

## Resource Management

Preparing for the Resource Management (RM)  
Section of the Administrative Review (AR)

Hawaii Child Nutrition Programs  
650 Iwilei Road, Suite 270  
Honolulu, HI 96817  
(808) 587-3600

SY 2021-2022

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## Resource Management



- Overall financial health of an SFA's nonprofit school food service
- Compliance with Federal regulations
- Effective, efficient and consistent management of program resources
- Documents all revenues and expenses



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## Resource Management Comprehensive Review



- Technical Assistance
- Corrective Action
- Fiscal action: Withholding





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## Resource Management sections



1. Maintenance of the Nonprofit School Food Service Account
2. Paid Lunch Equity (PLE)
3. Revenue from Nonprogram Foods (NPR)
4. Indirect Costs




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## Area 1: Maintenance of the Nonprofit School Food Service Account



- Ensure that revenues and expenditures allowable:
  - Necessary
  - Reasonable
  - Allocable
- Used only for the operation and improvement of school food service.
- Ensure that net cash resources do not exceed three months' average operating expenses.




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## Required Documents



- Detailed General Ledger
- Balance Sheet
- Profit & Loss Statement
- All Invoices and Receipts charged to the food service account




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## Required Documents



- **Detailed General Ledger – Sorted by date**
  - July 2020 to June 2021
  - July 2021 to Current
- **Detailed General Ledger – Sorted by vendor**
  - July 2020 to June 2021
  - July 2021 to Current




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## Required Documents



- **Profit and Loss Detail**
  - July 2020 to June 2021
  - July 2021 to Current
- **Vendor invoices/receipts charged to nonprofit food service account**
  - July 2020 to June 2021
  - July 2021 to Current
- **Deposit slips for any nonprofit food**




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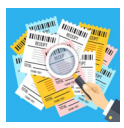

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## Allowable Costs



- Largest part of the Resource Management review
- Review a sample of SFA's expenses
  - Detailed general ledger report
  - Receipts


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## Area 2: Paid Lunch Equity (PLE)

- Assess the completion of the PLE tool (if applicable)
- Ensure that SFAs comply with the PLE requirements for pricing paid student lunches




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## Paid Lunch Equity Tool (PLE)

- Calculate paid lunch price increase requirements and/or non-Federal source contributions
- Compares the average weighted price for paid lunches to the determined targeted weighted average price.
  - Difference between the per meal Federal reimbursement for free meals and paid lunches.




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## Paid Lunch Equity Tool (PLE)

- Non-pricing / positive or zero balance in nonprofit school food service account = do not need to complete the PLE tool for that school year

