PREPARING FOR AN ADMINISTRATIVE REVIEW

State Conference

July 8, 2020

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Division of School Support, Director
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VISION
To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

MISSION
To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community
## Scope of Review

<table>
<thead>
<tr>
<th>Meal Access &amp; Reimbursement</th>
<th>Meal Pattern &amp; Nutritional Quality</th>
<th>Resource Management</th>
<th>General Program Compliance</th>
<th>Other Federal Program Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Certification &amp; Benefit Issuance</td>
<td>• Meal Components and Quantities</td>
<td>• Risk Assessment</td>
<td>• Civil Rights</td>
<td>• Afterschool Snacks</td>
</tr>
<tr>
<td>• Verification</td>
<td>• Infant and Pre-K Meal Pattern</td>
<td>• Nonprofit School Food Service Account</td>
<td>• SFA On-Site Monitoring</td>
<td>• Fresh Fruit &amp; Vegetable Program</td>
</tr>
<tr>
<td>• Meal Counting and Claiming</td>
<td>• Offer Versus Serve</td>
<td>• Paid Lunch Equity</td>
<td>• Local Wellness Policy</td>
<td>• Special Milk Program</td>
</tr>
<tr>
<td></td>
<td>• Dietary Specs &amp; Nutrient Analysis</td>
<td>• Revenue from Non-Program Foods</td>
<td>• Competitive Foods</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Indirect Costs</td>
<td>• Professional Standards</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• USDA Foods</td>
<td>• Water Availability</td>
<td></td>
</tr>
</tbody>
</table>

Critical Areas of Review: Performance Standard 1 and Performance Standard 2
- Healthy Hunger-Free Kids Act of 2010 (HHFKA)
- The Act also requires an accountability system that conducts Administrative Reviews to evaluate Program requirements for NSLP and SBP during a 3-year cycle.
Separate Review Processes

Procurement Reviews
Conducted by OCN, Office of School Support
6-Year Cycle (different from 3-year AR cycle)
For more info or TA, contact Charles Crawford (ccrawford@mdek12.org)

Office of Healthy Schools Monitoring Instrument
Conducted by OCN, Office of Healthy Schools
May be conducted concurrently with AR of NSLP/SBP
For more info or TA, contact Louis King (lking@mdek12.org)
Desk Review Process (COVID-19)

• Nationwide Waiver of Onsite Monitoring Requirements in the School Meal Programs – Revised
  • in effect until 8/31/20, waiting to see if it will be revised.
  • Waives onsite monitoring requirements and the requirement to complete the onsite portion of the AR during the same SY in which it began.
• Mississippi Application and Reimbursement System

• You must Complete the Off-site Assessment in MARS

• Your reviewer will use MARS to document all sections of the AR, including any TA or Findings issued

• You must respond to corrective Action in MARS
School Nutrition Programs

Applications | Claims | Compliance | Reports | Security | Search

Programs

School Nutrition Programs

Summer Food Service Program
Timing of Administrative Review

Between November and April

Off-site 4-6 weeks before on-site visit

Resource management must be completed at least four weeks in advance of on-site visit
Review Period/Day of Review

**Review Period**

- Most recent month with ‘submitted’ claim (with at least 10 operating days)

**Day of Review**

- Day(s) on which on-site review occurs
Administrative Review Focus

Performance standards 1 and 2

General Areas
Performance Standards

1. Certification and benefit issuance process
   • Accuracy of meal counting and claiming

2. Meals claimed for reimbursement
   • Meal pattern and dietary specification compliance
General Areas of Review

General Program Compliance

Civil Rights

Breakfast and Summer outreach

Local School Wellness Policy

Smart Snacks
General Areas of Review

General Program Compliance

- Water
- Food safety
- Reporting
- Record keeping
Resource Management

Non-profit Food Service Account

Paid Lunch Equity

Non-Program Food Revenue

Indirect Costs
Additional Review Components

- Special Milk
- Fresh Fruit and Vegetable
- Afterschool Care Snack Program
Off-site Assessment Process

- Documents to submit
- Phone interview
- Electronic forms to complete
Off-Site Review Questions

Performance Standard 1 (PS1)

- Certification and Benefit Issuance: 100-level questions
- Verification: 200-level questions
- Meal Counting & Claiming: 300-level questions
Certification Process

List: All students eligible for free and reduced-price meals at all schools within the School Food Authority

Random sample calculated if more than 100 students on list

Program Specialist reviews the randomly selected applications and direct certifications

Handout will be email on how to run the report
Benefit Issuance Sample Size

- Do not include paid students

- Do not include students who do not have access to any meals (pre-K/early childhood)

- No duplicate names
PULLING DOCUMENTATION

WHAT WE NEED TO SEE
General Documentation you will need

• Organization & Preparation can make AR go more smoothly

• Before your AR, you should get a list of all the documentation you will need for the AR from your Lead Reviewer or Program Specialist.

