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
MEAL PATTERN & NUTRITIONAL QUALITY

Meal components and quantities
Offer vs. serve
Dietary specifications and nutrient analysis
Meal Components and Quantities: Performance Standard 2

- Administrative Review
- Critical Areas
- General Areas
- Performance Standard 1
- Performance Standard 2
- Meal Components & Quantities
Meal Component and Quantities

- SFA will complete the Meal Component and Quantities Worksheet
- Reviewer will assess whether the school:
  - Offers students the required meal components in the required quantities for specific age/grade groups
  - Gives students access to select required meal components on all reimbursable meal service lines
  - Records only meals that contain required components in required quantities for reimbursement
Production Records

- Maintained completely and accurately on-site daily for each meal service
- Documents that all meal components are offered in quantities appropriate for age/grade groups served
- Fiscal Action taken for missing documents
Meal Pattern Requirements

• Specific to age/grade group
• Specific requirements for
  ➢ milk
  ➢ vegetable subgroups
  ➢ whole grains
  ➢ dietary specifications
School Breakfast Update for 2014-15

- All grains whole grain-rich
- Target 1 for average weekly sodium limit
- Fruit component increase to 1 cup per day
- 100% juice limited to no more than half of fruit offerings
- Vegetables substituted for fruits with limitations
- OVS meals selected must contain fruit (or vegetable substitution)
Best Practice

Use the Meal Compliance and Quantities Worksheet throughout the year to evaluate menu plans and determine component compliance before menus are served.
Milk Requirements

At least two varieties of fluid milk
- Fat-free, flavored or unflavored
- Low-fat, unflavored

Violations require fiscal action
Vegetable Subgroup Requirements

Offer required quantities weekly

- Dark green
- Red/orange
- Beans/peas
- Starchy
- Other
Whole Grain-Rich Requirements

• All grains offered in SBP and NSLP must be whole grain rich
• Must meet minimum amounts required by meal pattern
• No maximum limits as long as dietary standards are met
• Refer to the USDA Whole Grains Resource Manual
Meal Preparation Observation

Prior to Meal Service

• Observe meal preparation
• Ensure all reimbursable meal lines offer all required components
• If multiple age/grade groups, examine how requirements are met for each
• Alert staff to missing components and give opportunity to correct
Meal Service Observation

During the Meal Service

• Observe significant meals at point of service on each line
• Determine if meals contain components & quantities for age/grade group
• Ensure students have access to, and know how to select, reimbursable meal
Alternate Meal Service Locations

- Alternate meal service areas observed day of review or during review period: field trips, classroom, kiosks, buses, etc.
- If violations observed, check all other alternate meal sites
- OVS not required in alternate locations, but ≥ 2 milk varieties are required
- OVS may be waived for field trips, but menus must still meet daily and weekly component requirements
Menu Substitutions

• Must be recorded on Production Record
• “Alike” substitutions strongly encouraged
• Assess whether daily/weekly requirements are met
• Meals compliant if requirements met
Fiscal Action

• Missing Meal Components
• Repeat violations for
   Quantities
   Vegetable Subgroup
   Milk Type
   Whole-grain Rich
Fiscal Action: Repeat Violation

- Any repeated finding at the SFA level
- Any findings at a subsequent AR
- A repeat violation of any of the same meal component requirements or quantities
Questions?
Offer vs. Serve: Performance Standard 2

Administrative Review

- Critical Areas
- General Areas

Performance Standard 1

Performance Standard 2

Meal Components & Quantities

OVS
Offer vs. Serve (OVS)

- All components sufficiently offered
- Students select adequate components for reimbursable meal
Offer vs. Serve: Questions to ask…

- Is clear, easy to understand signage posted?
- Is the school offering enough food on all reimbursable meal service lines?
- Are students selecting components/items to make a reimbursable meal?
- Are staff at the POS taught to recognize a reimbursable meal?
Meal Signs

• Posted for breakfast and lunch near the beginning of the serving line
• Must be meal specific
• Aids students in identifying the reimbursable meal
• Clearly communicates options; tells items that may be selected for the meal
Meal Service Observation

Reviewer will determine:

• if meals selected by students contain minimum of 3 food *components* (NSLP) or *food items* (SBP)

• if each reimbursable breakfast or lunch contains at least ½ cup fruit or vegetable

• if CN staff understand OVS and can accurately judge quantities on the tray

• if students understand OVS and are aware of all options
## Food Component or Food Item?

