

What to Expect:

National School Lunch 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are encouraged to access professional development materials directly from the training library to prevent use of outdated content.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 all School Food Authorities (SFAs) operating the National School Lunch Program (NSLP) receiving an Administrative Review (AR). All regulations are specific to operating the NSLP under the direction of ADE.

Objectives

At the end of this training, attendees will:

- understand the State agency monitoring requirements for SFAs undergoing an AR;
- know what to expect from the AR 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

Information to include when documenting this training for Professional Standards:

Training Title: What to Expect:
National School Lunch Program
Administrative Review

Key Area: 3000- Administration

Learning Code: 3260

Length: 30 Minutes

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Section One: State Agency Monitoring Requirements



Intent of the Administrative Review

The 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 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).

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 Review, and use a risk-based approach to evaluate compliance with specific program requirements.

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

Information from the **Review Period** will be reviewed by the State agency.

- **Review Period:** The month prior to the Day of Review.
 - For example, an AR conducted in February will require documentation from January to be reviewed during the off-site portion of the review.

Administrative Review

ADE is required to conduct ARs of all SFAs operating 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)

Please note, the Procurement Review will no longer be a separate review and instead will be included as a part of the NSLP administrative review.

Review of Other Programs

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

- ADE will only review **ASCSP** or **SMP** if a site selected for review operates the program. If none of the sites selected for the AR operate these programs, the State agency is not required to review these programs.
- If the SFA operates **At-Risk** or **FFVP**, the State agency must review the program(s) regardless of whether the site was selected for the NSLP review
 - If a site begins operating one of these programs after the administrative review is concluded, the program will be reviewed at the time of operation

Minimum Number of Sites to Review

At a 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 sites (s) to review.

- All non-associated sites will be selected for review regardless of the size of the SFA.

NUMBER OF SITES	MINIMUM NUMBER OF SITES TO REVIEW
1 to 5	1
6 to 10	2
11 to 20	3
21 to 40	4
41 to 60	6
61 to 80	8
81 to 100	10
101 or more	12

Scope of the AR

CRITICAL AREAS & GENERAL AREAS

During an AR, 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 that consistently yields correct claims.

Performance Standard 2 - Reimbursable lunches and breakfasts meet the meal pattern requirements, as applicable to the age/grade group reviewed.

GENERAL AREAS:

General areas include but are not limited to free and reduced-price processes, civil rights, SFA on-site monitoring, reporting/recordkeeping, food safety, competitive food standards, water, program outreach, resource management, and other areas.

Quiz Time

True or False: All SFA's 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 SFA's receiving an administrative review will be notified of the date their review will be conducted.

A True

B False

SFA's receiving an administrative review will be notified of their upcoming administrative review for the current program year.



Section Two: The Administrative Review Process



Scheduling the Administrative Review

On-site ARs will be scheduled during the months of **October through May** for schools that are up for review for the School Year. SFAs will be notified **at least 6 weeks prior** to the on-site review.

The notification will include:

- Date of the on-site review
- What sites will be reviewed
- What documentation will be required for submission

Official Notification of Review

In August, all SFAs up for review receive written notification via certified mail that they will receive an AR for the school year.

The [Administrative Review Schedule](#) can be found on the NSLP and SBP webpage under the 'Reviews Conducted by the State Agency' accordion.

- Please note this is a list of all SFAs receiving a review for this school year and does not detail which month the SFA will be receiving their AR.

Assigned HNS Reviewer

HNS's Compliance Reviews team conducts reviews for all CNPs.

SFAs will be assigned **one** HNS Reviewer to conduct the entire AR. SFAs can expect to be in constant contact with their assigned HNS Reviewer throughout the entire review process.

Notification of the Scheduled Review

At least six weeks prior to the day of on-site meal service observation, the HNS Reviewer will notify the SFA that the review has been scheduled via email. The HNS Reviewer will provide three AR 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.
- **Procurement Tool** — Provides the HNS Reviewer with information about the SFAs procurement process and the purchase of goods and services.

Included in this notification will also be a copy of the SFAs previous AR. It is encouraged to review the previous AR to ensure all findings have been corrected and to avoid possible repeat findings.

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 Review.

The HNS Reviewer will provide the Confirmation Memo via email to the SFA's Superintendent Contact and SFA Contact 6 weeks prior to the on-site review.