• If you don’t get it, ask for it!
Pulling & Organizing Meal Apps (if applicable)

What the SA will need:

Randomized Sample List of Free and Reduced (NO PAID)

List of pulled students using specific, randomized interval. Can get interval from Lead Reviewer

Alphabetized stack of student applications (corresponding with list of pulled students)

Alphabetized DC list (all school sites on one list, if possible)

Large enough sample of Free and Reduced

10 paid/denied applications

See Handout for instructions and Examples!
### Example of Meal App Random Sample

<table>
<thead>
<tr>
<th>LAST</th>
<th>FIRST</th>
<th>CATEGORY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baggins</td>
<td>Frodo</td>
<td>Free</td>
</tr>
<tr>
<td>Brady</td>
<td>Tom</td>
<td>Reduced</td>
</tr>
<tr>
<td>Brees</td>
<td>Drew</td>
<td>Reduced</td>
</tr>
<tr>
<td>Bunny</td>
<td>Easter</td>
<td>Categorically Eligible (Direct Certification)</td>
</tr>
<tr>
<td>Christ</td>
<td>Jesus</td>
<td>Free</td>
</tr>
<tr>
<td>Clause</td>
<td>Santa</td>
<td>Free</td>
</tr>
<tr>
<td>Doe</td>
<td>Jane</td>
<td>Categorically Eligible (SNAP)</td>
</tr>
<tr>
<td>Farve</td>
<td>Brett</td>
<td>Reduced</td>
</tr>
<tr>
<td>Goose</td>
<td>Mother</td>
<td>Free</td>
</tr>
<tr>
<td>Joe</td>
<td>Gi</td>
<td>Free</td>
</tr>
<tr>
<td>Johns</td>
<td>Papa</td>
<td>Categorically Eligible (SNAP)</td>
</tr>
<tr>
<td>Jones</td>
<td>Jimmy</td>
<td>Free</td>
</tr>
<tr>
<td>Longstocking</td>
<td>Pippy</td>
<td>Free</td>
</tr>
<tr>
<td>Nye</td>
<td>Bill</td>
<td>Free</td>
</tr>
<tr>
<td>Redenbacher</td>
<td>Orville</td>
<td>Reduced</td>
</tr>
<tr>
<td>Sippy</td>
<td>Missy</td>
<td>Categorically Eligible (Direct Certification)</td>
</tr>
<tr>
<td>Skywalker</td>
<td>Luke</td>
<td>Reduced</td>
</tr>
<tr>
<td>Smith</td>
<td>Joe</td>
<td>Free</td>
</tr>
<tr>
<td>Smith</td>
<td>John</td>
<td>Reduced</td>
</tr>
<tr>
<td>Spunkmeyer</td>
<td>Otis</td>
<td>Free</td>
</tr>
<tr>
<td>Suess</td>
<td>Doctor</td>
<td>Free</td>
</tr>
<tr>
<td>Tollhouse</td>
<td>Nestle</td>
<td>Reduced</td>
</tr>
</tbody>
</table>

From this list of names, we have only pulled 6 names (representing 6 applications) that will be reviewed.

In this example, the starting point was 5 and the randomized interval was 3, so we started on #5 and counted every 3rd person.

You **MUST** get your randomized interval and starting point from your SA Lead Reviewer.
Certification of Documents for Submission

- Income eligibility guidelines used to approve applications
- Conversion factors
- Direct certification notification letter
- Household notification letter for benefit approval
- Household notification letter for denial of benefits
Certification and Benefit Issuance Errors

- No approved application on file
- Income application missing required information
- Incorrect number recorded as case number
- Missing direct certification documentation
Certification and Benefit Issuance Common Errors

- Missing documentation for extension of benefits
- Student eligibility status is not updated in point of sale or roster
- Changes in benefits not made at end of 30-day carryover period
Total # reviewed applications in error * 100

Total # reviewed applications

= percentage of students in error

If ≥ 10%, the SFA is required to conduct an Independent Review of Applications during the subsequent school year.
Verification Documentation for Submission

- Household verification announcement letter
- Verification benefit denial letter
Verification Common Errors

- Process not completed by Nov. 15
- Verification not conducted
- Inaccurate number of verified applications
Verification Common Errors

Common errors:
- No confirming official
- Not selecting basic when required
- No follow up attempt
- Not using gross income
Providing Financial Reports

• The SA will need to perform a Resource Management Review based on the results of your completed Risk Assessment

• You may be required to provide financial reports including:
  - List of Revenues and Expenditures from the Previous School Year
  - Statement of Fund Balance from the Previous School Year
  - Balance Sheet from the Previous School Year

NOTE: you may need to get your business manager to provide you with these financial reports
Resource Management Overview

- Non-profit Food Service Account
- Paid Lunch Equity
- Non-Program Food Revenue
- Indirect Costs
Resource Management

- Is your **indirect cost** calculated correctly and applied evenly across all Federal Programs in your district?

- Do you have an **excess balance** in the school food service account? (must have less than 3 months operating expenses)

- Are you charging enough money for each “**extra sale**” item?

- Have you had a **General Financial Audit** Recently? Were there any findings, and if so have all issues been corrected?