Item	Amount	Amount	Amount
1. Federal Lunch Program (Free/Reduced Price)	0.00		
2. State Lunch Program	0.00		
3. Other Lunch Program	0.00		
4. Total Lunch Program	0.00		
5. Federal Lunch Program (Free/Reduced Price)	0.00		
6. State Lunch Program	0.00		
7. Other Lunch Program	0.00		
8. Total Lunch Program	0.00		
9. Federal Lunch Program (Free/Reduced Price)	0.00		
10. State Lunch Program	0.00		
11. Other Lunch Program	0.00		
12. Total Lunch Program	0.00		
13. Federal Lunch Program (Free/Reduced Price)	0.00		
14. State Lunch Program	0.00		
15. Other Lunch Program	0.00		
16. Total Lunch Program	0.00		
17. Federal Lunch Program (Free/Reduced Price)	0.00		
18. State Lunch Program	0.00		
19. Other Lunch Program	0.00		
20. Total Lunch Program	0.00		
21. Federal Lunch Program (Free/Reduced Price)	0.00		
22. State Lunch Program	0.00		
23. Other Lunch Program	0.00		
24. Total Lunch Program	0.00		
25. Federal Lunch Program (Free/Reduced Price)	0.00		
26. State Lunch Program	0.00		
27. Other Lunch Program	0.00		
28. Total Lunch Program	0.00		
29. Federal Lunch Program (Free/Reduced Price)	0.00		
30. State Lunch Program	0.00		
31. Other Lunch Program	0.00		
32. Total Lunch Program	0.00		
33. Federal Lunch Program (Free/Reduced Price)	0.00		
34. State Lunch Program	0.00		
35. Other Lunch Program	0.00		
36. Total Lunch Program	0.00		
37. Federal Lunch Program (Free/Reduced Price)	0.00		
38. State Lunch Program	0.00		
39. Other Lunch Program	0.00		
40. Total Lunch Program	0.00		
41. Federal Lunch Program (Free/Reduced Price)	0.00		
42. State Lunch Program	0.00		
43. Other Lunch Program	0.00		
44. Total Lunch Program	0.00		
45. Federal Lunch Program (Free/Reduced Price)	0.00		
46. State Lunch Program	0.00		
47. Other Lunch Program	0.00		
48. Total Lunch Program	0.00		
49. Federal Lunch Program (Free/Reduced Price)	0.00		
50. State Lunch Program	0.00		
51. Other Lunch Program	0.00		
52. Total Lunch Program	0.00		
53. Federal Lunch Program (Free/Reduced Price)	0.00		
54. State Lunch Program	0.00		
55. Other Lunch Program	0.00		
56. Total Lunch Program	0.00		
57. Federal Lunch Program (Free/Reduced Price)	0.00		
58. State Lunch Program	0.00		
59. Other Lunch Program	0.00		
60. Total Lunch Program	0.00		
61. Federal Lunch Program (Free/Reduced Price)	0.00		
62. State Lunch Program	0.00		
63. Other Lunch Program	0.00		
64. Total Lunch Program	0.00		
65. Federal Lunch Program (Free/Reduced Price)	0.00		
66. State Lunch Program	0.00		
67. Other Lunch Program	0.00		
68. Total Lunch Program	0.00		
69. Federal Lunch Program (Free/Reduced Price)	0.00		
70. State Lunch Program	0.00		
71. Other Lunch Program	0.00		
72. Total Lunch Program	0.00		
73. Federal Lunch Program (Free/Reduced Price)	0.00		
74. State Lunch Program	0.00		
75. Other Lunch Program	0.00		
76. Total Lunch Program	0.00		
77. Federal Lunch Program (Free/Reduced Price)	0.00		
78. State Lunch Program	0.00		
79. Other Lunch Program	0.00		
80. Total Lunch Program	0.00		
81. Federal Lunch Program (Free/Reduced Price)	0.00		
82. State Lunch Program	0.00		
83. Other Lunch Program	0.00		
84. Total Lunch Program	0.00		
85. Federal Lunch Program (Free/Reduced Price)	0.00		
86. State Lunch Program	0.00		
87. Other Lunch Program	0.00		
88. Total Lunch Program	0.00		
89. Federal Lunch Program (Free/Reduced Price)	0.00		
90. State Lunch Program	0.00		
91. Other Lunch Program	0.00		
92. Total Lunch Program	0.00		
93. Federal Lunch Program (Free/Reduced Price)	0.00		
94. State Lunch Program	0.00		
95. Other Lunch Program	0.00		
96. Total Lunch Program	0.00		
97. Federal Lunch Program (Free/Reduced Price)	0.00		
98. State Lunch Program	0.00		
99. Other Lunch Program	0.00		
100. Total Lunch Program	0.00		




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## Required Documents (if applicable)

- Copy of completed Paid Lunch Equity (PLE) tool
- If non-federal funds were transferred to food service account, provide supporting documentation that the funds were transferred (i.e. copy of General Ledger)




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## Area 3: Revenue from Nonprogram Foods (NPR)

- Assess the completion of the Non-Program Food Revenue (NPR) Tool, which assists SFAs in determining compliance with the non-program foods requirement.
- Review nonprogram food prices to ensure the payments are sufficient to cover the overall cost of nonprogram food.




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## Nonprogram Revenue (NPR)

- Common examples of nonprogram foods:
  - A la carte items
  - Adult meals
  - Second meals
  - Fundraisers or vending machines
  - Catered meals




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## Nonprogram Revenue Calculator (NPR)



USDA FOOD AND NUTRITION SERVICE

Nonprogram Revenue Calculator

How to use the calculator: Enter cost of nonprogram food and total revenue.

