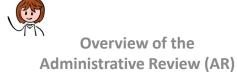
The Administrative Review for School Nutrition Programs

What schools need to know January 2022

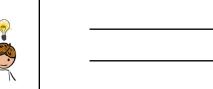


SY 21-22 Administrative Reviews

Bobby Benson Center
Hawaii Academy of Arts and Science PCS
Kamalani Academy PCS
Kaohao PCS
Ke Kula O Nawahiokalaniopuu Iki PCS
Na Wai Ola PCS
St. Joseph School
University Laboratory PCS
Volcano School of Arts and Sciences PCS
Windward Nazarene Academy



WHAT YOU NEED TO KNOW TO "PASS" THE REVIEW



Purpose of the Administrative Review (AR)

- ➤ Ensure program integrity
- ➤ Ensure school food authority (SFA) compliance with USDA regulations
- ➤ Ensure children are fed healthy, nutritious meals in compliance with the Dietary Guidelines for Americans and the Institute of Medicine's recommendations

Repeat Findings

- USDA requires State Agencies to monitor any repeat findings from previous review
 - Check your previous AR report to ensure that these areas have been addressed, corrected and corrective actions have been fully implemented



AR Reports from Previous Years:
https://hcnp.hawaii.gov/overview/nslp/ Program Resources → Administrative Reviews

Repeat Findings Examples

Repeat Findings May Lead To Fiscal Action During This Review!

- ➤ Missing vegetable subgroups over the course of a week
- ➤ Insufficient food quantities
- ➤ Not meeting the whole grain-rich requirement
- ➤ Not offering a variety of milk

Repeat Findings Examples

- ➤ Incomplete/missing production records
- ➤ No standardized recipes
- ➤ Incorrect eligibility of students
- ➤ Incorrect meal counting and claiming
- ➤ Not making meal accommodations for modified meals in a timely fashion
- ➤ Not maintaining records for the required timeframe

AR Process

- >HCNP identifies SFAs to be reviewed
- ➤ HCNP provides AR Training for SFAs scheduled for review
- ➤ HCNP sends letter informing SFA of
 - ➤ DATE for scheduled review
 - ➤ Site(s) being reviewed



Site Selection

Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP	Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP
1 to 51		41 to 60	6
6 to 10	2	61 to 80	8
11 to 20	3	81 to 100	10
21 to 40	4	101 or More	12*

Site Selection

- ✓ Site Name
- ✓ Site Type (elementary, secondary, combination)
- √ Number of serving days
- ✓ Number of eligible for Free meals
- √ Number of Free meals claimed
- ✓ Whether a school participates in a special provision option, such as
 - ✓ Provision 2
 - ✓ Community Eligibility Provision

AR Process (continued)

- ➤ HCNP will send notifications to SFA requesting specific information
 - ➤ Completion of Off-site Assessment Tool (OSAT)
- SFAs submit completed OSAT and any additional REQUESTED DOCUMENTS by the specified due date in HCNP Systems



Off-site Assessment Tool (OSAT)

- ➤ SFA to complete in HCNP Systems
- ➤ Asks questions about your SFA's program and requests information
- > Decreases time needed for on-site review
- ➤ Allows HCNP time to focus on areas of noncompliance and provide technical assistance
- ➤ Be honest! Tell us what your SFA is actually doing
- ➤ Complete the OSAT by the assigned due date

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AR Process (continued)

- ➤ Based on the responses provided in the OSAT, HCNP may request additional documents for review
 - ➤ Some responses from the OSAT may result in a comprehensive review of certain sections of AR
 - ➤ HCNP may provide technical assistance prior to on-site visit so SFA can take corrective measures prior to arrival of HCNP review team



AR Process (continued)

- > On-Site Review = Scheduled Virtual Review
- > On the first day of the scheduled review:
 - ➤ The NSLP team conducts ENTRANCE CONFERENCE
 ➤ Food Service Director & SFA Administrator <u>must</u> attend
 - ➤ Reliable Internet connection?
 - \blacktriangleright Be on-time to all scheduled meetings
 - > ALL DOCUMENTS should be organized and ready prior to the first day of the scheduled review
 - Administrative Review Organizational Tool to help organize documents

AR Process (continued)

- Meal service observation of the following programs will occur in selected schools
 - ➤ National School Lunch Program (NSLP)
 - ➤ School Breakfast Program (SBP)
 - > Fresh Fruit and Vegetable Program (FFVP)
 - ➤ Afterschool Snack Program (ASP)
 - ➤ Seamless Summer Option (SSO)
- ➤ May be done livestreaming or video recorded