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), Afterschool Snack Program (ASP), At-Risk Afterschool Meals, Special Milk Program (SMP), and Fresh Fruit & Vegetable Program (FFVP) during the 2022-2023 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 [DUE 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 1ST WEEK OF REVIEW MONTH].
- **Required Phase 3 Documentation** checklist outlines the materials that should be organized and readily 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], [Breakfast: milk type, milk variety, insufficient quantities (grain, fruit, vegetable, milk) AND/OR Lunch: milk type, milk variety, vegetable subgroup, insufficient quantities (grain, meat/meat alternate, fruit, vegetable, milk)] 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 3 cents). It is recommended to thoroughly review the previous report and make appropriate corrections to ensure repeat violations do not occur.

Confirmation Memo

Checklists

The pages following the Confirmation Memo include checklists containing the 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 count documentation for the month of review.
- **Phase 3:** Menus, menu documentation, and meal counts for the Day of Review.

SFA Name Here | 5
CTD# Here

25. Current school year calendar.

SFA Name Here | 6
CTD# Here

8. Special Milk Program Meal counts and invoices for [MONTH OF REVIEW] for [REVIEW SITES]
OPERATING SMP.

SFA Name Here | 2
CTD# Here

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

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 the notification letter sent to households letting them know they were certified for free, reduced-price, or paid meals. ☐
2. A copy of the Benefit Issuance Document (BID) or other documents which are used in supporting the meal benefits when a student receives a meal at the Point of Service (POS). Please provide this current as of the first operating day in the month of [MONTH OF REVIEW]. Due Date: [1 WEEK BEFORE PHASE 1 DOCUMENTATION DEADLINE].
a. Please consult with your reviewer if you are unsure about what this means.
b. These documents could be paper-based or electronic lists which are used at the POS in the school and directly used in the meal count system to deliver the benefits to students (e.g., rosters, master lists, etc.). There should be no duplication of names on the list; each eligible student should only be listed one time and it MUST contain ALL students eligible for free and reduced-price meals in your district/SFA EXCLUDING List SPO and CEP Sites. ☒
c. If the documents do not provide the following information for each student (whether specifically or via a coded system), you will need to provide as well: method of certification (income application, case number application, direct certification, homeless/migrant/runaway, foster, etc.), and approval date. Please also note the total number of ELIGIBLE students in the SFA, and any students which were selected for verification in the current school year. The student names may be listed in any order (alphabetically, by building, by ID number, etc.) but should NOT be grouped by benefit status.
3. Eligibility Certification Documents: Please consult with your reviewer on sample to be provided.
a. Household applications: free by income, free by case number (SNAP, TANF, FDIPIR), foster children, reduced-price, denied, and ~~withdrawn~~. ☐
b. All direct certification reports run to date (must be dated and saved).
c. Note: Income applications and/or case number applications for directly certified students must be filed separately from other applications and attached to the Direct Certification match report(s); List of Homeless/Runaway/Migrant students (from the Homeless/Runaway/Migrant liaison) or Homeless/Runaway/Migrant household applications where applicable.
4. Ten household applications from the current school year that were denied free or reduced-price benefits. ☐

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Checklists

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 Review.

Phase 1

OPERATIONAL REQUIREMENTS:

- Civil Rights
- On-Site Monitoring
- Local Wellness Policy
- Competitive Foods/Smart Snacks
- Food Safety and Buy American
- SBP and SFSP Outreach
- Media Release
- Professional Standards

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).

Please note, 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 school year may be requested.

Phase 1 Documentation

RECOMMENDATIONS ON HOW & WHAT TO PROVIDE

Checklist Item	Recommendation
2	It is highly recommended to send the BID in Excel format to allow for sorting and searching.
9	Review your labels to ensure they are sufficient for crediting toward the meal pattern. Product specification sheets and advertising/promotional literature are not sufficient documentation to support meal pattern contributions and cannot take the place of a manufacturer's Product Formulation Statement or Child Nutrition label.
12	Complaint procedures for the Child Nutrition Programs may have different requirements than district policies. Make sure procedures specify which outside agency complaints alleging discrimination within the program will be forwarded to.
20	Check your fruits and vegetables (juice/canned/fresh) as these are often found to be of a non-domestic origin. A statement from the manufacturer cannot take the place of a Buy American Exception completed by the SFA.
23	Even schools that are fully catered must request two food safety inspections each school year. Ensure you are documenting the request to provide during the review.
27	Even schools that do not serve meals during the summer must let households know that summer meals are available. Provide the correspondence you send to households informing them of how to access free meals during the summer.