Category	Amount
Cost of Nonprogram Food	1
Cost of Nonprogram Food	2
Cost of Nonprogram Food	3
Cost of Nonprogram Food	4
Cost of Nonprogram Food	5
Cost of Nonprogram Food	6
Cost of Nonprogram Food	7
Cost of Nonprogram Food	8
Cost of Nonprogram Food	9
Cost of Nonprogram Food	10




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## Required Documents (if applicable)

- Completed Non-Program Food Revenue Tool (NPR)
- Documentation demonstrating food costs & revenue of non-program foods
- Written explanation or example of how the SFA separates its program food revenue & costs from nonprogram food revenue & costs
- Documentation showing prices charged for nonprogram foods (i.e. adult meals)
- The SFA's pricing methodology for nonprogram food items and adult meals




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## Area 4: Indirect Costs

- Ensure that SFAs follow fair and consistent methodologies to identify and allocate allowable indirect costs to school food service accounts.
- Almost all of our SFAs do not charge indirect costs. If your SFA does not charge indirect costs to the school food service account this section does not apply.




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## Indirect Costs

- Benefit multiple programs
- Administrative overhead
  - Fringe benefits
  - Accounting
  - Payroll
  - Purchasing
  - Facilities Management
  - Utilities




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## Required Documents (if applicable)

- Support documentation for any indirect cost charged to the nonprofit food service account
- Indirect Cost Rate Agreement
- Only applies if your SFA charges indirect costs to the nonprofit school food service account




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## Off-site Assessment Tool

- Prior to the AR
- Requests information regarding the monitoring areas of the AR
- Targets areas of non-compliance
- Resource Management section of the Off-Site Assessment Tool **must** be completed before the review




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## Off-site Assessment Tool



Module: Maintenance of Nonprofit School Food Service Account		
Indicate the Resource Management review period to be used when answering Q700-Q702		
	<input type="checkbox"/> Previous School Year	<input type="checkbox"/> Last Audited School Year
700. Did the SFA have the ability to accurately track all revenues and expenditures for the nonprofit school food service separately from all other transactions?  If yes, describe the method used in the comments box, such as having a separate account only for food service revenues and expenditures, identifying all financial transactions by a separate fund code, using a separate ledger or other system to track revenues and expenditures specific to food service.	YES	NO
Comments:		
701. At the end of the SFA's RMI review period, did the food service have any cash resources that exceeded three months' average expenditures?  If the SFA has a plan approved by the state agency to use the excess funds, note this in the comments section.	YES	NO
Comments:		
702. Did the SFA transfer funds other than approved indirect costs out of the food service account to support general school	YES	NO




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## Review



- Off-site Assessment Tool (SFA)
- Resource Management Risk Indicator Tool (HCNP)
- Resource Management Comprehensive Review Form (HCNP)

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## Procurement Review



- Procurement Review conducted at the same time as Administrative Review
- Looks at SFAs procurement activities




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## Procurement – Required Documents

- SFA's Procurement Policies & Procedures
- SFA's Procurement Code of Conduct
- All contracts and documentation
- Vendor Paid List:
  - Detailed General Ledger – Sorted by vendor
    - July 2020 to June 2021
    - July 2021 to Current




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## Buy Hawaii Provision (Buy American)




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## Buy Hawaii Provision (Buy American)

- Hawaii is exempt from the Buy American provision, but recipient agencies in Hawaii are required to purchase food products grown in Hawaii in sufficient quantities to meet school meal program needs (7 CFR 210.21 (d)(3)).
- SFAs required to purchase food that is produced or processed domestically, and if domestically processed, done so substantially using domestic agricultural commodities.
- Substantially means over 51 percent, by weight or volume, of the final processed product consists of domestic agricultural commodities.