On-site Assessment Tool

- ➤ Validates information collected on OSAT through review of documents
- ➤ Provides opportunity for HCNP to observe operation of school nutrition programs at selected schools



AR Process (continued)

- ➤ After completing review of all required documentation and meal service operations, the team will conduct an EXIT CONFERENCE
 - ➤ Food Service Director & SFA Administrator <u>must</u> attend
- ➤ Team provides AR PRELIMINARY SUMMARY REPORT, which identifies:
 - ➤ Areas requiring corrective action
 - >Areas which may result in fiscal action
 - ➤ Corrective Action due dates

Corrective Action

- ➤ SFA provides DOCUMENTATION of corrective action for any AR findings identified in the SFA's AR Preliminary Summary Report
- ➤ HCNP reviews submitted corrections and determines if it is complete and has RESOLVED identified findings
- ➤ HCNP APPROVES the submitted corrections and CLOSES review

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AR Process (continued)

- ➤ SFA will need to submit a CORRECTIVE ACTION PLAN in the HCNP Systems
- > When all corrective actions have been received, reviewed and approved in the HCNP Systems, HCNP will sends a CLOSING LETTER to the Administrator, Business Official, and Food Service Director

Posting of the AR Report

- ➤ HCNP is responsible for ensuring that information regarding AR is made easily accessible to all members of the public
- ➤ HCNP must publicly post AR results for each SFA on HCNP's publicly available web site



Four Phases to the AR Process

- 1) Site Selection
- 2) Off-site Assessment
- 3) Scheduled Review (On-site Assessment)
- 4) Corrective Action



Administrative Review **Organizational Tool** (AROT)



AROT

- ➤ Developed to assist SFAs in ORGANIZING DOCUMENTS needed for off-site review
 - ❖To facilitate the review process, SFAs should organize all documents needed for AR as outlined in AROT

Having all documents ready and in good order prior to the scheduled review allows for an efficient review of required documents

AROT

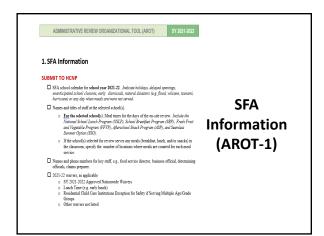


Organizing for the AR:

- ➤ Print the entire AROT
- > Place in a binder to store the requested documents
- ➤ Cover sheet for each review section
- > File documents behind the corresponding cover sheet
- > SFA should collect all documents
 - \succ The AROT contains a checklist of documents that must be available for HCNP review team

- otherwise noted
 ➤ If you do not know what is being requested, CONTACT YOUR
 LEAD REVIEWER AS SOON AS POSSIBLE

	ADMINISTRATIVE REVIEW ORGANIZATIONAL TOOL (AROT)	SY 2021-2022
	School Food Authority Review Month-	
	School Food Authority: Review Month:	
	The School Food Authority (SFA) must use this organizational tool to provide the required docum Administrative Review (AR) of the U.S. Department of Agriculture's (USDA) Child Nutrition Progr	nentation for completion of the arms operated by the sponsor.
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	The documents listed in the AROT are required for completion of the AR. If familiar with a document, please contact the HCNP lead reviewer before the special Resources bolded in blue are links to documents, forms, and websites with relevant	ied due date.



Single Agreement (AROT-1) • HCNP has an agreement with each SFA SFA/LEA Follow all laws, rules and regulations for program Reminder: SFA/Sponsor to submit a new agreement immediately when there is a change in Leadership. (Superintendent, Board Chair, Director, Program

Administrator, and/or Food Service Director)

Free & Reduced Price Policy Statement (AROT-1)

Procedures your SFA will use to implement free and reduced-price meals

- · Determine meal eligibility
- Count and claim meals
- · Inform public
- Procedure to collect payment
- Report to HCNP people responsible for each aspect of program



Nutritional Quality and Meal Pattern (AROT-5)

- 1) Meal Components and Quantities
- 2) Offer versus Serve (OVS)
- 3) Dietary Specifications and Nutrient Analysis



Nutritional Quality and Meal Pattern (AROT-5)

- Stewardship of Federal dollars
- **\$\$\$**
- Ensure that meals reimbursed with Federal dollars contain required components
- Assess meal components and quantities
 - Document review, menus, production records, recipes and labels
 - Meal observation
 - USDA Certification Worksheets review
 - All sections except Simplified Nutrient Assessment tab

