

# THE ADMINISTRATIVE REVIEW PROCESS DAY 2

QUESTIONS AND ANSWERS FROM DAY 1

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## GENERAL AREAS

GENERAL  
PROGRAM  
COMPLIANCE  
RESOURCE  
MANAGEMENT  
PROCUREMENT  
FINANCIAL  
MANAGEMENT

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## GENERAL PROGRAM COMPLIANCE

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

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# CIVIL RIGHTS

Protected categories for School Nutrition Programs:

- Race
- Color
- National origin
- Age
- Sex
- Disability

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# CIVIL RIGHTS REVIEW

"And Justice for All" poster placed in visible location. 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

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# CIVIL RIGHTS REVIEW

Annual continuing education provided

SFA and Site monitoring occurred

Monitoring and education documentation is maintained

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CIVIL RIGHTS:  
COMPLIANCE  
WORKSHEET

Required

Central Office

Each school site (includes satellite sites)

Complete by December 15 each year

Kept on file

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CIVIL RIGHTS: REVIEW

What are the SFA's complaint procedures?

Have there been allegations of discrimination?

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CIVIL RIGHTS: CORRECTIVE ACTION/FISCAL ACTION

Deficiencies addressed with corrective action

Funds withheld if corrective action plan not submitted or not implemented

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QUESTIONS?



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

Meal Counting and Claiming  
Procedures & General Review Areas

LEAs and RCCIs
 

- Annual On-Site review for every site
- By February 1<sup>st</sup>

Non-public and Charter schools
 

- Bi-annual Self Assessments for every site
- By November 1<sup>st</sup> and April 1<sup>st</sup>

Corrective Action and Follow-up  
within 45 days of any finding

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**ON-SITE  
REVIEW OR  
SELF  
ASSESSMENT**

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

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## 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

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## QUESTIONS?

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## 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



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## 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

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## COMPETITIVE FOODS

Includes:

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



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## SMART SNACKS RULE

Standards must be consistent with most recent Dietary Guidelines for Americans

Standards represent minimum requirements

Local standards may be more restrictive

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## SMART SNACKS RULE

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




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## WHAT IS THE DEFINITION OF A SCHOOL DAY?

From midnight to 30 minutes after the  
end of the official school day




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## 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




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### 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

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### 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.

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- 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: BOTTOM LINE IN NC

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## 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.

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## 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

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## 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.

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QUESTIONS?



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PROFESSIONAL  
STANDARDS

WHAT IS REQUIRED FOR THE ADMINISTRATIVE  
REVIEW?

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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/>



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# REQUIRED ANNUAL CONTINUING EDUCATION STANDARDS

SFA Director  
12 hours

Manager  
10 hours

Full-time Staff  
6 hours

Part-time staff (working < 20 hours/week)  
4 hours

Jan. 1 or later hire: ½ of required annual hours

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# KEY LEARNING TOPICS AND OBJECTIVES

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

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32

# 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

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33

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

**CONTINUING  
EDUCATION  
DOCUMENTATION**

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**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 LEA's effective April 30, 2019

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**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

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## 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

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## 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

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## 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



39

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## 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

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## QUESTIONS?



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## 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

<http://www.fns.usda.gov/tn/local-school-wellness-policy>

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## 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: NCDPI Local Wellness Policy Checklist

Resources: <https://www.dpi.nc.gov/districts-schools/district-operations/school-nutrition/information-resources-subject#local-wellness-policy>

44

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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

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**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 be involved?
- Has a triennial assessment occurred and how was the public informed of the results?

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**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

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**LWP CORRECTIVE  
ACTION AND  
FISCAL ACTION**

- Corrective Action
- Missing required elements
  - Public notification
- Fiscal Action
- May withhold funds for repeated or egregious violations

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## QUESTIONS?



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## 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



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## 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



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# QUESTIONS?