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## Buy Hawaii



- SFAs encouraged to include the following certification statement in their solicitations and contracts:
  - "We certify that X product is processed in Hawaii and contains at least X percent of its agricultural food component, by weight or volume, from Hawaii."
- Often labels fail to reflect information to determine compliance




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## Buy Hawaii – Exceptions



- Limited exceptions to the Buy Hawaii provision which allow for the purchase of non-domestic products when use of domestic products is truly not practicable.
- Alternative or exception may be utilized as long as documentation justifying an exception is maintained.




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## Buy Hawaii – Compliance



- HCNP will review a variety of agricultural food components to assess if the foods received by the SFA are over 51% domestic
- If non-domestic agricultural foods are identified, SFA should have documentation to support exceptions to the Buy Hawaii requirements
- Solicitation and contract language should include the requirement for domestic agricultural commodities and products.




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## Buy Hawaii – Required Documents

- Submit documentation demonstrating compliance with the Buy Hawaii Provision:
- Procurement plan / procedures
- All procurement solicitations, contracts, bid specifications
- Documentation of any exceptions used




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## Buy Hawaii – Required Documents

Submit 2-3 item labels or receipts in EACH of the following Food Component Categories:

- Bakery, pasta, and other miscellaneous components
- Canned fruit and fruit juice
- Canned vegetables and vegetable juice
- Frozen fruit and fruit juice
- Frozen vegetables and vegetable juice
- Frozen meat/entrée items
- Refrigerated foods




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## Questions?

- HCNP Fiscal Team
  - Shaynee.Moreno@k12.hi.us
  - Kyle.Sawai@k12.hi.us




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## Non-Discrimination Statement




In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the <https://www.usda.gov/sites/default/files/documents/USDA-ARC-NHDP-Complaint-Form-0508-0001-018-1-18-175x2001.pdf> (AD-3027) found online at: <https://www.usda.gov/office/foia> to file a program discrimination complaint, send it to any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter 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. 20250-9440;
2. fax: (202) 696-7442; or
3. email: [usda.nhdp@usda.gov](mailto:usda.nhdp@usda.gov)

This institution is an equal opportunity provider.



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### Meal Access and Reimbursement (AROT – 4) Meal Counting and Claiming

Meal Counting and Claiming: Accurately  
counting, recording, and claiming  
(submitting counts for reimbursement)  
meals for eligible students

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### Meal Counting and Claiming (AROT-4)

Off Site Review

Reviewer will validate:

- ✓ SFA's procedures described site Assessment Tool (OSAT)
- ✓ SFA's meal counting and claiming process
- ✓ Prevent overt identification, accurate counts by category and addresses overrides
- ✓ How SFA calculates and uses attendance factor and daily edit checks




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### Meal Counting and Claiming (AROT-4)

Off Site Review

- ✓ Live or record meal service (Breakfast, Lunch, ASP)
- ✓ Observe locations where meals are served and counted. (dining room, classrooms, multi-purpose room, etc)
- ✓ Proper identification of a reimbursable meal
- ✓ Submit a current On-Campus Meal Service and Counting Location form if information has changed

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### Meal Counting and Claiming (AROT-4)

Off Site Review



- ✓ On each serving line – all components available prior to and during meal service
- ✓ Use correct serving utensils
- ✓ Milk types, meal accommodations
- ✓ Signage
- ❖ Reimbursable meal




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### Meal Counting and Claiming (AROT-4)

#### Off Site Review

- ✓ Review reimbursement claim and supporting documentation for the review month for all schools/sites
  - Includes edit check (worksheet or computerized report)
- ✓ Includes determination and use of attendance factor (AF) which must be applied daily
  - If daily meal counts exceed AF multiplied by free or reduced enrollment more than 50% of the serving days, SFA must explain the reason

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### Edit Checks (AROT-4)

- ✓ Prevent over claims and meal counting problems BEFORE claim submitted to HCNP for payment
- ✓ Must be performed on daily meal counts BEFORE submitting monthly claim for reimbursement
  - SFA must update number of free, reduced and paid eligible students as changes occur and apply appropriate attendance factor
- ✓ May be done manually or automated through a POS system
  - Check with your POS company to see if your system has this ability
  - Confirm that it functions correctly and correct attendance factor is applied as required by USDA regulations

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### Edit Checks (AROT-4)



- Edit checks are required for all schools, including CEP schools
- Use the Edit Check worksheet if POS does not have edit check function or if another meal counting system is used
- The edit check worksheet has features designed to 'flag' when a potentially erroneous entry is made, allowing the SFA to investigate a potential error.