Nutritional Quality and Meal Pattern (AROT-5)

- Evaluate OVS policy and implementation
 - Staff and students understand what constitutes a reimbursable meal
 - Signage
 - NSLP and SBP ½ c of fruit or vegetable selected with all reimbursable meals
- · Assess compliance with dietary specifications
- Menus consistent with Federal standards
 - Calories
 - Saturated Fat
 - Sodium
 - Trans Fat

Nutritional Quality and Meal Pattern (AROT-5)
Meal Components and Quantities

PRIOR TO YOUR AR

- Complete USDA Certification Worksheets for each reviewed school for ONE WEEK from review period for
 - Breakfast and lunch
 - Each age/grade group
 - First full week of review period (may have flexibility)
- Worksheet must include ALL MEALS SERVED DAILY including all daily alternate meals offered

Nutritional Quality and Meal Pattern (AROT-5) Meal Components and Quantities

 $\frac{https://www.fns.usda.gov/school-meals/certification-compliance}{}$

	2	- 3	54	5b	4	44		54	
	Meat/Meat Alternate (or equivalents)					RECITABLE amount of			(hald Milk (myn)
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Nutritional Quality and Meal Pattern (AROT-5) Helpful Hints for Preparing Menu Week

- ✓ Use a cycle menu
- ✓ Complete USDA Certification Worksheets BEFORE you implement the week to ensure your menu meets the requirements
- ✓ Compile all supporting documentation (recipes, CN labels, nutritional analysis, ingredient lists, product formulation statements (PFS), production records) BEFORE you implement the week
- ✓ Use the same menu the week of the meal observation
- ✓ Include all items offered
 - ✓ Main menu
 - ✓ Alternate menu options

Nutritional Quality and Meal Pattern (AROT-5) Helpful Hints for Preparing Menu Week

- ✓ Must list ALL reimbursable meals
 - ✓ Entrées
 - ✓ Sides
 - ✓ Fruits
 - √ Vegetables
 - ✓ Milk
- ✓ Alternate meals
- $\checkmark \ \, \text{Must include SEPARATE MENUS for each age/grade group}$
- ✓ Must list VARIETY OF MILK SERVED
- ✓ Must list VEGETABLE SUBGROUPS

Nutritional Quality and Meal Pattern (AROT-5) Supporting Documentation for USDA Worksheets Menus • Correspond to each completed USDA Certification Worksheet Recipes • For all items served • Child Nutrition (CN) labels, Product Formulation Statements to show crediting information, ingredient lists, Nutrition Facts Production Records • Must be fully completed • For breakfast, lunch, afterschool snack for each selected school

Nutritional Quality and Meal Pattern (AROT-5) Requirements for Production Records

- ✓ List all menu items
- \checkmark Offer all required meal components
- \checkmark Used for proper planning, e.g., evaluate foods used and leftovers
- \checkmark Document food prepared is creditable for the total number of portions served
- ✓ Include adult meals and a la carte sales
- ✓ Document daily and weekly quantity requirements for grains, meat/meat alternates, vegetables, fruit and milk
- ✓ Identify if seconds are offered
- ✓ Align with standardized recipes
- ✓ Include condiments

Nutritional Quality and Meal Pattern (AROT-5) Production Record Template

 HCNP's Production Record Template: https://hcnp.hawaii.gov/overview/nslp/

(Program Resources→Production Record and Transport Daily Record)

Nutritional Quality and Meal Pattern (AROT-5) Production Records

- Missing/incomplete production records may result in disallowance of meals and fiscal action
- ✓ If production records reveal problems with meal components or quantities, HCNP is REQUIRED to expand the review of production records to, at a MINIMUM, the entire review period.

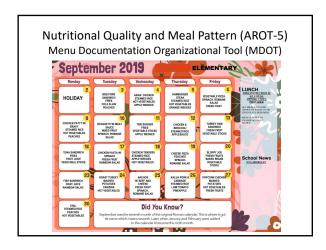


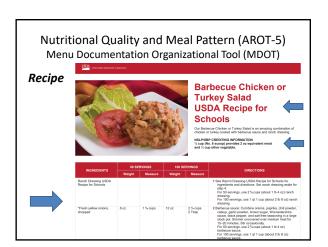
Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

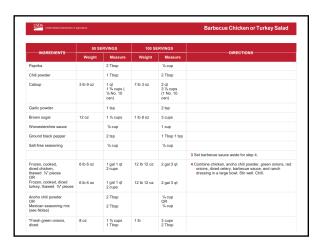
- √ Helps organize documents for review of Meal Components and Quantities
- ✓ Assists menu planners in completing the USDA Certification Worksheets by having all needed documents in order for selected week.