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52

## 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.

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53

## 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-subject/#haccp--food-safety>

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<b>FOOD SAFETY REVIEW</b>	<p>Observations at each review site</p> <ul style="list-style-type: none"> <li>– Buy American compliance</li> <li>– Current and complete HACCP Plan with required elements and proper implementation</li> <li>– Recordkeeping and monitoring</li> <li>– Compliant storage practices</li> <li>– Food safety inspection reports</li> <li>– Central Warehouse HACCP plan if applicable</li> </ul>
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<p>Required two (2) food safety inspections per school annually</p> <p>Current grade posted in a publicly visible location</p> <p>Written documentation required for insufficient number of inspections</p>	<b>FOOD SAFETY INSPECTIONS</b>
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<b>FOOD SAFETY: CORRECTIVE ACTION</b>	<ul style="list-style-type: none"> <li>• Any site food safety concerns identified</li> <li>• Food safety deficiencies usually do not result in Fiscal Action, however, Corrective Action is required</li> <li>• Repeat or egregious findings could result in fiscal action</li> </ul>
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QUESTIONS?

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**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.

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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 on website

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### OUTREACH: SUMMER FOOD SERVICE PROGRAM

- USDA requires schools to conduct SFSP outreach before the end of the school year

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## QUESTIONS?



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## RESOURCE MANAGEMENT

OVERVIEW  
MAINTENANCE OF THE NON-PROFIT SCHOOL NUTRITION ACCOUNT  
ALLOWABLE COSTS  
PAID LUNCH EQUITY  
REVENUE FROM NON-PROGRAM FOODS  
INDIRECT COSTS

63

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### 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



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### 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

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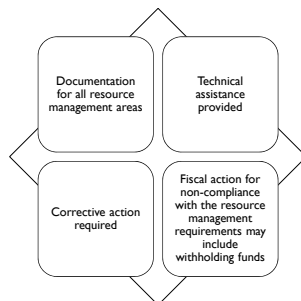
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### RESOURCE MANAGEMENT REVIEW



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### 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

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### COMPONENTS OF THE NON- PROFIT SCHOOL NUTRITION ACCOUNT

- SFA accounting system
- Net cash resources



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### ACCOUNTING SYSTEM

- Complies with the system established by the State Agency



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**NET CASH  
RESOURCES**

- Cash available beyond three (3) months operating balance



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**FC1-A  
FINANCIAL  
REPORT**

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

Actions	Version	Status	Approved Date
View   Modify   Summary   Admin	Original	Pending Approval	

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Import Financial Form

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71

**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 submit a corrective action plan to reduce the excess funds within the next 30 days. Some acceptable uses of these funds include, but are not limited to: reducing the prices charged to children, improving food quality and food service operations or purchasing food service equipment. Corrective action plans should be in sufficient detail to enable the State Agency to determine:

1. the type, quantity and unit cost of food service equipment to be purchased
2. the value of repairs to existing equipment
3. salary and benefit cost for new food service workers
4. value of the decrease in the student meal prices
5. projected amounts to be spent to otherwise improve the school food service

Please send your Corrective Action Plan to the following address:

Child Nutrition Services, NCDHHS  
Financial Management Consultant  
6324 Mail Service Center  
Raleigh, NC 27699-6324

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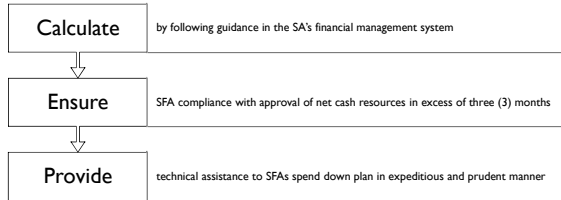
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## REVIEW OF NET CASH RESOURCES



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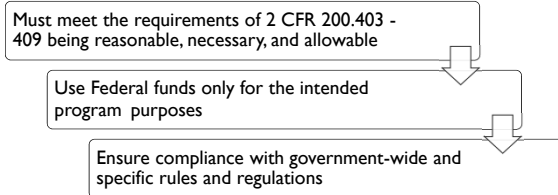
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## ALLOWABLE COSTS



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## REVIEW OF ALLOWABLE COSTS

Test	actual expenses for compliance with allowable cost requirements
Identify	unallowable costs
Ensure	costs are adequately documented and consistently treated

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

CLASSIFICATION OF COSTS  
AND EXAMPLES

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PAID LUNCH EQUITY

Included in the Healthy, Hunger-Free Kids Act (Section 205)

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Ensure SFAs charge paid lunch prices sufficient to cover the costs of paid meals or provide enough local funds to support paid meal costs

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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

78

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**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.

