THE ADMINISTRATIVE REVIEW PROCESS DAY 2

QUESTIONS AND ANSWERS FROM DAY 1

GENERAL AREAS

GENERAL PROGRAM COMPLIANCE
CIVIL RIGHTS
ON-SITE REVIEWS
COMPETITIVE FOODS
PROFESSIONAL STANDARDS
LOCAL WELLNESS POLICY
WATER
FOOD SAFETY
SBP AND SFSP OUTREACH

RESOURCE MANAGEMENT
PROCUREMENT
FINANCIAL MANAGEMENT
CIVIL RIGHTS

Protected categories for School Nutrition Programs:
- Race
- Color
- National origin
- Age
- Sex
- Disability

CIVIL RIGHTS REVIEW

“And Justice for All” poster placed in visible locations. You must have access to read the information on the poster.

Receipt of equal benefits without discrimination at each school during each meal service reviewed.

Correct non-discrimination statement on all program materials.

CIVIL RIGHTS REVIEW

Annual continuing education provided.

SFA and Site monitoring occurred.

Monitoring and education documentation is maintained.
CIVIL RIGHTS: COMPLIANCE WORKSHEET

Required

Central Office

Each school site (includes satellite sites)

Complete by December 15 each year

Kept on file

CIVIL RIGHTS: REVIEW

What are the SFA’s complaint procedures?

Have there been allegations of discrimination?

CIVIL RIGHTS: CORRECTIVE ACTION/FISCAL ACTION

Deficiencies addressed with corrective action

Funds withheld if corrective action plan not submitted or not implemented
**QUESTIONS?**

**ON-SITE REVIEW OR SELF ASSESSMENT BREAKFAST AND LUNCH**

- Meal Counting and Claiming Procedures & General Review Areas
- LEAs and RCCs
  - Annual On-Site review for every site
  - By February 1st
- Non-public and Charter schools
  - Bi-annual Self Assessments for every site
  - By November 1st and April 1st
- Corrective Action and Follow-up within 45 days of any finding

SA will request:
- Copy of On-Site Review or Self Assessments
- Written documentation of follow-up reviews
- Written documentation to verify Corrective Action has occurred for initial review findings
ON-SITE REVIEW OR SELF ASSESSMENT

Evaluated at the site and SFA level

No Fiscal Action unless repeated or egregious

Corrective Action Plan is required for errors

QUESTIONS?

COMPETITIVE FOODS AND SMART SNACKS RULE

All food and beverages sold to students on the school campus during the school day, other than reimbursable meals

Reference: 7 CFR 210 and 220
COMPETITIVE FOODS AND SMART SNACKS RULE

Healthy, Hunger-Free Kids Act 2010

Provided authority to establish nutrition standards for all foods and beverages sold outside of School Nutrition programs

Specified nutrition standards for all foods sold:
• outside the school meal programs
• on the school campus
• at any time during the school day

COMPETITIVE FOODS

Includes:
– A la Carte items
– Vending machines
– School Stores
– Fund-raisers
– Student sales
– Other food or beverage sales or activities

SMART SNACKS RULE

Standards must be consistent with most recent Dietary Guidelines for Americans

Standards represent minimum requirements

Local standards may be more restrictive
SMART SNACKS RULE

- A la carte foods sold in the cafeteria
- School stores
- Snack bars
- Vending machines
- And other venues

WHAT IS THE DEFINITION OF A SCHOOL DAY?
From midnight to 30 minutes after the end of the official school day

COMPETITIVE FOODS DURING MEAL PERIODS

Schools participating in the NSLP and SBP must prohibit sale of:
- foods or beverages in competition with school meals
- foods that do not meet Smart Snacks standards
### COMPETITIVE FOODS - WHAT HAPPENS AFTER LUNCH?

**Schools may:**

- Extend the existing NC Competitive Foods Rule to 30 minutes after the school day ends.
- Allow School Nutrition Program to control all food and beverage sales.
- Purchase qualifying snacks and beverages from School Nutrition.
- Control their own sales of foods and beverages after the lunch period.

