



# Resource Management

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

SY 2022-2023

Hawaii Child Nutrition Programs  
650 Iwilei Road, Suite 270  
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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 2021 to June 2022
  - ▶ July 2022 to Current
- ▶ Detailed General Ledger - Sorted by vendor
  - ▶ July 2021 to June 2022
  - ▶ July 2022 to Current
- ▶ Balance Sheet
  - ▶ July 2021 to June 2022
  - ▶ July 2022 to Current



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### Required Documents

- ▶ Profit and Loss Detail
  - ▶ July 2021 to June 2022
  - ▶ July 2022 to Current
- ▶ Vendor invoices/receipts charged to nonprofit food service account
  - ▶ July 2021 to June 2022
  - ▶ July 2022 to Current
- ▶ Deposit slips for any nonprofit food service account transactions
- ▶ Documentation showing lunch price charged for SY 21-22 (example: menu, flyer, student handbook)



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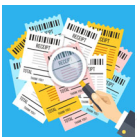
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### Allowable Costs

- ▶ 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

|                                                        |         |        |       |
|--------------------------------------------------------|---------|--------|-------|
| Line 11. Direct Costs (for Special Programs only)      | \$ 0.00 |        |       |
| Line 12. Federal Funds (FFP) Reimbursement             | \$ 0.00 |        |       |
| Line 13. Fund Transfer In                              | \$ 0.00 |        |       |
| Line 14. TOTAL REVENUE                                 | \$ 0.00 |        |       |
| <b>EXPENDITURES</b>                                    |         |        |       |
| Line 15. Salaries & Wages                              | \$ 0.00 | Amount | Notes |
| Line 16. Employee Benefits                             | \$ 0.00 |        |       |
| Line 17. Purchased Services (Professional & Technical) | \$ 0.00 |        |       |
| Line 18. Purchased Services (Maintenance & Energy)     | \$ 0.00 |        |       |
| Line 19. Purchased Food Materials                      | \$ 0.00 |        |       |
| Line 20. USDA Food Unit                                | \$ 0.00 |        |       |
| Line 21. General Operating Expenses                    | \$ 0.00 |        |       |
| Line 22. Food Production Supplies                      | \$ 0.00 |        |       |
| Line 23. General Administrative Expenses               | \$ 0.00 |        |       |
| Line 24. Miscellaneous                                 | \$ 0.00 |        |       |
| Line 25. FFP Food Reimbursement                        | \$ 0.00 |        |       |
| Line 26. Interest Expense                              | \$ 0.00 |        |       |
| Line 27. Fund Transfer Out                             | \$ 0.00 |        |       |
| Line 28. TOTAL EXPENDITURES                            | \$ 0.00 |        |       |
| <b>PLE PAY LUNCH EQUITY TOOL INDICATOR</b>             |         |        |       |
| Line 29. PLE Indicator                                 | 1       | Amount | Notes |
| <b>PLE PAY LUNCH EQUITY TOOL REQUIREMENTS</b>          |         |        |       |
| Line 30. PLE Pay Lunch Indicator                       | 1       | Amount | Notes |




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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)



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| Nonprogram Revenue Calculator                                                 |    |
|-------------------------------------------------------------------------------|----|
| Enter the costs for nonprogram meals and all nonprogram food and food revenue |    |
| Cost for Nonprogram Meals (Food)                                              | \$ |
| Cost of Nonprogram Food                                                       | \$ |
| Total Food Costs                                                              | \$ |
| Total Nonprogram Food Revenue                                                 | \$ |
| Total Revenue                                                                 | \$ |



## 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



## 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.



## 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 Q700-705:

☐ Previous School Year    ☐ 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?<br><br>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 RM review period, did the food service have net costs (revenues that exceeded three months' average expenditures)?<br><br>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 operations?                                                                                                                                                                                                                                                                                                                                               | YES | NO |

Resource Management review period: RM review period of 3 months or less.