- Have you completed the **PLE Tool** or Submitted a Request exemption?

- Have you analyzed **adult meal prices** to ensure you are charging enough? *(the SA will send a memo out every year)*
Completed 4-6 weeks before on-site review

Risk indicator approach: 0-6 indicators

0-2 risk factors is corrective action, 3 or more require a full on-site resource management review
Resource Management Risk Tool

Answers to questions may trigger a risk flag indicator.
Resource Management Documentation

- Annual Balance Sheet
- General Ledger: Previous School Year
- Paid Lunch Equity Tool
- Non-Program Foods Calculation
Components of the Nonprofit Food Service Account

- **Total Revenue**
  - **Reimbursement** = Meals x Rates
  - **Meal payments**
  - **A la carte sales**
  - **Any other local revenues**
  - **Earnings on investments**
Components of the Nonprofit Food Service Account

- Food/non-food costs
- Total expenses
- Labor/benefits
- Training
- Food service business supplies
Components of the Nonprofit School Food Service Account

Net cash resources – not to exceed three months operating expenses

- Surplus funds cannot be transferred to support other operations
- Non-program adult meals may not be subsidized
- In excess of three months balance, funds must be spent to operate and/or improve the food program
Components of the Nonprofit School Food Service Account

Allowable costs

- For authorized purposes (food, labor, purchased services, equipment, supplies, etc.)
- Reasonable and necessary
- Documented
- Represent activity and function for operation of food program
Nonprofit School Food Service Account: Common Errors

- Failure to conduct a year-end review of revenue and expenses
- Year-end expenses in excess of revenues
- Transfer out of account for other operations
- Failure to measure net cash resources below three months of expenses
- Failure to maintain records
Paid Lunch Equity

Required pricing for full paid students

Based on weighted average paid lunch prices

• Difference between free and paid reimbursement rates

Raise prices or find non-federal funding source
<table>
<thead>
<tr>
<th></th>
<th>Reduced Price Requirement</th>
<th>Full-Paid Price Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Breakfast</strong></td>
<td>No minimum 30 cents max</td>
<td>No minimum No max</td>
</tr>
<tr>
<td><strong>Lunch</strong></td>
<td>No minimum 40 cents max</td>
<td><strong>Minimum:</strong> At least the difference between Free and Full-Paid reimbursement ($3.41 - .32 = $3.09) No max</td>
</tr>
</tbody>
</table>

**Paid Lunch Equity**
Non-Program Foods Overview

Foods and beverages sold:
- Any time
- Any location
- School campus
- During the school day

Purchased with the non-profit food service account
Revenues from sales of non-program foods must generate at least the same proportion of school food authority revenues as they contribute to food costs.
Example

**Total Costs:** $1,000,000

**Total Food Costs:** $500,000

**Non-program Food Costs:** $50,000

**Reimbursable Meals Food Costs:** $450,000

**Total Revenue:** $1,000,000
Non-Program Foods Tool

Non-Program Revenue Requirement

$50,000 non-program food costs divided by total food costs = 10%

Non-program food revenue must equal at least 10% of total sales

If this school makes $100,000 in non-program food sales, they are in compliance.
Indirect cost guidance is available at http://www.fns.usda.gov/indirect-cost-guidance
Typical School Food Service Direct Costs

- Wages and salaries
- Food
- Cleaning supplies
- Paper supplies
- Equipment purchases
- Promotional materials
Indirect Costs

- Payroll services
- Human resources
- Workers compensation
- Procurement services
- Utilities
- Administration time
Charging Indirect Costs

School applies for an indirect cost rate

School approved for indirect cost rate

School charges indirect cost percentage
Charging Indirect Costs

Costs must not be charged as both direct and indirect costs

Must treat all federal grants consistently
  • Cannot charge indirect cost to just school food service account

Appropriate documentation required
Indirect Costs Common Errors

- Charging the food service account for indirect costs
- Charging indirect costs at rate not approved by MDE
# Example of Balance Sheet

**Fake County School District**  
**Consolidated Fund Balance Sheet EXAMPLE**

<table>
<thead>
<tr>
<th>Account</th>
<th>Total Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assets</strong></td>
<td></td>
</tr>
<tr>
<td>101-0000-000-000-00</td>
<td>670,705.78</td>
</tr>
<tr>
<td>102-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>103-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>104-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>121-0000-000-000-00</td>
<td>3,335.74</td>
</tr>
<tr>
<td>122-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>123-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>125-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>143-0000-000-000-00</td>
<td>89,098.87</td>
</tr>
<tr>
<td><strong>Assets Total:</strong></td>
<td><strong>763,140.39</strong></td>
</tr>
<tr>
<td><strong>Liabilities</strong></td>
<td></td>
</tr>
<tr>
<td>401-0000-000-000-00</td>
<td>2,469.96</td>
</tr>
<tr>
<td>441-0000-000-000-00</td>
<td>300,000.00</td>
</tr>
<tr>
<td>451-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>461-0000-000-000-00</td>
<td>105,430.51</td>
</tr>
<tr>
<td><strong>Liabilities Total:</strong></td>
<td><strong>407,900.47</strong></td>
</tr>
<tr>
<td><strong>Fund Equity</strong></td>
<td></td>
</tr>
<tr>
<td>724-0000-000-000-00</td>
<td>134,290.95</td>
</tr>
<tr>
<td>736-0000-000-000-00</td>
<td>0.00</td>
</tr>
<tr>
<td>745-0000-000-000-00</td>
<td>211,076.22</td>
</tr>
<tr>
<td><strong>Fund Gain Loss:</strong></td>
<td><strong>9,872.75</strong></td>
</tr>
<tr>
<td><strong>Fund Equity Total:</strong></td>
<td><strong>355,239.92</strong></td>
</tr>
<tr>
<td><strong>Out of Balance:</strong></td>
<td><strong>0.00</strong></td>
</tr>
</tbody>
</table>
## Example of Statement of Fund Balance