*Combination – must have SA approval*

### COMPETITIVE FOODS: NC RULES

No food or beverage may be sold to students on campus in competition with the school nutrition program between 12:01 AM and the cafeteria closing.

Sales must accrue to the school's nonprofit meal programs and income used only for these programs.

### COMPETITIVE FOODS: BOTTOM LINE IN NC

- All revenues from the sale of foods and/or beverages sold to students until the established lunch period ends must accrue to the non-profit School Nutrition Program.
- Failure to comply means loss of federal School Nutrition funds.
COMPETITIVE FOODS AND THE ADMINISTRATIVE REVIEW

Observations to determine:

- If food and beverage sales occurring during the school day are conducted by the School Nutrition Program.
- If all receipts of food and beverage sales are returned to the School Nutrition Program.
- If foods available and sold by the School Nutrition program meet Smart Snacks standards.

COMPETITIVE FOODS: CORRECTIVE ACTION

Competitive food sales will be evaluated at the site level. Sites in violation must reimburse the School Nutrition Program.

Violations require a written Corrective Action Plan from the LEA's Superintendent or the SFA's Administrator.

COMPETITIVE FOODS: FISCAL ACTION

The State Agency has the authority to reclaim or withhold all Federal funds for reimbursable school meals each day the school is in violation of the Competitive Foods Regulations and/or may withhold federal reimbursement until compliance is sustained.
QUESTIONS?

PROFESSIONAL STANDARDS

WHAT IS REQUIRED FOR THE ADMINISTRATIVE REVIEW?

FINAL RULE

- Implementation began July 1, 2015
- Establishes minimum:
  - Hiring standards for new SFA directors
  - Annual continuing education standards for all employees
- http://professionalstandards.nal.usda.gov/
REQUIRED ANNUAL CONTINUING EDUCATION STANDARDS

<table>
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<th>Role</th>
<th>Hours</th>
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<tbody>
<tr>
<td>SFA Director</td>
<td>12</td>
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<tr>
<td>Manager</td>
<td>10</td>
</tr>
<tr>
<td>Full-time Staff</td>
<td>6</td>
</tr>
<tr>
<td>Part-time staff (working &lt; 20 hours/week)</td>
<td>4</td>
</tr>
<tr>
<td>Jan. 1 or later hire: ½ of required annual hours</td>
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</tr>
</tbody>
</table>

KEY LEARNING TOPICS AND OBJECTIVES

- 1000 Nutrition
- 2000 Operations
- 3000 Administration
- 4000 Communications/Marketing

SOURCES OF CONTINUING EDUCATION

- Variety of formats
  - Virtual/web-based and in-person
  - Credited in 15 minute increments
- Variety of sources
  - FNS-Team Nutrition
  - Institute of Child Nutrition
  - Professional Associations and organizations-SNA
  - Within the SFA
  - State Agency-DPI
  - Commercial vendors
CONTINUING EDUCATION DOCUMENTATION

- employee names by category
- employer/school
- title of continuing education (CE)
- date of CE
- topic or objectives
- learning code
- source of CE
- total contact hours

HIRING STANDARDS FOR DIRECTORS

Based on 3 LEA size categories:

- 2,499 or less student enrollment (Small)
- 2,500-9,999 student enrollment (Mid-Size)
- 10,000 or more student enrollment (Large)

Educational requirements for all size categories reflect the knowledge and expertise required to perform duties successfully.

The Final Rule provided hiring flexibilities for Small LEAs effective April 30, 2019.