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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 2021 to June 2022
    - ▶ July 2022 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
- ▶ Solicitation and contract language should include the requirement for domestic agricultural commodities and products




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### Buy Hawaii - Compliance

- ▶ If non-domestic agricultural foods are identified, SFA should have documentation to support exceptions to the Buy Hawaii requirements. Example of supporting documentation:
- ▶ Market studies that compare the prices of most commonly used items for domestic items against non-domestic items. The market study must be completed once per year, before the start of the school year




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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

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**Meal Access and Reimbursement (AROT-D)**  
**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-D)

Reviewer will validate:

- ✓ SFA's procedures described in Off-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-D) On-Site Review

- ✓ Observe locations where meals are served and counted (including alternate meal service locations)
- ✓ 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-D) On-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
- ✓ Meal accommodations for students with disabilities




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

- ✓ 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-D)

- 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.

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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-F) Civil Rights



- ✓ Program services and benefits are administered 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
- ✓ CANNOT prevent the complainant from submitting a complaint.
- ✓ Complainant may file a complaint within **180 days**
- ✓ Forward complaint to HCNP within **5 days**

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### General Areas (AROT-F) Civil Rights Non-Discrimination Statement

- The Civil Rights Nondiscrimination Statement must be included on any document and web-based materials that reference USDA Child Nutrition Programs
  - Full Statement: include on outreach materials when notifying families about how to apply for benefits or when informing participants about their right to file a complaint. Must be used on materials longer than one page.
  - Short Statement: if material is too small to contain the full statement, or materials up to one page in length.
    - "This institution is an equal opportunity provider."

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**General Areas (AROT-F)  
Civil Rights  
Non-Discrimination Statement**

- Refer to HCNP email, **IMPORTANT: USDA FNS Policy Update: Program Discrimination Complaint Processing** (dated May 26, 2022)
  - Nondiscrimination statement has been updated to include the prohibition of discrimination based on sex, including sexual orientation and gender identity
- All SFA documents, pamphlets, websites, etc. **MUST** be updated with the 2022 nondiscrimination statement
  - Websites must be updated by August 3, 2022
  - Any new documents printed by your SFA must use the updated 2022 nondiscrimination statement
  - Existing pamphlets, documents, brochures, etc. using the 2015 nondiscrimination statement must be updated when current supply is exhausted OR by September 30, 2023

Updated 2022 Civil Rights Nondiscrimination Statement  
<https://hcnp.hawaii.gov/wp-content/uploads/2022/05/UPDATED-5.2022-Civil-Rights-Nondiscrimination-Statement.docx>

**Ensure that the nondiscrimination statement is printed exactly as required!**

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**General Areas (AROT-F)  
Civil Rights,  
And Justice for All Poster**

- Must be prominently displayed in a public location at your school
  - School office, location where applications are certified/verified, dining area, point of service
- USDA is in the process of producing new And Justice For All posters to include the updated nondiscrimination statement
- The 2019 And Justice For All posters language should be updated on websites, training presentations, and any pending printing of program materials
- DO NOT REMOVE old And Justice For All posters until they may be replaced with the new poster
- HCNP will distribute the new posters once they are available




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

- Not all staff members associated with school meal program 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 (including gender identity and sexual orientation), disability




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## General Areas (AROT-G) Onsite 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
- ✓ Meals in the classroom: conduct onsite monitoring of at least 25% of the total number of classrooms
- ✓ Onsite Monitoring Forms: <https://hcnp.hawaii.gov/overview/nsip/> Program Resources → Meal Counting and Point of Service Review
  - ✓ MC-7 On-Site Monitoring Review Checklist
  - ✓ Meals in the Classroom Monitoring Checklist




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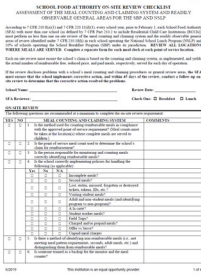
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## General Areas (AROT-7) On Site Monitoring Form MC-7

Available on HCNP's website  
<https://hcnp.hawaii.gov/overview/nsip/>  
 Program Resources → Meal Counting and Point of Service Review




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## Meals in the Classroom Monitoring Checklist