Fake County School District  
Statement of Fund Balance EXAMPLE

Report Date: 00/00/0000  
Begin Account: 000-0000-000-000-00  
Period: 00/00/0000 - 00/00/0000  
End Account: 999-9999-999-999-99  
Fund: 2100-SCHOOL FOOD SERVICE

<table>
<thead>
<tr>
<th>Fund</th>
<th>Beginning Fund Balance</th>
<th>Year to Date Receipts</th>
<th>Year to Date Expenditures</th>
<th>Year to Date Adjustments</th>
<th>Ending Fund Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2100-SCHOOL FOOD SERVICE</td>
<td>345,367.17</td>
<td>5,875,700.66</td>
<td>5,853,541.80</td>
<td>(12,286.11)</td>
<td>355,239.92</td>
</tr>
<tr>
<td>345,367.17</td>
<td>5,875,700.66</td>
<td>5,853,541.80</td>
<td>(12,286.11)</td>
<td></td>
<td>355,239.92</td>
</tr>
</tbody>
</table>
Meal Counting and Claiming

Day of Review

- Back-up system
- Observe meal service
- Overt identification
- Cashier training
- Inquire cashier
- POS counts accurate
Meal Counting Common Errors

- Daily counts are inaccurate or missing
- Meal count consolidation errors
- Questionable meal count patterns
- No edit checks
Pre-Visit: Menu Review

Send all menus and production records for all reviewed sites representing one week from review month.

Complete the menu worksheet of USDA Performance-Based Tool.
This module is designed to assess whether meals offered to children through the school meal programs are consistent with federal standards for:

- Calories
- Saturated fat
- Sodium
- Trans fat
Conducting a Nutrient Analysis

- The SA will need to validate the nutrient analysis of your menus as part of the AR
- If your District uses Nutrikids software, there are two reports the SA needs to see:
  1. **Base Menu Spreadsheet**
     
     (Week of the Targeted Review for Breakfast and Lunch for *all* age groups)
  2. **Weekly Certification Worksheet**
     
     (Week of the Targeted Review for Breakfast and Lunch for *all* age groups)

Your Lead Reviewer or Program Specialist can provide you with instructions on how to pull reports correctly from Nutrikids prior to the AR.

Note: having a specific type of Nutrient Analysis software is NOT necessary. However, we have used Nutrikids as an example because we know that many of our schools utilize this software.
## Example of Base Menu Spreadsheet

### MS Department of Education

**Planned Menu Spreadsheet**  
**Weighted Values - Detailed**  
**Page 3**

**Monday – Friday – one week**  
**Apr 1, 2019 thru Apr 5, 2019**  
**Lunch 9-12**  
003 - Canton Middle School  
**Generated on:** 4/12/2019 3:55:53 PM