HIRING STANDARDS FOR SMALL LEAS

- 2,499 students:
  - Bachelor’s degree with specific major
  - Associate’s degree with specific major with 1 year of experience*
  - High school diploma with 3 years of experience*

- ≤500 students:
  - State Agency has discretion to approve the hiring of a director having a high school diploma and less than 3 years of experience*

*School nutrition or other relevant food service experience including documented volunteer or unpaid work.
HIRING STANDARDS FOR MID-SIZE LEAS

2,500 - 9,999 students:
- Bachelor’s degree with specific major
- Bachelor’s degree in any academic major and at least 2 years of Program experience
- Associate’s degree with a specific major and at least 2 years of Program experience

HIRING STANDARDS FOR LARGE LEAS

<10,000 students:
- Bachelor’s degree with specific major
- Bachelor’s degree in any academic major and at least 5 years of experience in management of school nutrition programs

HIRING STANDARDS FOR ALL CATEGORIES

Food Safety Certification Required
- Achieve food safety certification within 5 years prior to the starting date or within 30 days after the starting date
- Maintaining food safety certification for all current Directors is an expectation
SFA OVERSIGHT

Document compliance with the hiring standards and food safety certification for Director

Document continuing education standards for all

Documentation of compliance must be available for the Administrative Review

QUESTIONS?

LOCAL WELLNESS POLICY (LWP)

Part of the General Program area of Review

HHFKA added new provisions

• Public involvement, notification
• Foods sold outside of school meals
• Foods provided, not sold to students
• Food and beverage marketing

**LOCAL WELLNESS POLICY**

NC Annual Agreement includes LWP Responsibilities

Designate LWP Coordinator for developing, implementing and monitoring

Required for all School Food Authorities (Traditional schools, RCCI, non-public, and charter schools)

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**LWP ELEMENTS**

Measurable Goals for:
- Nutrition education and promotion
- Physical activity
- Other school-based strategies promoting student wellness

Handout: NC DPI Local Wellness Policy Checklist
Resources: https://www.dpi.nc.gov/districts-schools/district-operations/school-nutrition/information-resources-subject#local-wellness-policy

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**OTHER LWP REQUIRED ELEMENTS**

Nutrition guidelines for all foods and beverages available to students on school campus during the school day
- Items sold meet Smart Snacks Nutrition Standards
- Items provided have guidelines

The team who develops and implements the LWP includes broad based group of stakeholders and permit public involvement

Inform and update the public about the content, implementation, and assessment of wellness policies
AR QUESTIONS ASK:

- Are the required LWP elements present?
- How does public know about LWP?
- When, how, and who reviews/updates LWP?
- What is their relationship with the LEA?
- How are potential stakeholders made aware of their ability to be involved?
- Has a triennial assessment occurred and how was the public informed of the results?

LWP: TRIENNIAL ASSESSMENT

HHFKA provision requires assessment for:

- Schools’ compliance with the LWP
- How the LWP compares to a model LWP
- Schools’ progress toward LWP goals

Tools:

- CDC: School Health Index
- Rudd Center University of Conn: WellSAT 3.0
- The Institute of Child Nutrition: Sustaining and Strengthening Local Wellness Policies

LWP CORRECTIVE ACTION AND FISCAL ACTION

Corrective Action

- Missing required elements
- Public notification

Fiscal Action

- May withhold funds for repeated or egregious violations
QUESTIONS?

WATER

• Potable water available to all students at no charge
  (includes cups)
• In the area where meals are served
• Must be available without restriction
• Not a part of reimbursable meal

WATER

May be provided in a variety of ways
Reasonable costs to SFA are allowable
Multiple service locations would require water made available for each
Must be available for ASSP
Corrective Action required if non-compliant
QUESTIONS?

FOOD SAFETY: GENERAL AREA OF REVIEW

Includes:
1. Written plan (HACCP)
2. Food safety inspections
3. Recordkeeping
4. Storage

Assessment conducted at each site reviewed
Must cover all facilities storing, preparing or serving food for FNS programs
Includes alternate locations such as classrooms, transported meals, buses, warehouses, etc.