Meals in the Classroom Monitoring Checklist

Date: \_\_\_\_\_ School: \_\_\_\_\_

| Classroom #                                                                                                                                                                                                                                                                               | Teacher | Meal Type (Circle one)                                                       | Breakfast                                            | Lunch | After-school Snack |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------|------------------------------------------------------|-------|--------------------|
|                                                                                                                                                                                                                                                                                           |         | Meal Service Type (circle one):<br>Serving line Pre-set at desk Other: _____ | Circle one:<br>First Monitoring Follow-up Monitoring |       |                    |
| <b>REIMBURSABLE MEALS</b>                                                                                                                                                                                                                                                                 |         | YES NO                                                                       | NOTES, TRAINING OR CORRECTIVE ACTION                 |       |                    |
| Signage on what makes up a reimbursable meal is easily found in the classroom (if implementing OVS for breakfast/lunch, must also have OVS signage posted)                                                                                                                                |         |                                                                              |                                                      |       |                    |
| Teacher/staff understands all of the components required for a reimbursable meal.                                                                                                                                                                                                         |         |                                                                              |                                                      |       |                    |
| Meal delivery: Teacher/staff checks the meal delivery to ensure all of the required components are present before serving students.                                                                                                                                                       |         |                                                                              |                                                      |       |                    |
| Milk variety: At least two varieties of milk are available. Teacher/staff offers students a choice of the available milk types.                                                                                                                                                           |         |                                                                              |                                                      |       |                    |
| Special diets/allergies are properly handled. (Special meal is given to the correct student)                                                                                                                                                                                              |         |                                                                              |                                                      |       |                    |
| Food safety controls are in place during the distribution of meals. Food is kept at proper temperature until immediately before meal service. Meals are distributed from a clean surface. Student desks/tables are clean and free of debris. Appropriate trash receptacles are available. |         |                                                                              |                                                      |       |                    |

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### Monitoring Meals in the Classroom

| Total number of classrooms where reimbursable meals are served | Total number of classrooms to be reviewed |
|----------------------------------------------------------------|-------------------------------------------|
| 1-4                                                            | 1                                         |
| 5-8                                                            | 2                                         |
| 9-12                                                           | 3                                         |
| 13-16                                                          | 4                                         |

Forms are available on the HCNP website under the NSLP section

**PROGRAM RESOURCES**

- Free and Reduced Price Application
- HCNP Systems
- Local Wellness Policy
- Meal Counting and Point of Service Review

Classroom Review Chart  
Meals in the Classroom Monitoring Checklist  
Form MC-3a Meal Counting Checklist  
Form MC-3b Daily Meal Count Worksheet  
Form MC-7 SFA On Site Review Checklist

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### General Areas (AROT-G) On site Monitoring MC-7 Common Problems

- ✓ Form not completed before February 1st
- ✓ Form not being utilized effectively
- ✓ Form not completed at all sites
- ✓ Did not observe the full service
- ✓ Incomplete forms
- ✓ No follow-up documented, if required
- ✓ Person conducting review has limited knowledge of what they are observing
- ✓ Using white out

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

Sec. 204 HHFKA of 2010

- ✓ Strengthens wellness policies by emphasizing ongoing implementation, assessment, and communication
- ✓ Intended to foster broad-based community support for the development and implementation of an effective LWP

HCNP reviews the SFA's Local Wellness Policies to ensure it contains all required elements




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### General Areas (AROT-H) 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
  - ❖ If your SFA previously requested the nationwide waiver of the Local Wellness Policy Triennial Assessment, and would like an extension of this waiver for SY 22-23, please email the NSLP Team.