Phase 2

MEAL COUNTS FOR THE REVIEW PERIOD:

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

Remember, the Review Period is the month prior to the Day of Review.

Phase 2 Documentation

RECOMMENDATIONS ON HOW & WHAT TO PROVIDE

Checklist Item	Recommendation
1	Double and triple check your claims for any typos
2	Submit all documentation that you used to get to the numbers submitted on the claim(s).
3	Double check that the attendance factor matches your reimbursement claim.

Phase 3

OPERATIONAL REQUIREMENTS:

- Buy American Exception documentation for all products served/purchased for all observed meal services for the Day of Review.

MEAL COUNTS AND MENU DOCUMENTATION FOR DAY OF 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)

Phase 3 Documentation

RECOMMENDATIONS ON HOW & WHAT TO PROVIDE

Checklist Item	Recommendation
2	When providing standardized recipes, Nutrition Fact labels, ingredient labels, PFS/CN labels, it is not necessary to resubmit labels for items that were already provided in the Phase 1 Documentation.
3	Buy American Exception for ALL non-domestic products served/purchased on day of the review.
4	Temperatures must be obtained by a thermometer inside the storage unit (e.g., inside of the reach-in refrigerator, inside of the dry storage area, etc.). Make sure every storage unit has a temperature log.

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 fourteen modules (plus a Special Provisions Option module), 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

104. If your school system has an electronic application approval system, answer the below questions. If not, proceed to the next question.
a. How are records maintained and for how long?
b. Describe the backup to the electronic-based approval system.
c. List the method used to obtain household signature.
Comments:

Administrative Review Off-Site Assessment Tool Questions

Electronic application system means household applications are submitted by the household through a web-based or scanned application system. The system has limited to virtually no manual data entry by your school system. Records are kept at your school system electronically. All direct certification matches at your school system level are completed with a computer match.

Manual application system means household applications are submitted by the household to your school system. Your School System completes eligibility determination and direct certification matches and enters data manually into a system and/or keeps written

ie school receives the

Administrative Review Off-Site Assessment Tool Questions

FLORIDA DEPARTMENT OF EDUCATION

School Food Authority:

Module: Certification and Benefit Issuance

100. Does your school system meet one of the following criteria:
☐ SFA-wide Special Provision Non-Base Year (Provision 2/3)
☐ RCCI, without day students
☐ SFA-wide Community Eligibility Provision

Note: If one of the above is checked, skip questions 101–205 and proceed to question 300. If your school system does not meet one of the above criteria answer the following questions (101-205).

YESNO
☐☐

Comments:

101. Who is the determining official for certifying household applications?

Name and position title:

102. a. Does your school system use an electronic applications approval system or a manual application approval system? If a combination of electronic and manual is used check both boxes.
b. Does your school system use an electronic benefit issuance system or a manual benefit issuance system? If a combination of electronic and manual check both boxes.

ELECTRONICMANUAL
a. ☐☐
b. ☐☐

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Administrative Review Off-site Assessment Tool School Year 2022-2023 1

Off-Site Assessment tool

The Procurement Tool is an Excel document that the SFA will complete by entering required information such as:

- Vendors;
- Total paid/vendor;
- Goods/services purchased; and,
- Competitive procurement method to procure the product(s) or service(s).

Once the information has been entered, the SFA will:

- Save the Excel file and return the file to the HNS Reviewer.
- Provide a vendor paid list/summary of expenses by vendor.

*A vendor paid list/summary of expenses by vendor is a report from the SFA accounting system that identifies all vendors paid from the nonprofit food service account and summarizes the total amount paid to each vendor for the previous school year.

SFA Procurement Table (INSERT SFA NAME)				
Procurement Authority SFA Instructions: List name(s), position(s)/title(s) and contact information of those person(s) authorized by the LEA/SFA or procurement agent(s) and who is/are responsible for compliance with local, state and federal program regulations, including Child Nutrition Program requirements.				
Name	Position/Title	Responsibilities (for contract acquisition, award process questions, items 10-12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000	Contact Information (see 2, item 10)	
Small Purchase Threshold Information SFA Instructions: Answer questions below.				
What is the small purchase threshold for the LEA/SFA?		Is the small purchase threshold for the State, if applicable?		\$25,000.00
Group Purchasing Organization, Group Buying Organization and Third Party Entity SFA Instructions: Answer questions below.				
Did the SFA pay a membership fee for the services of a Group Purchasing Organization (GPO), Group Buying Organization (GBO) or third party entity? If YES, include the name of the SFA, GPO, or third party entity in the comments. If YES, in the SFA contract execution table check boxes from this organization. If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? If YES, how often does the SFA review checks for quality, timeliness, accuracy, etc.? 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Procurement Tool

Compile and Send Review Documents

SFAs are required to email both the Off-Site Assessment Tool and the program documents listed on the Checklists 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 Review.