FOOD SAFETY: HACCP PLAN

Based on USDA guidance & HACCP principles
Current year Food Safety plan available and accessible
HACCP templates and forms in place and updated

https://www.dpi.nc.gov/districts-schools/district-operations/school-nutrition/information-resources-subjects/haccp-food-safety
**FOOD SAFETY REVIEW**

Observations at each review site
- Buy American compliance
- Current and complete HACCP Plan with required elements and proper implementation
- Recordkeeping and monitoring
- Compliant storage practices
- Food safety inspection reports
- Central Warehouse HACCP plan if applicable

**FOOD SAFETY INSPECTIONS**

Required two (2) food safety inspections per school annually

Current grade posted in a publicly visible location

Written documentation required for insufficient number of inspections

**FOOD SAFETY: CORRECTIVE ACTION**

- Any site food safety concerns identified
- Food safety deficiencies usually do not result in Fiscal Action, however, Corrective Action is required
- Repeat or egregious findings could result in fiscal action
QUESTIONS?

OUTREACH:
SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM

SFA must inform eligible families of the availability of reimbursable Breakfast in SBP and meals in SFSP programs.

OUTREACH: SCHOOL BREAKFAST PROGRAM

Inform about availability of SBP at beginning of the SY in F&RP packets

Send reminders about SBP multiple times throughout the SY

May provide reminders:
- through public address system
- by providing printed or electronic material
- by posting menus or website

QUESTIONS?
OUTREACH: SUMMER FOOD SERVICE PROGRAM

- USDA requires schools to conduct SFSP outreach before the end of the school year.
**IMPORTANCE OF MONITORING RESOURCE MANAGEMENT**

- Ensure SFAs account for all revenues and expenditures of nonprofit School Nutrition account
- Ensure effective and consistent management of program resources

**RESOURCE MANAGEMENT: 5 AREAS**

1. Maintenance of the Non-profit School Nutrition Account
2. Allowable Costs
3. Paid Lunch Equity
4. Revenue from Non-program Foods
5. Indirect Costs

**RESOURCE MANAGEMENT REVIEW**

- Documentation for all resource management areas provided
- Technical assistance provided
- Corrective action required
- Fiscal action for non-compliance with resource management requirements may include withholding funds
NON-PROFIT SCHOOL NUTRITION ACCOUNT

- Break-even or loss not required for non-profit status
- Comply with regulatory limitations on the use of nonprofit School Nutrition revenue
- Identify revenue excess or shortfall

COMPONENTS OF THE NON-PROFIT SCHOOL NUTRITION ACCOUNT

- SFA accounting system
- Net cash resources

ACCOUNTING SYSTEM

- Complies with the system established by the State Agency
NET CASH RESOURCES

- Cash available beyond three (3) months operating balance

FC1-A FINANCIAL REPORT

- Monitor each quarter in the SNTS.
- View
- Modify
- Summary
- Admin

SUMMARY REPORT

- Monitor each quarter in the SNTS.
- Annual FC1-A over 3 months requires an approved Spenddown Plan.

# Months Operating Balance

6.4886

Please select 'Approve' after plan is revised and routed within the set time limit. After approval, the plan is to be printed and signed. A copy of the approved plan is to be kept on file, a copy of the signed plan must be submitted to the state agency. This plan is to be updated annually.
**REVIEW OF NET CASH RESOURCES**

- **Calculate** by following guidance in the SA’s financial management system
- **Ensure** SFA compliance with approval of net cash resources in excess of three (3) months
- **Provide** technical assistance to SFA spend down plan in expeditious and prudent manner

**ALLOWABLE COSTS**

- Must meet the requirements of 2 CFR 200.403 - 409 being reasonable, necessary, and allowable
- Use Federal funds only for the intended program purposes
- Ensure compliance with government-wide and specific rules and regulations

**REVIEW OF ALLOWABLE COSTS**

- **Test** actual expenses for compliance with allowable cost requirements
- **Identify** unallowable costs
- **Ensure** costs are adequately documented and consistently treated
### Classification of Costs and Examples

<table>
<thead>
<tr>
<th>Allowable</th>
<th>Allowable with prior SA Approval</th>
<th>Unallowable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salaries/Benefits</td>
<td>Capital expenditures (equipment purchases, etc.)</td>
<td>Gifts</td>
</tr>
<tr>
<td>Travel</td>
<td>Vehicles – Request in Writing to the Office of School Nutrition</td>
<td>Entertainment</td>
</tr>
<tr>
<td>Continuing Ed</td>
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<td>Alcoholic Beverages</td>
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<tr>
<td>Conferences</td>
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<td>Construction</td>
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<td>Printing</td>
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<td>Food</td>
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<td>Charges</td>
</tr>
<tr>
<td>Supplies</td>
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</tr>
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</table>