[Local Wellness Policy Resources](https://hcnp.hawaii.gov/overview/nslp/)  
<https://hcnp.hawaii.gov/overview/nslp/> Program Resources →  
 Local Wellness Policy

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### General Areas (AROT-I) 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

**UPDATE!**

Flavored low-fat milk allowed

Refer to: SP 04-2022, Question and Answer Guidance on the Final Rule  
Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium Effective July 1, 2022, Question #8




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### General Areas (AROT-I) Smart Snacks in Schools

- ✓ Nutrition documentation for food items sold by the 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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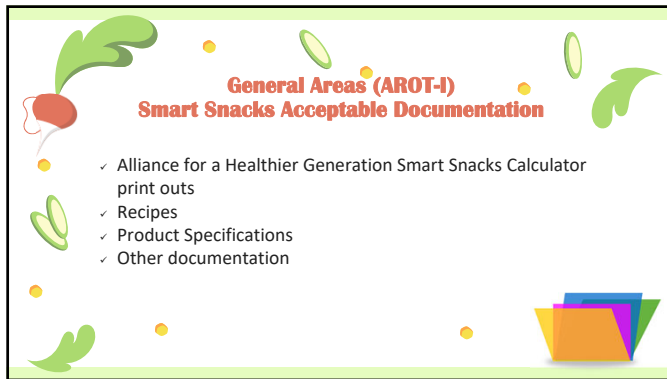
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**General Areas (AROT-I)**  
**Smart Snacks Acceptable Documentation**

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

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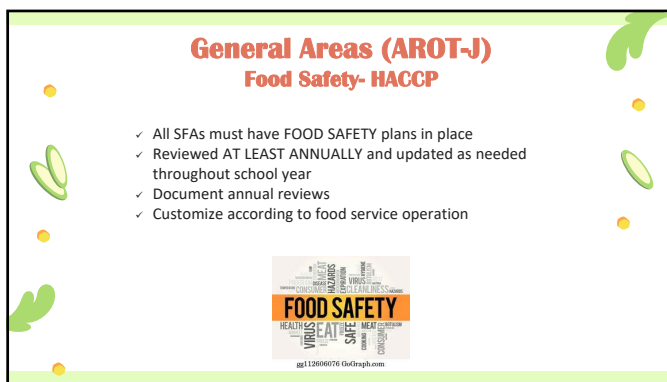
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**General Areas (AROT-J)**  
**Food Safety- HACCP**

- ✓ 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

**FOOD SAFETY**

gg112606976 OneGraph.com

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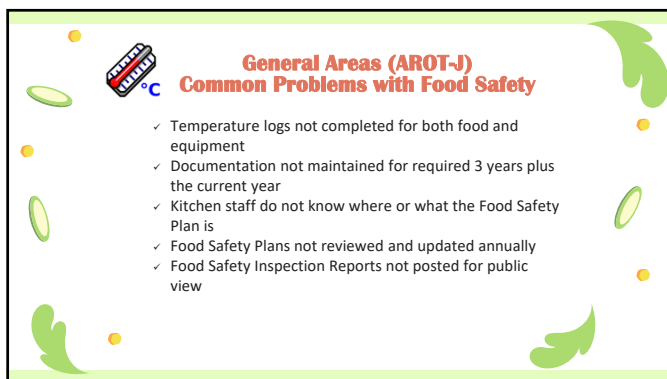
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**General Areas (AROT-J)**  
**Common Problems with Food Safety**

- ✓ 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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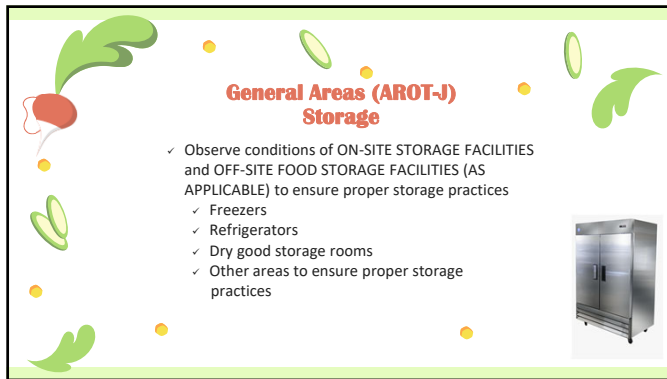
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### General Areas (AROT-J) Storage