Edit checks must be completed for SY 21-22, even though SSO free meals are being served to students.

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## Audit Checks (AROT-4)

1. SA NAME		3. SCHOOL SITE ID		4. CLERK MONTH / FR		5. MEAL		Breakfast	
Aloha SFA		1		JAN-22					
2. AMOUNT		8. SERVING DATES		ADA =		ADP =		4. ATTENDANCE FACTOR (AF)	
888		18		345		103		0.953	
INSTRUCTIONS: (1) the separate worksheets for each meal and each site. (2) AF=Attendance Factor, from October Data Report. (3) Eligible by category # of students approved for FREE, REDUCED, or PAID. (4) AF=Eligible (actual/ADA). (5) * = Meal counts exceed # of eligible. Conduct audit check, verify enrollment, eligibility, meal counts.									
Breakfast		5. FREE		6. REDUCED PRICE		7. PAID		8. TOTAL	
Day of Month	7. ENROLLMENT	Free Eligible	Free Actual	RP Eligible	RP Actual	PAID Eligible	PAID Actual	MEAL COUNTS	9. COMMENTS
1	7	0	0	0	0	0	0	0	345 students in attendance & all students are breakfast For example: if your attendance factor is 96.4, enter 0.964
2	0	0	0	0	0	0	0	0	
3	0	0	0	0	0	0	0	0	
4	0	0	0	0	0	0	0	0	
5	362	362	345	120	0	0	0	120	
6	362	362	345	95	0	0	0	95	
7	362	362	345	346	0	0	0	345	
8	0	0	0	0	0	0	0	0	
9	0	0	0	0	0	0	0	0	
10	362	362	345	80	0	0	0	80	
11	362	362	345	100	0	0	0	100	

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**Edit Checks (AROT-4)**

Meal Counting and Claiming  
Common Problems with Edit Checks



- Edit checks not being done
- Not taking point of service counts
- Edit checks do not include paid meals
- Site enrollment not updated daily
- More meals claimed than eligible students
- Staff do not understand importance of edit check

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**General Areas**

- ✓ Civil Rights
- ✓ On-site Monitoring
- ✓ School Wellness Policy
- ✓ Smart Snacks
- ✓ Food Safety/Storage/Buy American
- ✓ School Breakfast Program and Summer Food Service Program Outreach
- ✓ Professional Standards
- ✓ Other Federal Programs

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**General Areas (AROT-6)****Civil Rights**

- ✓ Administering program services and benefits in accordance with the laws, regulations, policies and guidance related to Civil Rights compliance
- ✓ SFA's procedures for receiving and processing complaints alleging civil rights discrimination within USDA CNPs must
  - ✓ Indicate whether allegation was made in writing, verbally or in person
  - ✓ Transcribe the verbal complaint
  - ✓ Identify the outside agency to which complaints are forwarded
- ✓ Procedures CANNOT indicate that attempts to resolve the complaint be made at the local level
- ✓ Complaint filed within **180 days** & forward to HCNP within **5 days**

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**General Areas (AROT-6)****Civil Rights**

- ✓ Confirm “And Justice for All” posters are displayed in prominent locations (school office, bulletin board on main building entrance, dining area, etc)
- ❖ Refer to 7/23/21 email: IMPORTANT: SP 16-2021 Previously issued Q&As, Question #50
- ✓ Appropriate use of Non-Discrimination statement on program materials




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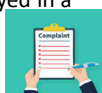
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**General Areas (AROT-6)****Civil Rights Common Problems**

- ✓ Not all staff members associated with CNPs received annual training
- ✓ “And Justice for All” posters not displayed in a prominent location
- ✓ No complaint log for each school year
- ✓ CNP civil rights complaints that do not fall within the 6 protected classes (race, color, national origin, age, sex, disability)