### Paid Lunch Equity

- Included in the Healthy, Hunger-Free Kids Act (Section 205)
- Ensure SFAs charge paid lunch prices sufficient to cover the costs of paid meals or provide enough local funds to support paid meal costs

### Non-Program Foods

- Foods and beverages purchased using funds from the nonprofit School Nutrition account
- Sold in a school participating in the federally assisted School Meal Programs
- Includes a la carte items, adult meals, vending machine items, fundraisers, school stores, and for catered and vended meals
- A la carte price listing form to be completed by the School Nutrition Administrator
**REVENUE FROM NON-PROGRAM FOODS**

- Included in the HHFKA (Section 206)
- Intent: With the exception of reimbursable meals, all food sold in a school and purchased with funds from the nonprofit school food service must generate revenue at least equal to the cost of the food
- North Carolina A La Carte Bid Price versus Selling Price Comparison Template.

**INDIRECT COST**

<table>
<thead>
<tr>
<th>Determine</th>
<th>if costs are allowable, allocable and appropriately charged as a direct or indirect cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure</td>
<td>application of correct indirect cost rate to the allowable expense codes</td>
</tr>
<tr>
<td>Confirm</td>
<td>assessment of indirect cost according to SA agreement</td>
</tr>
</tbody>
</table>

**QUESTIONS?**
FINANCIAL MANAGEMENT

CASH MANAGEMENT PROCEDURES

- SFA must have written cash management procedures
- SFA must abide by approved procedures
- Provide annual training to School Nutrition Managers and Cashiers

DUAL EMPLOYEES

Areas of review include:

- Salary
- Annual/medical leave
- Health insurance
- Other (longevity, bonus leave and supplements)

Salaries and benefits for employees working in multiple departments must be prorated according to the time worked for each department.
INTEREST

- All interest earned on bank/investment accounts must accrue to the Non-Profit School Nutrition Account.

SALES TAX REFUND

All eligible sales tax paid by School Nutrition should be included in the Sale and Use Tax Refund document prepared by the PSU and submitted to the NC Department of Revenue.

The refund of sales tax must be deposited in the Non-Profit School Nutrition Account for current and prior years.

WORKER'S COMPENSATION INSURANCE

- The amount of premium charged to School Nutrition must reflect the salaries by position type and insurance rate.

- Discounts and credits must be applied to School Nutrition on a prorated basis.

- Any refunds from prior years must be prorated accordingly and deposited into the Non-Profit School Nutrition account.
ADULT MEAL PRICES

- FNS Instruction 782-5 REV 1
- Include the value of any USDA entitlement and bonus donated foods used to prepare the meal

SINGLE AUDIT

Review the single to determine if there were any financial exceptions noted by the independent auditor in the following areas:
- Cited Question Cost
- Unallowable Use of Funds
- Adult Meal Charges

OUTSTANDING CHARGES/BAD DEBTS

- Review financial reports to determine if there were outstanding charge/bad debt (Students/Adults) or NSF checks
- All outstanding balances should be repaid by June 30th, but no later than September 30th
STATE REVENUE MATCH

• If applicable, review the financial reports to determine if the Public-School Unit (PSU) has met the state revenue match requirement.

DISPOSITION OF EQUIPMENT

Federal regulations require that disposition/disposal of any equipment purchased with School Nutrition funds with a current value of $5,000 or more must receive prior approval from the State Agency.

Proceeds from the sale of any equipment must be deposited into the Non-Profit School Nutrition account.

