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

OTHER FEDERAL PROGRAM REVIEWS

Afterschool Snack Program

Seamless Summer Option

Fresh Fruit & Vegetable Program

Afterschool Snack Program (ASSP)

- Operated under the NSLP
- Supervised
- Organized activities
- Educational or enrichment
- After the end of the school day

ASSP: Meal Pattern

- Snack Meal Pattern has not been updated to most recent Dietary Guidelines
- Encouraged to provide healthy snacks
  - Increase whole grain-rich foods
  - Decrease fats
- Must offer only fat-free (flavored/unflavored) and low-fat milk (unflavored only)
- Milk variety (offering ≥ 2 milk types) not required

ASSP: Evaluating Compliance

- Determine if SFA retains administrative and management responsibility for meeting requirements
- Assess compliance in the following areas:
  - Eligibility
  - Accountability/Meal Counting and Claiming
  - Meal Pattern/Production Records
  - Monitoring
  - General Areas

ASSP: Eligibility

- Education or Enrichment Activities
- Area Eligible – all meals free
  - Free/Reduced-Price 50% or more
- Non-Area Eligible
  - Documentation of Free/Reduced-Price eligibility required
- Expanded Learning Time
  - SP 04-2011
- Age Eligibility
- Snack Pricing

ASSP: Accountability

- Attendance/Sign-in Sheets
- Point of Service Roster
- Counting/Claiming Procedures
- Supporting Documentation
  - Snack Orders
  - Delivery Records
  - Production Records
  - Adult Snacks
- Record Keeping

ASSP: Meal Pattern & Production Records

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

ASSP: Self Assessment

- Self-Reviews completed on site
  - 1st – during first 4 weeks of operation
  - 2nd – prior to end of SY
- Records kept for 3 years

ASSP: General Areas

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

ASSP: Review

- Snack contains required components and adequate portion
- One snack per child claimed
- Snacks are served at the appropriate time
- Counting and claiming is accurate

ASSP: Corrective Action/Fiscal Action

EXAMPLES

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

Review Process

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Immediate CA required

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Corrective Action Plan

ASSP: Common Findings

- ASSP checklist not completed prior to startup of snack service and/or not available
- Two After School Snack Program On-Site Reviews not conducted, one within the first 4 weeks of operation.
- ASSP Production Record indicating inadequate portion sizes for meal components.
- Meal Counts not taken at the point of service

Questions?

Seamless Summer Option (SSO)

- Review at least one SSO site
- Site eligibility

SSO: Compliance

- Assess menus and production records
- Review meal counting and claiming procedures
- Examine food safety records and practices
- Evaluate performance of self-monitoring
- Determine differentiation between age/grade groups
- Observe community participation/site advertisement

SSO: Advertisement & On-Site Review

- Advertisement
  - SFA makes reasonable effort to advertise to community
  - Advertisements have non-discrimination statement
- SFA On-Site Review
  - SFA reviews all sites once/year during operation

SSO: Meal Counting & Claiming

- Count complete meals at POS
- Compare POS meal counts to:
  - Meal counts from last full week from review period
  - Benefits issuance roster
- Camps: Ensure only meals served to F/RP eligible children are claimed for reimbursement

SSO: Menu Planning & Meal Service

- Review menus & production records
- Assess how site provides meals to varying age/grade groups, if applicable
- Ensure children eat meals on-site during approved meal service times

SSO: Menu Planning & Meal Service

- Ensure eligible children get one meal before seconds are served
- Verify food safety measures
- Validate alternate arrangements for inclement weather

SSO: Corrective Action

- Missing meal components for day of review
  - Immediate corrective action required before any meals claimed
  - Include on Corrective Action Plan
- Documentation Review
  - Give opportunity to provide documentation to show component was actually offered
  - Evaluate erroneous meals to assess fiscal action
  - Require Corrective Action Plan

SSO: Corrective Action

- Findings for Vegetable Subgroups, Milk Types, Whole Grain-rich foods, Quantities
  - Provide technical assistance
  - Include on Corrective Action Plan
- Production Records Missing/Incomplete
  - Provide technical assistance
  - Ensure site manager understands how to complete production records to prevent future problems

Questions?

Fresh Fruit and Vegetable Program (FFVP)

- Evaluated during the administrative review
- Review of individual schools
- Review of central office

FFVP: Review

- Three components
  - Review of a pre-established number of FFVP sites
  - Claim validation
  - FFVP meal service observation

FFVP: Claim Validation

- Validate one month's claim per site
- Select any month
- Check status of administrative costs
- Recommendation: Complete off-site prior to the on-site portion of the administrative review

FFVP: Site Selection

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

FFVP: Claim validation

- Costs claimed for reimbursement compared to site's cost documentation
- Invoices, timesheets, purchase orders, etc.
- Costs claimed for reimbursement matches site's cost documentation
- Administrative versus Operational Costs

FFVP: Meal Service Observation

- Occurs at selected FFVP site(s)/Only one location per site
- Ensures FFVP funds used for allowable purposes

FFVP: Corrective and Fiscal Actions

- Corrective Action must address all program non-compliance
- Fiscal Action must be used to recover any payments inconsistent with FFVP requirements

Questions?

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