<table>
<thead>
<tr>
<th>Day</th>
<th>Item Description</th>
<th>Portion Size</th>
<th>Plan Qty</th>
<th>Cals (kcal)</th>
<th>Sodm (mg)</th>
<th>Sugars (g)</th>
<th>Carb (g)</th>
<th>S-Fat (g)</th>
<th>Tr-Fat* (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fri - 04/06/2019</td>
<td>Lunch 9-12</td>
<td>2/3 cup w/rice</td>
<td>500</td>
<td>244</td>
<td>539</td>
<td>*1</td>
<td>26.7</td>
<td>2.07</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Bacon Burger 2 oz Patty</td>
<td>1 each</td>
<td>50</td>
<td>34</td>
<td>68</td>
<td>1</td>
<td>3.34</td>
<td>0.53</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Chef Salad MS900</td>
<td>1 salad</td>
<td>50</td>
<td>20</td>
<td>119</td>
<td>1</td>
<td>1.68</td>
<td>0.39</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Baked Ranch Fries MS1097</td>
<td>1/2 cup</td>
<td>170</td>
<td>44</td>
<td>154</td>
<td>0</td>
<td>7.25</td>
<td>0.18</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Baked Beans MS818</td>
<td>1/2 cup</td>
<td>170</td>
<td>54</td>
<td>55</td>
<td>4</td>
<td>12.43</td>
<td>0.04</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Tomato/Cucumber Salad MS1134</td>
<td>1/2 cup</td>
<td>150</td>
<td>13</td>
<td>22</td>
<td>3</td>
<td>3.35</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Fresh Blueberries MS1222</td>
<td>1/2 cup</td>
<td>170</td>
<td>18</td>
<td>0</td>
<td>3</td>
<td>4.47</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Fresh Apple MS1206</td>
<td>1 each</td>
<td>150</td>
<td>22</td>
<td>0</td>
<td>4</td>
<td>5.72</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Cornbread W/G MS1301</td>
<td>1 piece</td>
<td>250</td>
<td>102</td>
<td>293</td>
<td>3</td>
<td>9.71</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Milk, FF Choc 1/2 pt Br MS1700</td>
<td>1/2 pint</td>
<td>150</td>
<td>36</td>
<td>72</td>
<td>6</td>
<td>5.6</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Milk, FF Strawbr, 1/2 pt Br MS1702</td>
<td>1/2 pint</td>
<td>150</td>
<td>45</td>
<td>37</td>
<td>9</td>
<td>8.7</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Milk, LF White 1/2 pt, Br MS1768</td>
<td>1/2 pint</td>
<td>150</td>
<td>26</td>
<td>24</td>
<td>2</td>
<td>2.2</td>
<td>0.39</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td>Weighted Daily Average</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>Nutrient Guideline</td>
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<td></td>
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</tbody>
</table>

### Weighted Average

- **603**
- **1180**
- **80.17**
- **6.63**
- **0.00**

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>Menu AVG</th>
<th>% of Cals</th>
<th>Weekly Target</th>
<th>% of Target</th>
<th>Miss Data</th>
<th>Shortfall</th>
<th>Overage</th>
<th>Error Messages (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calories</td>
<td>603</td>
<td>100%</td>
<td>750 – 850</td>
<td>80%</td>
<td>Missing</td>
<td>147</td>
<td>109</td>
<td>Correction Required - Calories are Low</td>
</tr>
<tr>
<td>Sodium 1 (mg)</td>
<td>1190</td>
<td>21.91%</td>
<td>1420</td>
<td>80%</td>
<td>Missing</td>
<td>147</td>
<td>109</td>
<td>Correction Required - Sodium too High</td>
</tr>
<tr>
<td>Sodium 2 (mg)</td>
<td>1180</td>
<td>21.91%</td>
<td>1420</td>
<td>80%</td>
<td>Missing</td>
<td>147</td>
<td>109</td>
<td>Correction Required - Sodium too High</td>
</tr>
<tr>
<td>Sugars (g)</td>
<td>35</td>
<td>0.00%</td>
<td>1080</td>
<td>50.2%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td></td>
</tr>
<tr>
<td>Carbohydrate (g)</td>
<td>80.17</td>
<td>53.19%</td>
<td>1420</td>
<td>80%</td>
<td>Missing</td>
<td>147</td>
<td>109</td>
<td>Correction Required - Calories are Low</td>
</tr>
<tr>
<td>Trans Fat* (g)</td>
<td>6.63</td>
<td>0.00%</td>
<td>1080</td>
<td>50.2%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td></td>
</tr>
</tbody>
</table>

Ends
## Example of Weekly Certification Worksheet

### MS Department of Education

#### Weekly Certification Worksheet

<table>
<thead>
<tr>
<th>C. Lunch 9-12</th>
</tr>
</thead>
</table>

### 5 Day Week

<table>
<thead>
<tr>
<th>Fruit, Minimum (cups)</th>
<th>Mon 4/1/19</th>
<th>Tue 4/2/19</th>
<th>Wed 4/3/19</th>
<th>Thu 4/4/19</th>
<th>Fri 4/5/19</th>
<th>Weekly Total</th>
<th>Weekly RmtL. Check</th>
<th>Weekly Fruit Juice Limit Check (half of total fruit)</th>
<th>Weekly Vegetable Juice Limit Check (half of total Veg)</th>
<th>Total Weekly Fruit</th>
<th>Total Weekly Veg</th>
<th>% of Total Weekly Fruit that is Juice</th>
<th>Weekly RmtL. Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td></td>
<td></td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>0.00%</td>
<td>Yes</td>
</tr>
</tbody>
</table>

| Vegetables, Minimum (cups) | Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
|----------------------------|-----------|-----------|-----------|-----------|-----------|-------------|------------------|---------------------------------------------------|-------------------|----------------|---------------------------------------|------------------|
| 1.375                      | 1.125     | 1.25      | 1.5       | 1         |           | 6.25        | 5                | Yes                                             |                   |                |                                       |                  |
| - Dark Green               | 0.5       | 0.5       | 0.25      | 0         | 0.5       | 1.75        | 0.5              | Yes                                             |                   |                |                                       |                  |
| - Red/Orange               | 0.25      | 0.75      | 1         | 0.5       | 0.375     | 2.875       | 1.25             | Yes                                             |                   |                |                                       |                  |
| - Legumes                  | 0         | 0.5       | 0         | 0         | 0         | 0.5         | 0.5              | Yes                                             |                   |                |                                       |                  |
| - Starchy                  | 0.5       | 0         | 0         | 0         | 0.5       | 1           | 0.5              | Yes                                             |                   |                |                                       |                  |
| - Other                    | 0.625     | 0.625     | 0.625     | 1         | 0.625     | 3.6         | 0.75             | Yes                                             | 7.875             | 0              | 0.00%                                 | Yes               |