- ✓ 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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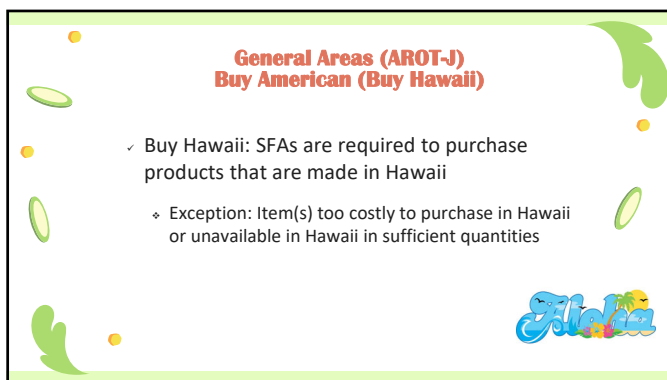
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### General Areas (AROT-J) Buy American (Buy Hawaii)

- ✓ 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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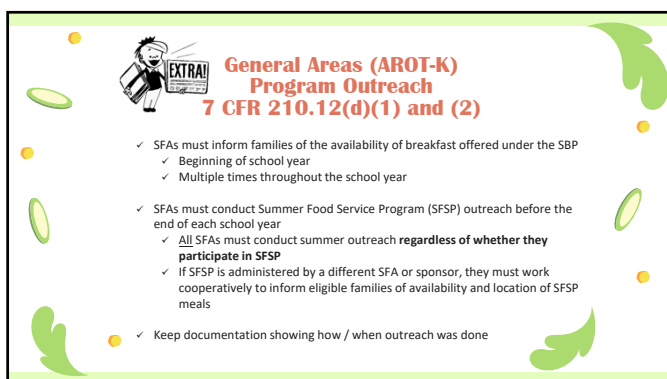
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### General Areas (AROT-K) Program Outreach 7 CFR 210.12(d)(1) and (2)



- ✓ 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
- ✓ Keep documentation showing how / when outreach was done

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**General Areas (AROT-L)  
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.us/sites/default/files/resource-files/Professional\\_Standards\\_Flyer.pdf](https://fns-prod.azureedge.us/sites/default/files/resource-files/Professional_Standards_Flyer.pdf)

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**General Areas (AROT-L)  
Professional Standards**

- ✓ Review SFA records documenting that applicable hiring actions for new program directors completed on or after July 1, 2015
- ✓ Review SFA records documenting completion of annual training standards by all personnel (program directors, managers and staff)



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**General Areas (AROT-L)  
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-L) 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

- ✓ 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

- ✓ 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-M) Afterschool Snack Program (ASP)

- ✓ Verify school eligibility
  - Must offer enrichment or educational activities
  - Maintain documentation of area eligibility
  - If not area eligible, the SFA transfers eligibility status accurately to the roster
  - 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 day
  - Production records




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### General Areas (AROT-M) 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-N) 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-N) Fresh Fruit and Vegetable Program (FFVP) Remote Observation

Ensure that the FFVP service scheduled for remote observation will:

- ✓ Be Available to all eligible students, free of charge
- ✓ Follow school's HACCP / Food Safety guidelines
- ✓ Be widely Publicized
- ✓ Not serve frozen, canned, dried fruit
- ✓ Not serve juice, nuts/trail mix, fruit/vegetable pizza, smoothies, fruit strips, fruit drops, fruit leather

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### General Areas (AROT-N) Fresh Fruit and Vegetable Program REMINDERS



- ✓ Served only to eligible students  
(But, can be served to Teachers of these classrooms that 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 a cooked vegetable is served:
  - ✓ Can be served no more than once in a week
  - ✓ Must be accompanied by nutrition education lesson
- ✓ Follow HACCP / Food Safety Plan guidelines

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### General Areas (AROT-N) 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-O) 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 (2015-2021 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-P)  
Seamless Summer Option (SSO)**