<table>
<thead>
<tr>
<th>Food Component</th>
<th>Food Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>One of five food groups for reimbursable meals</td>
<td>A specific food offered within the five food components</td>
</tr>
<tr>
<td>- Milk</td>
<td>- Chocolate Skim Milk</td>
</tr>
<tr>
<td>- Meats/meat alternates</td>
<td>- Beef Patty</td>
</tr>
<tr>
<td>- Grains</td>
<td>- WGR roll</td>
</tr>
<tr>
<td>- Vegetables</td>
<td>- Carrots</td>
</tr>
<tr>
<td>- Fruits</td>
<td>- Banana</td>
</tr>
</tbody>
</table>
OVS at Lunch: Offer 5 components

1. Milk
2. Meats/Meat Alternates
3. Grain
4. Fruit
5. Vegetable
OVS at Lunch

• Students are allowed to decline 2 of the 5 required food components
• Students must select at least ½ cup of either a fruit or vegetable
• Other selections must be of minimum amounts required by the meal pattern
OVS: Lunch K-8 Example

- Steak, roll and milk ≠ reimbursable lunch
- Reimbursable → must take ½ c. mashed potatoes OR ½ cup green beans OR ½ cup Peaches AND two additional selections in the full component amount required by the meal pattern.
OVS: Lunch 9-12 Example

- Steak, roll and milk ≠ reimbursable lunch
- Reimbursable → must take ½ c. mashed potatoes OR ½ cup green beans OR ½ cup Peaches OR Banana AND two additional selections in the full component amount required by the meal pattern.
OVS at Breakfast

• Must offer 4 food items if using OVS
  – Milk
  – Fruit/Vegetable/Juice
  – Grain
  – Additional item (i.e. Grain, Fruit, M/MA as substitute for grain)
OVS at Breakfast

- OVS is optional at breakfast
- 4 food items for OVS versus 3 components for non-OVS
- Students may decline 1 item at breakfast
- Students must select $\frac{1}{2}$ cup fruit component
OVS at Alternate Locations

- Alternate Meal Service Locations
  - May waive OVS at lunch
  - Must meet meal pattern
  - Milk choices must be offered
OVS Fiscal Action

• Missing Meal Components on tray at POS (including no fruit/vegetable at lunch)
  ➢ Fiscal action required

• Insufficient fruit/vegetable quantity on tray at lunch is considered incomplete meal
  ➢ Fiscal action may occur for repeat violations

• Corrective Action required
Reimbursable or Not Reimbursable?

That is the Question
Questions to ask at POS

1. Did the student select at least ½ cup fruit or vegetable?
2. Did the student select at least 2 additional meal components that meet at least the minimum amount required by the meal pattern for the grade group at lunch or 2 additional items as designated by the menu planner at breakfast?
Beef Patty (2 oz eq)
Bun (2 oz eq)
Milk (1 cup)

NOT Reimbursable:
No Fruit or Vegetable selected
Grades K-8

Broccoli (1/2 cup)

Whole-Grain Flatbread (2 oz.)

Mandarin Oranges (1/2 cup)

Reimbursable at K-5, 6-8, or K-8
Grades 9-12

Broccoli
(1/2 cup)

Whole-Grain Flatbread
(2 oz.)

Mandarin Oranges
(1/2 cup)

Not Reimbursable at 9-12
Pizza Slice
(2 oz eq M/MA and 2 oz eq Grain)

Milk
(1 cup)

NOT Reimbursable:
fruit or vegetable not selected
Toasted Cheese Sandwich
Cheese (2 oz eq)
Sandwich Bread (2 oz eq)
Tossed Salad, ½ cup portion (1/4 cup component contribution)

Not Reimbursable:
Does not contain ½ cup fruit or vegetable
Hamburger Steak
(2 oz eq)
Dinner Roll
(1 oz eq)
Apple
(1 cup)
Tossed Salad, 1 cup
(1/2 cup component)
Corn
(1/2 cup)
Milk
(1 cup)

Reimbursable
Cereal 
(1 oz eq)
Crackers 
(1 oz eq)
Milk 
(1 cup)

Not Reimbursable: 
No fruit or vegetable selected
Muffin (2oz eq) Counted as 2 items

Orange Wedges (1/2 cup)

Reimbursable: Fruit and 2 items selected
Biscuit
(2 oz eq)
Milk
(1 cup)
Sausage
(Extra)

Not Reimbursable:
No fruit or vegetable selected
Questions?