| Meat/Meal Alt: Minimum (oz eq) | Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|-------------|------------------|---------------------------------------------------|-------------------|----------------|---------------------------------------|------------------|
| 2                             | 2         | 2         | 2.25      | 2         | 2         | 10.25       | 10               | Yes                                              |                   |                |                                       |                  |
| Meat/Meal Alt: Maximum (oz eq) | Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
| 2.5                           | 3         | 2.75      | 2         | 4.25      | 14.5      | 12           | OVER             |                                                   |                   |                |                                       |                  |

| Grain: Minimum (oz eq)       | Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
|-------------------------------|-----------|-----------|-----------|-----------|-----------|-------------|------------------|---------------------------------------------------|-------------------|----------------|---------------------------------------|------------------|
| 2                             | 2         | 2         | 2         | 2         |           | 10          | 10               | Yes                                              |                   |                |                                       |                  |
| Grain: Maximum (oz eq)       | Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
| 2.75                          | 2.5       | 3         | 3         | 3         |           | 14.25       | 12               | OVER                                             |                   |                |                                       |                  |

### Grain Based Dessert Total for all weekly meals

| Whole Grain Rich Weekly Amount | Weekly Grains Total | Weekly Whole Grain Rich Total | % of Whole Grain Rich | 103% whole grain rich | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
|-------------------------------|---------------------|-------------------------------|-----------------------|------------------------|-------------|------------------|---------------------------------------------------|-------------------|----------------|---------------------------------------|------------------|
| 0                             | No more than 2 oz   |                               |                        | Yes                    |             |                  |                                                   |                   |                |                                       |                  |

### Milk, Minimum (cups)

| Mon 4/1/19 | Tue 4/2/19 | Wed 4/3/19 | Thu 4/4/19 | Fri 4/5/19 | Weekly Total | Weekly RmtL. Check | Weekly Vegetable Juice Limit Check (half of total Veg) | Total Weekly Veg | % of Total Weekly Veg that is Juice | Weekly RmtL. Check |
|------------|------------|------------|------------|------------|-------------|------------------|---------------------------------------------------|-------------------|----------------|---------------------------------------|------------------|
| 3          | 3          | 3          | 3          | 3          | 15          | 5                | Yes                                              |                   |                |                                       |                  |

**Cells with this background color signify Requirements not being met!**

If you have the appropriate waiver from your State Agency, then the menu must be at least 50% whole grain-rich or 1% flavored milk is an acceptable variety.
Are your calories, saturated fat, and sodium on target for the Review Week?

Are you including all menu items in your nutrient analysis? (don’t forget your condiments!)

When conducting a nutrient analysis using nutrient analysis software, have you correctly entered planned/prepared quantities of each food item to give you correct weighted values? (example: are you really only serving 100 hamburgers? Check your production books!)

Are your cafeteria managers/sites producing and serving the PLANNED menu?
Pre-Visit: Dietary Risk Score

- Document Collection
  - Interview food service contact

- Off-Site Dietary Tool
  - Low risk or high risk

- On-site Dietary Specifications Tool
  - Confirm risk
## Overall Dietary Risk Score

<table>
<thead>
<tr>
<th>Pre-Visit Score</th>
<th>On-Site Score</th>
<th>Dietary Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low-Risk</td>
<td>Low-Risk</td>
<td>No nutrient analysis required</td>
</tr>
<tr>
<td>Low-Risk</td>
<td>Low-/High-Risk</td>
<td>Depends on findings during on-site review</td>
</tr>
<tr>
<td>Low-Risk</td>
<td>High-Risk</td>
<td>Nutrient analysis required</td>
</tr>
<tr>
<td>High-Risk</td>
<td>Low-Risk</td>
<td>SFA likely put corrective action into motion before on-site review; Nutrient analysis still required</td>
</tr>
<tr>
<td>High-Risk</td>
<td>High-Risk</td>
<td>Nutrient analysis required</td>
</tr>
</tbody>
</table>
Offer VS. Serve

Meal signage posted for both breakfast and lunch

Students must select ½ cup fruit and/or vegetable

All components must be offered in full required quantities
Offer Versus Serve (OVS)

- Are any non-reimbursable meals getting past the POS?
- Does cashier understand what constitutes a reimbursable meal and can he/she verbalize that to the Reviewer?
- Is there OVS signage posted at each serving line?
- Have all High School sites implemented OVS?
- Are serving staff at OVS sites pre-plating all items on trays as students move through the line? (not allowed!)
Quantities & Components

- Proper size serving spoon/ladle/instrument used?
- All five components offered on each line?
- Each component available in the proper quantity according to Meal Pattern? (ex: need a full cup of fruit at HS level)
- Is denial of food used as a punishment? All students should have equal access to meals.

