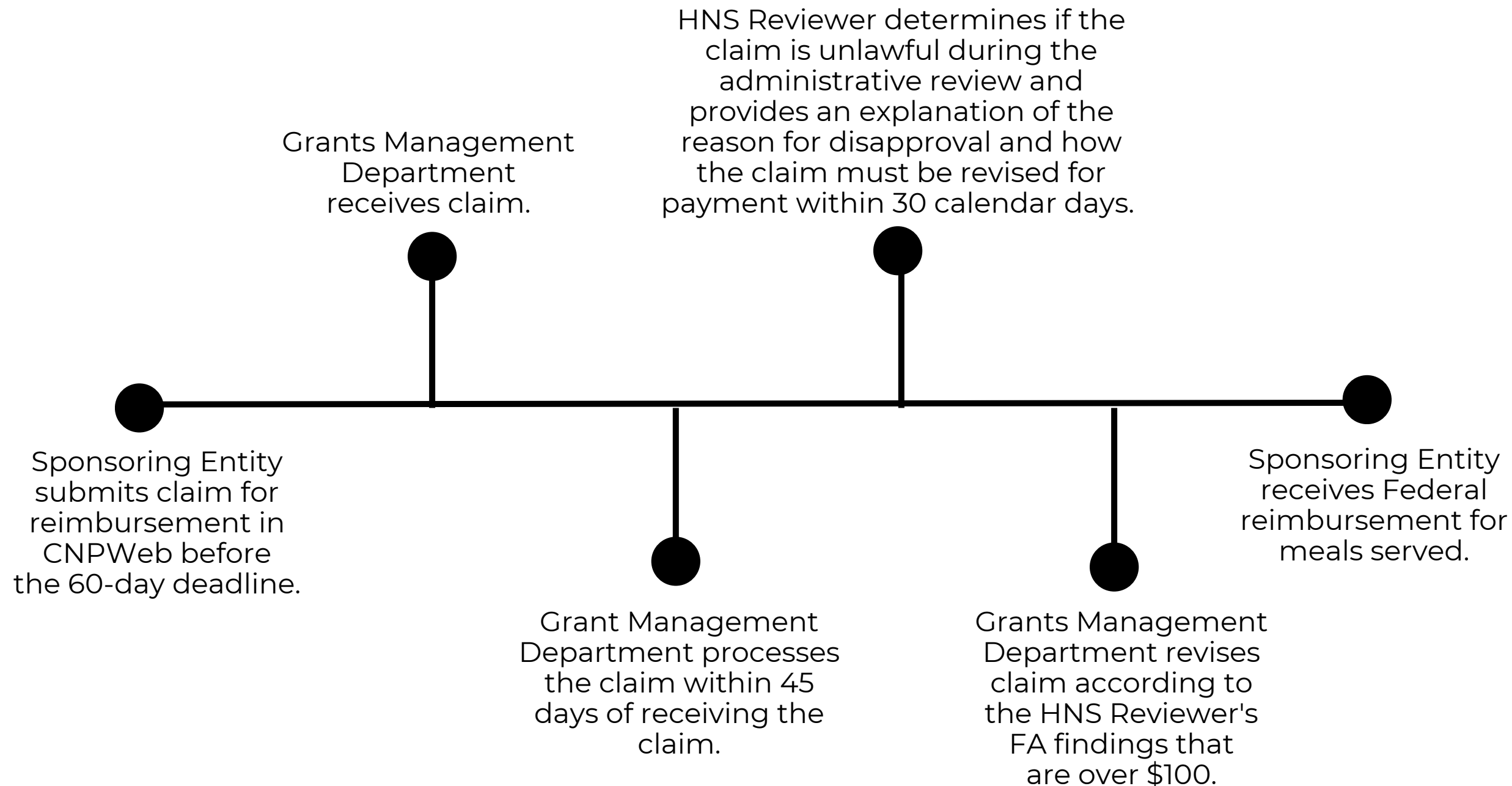
If the total sum of SFSP fiscal action is less than \$100, it is disregarded, and the funds are not recovered.

FOR EXAMPLE...

If \$50 of fiscal action for a missing component was calculated during the menu portion of the administrative review and \$40 of fiscal action was calculated for meal count errors during the rest of the administrative review, ADE will disregard the total \$90 fiscal action.

Reimbursement Timeline

Sponsoring entities serving reimbursable meals under the SFSP receive Federal reimbursement when a claim for reimbursement is submitted to the State agency.



Quiz Time

Is the administrative review closed the day of the on-site visit?

- A** Yes, you will never discuss the administrative review 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 actions are received and the Close-Out Memo is issued by the HNS



Quiz Time

Is the administrative review closed the day of the on-site visit?

- A** Yes, you will never discuss the administrative review 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 actions are received and the Close-Out Memo is issued by the HNS

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



Quiz Time

1 True or False: Meals that are not marked consecutively on the Daily Meal Count sheet will result in fiscal action.

A True

B False

2 True or False: Failure to comply with program requirements or failure to implement required corrective action assigned after the administrative review will result in the sponsoring entity being declared Seriously Deficient (SD).

A Yes

B No



Quiz Time

- 1 True or False: Meals that are not marked consecutively on the Daily Meal Count sheet will result in fiscal action.

A True

B False

Meals that are not marked consecutively will result in fiscal action. Fiscal action will be assessed based on review findings and the review will result in fiscal action if administrative review findings exceed the \$100 threshold.

- 2 True or False: Failure to comply with program requirements or failure to implement required corrective action assigned after the administrative review will result in the sponsoring entity being declared Seriously Deficient (SD).

A Yes

B No

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 the sponsoring entity will be declared Seriously Deficient.





Congratulations

**You have completed the Online Course:
What to Expect: Summer Food Service Program
Administrative Review**

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

**Training Title: What to Expect: Summer Food
Service Program Administrative Review
Length: 30 minutes**

Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.

Certificate

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this online training. Once the
survey is complete, you will be
able to print your certificate of
completion from Survey Monkey.

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

- **Training Title: What to Expect: Summer Food Service Program Administrative Review**
- **Length: 30 minutes**

Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.





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