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
- Supply Chain Assistance Funds

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.

Preparing for the Day of Review

One week prior to the Day of 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 ENTRANCE CONFERENCE,
ON-SITE OBSERVATION(S) FOR
ALL SITE(S) SELECTED, AND
AN EXIT CONFERENCE WILL
BE CONDUCTED ON THE DAY
OF REVIEW.**

On-Site Review Tips

Topic	Tip
Inform School Administration	<ul style="list-style-type: none">• Inform administration and teachers when the AR is occurring especially in schools participating in Breakfast in the Classroom where the HNS reviewer will be entering classrooms during breakfast service to conduct a meal observation.
Meal Observation	<ul style="list-style-type: none">• Provide HNS Reviewers with a clear picture of the day-to-day operations and your typical meal service.• Ensure the SFA contact listed on the approved CNPWeb application is available for the Day of Review and for the entrance and exit conference.
Required Signage	<ul style="list-style-type: none">• Check that meal service signage (OVS or Serve Only) is accurate and displayed clearly at all schools, especially those selected for the on-site review.• Check that the latest Health Department Inspection is posted and publicly visible at all sites, especially those selected for the on-site review.

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, an 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.



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.

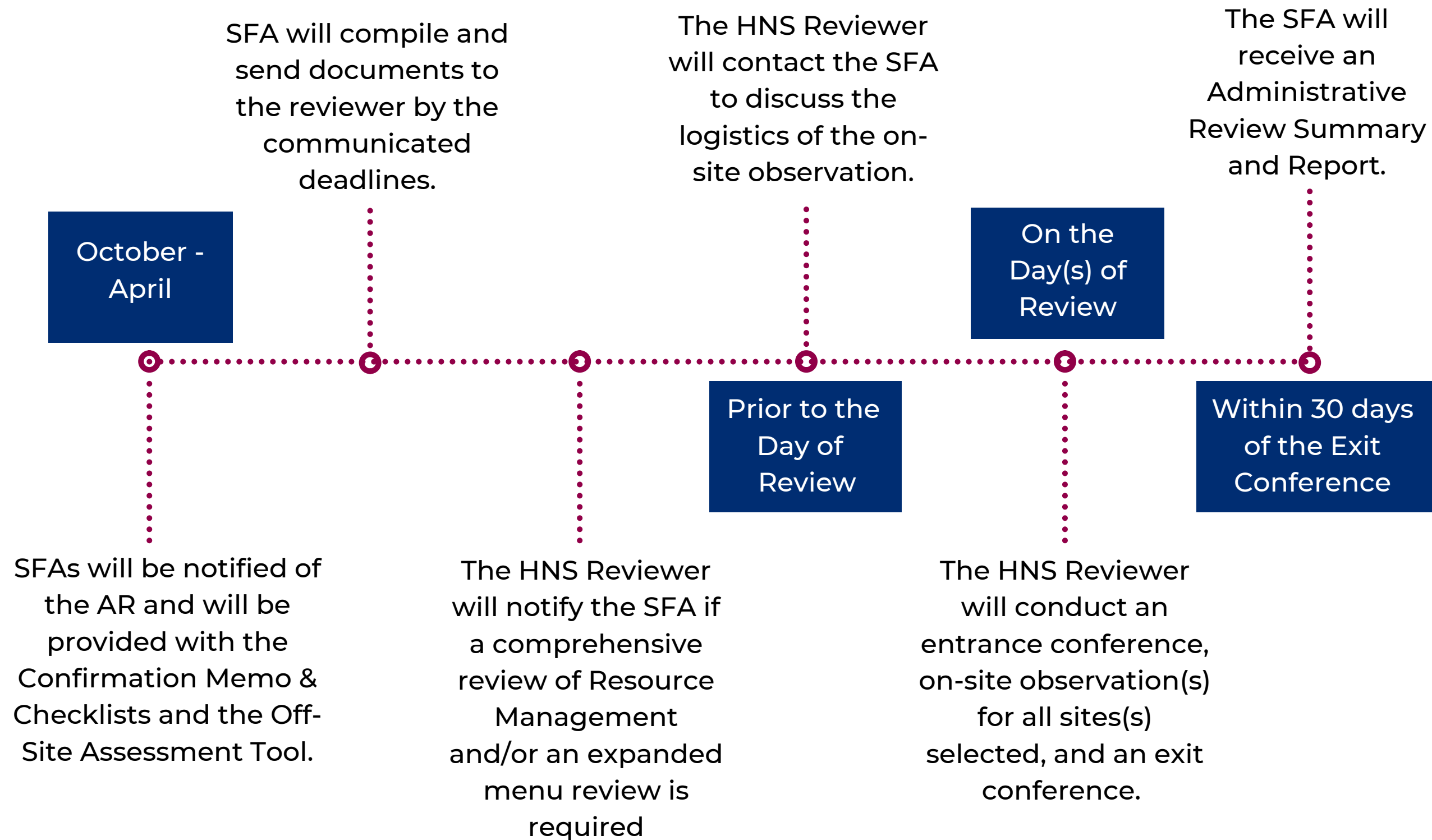


Administrative Review Summary Report

The Administrative Review Report is a detailed record of any review findings and technical assistance that occurred during the AR. The Summary is the Cover Memo to the Administrative Review Report.

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

Administrative Review Timeline



Section Three: Responding to Review Findings



Administrative Review Summary Report Response

The SFA must review the Administrative Review Summary and 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.



Corrective Action

Corrective Action

When a reviewer establishes an AR finding, corrective action will be required by the HNS Reviewer to demonstrate the SFA understands the error and has corrected it since being reviewed.

Corrective action may include:

- written descriptions of changes made within the operation after the AR occurred;
- documentation to demonstrate understanding of program regulations; and/or
- certificates showing training was completed.

REQUIREMENTS & DEADLINES

A written response must be provided by the deadline indicated in the AR Report. The response must:

- be on school letterhead,
- be signed by an authorized representative listed on the Food Program Permanent Service Agreement (FPPSA), and
- 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.

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 and Report will provide the total amount of fiscal action that was assessed due to the review findings.