Remember that this section is our second most common finding!
Nutrition Quality and Meal Pattern on Site

Staff Training

• Reimbursable meals versus a la carte
• Required meal components/food items
• Required quantities with meals from salad bars, food stations, theme bars, etc.
Nutrition Quality and Meal Pattern: Common Errors

- Menus do not meet the meal pattern-daily requirements, portion sizes
- Grain items not whole grain rich/50% requirement
- CN labels or product formulation statements unavailable
- Offer vs. serve not implemented correctly
Nutrition Quality and Meal Pattern:
Common Errors on-Site

- Vegetable subgroups not met
- Inadequate portion sizes
- Credited amounts unclear
- Missing production records
- Not using standardized recipes
General Areas of Review

- Civil Rights
- SFA on-site monitoring
- Local school wellness policy
- Smart snacks
- School meal environment
<table>
<thead>
<tr>
<th>General Areas of Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water</td>
</tr>
<tr>
<td>Food safety</td>
</tr>
<tr>
<td>Reporting and recordkeeping</td>
</tr>
<tr>
<td>School Breakfast Program outreach</td>
</tr>
<tr>
<td>Summer Food Service Program outreach</td>
</tr>
</tbody>
</table>
General Areas of Review – Civil Rights

- Non discrimination statement
- Discrimination complaint procedures
- Complaint form and log
- Civil rights training materials and log
- Racial/ethnic data collection procedure
Do you have the CORRECT non-discrimination statement on all letters and program materials?

Do you have the LONG version on all eligibility letters?

Is the font size at least the size of the body of the letter?

Have you conducted staff training on civil rights?

Have you conducted outreach to inform families of availability of CN programs (SBP/SFSP/Prov 2 or CEP) and are copies on file?

Have you received any civil rights complaints?

Is the AJFA poster prominently displayed where meals are served?
Civil Rights: Common Errors

- No civil rights complaint procedure
- Not using correct nondiscrimination statement
- Not conducting civil rights training
- Missing nondiscrimination statement
- *And Justice For All* not in visible location
- No procedure for documenting and accommodating children with special dietary needs
SFA On-site Monitoring: Common Errors

Monitoring tool not completed

Monitoring tool not completed by deadline
On-Site Monitoring

- Have all sites been monitored by the SFA prior to February 1?
- Has the SFA used the SA-approved checklist for on-site monitoring?
General Areas of Review LWP

SFA to submit the following 1000 level area of review documents:

- Copy of current Local Wellness Policy (LWP)
- Document of when and how reviews and updates of LWP occurs
- Most recent assessment on LWP implementation and public notification
Local Wellness Policy: Common Errors

- Not available to the public
- Not reviewed or updated
General Areas of Review Smart Snacks

SFA to submit the following 1100 level area of review documents:

Copy of Smart Snacks SFA food sale policy; including the name of the monitoring personnel

Copy of Smart Snacks Process for determining non packaged or recipe foods compliance
Vending & Smart Snacks

- Are all items sold (vending/cafeteria/school store) smart snack compliant?
- Do you have documentation of smart snack compliance *on file for each* item sold?
- Are all of your vending machines locked or timed to prohibit purchases within an hour prior to meal service?
- Do any of your vending machines “advertise” non-compliant products such as high calorie soft-drinks (this is not allowable)?
Smart Snacks – Common Errors

Selling unapproved food or beverages

No document tracking Smart Snacks Calculation
Professional Standards

Hiring standards

• Did the school food authority hire a director after July 1, 2015?

Training standards

• Did employees meet or expect to meet standards
Professional Development

- Have all staff accrued the correct number of Hours?
  - 12 hours for CND
  - 10 hours for Managers
  - 6 hours for staff

- Do you have an updated/current tracking tool for staff professional development?
- Are all staff on one sheet, showing the total hours accrued for each person?
- Does tracking tool have all USDA required elements: name/hire date/title/core duties/ FT or PT status

- Are Agendas, Sign-In Sheets, and Certificates of Completion maintained on file?
### Example of Prof. Dev. Tracking Tool

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Site</th>
<th>Hire Date</th>
<th>Employee Position</th>
<th>Requir ed Hours of Training</th>
<th>FT/PT</th>
<th>Avg. Hrs per week</th>
<th>Manage r Recert</th>
<th>ICN Online Safety Training</th>
<th>Back to School Prof Dev</th>
<th>School Year Training Applied To</th>
<th>Completed Training Hours Year to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Helena Troy</td>
<td>Adm. Office</td>
<td>4/12/2018</td>
<td>Director</td>
<td>12 FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>2019-20</td>
<td>19</td>
</tr>
<tr>
<td>Jane Doe</td>
<td>High School</td>
<td>8/6/1997</td>
<td>Manager</td>
<td>10 FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>2019-20</td>
<td>19</td>
</tr>
<tr>
<td>Missy Sippy</td>
<td>High School</td>
<td>12/3/2012</td>
<td>Caf. Staff</td>
<td>6 FT</td>
<td>40</td>
<td>3</td>
<td>8</td>
<td>2019-20</td>
<td>11</td>
<td></td>
<td></td>
</tr>
<tr>
<td>John Deer*</td>
<td>High School</td>
<td>1/2/2020</td>
<td>Caf. Staff</td>
<td>6 PT</td>
<td>20</td>
<td></td>
<td></td>
<td>2019-20</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*PLEASE NOTE: John Deer is a newly hired employee who hasn’t received any training yet this SY. The SFA will have to submit a plan to the SA Reviewer for how he will receive training to reach his 6 required hours this SY.*
General Areas of Review - Outreach