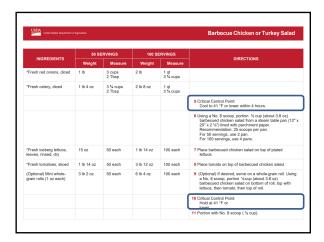
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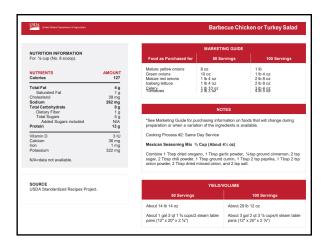












Nutritional Quality and Meal Pattern (AROT-5)
Menu Documentation Organizational Tool (MDOT)

• Child Nutrition (CN) Label

Chicken Stir-Fry Bowl
Ingredient Statement:
Chicken, whole grain brown rice, broccol, red peppers, carrots, onlors, whole grain brown rice, broccol, red peppers, carrots, onlors, vivole grain brown rice, broccol, red peppers, carrots, onlors, vivole grain brown rice, broccol, red peppers, carrots, onlors, vivole grain brown rice, brock, splices, carrots, onlors, vivole grain brown rice, brock, splices, splices, carrots, onlors, vivole grain brown rice, brock, splices, splices, carrots, onlors, vivole grain brown rice, brown rice, splices, s

Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

Product Formulation Statement (PFS)

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Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

USDA Foods Product Info Sheet



Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

• Nutrition Facts and Ingredient List

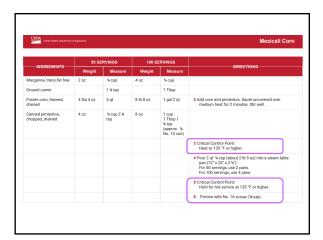


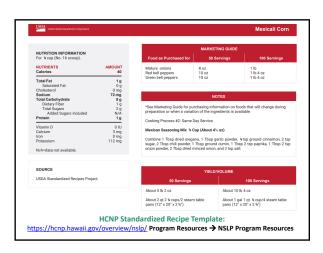
INGREDIENTS: WHOLE WHEAT FLOUR WATER WHEAT GLUTEN, SUIGAR, YEAST, SOYBEAN OIL. SALT, PRESERVATIVES (CALCI-UM) PROPIONATE, SORBIC AGID, DATEM, NATURAL ELAVORS, MONOCLYCENIDES, MONOCLAC, COLIN PROSPHARE, SOYD, WORGGAR, EQ-030-300-498 CONTAINS WHEAT, SOY, MADE IN A BAKERY THAT MAY ALSO USE MILK.

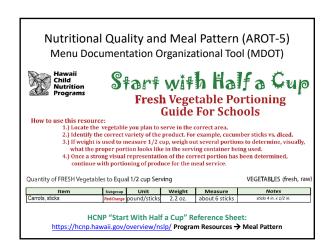
52 grams ÷ 28 grams per ounce = 1.86 oz → 1.75 oz eq (round down to nearest 0.25)

2 slices of this bread = 1.75 oz eq grain









Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

Canned Fruit





Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)



Nutritional Quality and Meal Pattern (AROT-5) Menu Documentation Organizational Tool (MDOT)

Condiments





Nutritional Quality and Meal Pattern (AROT-5) Meal Modifications

- Medical statements and supporting documentation for modified meals
 - Meal modifications that do not meet the meal pattern requirements are reimbursable when supported by a medical statement signed by State licensed healthcare professional



Nutritional Quality and Meal Pattern (AROT-5) On-site Meal Service Observation

Prior to Meal Service

- ✓ Observe meal preparation
- ✓ Ensure all meal service lines offer all required meal components
- ✓ Ensure signage is posted to instruct students on how to select a reimbursable meal
 - ✓ Visible and posted at the beginning of the line

OVS Signage





Nutritional Quality and Meal Pattern (AROT-5) On-site Meal Service Observation

During Meal Service

- ✓ Observe meal service at each POS
 - Meals served in alternate locations (ex: classrooms, office)
- ✓ Determine if meal contains required components and quantities for age/grade group
 - Production records to support what is being served
- ✓ Ensure students are selecting enough components/items for a reimbursable meal
- ✓ Ensure food service staff at POS are trained and can recognize reimbursable meals

Nutritional Quality and Meal Pattern (AROT-5) On-site Meal Service Observation

During Meal Service

- ✓ Only non-reimbursable meals are being claimed
 - A la carte salesSecond meals

NON-REIMBURSABLE

✓ Meal accommodations for disabilities?