QUESTIONS?
PROCUREMENT REVIEWS 2023 – 2024
ADMINISTRATIVE REVIEWS

VENDOR PAID SUMMARY

- For School Year 2022-2023
- Summary of all vendor payments
- Includes Name of Vendor
- Vendor Number
- Total of yearly expense

SAMPLE VENDOR PAID SUMMARY LIST

- Vendor Number – Assigned by the local Public-School Unit.
- Name of Vendor
- Transaction and/or Total Expenses – total amount spent in the school year
- Submit a copy to your Lead Administrative Review Specialist
2018-2019 New Format for Procurement Review

Off-Site Entries – School Nutrition Technology System

PROCUREMENT ENTRY

- Located in the School Nutrition Technology System
- Power Point in the Download Forms section, under Applications, then Administrative Reviews
- Contact your Lead Administrative Review Specialist if you need assistance.

PROCUREMENT ENTRY AREAS

- Micro Purchases
- Small Purchases
- Formal Contracts
- Food Service Management Company Contract
- Processing Contracts
- Emergency Purchases

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<tr>
<th>Type</th>
<th>Vendor Cost</th>
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<tr>
<td>Small Purchases</td>
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<tr>
<td>Formal Contracts</td>
<td>0</td>
<td>0</td>
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<tr>
<td>FAS Contracts</td>
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<td>0</td>
</tr>
<tr>
<td>Processing Contracts</td>
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<td>0</td>
</tr>
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</table>
SOLE SOURCE

All Sole Source Purchase requires State Agency Approval.

Submit request on program letterhead.

Do Not purchase items before you receive State Agency Approval.

PROCUREMENT PLAN

• All School Nutrition Programs in North Carolina MUST have a Board Approved Procurement Plan.
• Fill in the blank document with the Title of person responsible
• Attachment A – Code of Ethics
• Attachment B – Types of Procurement
• Attachment C – Procurement Checklist
• Signed and Dated – Board Chair and Superintendent

QUESTIONS?
**POST REVIEW**

PROCEDURES AFTER THE ADMINISTRATIVE REVIEW

- Administrative review exit conference
- Preliminary findings signed by SFA and reviewer
- Second party review
- Exit letter and review results
- Corrective action submitted and approved

**POST REVIEW: EXIT CONFERENCE**

**PURPOSE**

- Report of Preliminary Findings
- Required Corrective Action
- Preliminary Fiscal Action
  - Compilation of all review areas
POST REVIEW: EXIT LETTER AND REVIEW RESULTS

- Review Findings
- Required Corrective Action
- Timeframes
- Fiscal Action
- Appeals Process

CORRECTIVE ACTION – WHAT NOW?

- Review the report upon receipt, including the Report of Findings.
- Contact the Administrative Review Specialists with questions about the required corrective action.
- Develop a plan to address areas of corrective action.
- Begin immediately on Corrective Actions.

CORRECTIVE ACTION – HOW?

- Submit written Corrective Action Plan.
- Remedy non-compliance.
- Must be sustainable.
- Adhere to timeframes.

POST REVIEW: CORRECTIVE ACTION

- Submit written Corrective Action Plan.
- Remedy non-compliance.
- Must be sustainable.
- Adhere to timeframes.
CORRECTIVE ACTION – REPORT OF FINDINGS

- Continuing Education – Read the requirements of the required continuing education. Written procedures, Agenda, Sign in Rosters, etc.
- Written Assurances – On district letterhead, dated, and signed
- Financial Repayments – Copies of a check or journal entry.
- Procurement – Approved Board Procurement Plan or addendum to Invitation for Bid (IFB).
- Production Records – Does it say submit one week of breakfast or lunch production records.
- Recipes – Copies of Recipes

CORRECTIVE ACTION – SUBMITTING TO ADMINISTRATIVE REVIEW SPECIALIST

- Submit Corrective Action by email (zip file) or traceable mail.
- Organize the information – If in an email, submit documentation for each identified area in a file. If by mail, use a cover sheet or folders to separate information.
- The Administrative Review Specialist will acknowledge receipt.
- You will be notified if additional information is needed

POST REVIEW: CLOSURE

- Corrective Action Plans meets program compliance
- Closure letter issued
OFFSITE DATA ENTRY IN SCHOOL NUTRITION TECHNOLOGY SYSTEM

- You will receive a detailed email containing attachments to walk you through the process of completing the offsite questions. The email will contain the date the offsite is open for you to complete the information.
- The person completing the information must have Application Rights.
- Information MUST be completed at least 3 weeks prior to the start of your review.
- Please enter comments into the comment boxes, just don’t answer questions as “Yes” or “No”.