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**INDIRECT COST**

Determine	if costs are allowable, allocable and appropriately charged as a direct or indirect cost
Ensure	application of correct indirect cost rate to the allowable expense codes
Confirm	assessment of indirect cost according to SA agreement

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**QUESTIONS?**

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81



# FINANCIAL MANAGEMENT

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# 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

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# DUAL EMPLOYEES

Salaries and benefit for employees working in multiple departments must be prorated according to the time worked for each

Areas of review include:

Salary	Annual/medical leave	Health Insurance	Other (Longevity, bonus/leave and supplements)
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## INTEREST

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



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## 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

86

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## 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

87

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## ADULT MEAL PRICES

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



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## 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

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## 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 30<sup>th</sup>, but no later than September 30<sup>th</sup>

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## STATE REVENUE MATCH

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



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## 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

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## QUESTIONS?

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PROCUREMENT REVIEWS  
2023 – 2024  
ADMINISTRATIVE REVIEWS

94

VENDOR PAID SUMMARY

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

95

SAMPLE VENDOR PAID SUMMARY LIST

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

VENDOR SUMMARY LIST 2022-23 SY

Vendor #	Name	Transactions	Total Expenses
64326	OVER THE TOP FOOD COMPANY	\$1,563,365.00	\$1,563,365.00
89563	MOO COW DAIRY	\$89,632.32	\$89,632.32
31121	GARDEN FRESH PRODUCE	\$23,452.12	\$23,452.12
96368	MAIN STREET BAKERY COMPANY	\$42,536.22	\$42,536.22
52365	YOUR EQUIPMENT NEEDS	\$12,635.00	\$12,635.00
58658	UNIFORMS PLUS	\$4,963.23	\$4,963.23
45698	OFFICE SUPPLIES 4U	\$454.20	\$454.20
23674	PLASTIC TRAYS FOR SCHOOLS	\$8,236.52	\$8,236.52
38811	JOHNSON EQUIPMENT COMPANY	\$26,521.36	\$26,521.36
12585	GROCERY STORE USA	\$383.85	\$383.85

96



**PROCUREMENT  
REVIEW**

2018-2019 New  
Format for  
Procurement Review

Off-Site Entries –  
School Nutrition  
Technology System

97

**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.

Item	Description
Review Tracking	Functions for tracking reviews.
Statowide Review Dashboard	Provides statewide statistics regarding reviews.
Bulk Review Scheduling	Functions for scheduling reviews in bulk.
Bulk Review Assignments	Functions for bulk assignments to reviews.
Historical Reviews	Functions for tracking historical QSE Reviews.
Menu Planning and Nutrient Analysis	Functions related to menu planning and meal pattern compliance.
Procurement Review Tracking	Functions for tracking procurement reviews.
Procurement Review Bulk Scheduling	Functions for scheduling procurement reviews in bulk.

98

**PROCUREMENT  
ENTRY AREAS**

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

Type	Vendor Count	# Selected for Review
Micro Purchases	0	0
Small Purchases	0	0
Formal Contracts	0	0
FSMC Contracts	0	0
Processing Contracts	0	0

99

## 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.**

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## 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

### NAME OF SCHOOL FOOD AUTHORITY PROCUREMENT PLAN SCHOOL NUTRITION PROGRAM

The procurement plan described on the following pages (pages \_\_\_\_\_ through \_\_\_\_\_) was adopted by the \_\_\_\_\_ Board of Education (BOE) (or Board of Directors for Charter or non-public schools) (BOE) and will be implemented effective \_\_\_\_\_ (date of adoption) and from that date forward until amended. All procurement processes and activities will be consistent with the principles of free and open competition. The SFA will avoid unreasonable conditions that restrict competition. All reasonable efforts will be made to solicit bids, proposals and/or quotes from as many qualified vendors as possible; all qualified vendors are invited to respond to solicitations.

The procurement of all goods and services using School Nutrition funds will be carefully documented during each phase of the procurement process. The BOE/BOB shall award contracts to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed solicitation. The BOE/BOB will restrict awards, sub-awards and contracts with any party that is delinquent, suspended or otherwise excluded from participation in Federal assistance programs or activities. All parties involved in the procurement process involving School Nutrition funds will comply with a written code of ethics/conduct, which includes a conflict of interest policy. Adherence with the code of ethics/conduct and conflict of interest policies is fundamental to the integrity of the procurement process.