Nutritional Quality and Meal Pattern (AROT-5) Offer vs Serve

- ✓ Reduces food waste in school meals while permitting students to decline foods they do not intend to eat
- ✓ Optional for grades K-8
- ✓ NOT ALLOWED for preschool (unless comingled)
- ✓ High school: OVS is REQUIRED at lunch
- ✓ OVS NOT required (all grades) for prepackaged meals for field trips



Nutritional Quality and Meal Pattern (AROT-5) USDA OVS Manual



https://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16

Nutritional Quality and Meal Pattern (AROT-5
Dietary Specifications and Nutrient Analysis

- Determine if SFA is serving reimbursable meals according to Dietary Specifications at one targeted school
 - Calories
 - Saturated Fat
 - Sodium
 - Trans Fat
- Nutrient Analysis ONLY REQUIRED if you are notified by HCNP

Nutritional Quality and Meal Pattern (AROT-5) SFAs with More than One School Being Reviewed

MEAL COMPLIANCE RISK ASSESSMENT TOOL

- ✓ Used to assess schools most at-risk for error prone areas such as:
 - multiple meal service lines
 - multiple age groups
 - alternate meal service locations
- ✓ School with the highest score is identified for the Targeted Menu Review

Nutritional Quality and Meal Pattern (AROT-5)
Dietary Specifications Questionnaire

Completed for school chosen for TARGETED MENU REVIEW:

- Analyzes SFAs food service practices for breakfast and lunch
- Determines whether meals are at risk for not meeting required dietary specifications
- SFA should exercise best judgement and provide the most appropriate response

Nutrient analysis may also be conducted at HCNP's discretio

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Nutritional Quality and Meal Pattern (AROT-5) Nutrient Analysis for Sponsors Determined High Risk

One week weighted nutrient analysis of breakfast and lunch required for each menu type offered for TARGETED SITE

OR

Validate existing nutrient analysis of breakfast and lunch for each menu type offered if SFA is using USDA-approved nutrient analysis software for TARGETED SITE



Nutritional Quality and Meal Pattern (AROT-5)
Common Problems with Nutritional Quality and Meal Pattern

- Production records and supporting docs do not meet the meal pattern requirements
- Production records were either missing or incomplete
- The planned menu is not being followed
- Lack of standardized recipes
- · Standardized recipes are not being followed



Nutritional Quality and Meal Pattern (AROT-5) Common Problems with Nutritional Quality and Meal Pattern

- · Incorrect serving utensils being used
- · Insufficient serving sizes
- · Excessive portions
- Milk variety not offered throughout service
- WG-rich requirement is not being met



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Nutritional Quality and Meal Pattern (AROT-5) Common Problems with Nutritional Quality and Meal Pattern

- No OVS or menu signage / not visible to students
- OVS not being implemented correctly
 - Staff require additional OVS training
- Non-reimbursable meals being counted as reimbursable
 Today's Lanch Choices

 Today C
 - No medical statement

Today's Lunch Choices

Nutritional Quality and Meal Pattern (AROT-5) Common Problems with Nutritional Quality and Meal Pattern

- Changes in usual attendance (ex: field trips) impacted meal service
- Meal service did not start on time
- The preschool meal pattern must be followed when not comingled with older grades



Certification and Benefit Issuance (AROT-2)



Certification and Benefit Issuance (AROT -2)

- ➤ Free and Reduced Price Applications
 - ➤ Not reviewed in SY 21-22 for SFAs that are operating Seamless Summer Option (SSO)
- ➤ If your SFA collected any free and reduced price applications, the verified applications will be reviewed

Certification and Benefit Issuance (AROT -2)

Submit to HCNP...

- ➤ CEP Schools: All documentation supporting original qualifying data for Year 1 (Identified Students, Enrollment)
- >RCCIs: Statement of Facts



Common Problems with Benefit Issuance (AROT-2)

- ➤ CEP Schools: No CEP documentation
- ➤ RCCIs: No Statement of Facts
- ➤ Applications were not approved correctly
- ➤ No documentation to support eligibility

determination		



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Verification: the process by which School Food Authorities (SFAs) participating in NSLP verify income for a small percentage of households approved for free or reduced price meals each school year.

