THE ADMINISTRATIVE REVIEW PROCESS:

A new approach to collaborative compliance

June 16-17, 2014

PUBLIC SCHOOLS OF NORTH CAROLINA
State Board of Education
Department of Public Instruction

GENERAL PROGRAM COMPLIANCE

Civil Rights
On-site reviews
Competitive Foods
Local wellness policy
Water
Food safety
SBP and SSO Outreach
Procurement

Local Wellness Policy (LWP)

- Part of the General Program area of Review
- HHFKA added new provisions
  - Changed content requirements
  - Required LEA's take additional actions
- NC agreement indicates LWP responsibilities

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

Local Wellness Policy

- Responsibility for LWP extends beyond the School Food Authority level
- LWP is the responsibility of facility Administration
- Applies similarly to LEA, RCCI, non-public schools, charter schools

Local Wellness Policy: Assessment

HHFKA provision requires assessment for:

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

How does the public know about the results of the most recent assessment on the implementation of the LWP?

- Documentation needed for this

Local Wellness Policy: Assessment

Required elements are present:

- Goals for nutrition education, physical activity, school-based activities
- Nutrition promotion goals
- Nutrition guidelines
- Designated LEA oversight official for LWP

Local Wellness Policy: Assessment, cont'

Required elements are present:

- Plan for measuring implementation
- LWP available to public
- When and how does the LEA review and update the LWP?
- Who is involved in reviewing and updating the LWP? What is their relationship with the LEA?

Local Wellness Policy: Corrective Action and Fiscal Action

Corrective Action

- Required if LWP is not available
- Must address all deficiencies in the policy

Fiscal Action

- May withhold funds for repeated or egregious violations

Questions?

Water

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

Water

- May be provided in a variety of ways
- Students are not required to take water
- Reasonable costs allowable
- Multiple service locations would require water made available for each
- Must be available for ASSP
- Corrective Action required if non-compliant

Questions?

Food Safety

- General Area of Review
- Require assessment at each site selected for review
- Includes: Written plan (HACCP), food safety inspections, recordkeeping, and storage practices
- Food safety requirements must be met but the review is not a food safety inspection

Food Safety: HACCP Plan

- Based on USDA guidance & HACCP principles
- Current year HACCP forms must be in place and updated
- Current year Food Safety plan available and accessible
- HACCP Plan templates and checklists will be available on website

Food Safety: HHFKA Changes

- Added content requirements
- Must cover all facilities that store, prepare or serve food for FNS programs
- Includes hallways, classrooms, buses, warehouse, etc.

Food Safety: Review

Observations at each review site

- HACCP Plan is current and complete with required elements & proper implementation
- Recordkeeping and monitoring
- Compliant storage practices
- Food safety inspections reports

Food Safety: Inspections

- Assessed at each selected site
- Two food safety inspections per school year
- Current grade in a publicly visible location
- Written documentation needed for insufficient number of inspections

Food Safety: Corrective Action

- Each area is assessed at the site level
- If all sites compliant, SFA compliant
- Food safety deficiencies do not result in Fiscal Action (unless repeated or egregious), but Corrective Action is required.

Questions?

Outreach: School Breakfast Program and Seamless Summer Option

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

Outreach: SBP

- Inform about availability of SBP at beginning of the SY in F&RP packets
- Send reminders about SBP multiple times throughout the SY
- May provide reminders:
  - through public address system
  - by providing printed or electronic material
  - By posting menus on website

Outreach: SSO

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

Outreach: Corrective Action

- If the outreach requirements are not met, Corrective Action is required in a timely and adequate manner.

Questions?

Procurement

Full, Free and Open Competition is required for all purchases made with School Nutrition funds.

Procurement: Methods

Purchasing Thresholds

- Formal (Large Purchases)
  - $150,000 – Federal
  - $90,000 – State
  - Local Thresholds
- Informal (Small Purchases)

Procurement: Methods

- Request for Quote (RFQ)
- Invitation for Bid (IFB)
- Request for Proposal (RFP)
- Non-Competitive Negotiation

Procurement: Bid Specifications

- Clearly written, detailed product specifications *(approved brand or equal)*
- Quantity
- Quality
- Packaging
- Pricing (unit and extended)
- Substitutions and/or derivations

Procurement: Terms and Conditions

- Include in all bid documents
- Sample template available at: http://childnutrition.ncpublicschools.gov/front-page/information-resources/procurement

Procurement: Written Plan

- Written description of how all goods and services will be purchased
- Approved by Board of Education
- Procurement Plan and the procurement documents must correspond

Procurement: Review

- Evaluation of Procurement documents for which CN Funds were used – i.e.:
  - IFB, RFP, RFG, etc.
  - Bidders
  - Advertisements
  - Bid openings
  - Award decision
  - Award letters
- Hint: Use the Procurement Checklist that contains required elements to conduct self-assessment of all procurement activities

Procurement: Corrective Action

- Assessed primarily at the SFA level for compliance
- Fiscal Action required for improper or unallowable expenditures
- Corrective Action Plan required for non-compliance

Questions?

OFF SITE DATA ENTRY

June 23 to September 23, 2014

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