Let’s walk through the process now with step by step instructions.

OTHER FEDERAL PROGRAM REVIEWS

AFTERSCHOOL SNACK PROGRAM
SEAMLESS SUMMER OPTION
FRESH FRUIT & VEGETABLE PROGRAM
AFTERSCHOOL SNACK PROGRAM (ASSP)

- Operated under the NSLP
- Sponsored and/or operated by the SFA
- Supervised
- Organized activities
- Educational or enrichment
- After the end of the school day

ASSP: MEAL PATTERN

Food Based

- 1 cup Milk, fat-free or 1% unflavored or flavored
- 1 oz eq Grain
- 1 oz eq Meats/Meat Alternates
- 1/4 cup Fruits/Vegetables

ASSP: EVALUATING COMPLIANCE

Determine if SFA retains administrative and management responsibility for meeting requirements

Assess compliance in the following areas:
- Eligibility
- Accountability/Meal Counting and Claiming
- Meal Pattern/Production Records
- Monitoring
- General Areas
ASSP: ELIGIBILITY

Qualifying Checklist - completed prior to start
Education or Enrichment Activities
Area Eligible – all meals free
  • Free/Reduced-Price 50% or more
Non-Area Eligible
  • Documentation of Free/Reduced-Price eligibility required
Expanded Learning Time
  • SP 04-2011
Age Eligibility
Snack Pricing

ASSP: ACCOUNTABILITY

Attendance/Sign-in Sheets
Point of Service Roster
Counting/Claiming Procedures
Supporting Documentation
  • Snack Orders
  • Delivery Records
  • Production Records
  • Adult Snacks
Record Keeping

ASSP: MEAL PATTERN & PRODUCTION RECORDS

• One snack per child
• Production Records completed daily
• Menu compliant with Meal Pattern
• Counting and Claiming at POS
ASSP: SELF ASSESSMENT

- 1st: during first 4 weeks of operation
- 2nd: prior to end of SY
- Records kept for 3 years

ASSP: GENERAL AREAS

- Civil Rights
- Health Inspection Records
- Food Safety
  - HACCP
  - Temperature Logs

ASSP: REVIEW

- Snack contains required components and adequate portions
- One snack per child claimed
- Snacks are served at the appropriate time
- Counting and claiming is accurate
### ASSP: CORRECTIVE ACTION/FISCAL ACTION

#### EXAMPLES
- Site Eligibility Concerns
- Counting/Claiming Violations
- Inappropriate Food Components
- Insufficient Quantities
- Missing Components

#### REVIEW PROCESS
- **TA**
- Immediate CA required
- Corrective Action Plan

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### ASSP: COMMON FINDINGS

- ASSP checklist not completed prior to startup of snack service and/or not available
- Two After School Snack Program On-Site Reviews not conducted, one within the first 4 weeks of operation
- ASSP Production Record indicating inadequate portion sizes for meal components
- ASSP Production Records are incomplete
- Meal Counts not taken at the point of service
- Inadequate 6 oz Fruit components (pay special attention to juice and dried fruit serving sizes)

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### SEAMLESS SUMMER OPTION (SSO)

**REVIEW AT LEAST ONE SSO SITE**

**SITE ELIGIBILITY**
**SSO: COMPLIANCE**

- Evaluate site eligibility
- Assess menus and production records
- Review meal counting and claiming
- Examine food safety records and practices
- Evaluate performance of self-monitoring
- Determine differentiation between age/grade groups
- Observe community participation/site advertisement