Verification (AROT-3)

Submit to HCNP:

- A document showing total number of approved applications for SY 21-22 on file as of October 1, 2021 (this is the list used for the selection of applications for verification; also known as 'Sampling Pool')
- Completed V-7a, V-7b, and V-7c forms
- All verified applications for the current school year, including documents submitted by household (e.g. pay stubs)
- Copies of verification notification letter sent to households selected for verification
- Documentation of follow-up with households that do not respond
- · Copies of any notice of adverse action

١	Verification (ARC	OT-3)
SFA	Name:	Form V-7a
Verific	cation Collection Report - Counting Applications	SY 2021-22
Collec	ct the following information on QCTOBER 1	Number o application
4-1 A	Number of approved as categorically FREE Eligible (based on documentation such as a case number)	
4-2 A	Number of approved as FREE Eligible applications (Based on household size and income information)	
4-3 A	Number of approved as REDUCED PRICE Eligible applic (based on household size and income information)	ations
	Transfer the number of applications to Section 4 A on FNS-	742.
	cting Applications For Verification TOTAL (4-1A) = (4-2A) Standard Verification: 3% of total applications	i) + (4-3A)
	To be used by all Mawaii SFA's unless an alternate method is approve Check this one on the Verification Report.	nd.
5-4	Total number of ERROR PRONE applications ISROR PROME-reported income is within \$100month or \$1200year of income eligibility guidelines (both free and reduced-price)	
5-5	Number of error prone applications selected for vertication Total number of applications above [(4-1A) + (4-2A) + (4-3A)] X	
	Cheat sheet for calculating the number of applications to verify.	
	If you have The	number to verify is
	0.33 approved applications for free and reduced price meals 34.66 approved applications for free and reduced price meals	1
	67-100 approved applications for free and reduced price meals	
	101-133 approved application for free and reduced price meals 134-166 approved applications for free and reduced price meals	4
2021	134-100 approved approximation for the discretization price means	

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Verification (AROT-3)	
FORM V-7b SFA Name: Well-dutine Collection Report - Countring Students	
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2021	<u> </u>
Verification (AROT-3)	
FORM V-7c	
SFA Name Section 5-8 Results of Verification by Original Benefit Type A. FREE-Categorically	
Baighaite (contend as FREE based based on SNAP TAWN FORM can a matter based on SNAP TAWN FORM can a matter on and can application) and can be contended to the	
Column Replace Redwin Column Perfection Redwin Column Repetition Redwin Column Repetition Repetiti	
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Reproved Reproved	
VC-1 Total questionable applications writind for cause (Entire Year's find applicable) Report the number of applications as of financinal find wouldn't be cause	
Parachism regulared	
Verification (AROT-3)	
Validate SFA's procedures as described on Off-site Assessment Tool	
Determine compliance with verification requirements: Confirmation reviews conducted correctly	
 Error prone applications selected to be verified before all other applications 	
Sample size calculated correctly Correct language included on notification letters	
Review verified applications for accuracy	

Verification (AROT-3) VERIFICATION REMINDERS

- Use HCNP sample forms
- Make copies of all correspondence and documentation
- Organize materials for each verified application selected



Verification (AROT-3)

FOR EACH APPLICATION SELECTED

- Copy of the application
- Household Notification of Selection form
- Documents submitted by household, e.g. pay stubs
- Other household letters as applicable, e.g. employer letter, etc.
- Documentation of follow-up attempts, if applicable
- Notification of adverse action or continuation of benefits
- Master List showing change in eligibility status

Verification (AROT-3)

COMMON PROBLEMS WITH VERIFICATION

- Poor/No documentation to support numbers
- Confirmation review is not completed or is erroneous
- · Eligibility changes not made to POS/Master List
- Incorrect nondiscrimination statement used on verification letters
- Not submitting FNS-742 as required
- Required language not included on verification letters



Friday, 1/14/22 (tomorrow) DAY 2: NSLP Administrative Review Prep Training 1:00pm - 4:00pm



Rachel Itano Kasey Kawamoto Shirley Robinson rachel.itano@k12.hi.us kasey.kawamoto@k12.hi.us shirley.robinson@k12.hi.us

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