SFA to submit the following 1600 level area of review documents:

- School Breakfast Outreach Document
- Summer Food Service Outreach Document
School Breakfast and SFSP Outreach - Common Error

Breakfast notification not sent as a hard document before or at beginning of year

Summer notification not sent or made publicly available
On-Site Expectations

Date set 8-12 weeks ahead

Notification of site(s) to be reviewed at the time of the phone interview

Phone interview to occur 2-4 weeks prior to on-site
On-Site Process

- Entrance Conference
- Documentation Review
- On-site Meal Review
- Staff Interviews
- Exit Conference
On-Site Areas of Review

All areas of review that the off-site covers have an on-site portion.

There are three additional areas of review in the on-site that are not covered in the off-site:

- Water
- Food safety
- Reporting and record keeping
Food Safety

- Are 2 Most recent food inspections available to Reviewer
  - 2 Per Year or documentation of request to MSDH

- Equipment Works Properly
  - functioning coolers/warmers,
  - no ice build up in freezer

- HACCP manual on site and being followed?

- Are temperature logs maintained and available for review?
  - Freezers
  - Coolers (don’t forget milk coolers!)
  - Dry Storage
  - Prepped Food

*Remember that Food Safety is our most common finding!*
Is FIFO implemented properly (rotating stock)
Are you over-stocked on products, especially Commodity Products?
Are all food products correctly dated (all 3 dates)?
Are chemicals stored separately from food?

NOTE: Food Storage is considered part of Food Safety.

Remember that Food Safety is our most common finding!
Reporting and Record Keeping

**Required records**

- Approved and denied household eligibility applications
- Direct certification documentation
- Verification records
- Claims for reimbursement
- Meal count participation data by school
Reporting and Record Keeping

- Menus
- Production records
- Civil rights complaints
- On-site reviews
- Local wellness policy
- Food safety inspections
- Temperature records for six most recent months
SFA review sites are selected for the Administrative Review (7 CFR 210.18 (e)(2))

Sites are selected after the October claim is processed
<table>
<thead>
<tr>
<th>Number of Schools in the SFA</th>
<th>Minimum Number of Schools to Review for NSLP</th>
<th>Number of Schools in the SFA</th>
<th>Minimum Number of Schools to Review for NSLP</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>1</td>
<td>41 to 60</td>
<td>6</td>
</tr>
<tr>
<td>6 to 10</td>
<td>2</td>
<td>61 to 80</td>
<td>8</td>
</tr>
<tr>
<td>11 to 20</td>
<td>3</td>
<td>81 to 100</td>
<td>10</td>
</tr>
<tr>
<td>21 to 40</td>
<td>4</td>
<td>101 or More</td>
<td>12*</td>
</tr>
</tbody>
</table>

* 12 plus 5 percent of the number of schools over 100. Fractions must be rounded to the nearest whole number.
AJFA poster at point of service delivery? *(may need to be in the classroom or on a cart)*

Are educational or enrichment activities offered directly before/during/after the distribution of snacks?

Is a system in place to provide ACCURATE meal counts?

Do you have a system in place to safely store food products? *(for example, you don’t want milk sitting outside of a cooler for too long)*
Fresh Fruit and Veg Program (FFVP)

- Are you purchasing only allowable products?
  - Remember that dips for fruits are not allowable
  - Remember that dips for veggies have to be low fat

- Have you limited your administrative costs for the program?

- Are you serving only to elementary students?
  - Remember that teachers who pass out fruit/vegetables are allowed to partake so as to model positive eating habits
Exit Conference

Once the review is complete, the reviewer will meet with the SFA key personnel to discuss the findings. The SFA is encouraged to ask questions if clarification of the findings is needed. Generally occurs in-person, on-site, on the last day of the review.
Closing the Review

The program specialist will notify the SFA of corrective action if applicable.

The review will be closed in the Claims Reimbursement and Reporting System once all corrective actions have been addressed.
This Institution is an Equal Opportunity Provider.

Full Statement:

Questions
Mary Burks
Division of School Support, Director
mburks@mdek12.org
Handouts that Should Accompany this Presentation

• AR Document Checklist

• Example/Instructions of how to pull meal applications

• Instructions on Pulling Reports from Nutrikids (note – you may use a different type of Nutrient Analysis Software)

• Simplified version of self-assessment