Chair, Board of Education/Directors \_\_\_\_\_ Date \_\_\_\_\_  
Superintendent of Schools \_\_\_\_\_ Date \_\_\_\_\_

101

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## QUESTIONS?



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# POST REVIEW

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PROCEDURES AFTER THE ADMINISTRATIVE REVIEW

103

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- 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

104

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## POST REVIEW: EXIT CONFERENCE PURPOSE

Report of Preliminary Findings

Required Corrective Action

Preliminary Fiscal Action

- Compilation of all review areas

105

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

## POST REVIEW: EXIT LETTER AND REVIEW RESULTS

106

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## POST REVIEW: CORRECTIVE ACTION

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

107

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## 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

108

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## 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

109

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## 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

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## POST REVIEW: CLOSURE

- Corrective Action Plans meets program compliance
- Closure letter issued



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# OFF SITE DATA ENTRY



112

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## 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.

113

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# OTHER FEDERAL PROGRAM REVIEWS

AFTERSCHOOL SNACK PROGRAM  
SEAMLESS SUMMER OPTION  
FRESH FRUIT & VEGETABLE PROGRAM

114

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**AFTERSCHOOL  
SNACK  
PROGRAM  
(ASSP)**

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 Operated under the NSLP
 

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 Sponsored and/or operated by the SFA
 

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 Supervised
 

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 Organized activities
 

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 Educational or enrichment
 

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 After the end of the school day

115

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Food Based

Four Components and Snack must contain two
 

- 1 cup Milk, fat-free or 1% unflavored or flavored
- 1 oz eq Grain
- 1 oz eq Meats/Meat Alternates
- ¾ cup Fruits/Vegetables

**ASSP: MEAL  
PATTERN**

116

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**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

117

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**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

118

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**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

119

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**ASSP: MEAL  
PATTERN &  
PRODUCTION  
RECORDS**

- One snack per child
- Production Records completed daily
- Menu compliant with Meal Pattern
- Counting and Claiming at POS



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# ASSP: SELF ASSESSMENT

Self-Reviews completed on site for each ASSP

- 1<sup>st</sup> – during first 4 weeks of operation
- 2<sup>nd</sup> – prior to end of SY

Records kept for 3 years

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121

# ASSP: GENERAL AREAS

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



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122

# 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

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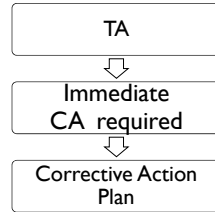
123

## ASSP: CORRECTIVE ACTION/FISCAL ACTION

### EXAMPLES

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

### REVIEW PROCESS



124

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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!)

125

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## SEAMLESS SUMMER OPTION (SSO)

REVIEW AT LEAST ONE SSO SITE  
SITE ELIGIBILITY

126

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SSO:  
COMPLIANCE

Evaluate

site eligibility

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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

127

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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 4<sup>th</sup> week of operation or before site close

128

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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

129

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## 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




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130

## 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




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131

## 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

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132

## 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

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133



## QUESTIONS?

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134



## FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)

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135

**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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136

**FFVP  
REVIEW  
SCHOOL  
SELECTION**

Number of Schools Selected for AR that operate FFVP	Minimum Number of FFVP Schools to be Reviewed
0-5	1
6-10	2
11-20	3
21-40	4
41-60	6
61-80	8
81-100	10
101 or more	12 plus 5% of the number of schools over 100 rounded to the nearest whole number

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137

**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



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138

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)

139

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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



140

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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

141

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IF YOU DON'T  
KNOW...CONTACT ZOE

zoe.mckaytucker@dpi.nc.gov

NCDPI: 984-236-2636

Cell: 919-961-0608



142

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QUESTIONS?



143

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USDA Non-Discrimination Statement

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, audiotape, 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/ad-3027.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:

1. **mail:**

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

2. **fax:**

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

3. **email:**

[discrim.intake@usda.gov](mailto:discrim.intake@usda.gov)

This institution is an equal opportunity provider.

144

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