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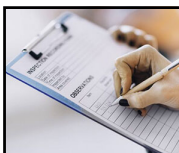
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**General Areas (AROT-7)****On Site Monitoring**

- ✓ SFAs with MORE THAN ONE SITE must perform AT LEAST ONE on-site review of the lunch counting and claiming system used by each site under its jurisdiction prior to FEBRUARY 1 of each year
- ✓ On site monitoring must occur in 50% of all SBP sites prior to FEBRUARY 1 each school year

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### General Areas (AROT-8) Local Wellness Policy (LWP)

- ✓ Copy of the current LWP
- ✓ Demonstrate LWP made available to the public
- ✓ Documentation of review and update; people involved; methods used for stakeholder participation
- ✓ Triennial assessment
- ❖ 3 required components:
  - Compliance with wellness policy
  - How the LWP compares to model wellness policies
  - Progress made in attaining the goals of LWP
- ❖ Assessment made available to the public
  - ➔ Visit HCNP website (Program Resources) for more information

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### General Areas (AROT-9)

#### Smart Snacks in Schools



- ✓ Documentation for first full week of review month of **ALL FOODS AND BEVERAGES SOLD as A LA CARTE** at the selected schools
- ❖ The Congressional Flexibility to serve Low Fat (1%) flavored milk is extended through Feb. 18, 2022



Note: However, Ala Carte items sold such as milk must follow Smart Snack Standards

Refer to: SP 22-2021 Q&A for CNP operations in SY 21-22, Q&A#2 , Question #15

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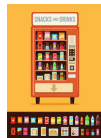
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### General Areas (AROT-9)

#### Smart Snacks in Schools

- ✓ Nutrition documentation for food items sold by **FOOD SERVICE DEPARTMENT** to students in ALL schools within the SFA
- ✓ Nutrition documentation for food items sold by **OUTSIDE** entities
- ❖ School stores, PTAs, fundraisers, vending machine, concession stand, etc




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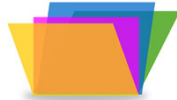
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### General Areas (AROT-9)

#### Smart Snacks Acceptable Documentation

- ✓ Alliance for a Healthier Generation Smart Snacks Calculator print outs
- ✓ Recipes
- ✓ Product Specifications
- ✓ Other documentation




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### General Areas (AROT-10)

#### Food Safety- HACCP

- ✓ All SFAs must have FOOD SAFETY plans in place
- ✓ Reviewed AT LEAST ANNUALLY and updated as needed throughout school year
- ✓ Document annual reviews
- ✓ Customize according to food service operation




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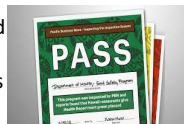
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### General Areas (AROT-10)

#### Common Problems with Food Safety

- ✓ Temperature logs not completed for both food and equipment
- ✓ Documentation not maintained for required 3 years plus the current year
- ✓ Kitchen staff do not know where or what the Food Safety Plan is
- ✓ Food Safety Plans not reviewed and updated annually
- ✓ Food Safety Inspection Reports not posted for public view




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### General Areas (AROT-10)

#### Storage

- ✓ Observe conditions of ON-SITE STORAGE FACILITIES and OFF-SITE FOOD STORAGE FACILITIES (AS APPLICABLE) to ensure proper storage practices

- ✓ Freezers
- ✓ Refrigerators
- ✓ Dry good storage rooms
- ✓ Other areas to ensure proper storage practices




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### General Areas (AROT-10)

#### Buy American (Buy Hawaii)

- ✓ Buy Hawaii: SFAs are required to purchase products that are made in Hawaii

- ❖ Exception: Item(s) too costly to purchase in Hawaii or unavailable in Hawaii in sufficient quantities




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### General Areas (AROT-11)

#### Program Outreach

7 CFR 210.12(d)(1) and (2)

- ✓ SFAs must inform families of the availability of breakfast offered under the SBP
  - ✓ Beginning of school year
  - ✓ Multiple times throughout the school year
- ✓ SFAs must conduct Summer Food Service Program (SFSP) outreach before the end of each school year
  - ✓ All SFAs must conduct summer outreach **regardless of whether they participate in SFSP**
  - ✓ If SFSP is administered by a different SFA or sponsor, they must work cooperatively to inform eligible families of availability and location of SFSP meals