**SSO: ADVERTISEMENT & ON-SITE REVIEW**

- Advertisement
  - SFA makes reasonable effort to advertise to community
  - Advertisements have non-discrimination statement
- SFA On-Site Review
  - SFA reviews all sites by the 4th week of operation or before site close

**SSO: MEAL COUNTING & CLAIMING**

- Count complete meals at POS
- Compare POS meal counts to:
  - Meal counts from last full week from review period
  - Benefits issuance roster
- Camps - Ensure only meals served to F/RP eligible children are claimed for reimbursement
SSO: MENU PLANNING & MEAL SERVICE

- Review menus, meal component and Quantity worksheets, and production records
- Assess how site provides meals to varying age/grade groups, if applicable
- Ensure children eat meals on-site during approved meal service times

SSO: MENU PLANNING & MEAL SERVICE

- Ensure eligible children get one meal before seconds are served
- Verify food safety measures
- Validate alternate arrangements for inclement weather

SSO: CORRECTIVE ACTION

- Missing meal components for day of review
  - Immediate corrective action required before any meals claimed
  - Include on Corrective Action Plan

  Documentation Review
  - Give opportunity to provide documentation to show component was actually offered
  - Evaluate erroneous meals to assess fiscal action
  - Require Corrective Action Plan
SSO: CORRECTIVE ACTION

Findings for Vegetable Subgroups, Milk Types, Whole Grain-rich foods, Quantities
- Provide technical assistance
- Include on Corrective Action Plan

Production Records Missing/Incomplete
- Provide technical assistance
- Ensure site manager understands how to complete production records to prevent future problems

QUESTIONS?

FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)
FFVP REVIEW:
3 COMPONENTS

1) NCDPI determines which FFVP school(s) will be reviewed
2) On-site (school) review of FFVP operation
3) SN Admin Office review of FFVP financial records & documents

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FFVP REVIEW: SCHOOL SELECTION

<table>
<thead>
<tr>
<th>Number of Schools Selected for AR that operate FFVP</th>
<th>Minimum Number of FFVP Schools to be Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5</td>
<td>1</td>
</tr>
<tr>
<td>6-10</td>
<td>2</td>
</tr>
<tr>
<td>11-20</td>
<td>3</td>
</tr>
<tr>
<td>21-40</td>
<td>4</td>
</tr>
<tr>
<td>41-60</td>
<td>6</td>
</tr>
<tr>
<td>61-80</td>
<td>8</td>
</tr>
<tr>
<td>81-100</td>
<td>10</td>
</tr>
<tr>
<td>101 or more</td>
<td>10 plus 5% of the number of schools over 100 rounded to the nearest whole number</td>
</tr>
</tbody>
</table>

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FFVP SCHOOL REVIEWED ON SITE FOR PROGRAM OPERATION
- FFVP menu/weekly operation
- Advertise/Marketing
- Storage of produce/supplies
- Preparation/Distribution of snacks
- FFVP snack service
- Unused FFVP snacks
- Nutrition education efforts
- Partnerships
SN ADMIN OFFICE: FFVP FINANCIAL RECORDS & DOCUMENTS

Addendum/School Proposal
Advertising efforts
Budget implementation/status
Procurement plan/practices

Claim for review month (and other months?)
- Paid FFVP invoices for food/non-food expenses
- Time & Activity Report to justify FFVP labor claimed
- Status of FFVP 10% Administrative funds/expenses
- Confirm NC E-Pay Remittance for FFVP claim (direct deposit notification)

FFVP ANNUAL BUDGET

Plan! Plan! Plan!

Requirement to complete/submit to NCDPI
Wisely utilize FFVP funding monthly
Exhaust FFVP school's grant allocation by completion of school year

CORRECTIVE AND FISCAL ACTIONS

Corrective Action will address all FFVP non-compliance
Fiscal Action will be used to recover any payments inconsistent with FFVP requirement
IF YOU DON'T KNOW...CONTACT ZOE

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NCDPI: 984-236-2636
Cell: 919-961-0608

QUESTIONS?

USDA Non-Discrimination Statement

This institution is an equal opportunity provider.