EXAMPLES OF FINDINGS THAT MAY LEAD TO FISCAL ACTION:

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

Example 4: Repeat Findings

- A repeat finding occurs if an SFA received a finding during their previous AR and receives the same type of finding during the current AR.

Fiscal Action & 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 8 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.

Assessing Fiscal Action

Fiscal action is assessed for the entire AR by combining the fiscal action of all CNPs reviewed, including SSO. If fiscal action exceeds \$600, funds for fiscal action will be offset from future claims 30 days after receiving the AR Report.

FOR EXAMPLE...

If \$700 of fiscal action was assessed during the AR, ADE will take a total of \$700 back from the SFA after all CNPs being operated have been reviewed.

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

Fiscal Action Disregard

If the total sum of fiscal action is less than \$600, funds will only be recovered if the combined sum of fiscal action for all CNPs reviewed 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...

- **Disregarded:** *If \$300 of fiscal action was assessed during the school year portion of the AR and \$100 of fiscal action was assessed during the SSO portion of the AR, HNS will disregard the total \$400 of fiscal action.*
- **Not Disregarded:** *If \$100 of fiscal action was assessed during the school year portion of the AR and \$700 of fiscal action was assessed during the SSO portion of the AR, HNS will take a total of \$800 back from the SFA*

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: Repeat findings for vegetable subgroups, milk variety and type, and quantities 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 organization being declared Seriously Deficient.

A Yes

B No



Quiz Time

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

A True

B False

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

- 2 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.

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 the Online Course:
What to Expect: National School Lunch Program
Administrative Review**

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

**Training Title: What to Expect: National School
Lunch 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

Requesting a training certificate:
Please click the button 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.

[Take Survey](#)



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

- **Training Title: What to Expect: National School Lunch 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.





In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at:

<https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-50811-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation.

The completed AD-3027 form or letter must be submitted to USDA by:

Mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW Washington, D.C. 20250-9410; or

Fax: (833) 256-1665 or (202) 690-7442; or

Email: program.intake@usda.gov

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