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### General Areas (AROT-11)

#### Program Outreach (continued)

- ✓ Seamless Summer Option (SSO)
  - ✓ Household notification of availability and location of free meals via SSO
- ✓ Community Eligibility Provision (CEP)
  - ✓ Household notification of availability and location of free meals via CEP (SP 18-2021, #4)
- ✓ Keep documentation showing how / when outreach was done

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### General Areas (AROT-12)

#### Professional Standards 7 CFR 210.30

- ✓ Established HIRING STANDARDS for new school nutrition program directors at the SFA level
- ✓ Established ANNUAL TRAINING STANDARDS for all school nutrition program directors, managers and food service staff

USDA Professional Standards for School Nutrition Program Professionals:

[https://fns-prod.azureedge.net/sites/default/files/resource-files/Professional\\_Standards\\_Flyer.pdf](https://fns-prod.azureedge.net/sites/default/files/resource-files/Professional_Standards_Flyer.pdf)

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### General Areas (AROT-12)

#### Professional Standards

- ✓ Per SP 22-2021:
  - ✓ Professional standards training requirements are not applicable to SFAs that operate SSO during SY 2021-2022
  - ✓ However, school nutrition professionals are encouraged to complete trainings
    - ✓ Training hours completed during SY 21-22 may be applied to SY 22-23, except those trainings that are required on an annual basis
  - ✓ Continue to maintain professional standards documentation & have it ready for review




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### General Areas (AROT-12)

#### Professional Standards: Hiring Standards

- ✓ Inform HCNP if your SFA has an Acting School Nutrition Program Director
  - ✓ Background information (name, date hired, title/position)
  - ✓ Highest level of education achieved
  - ✓ Education achievement certificates (diplomas)
  - ✓ Years of school nutrition experience
  - ✓ Prior food safety training record
  - ✓ Plan for hiring a permanent Program Director




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### General Areas (AROT-12)

#### Professional Standards: Hiring Standards

- ✓ For ALL School Nutrition Program Directors:
  - ✓ Name
  - ✓ Date Hired
  - ✓ Title/Position
- ✓ For School Nutrition Program Directors hired on or after July 1, 2015:
  - ✓ Highest level of education achieved
  - ✓ Education achievement certificates (i.e. diplomas)
  - ✓ Years of school nutrition program experience
  - ✓ Prior food safety training record
- ✓ Review SFA records documenting that applicable hiring actions for new program directors completed on or after July 1, 2015

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### General Areas

#### Water Requirement: Potable Water

Per SP 16-2021, #10 – 12:

- ✓ Potable water must be made available & accessible at no charge in the place(s) where lunches are served
  - ✓ When lunch is served in the classroom, the potable water requirement still applies
- ✓ Potable water must be made available when breakfast is served in the cafeteria
  - ✓ Not required to make water available when breakfast is served outside the cafeteria
  - ✓ However, schools are encouraged to make potable water available in all meal service locations

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### General Areas

#### Water Requirement: Potable Water (continued)

Per SP 16-2021, #10 – 12:

- ✓ Schools are not required to provide potable water to students who are learning virtually and who are not eating meals at school
- ✓ Potable water can be provided in a variety of ways
  - ✓ Water fountain or sink in the classroom
  - ✓ Water pitchers and cups on a table
  - ✓ A faucet that allows students to fill their own bottles or cups
- ✓ HCNP will assess whether a school makes free water available to students in any location where lunches are served (during meal service) and when breakfast is served in the cafeteria

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### General Areas

#### Common Requirement for Recording and Recordkeeping

- ✓ To determine if reports are submitted as required by HCNP and maintained with other program records for a period of THREE YEARS after submission of the final claim for reimbursement for the fiscal year
- ✓ If AR findings have not been resolved , the three year period is EXTENDED as long as required for resolution of audit issues