- ✓ Review occurs in summer
  - ✓ May be conducted the summer prior to or after the AR
- ✓ HCNP must review at least one SSO site
  - ✓ Site selected for SSO may be any SSO site
  - ✓ Does not have to be a site selected for regular AR
- ✓ HCNP determines SSO compliance in same manner as NSLP and SBP
  - ✓ HCNP will conduct on-site and off-site review components
  - ✓ SFA will submit off-site review materials to HCNP prior to on-site review

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**General Areas (AROT-P)  
Seamless Summer Option (SSO)**

- ✓ HCNP may utilize any information derived from the regular AR during the SSO review
- ✓ Verify meal counting and claiming
- ✓ Assess how site differentiates between age/grade groups
- ✓ Ensure children eat meals on-site
- ✓ Ensure one meal served prior to offering seconds
- ✓ Verify proper food safety measures are in place
- ✓ Verify meal service times are same as approved by HCNP
- ✓ Confirmation of site eligibility
- ✓ HCNP must ensure SFA makes reasonable effort to advertise the availability of free meals to children in community
- ✓ HCNP must examine SFA's self monitoring forms

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### General Areas (AROT-P) Seamless Summer Option (SSO)

- ✓ To ensure meals are compliant and reimbursable, HCNP will review ONE WEEK of meals using the USDA Certification Worksheets
- ✓ Materials needed to complete the worksheets
  - ✓ One week of menus
  - ✓ Portion sizes for all reimbursable items
  - ✓ Contribution information for each menu item (CN label, USDA food Fact Sheet, Product Formulation Statement)
  - ✓ Production Records
  - ✓ Standardized Recipes
  - ✓ Food labels, ingredient lists, nutrition facts labels

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### Test your Knowledge

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#### True or False:

All SFAs must have one school nutrition program director who meets the Professional Standards hiring requirements.

**TRUE**

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**True or False:**

A school serves meals in the cafeteria and serves meals in three classrooms. Reviewers will only observe meal counting in the cafeteria.

**FALSE.** Reviewers will observe meals in the cafeteria and in the classrooms.

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**Which of the following is acceptable to meet the potable water requirement?**

- A. Sell bottled water to students
- B. Have a water pitcher and cups available in the cafeteria
- C. Require students to bring their own flask/bottle/cup to school to fill with water
- D. Have a water fountain that can only be accessed by students before school and after school

**B. Have water pitcher and cups available in the cafeteria.**

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**True or False:**

All SFAs must inform families of the availability of free summer meals, even if they do not participate in the Summer Food Service Program.

**TRUE**

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Which of the following statements is **NOT** TRUE?

- A. The edit check worksheet should be completed daily.
- B. On the edit check worksheet, error messages must be reviewed. If the meal count is valid, an explanation must be provided under the Comments section.
- C. Schools that participate in CEP do not need to complete edit check worksheets.
- D. HCNP will review reimbursement claims and supporting documentation for the review month.

**C. Schools that participate in CEP do not need to complete edit check worksheets.**

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Which of the following is TRUE about civil rights?

- A. Staff are required to receive civil rights training every other year.
- B. A complaint log is only required when my SFA receives a civil rights complaint.
- C. The nondiscrimination statement is only required on the free and reduced price application.
- D. All of the above.
- E. None of the above.

**E. None of the above**

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**True or False:**

A school ends at 2:00pm and has a fundraiser every Friday from 2:15-2:45pm selling smoothies. The smoothies are not required to be in compliance with the Smart Snacks standards because it occurs after the school day ends.

**FALSE**

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Which of the following must be posted in a publicly visible location?

- A. Most current food safety inspection report
- B. Most current And Justice For All poster
- C. List of students eligible for free and reduced price meals
- D. A and B
- E. All of the above

**D. A and B**

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The Onsite Monitoring Form (MC-7) must be completed:

- A. Prior to December 31
- B. Prior to February 1
- C. Prior to March 1
- D. Prior to the end of the school year

**B. Prior to February 1**

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**Any Questions?**

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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, 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/USDA-ASCRC2020-complaint-form-0508-0902-508-11-29-17-px2Mail.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:

**mail:**  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or  
**fax:**  
(833) 256-1665 or (202) 690-7442; or  
**email:**  
[program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

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