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### General Areas

#### Other Federal Program Reviews

- Afterschool Snack Program (ASP)
- Fresh Fruit and Vegetable Program (FFVP)
- NSLP Equipment Assistance Grant
- Seamless Summer Option (SSO)




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### General Areas (AROT-13)

#### Afterschool Snack Program (ASP)

- ✓ Verify school eligibility
  - Must offer enrichment or educational activities
  - Maintain documentation of area eligibility
  - If not area eligible, documentation of an approved waiver for Area Eligibility in ASP for SY 21-22
  - Schools serve snacks only after the end of the regular school day
- ✓ Ensure accurate counting and claiming
  - Maintain attendance records
  - Meal counting and claims
  - Claim only one snack per child per c
  - Production records




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### General Areas (AROT-13)

#### Afterschool Snack Program (ASP)

- ✓ Verify snacks meet snack service and nutritional requirements
- ✓ Confirm SFA conducts self-monitoring activities twice per year
  - ✓ <https://hcnp.hawaii.gov/overview/asp/>
  - ✓ Under Program Resources
- ✓ Verify that food safety and civil rights requirements are being met




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### General Areas (AROT-14)

#### Fresh Fruit and Vegetable Program (FFVP)

- ✓ Any school participating in FFVP will have its FFVP operation reviewed during its AR this school year
- ✓ Observations of FFVP preparation/service at the schools will be conducted remotely.
- ✓ If FFVP occurs in multiple locations throughout your campus, at least one site will be observed, but observation of more sites may be necessary.




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### General Areas (AROT-14)

#### Fresh Fruit and Vegetable Program (FFVP) Remote Observation

Ensure that the FFVP service on a  
scheduled review date is:

- ✓ Available to all eligible students, free of charge
- ✓ Follows pre-COVID procedures (e.g. offers within school day outside of meal service, etc.) or procedures allowed by USDA flexibility that were approved by HCNP
- ✓ Publicized
- ✓ Not serving frozen, canned, dried fruit
- ✓ Not serving juice, nuts/trail mix, fruit/vegetable pizza, smoothies, fruit strips, fruit drops, fruit leather

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### General Areas (AROT-14)

#### Fresh Fruit and Vegetable Program REMINDERS

- ✓ Served only to eligible students  
(Teachers of these classrooms may also participate as role models of healthy-eating)
- ✓ Dip may only be used for vegetables
  - ✓ Serving size to encourage the eating of vegetables but not more than 2 tablespoons
  - ✓ Must be low-fat or fat free
- ✓ If cooked vegetables are served:
  - ✓ At the most once per week
  - ✓ Must be accompanied by nutrition education lesson
- ✓ Follow HACCP / Food Safety Plan guidelines




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### General Areas (AROT-14)

#### FFVP Claim Validation for the School Year

- ✓ All claims for FFVP reimbursement by the school
- ✓ Supporting cost documentation must indicate:
  - ✓ School uses majority of funds to purchase FRESH PRODUCE
  - ✓ School carefully reviews and prorates equipment purchases
  - ✓ Labor costs (prep/serve & administrative) and all other nonfood costs are minimal
    - ✓ Administration costs ≤ 10%
- ✓ Proper documentation includes:
  - ✓ Invoices of FFVP costs
  - ✓ Payroll reports
  - ✓ Time sheets
  - ✓ Documentation of time allocated to FFVP




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### General Areas (AROT-14)

#### National School Lunch Program Equipment Assistance Grant (NSLP EAG)

- ✓ If the school selected for AR received an ARRA equipment award (2014) or NSLP EAG award (2015-2020 grant years) the school will be required to submit the following :
  - Updated form 428-A list of federally-acquired equipment located on campus
  - New photographs or video of the listed equipment
  - IF equipment was pro-rated for NSLP usage, any records necessary to demonstrate the NSLP % usage of the equipment.

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### General Areas (AROT-15)

#### Seamless Summer Option (SSO) – Summer 2022

- ✓ SFAs that receive an SSO AR during the regular SY 21-22:
  - ✓ SSO Summer 2022 will not be reviewed




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