



Food and
Nutrition
Service

DATE: November 27,

MEMO CODE: 2015 SP 13-2016

Park Office
Center

SUBJECT: School Year 2015-2016 Coordinated Review Effort (CRE):
Procedures Manual, Forms and Instructions

3101 Park
Center Drive
Alexandria
VA 22302

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum provides guidance to State agencies conducting School Year (SY) 2015-2016 administrative reviews using the revised Coordinated Review Effort (CRE) procedures. For guidance on conducting certification for performance-based reimbursement, including certifications which may occur during the administrative review process, please refer to SP-54-2014, *Administrative Reviews and Certification for Performance-Based Reimbursement in SY 2014-2015*, dated July 11, 2014.

Attached to this memorandum are the *SY 2015-2016 CRE Procedures Manual* and updates to *CRE Forms and Instructions*. These documents are to be used for reviews of the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Please note that the reviewer will use two sets of CRE forms, one for each program (e.g., NSLP and SBP).

The *SY 2015-2016 CRE Procedures Manual* highlights the requirement for State agencies to use the *CRE Forms and Instructions* for the Critical Areas of Review as they are prescribed by the Food and Nutrition Service (FNS) to ensure uniformity in the review process. These forms must be used for all administrative and follow-up reviews of the NSLP and SBP conducted under the CRE. The *CRE Forms and Instructions* developed for the General Areas of Review are prototypes. State agencies may use their own administrative review forms for the General Areas as long as the forms include the scope of review defined in 7 CFR Part 210.18 and the provisions from the *Healthy, Hunger-Free Kids Act of 2010* (HHFKA).

A new section, *Professional Standards*, is included in the General Areas of Review, Section G-7, to assess compliance with the new Professional Standards regulations. State agencies are required to ensure that School Food Authorities (SFA) are in compliance with hiring standards for new school nutrition program directors hired on or after July 1, 2015 at the SFA level and that the annual training standards for all school nutrition program directors, managers, and staff are in line with the

requirements established in 7 CFR 210.30. No fiscal action will be associated with noncompliance; however, State agencies must provide technical assistance to support schools in meeting hiring and training requirements.

For State agencies using the CRE procedures during SY 2015-2016, the review must include the following:

- **Performance Standard 1 (PS1) and General Areas:** State agencies should use the attached *CRE Forms and Instructions* for PS1 and General Areas as the forms and instructions have been updated to reflect current regulations and policy guidance implemented as a result of the HHFKA.
- **Performance Standard 2 (PS2):** The reviewer must observe the meal service for selected schools for both NSLP and SBP, as applicable, and examine menu records using the:
 - FNS Certification Tool (or an FNS-approved certification tool) for conducting certification for performance-based reimbursement;
 - Written menu (s);
 - Production records;
 - Weighted nutrient analysis; and
 - Other supporting documentation for one school week to determine compliance with the daily/weekly meal pattern requirements including:
 - Meal components (e.g., all grains must be whole grain-rich products);
 - Milk types;
 - Vegetable subgroups;
 - Food quantities; and
 - Dietary specifications (e.g., calories, sodium, saturated fat, and *trans fat*).
- **School Breakfast Program (SBP) Review:** For SY 2015-2016, FNS will continue to allow State agencies to adopt the new administrative review procedures for conducting SBP reviews as follows:
 - State agencies must review the SBP at 50 percent of the schools that are selected for a NSLP review, with a minimum of one (1) school receiving a SBP review.

- For example, if ten schools are selected for a NSLP review and all ten schools operate SBP, then five schools are required to be reviewed. If SBP is only in operation in five schools, then three would be required (round up).
- If none of the schools selected for review operates SBP and the review sample was obtained using the required selection criteria exclusively then the State agency must select an additional school (SBP site, a minimum of one) to review. For this school, only the SBP will be reviewed; no reviews of additional programs are required.
- If additional criteria were used to obtain the required review sample size, then the State agency has discretion to select an additional SBP school or replace one of the non-SBP schools with a school that operates SBP.

Please refer to the *CRE Procedures Manual Section 2.1 Pre-Review Procedures*.

- **Weighted Nutrient Analysis:** The weighted nutrient analysis of meals must be conducted for one school week for each age/grade group (kindergarten and above) of one selected school to determine if the meals meet the dietary specifications (calories and saturated fat) in both NSLP and SBP. For trans fat, product specifications, labels, etc. must be used to determine compliance with this requirement. The sodium requirement for meals offered during the week must, on average, meet the sodium targets (varies by grade) as specified in 7 CFR 210.10 (f)(3). Technical assistance should be provided, as necessary, to meet future sodium targets.

The following areas must also be reviewed during administrative reviews conducted in SY 2015-2016, if applicable:

- **Fresh Fruit and Vegetable Program (FFVP):** State agencies should follow the existing FFVP review requirements detailed in the FFVP Handbook for schools. If the State agency has adapted the *CRE Forms and Instructions* to include a FFVP review, FNS expects a review of this program to be conducted with the SY 2015-2016 administrative review.
- **Seamless Summer Option (SSO):** For SY 2015-2016, State agencies should follow the guidance in SP 37-2015, *Q&As for the National School Lunch Program's Seamless Summer Option*, dated May 22, 2015.

Review Procedures for Schools using Provisions 2, Provision 3, and the Community Eligibility Provision (CEP)

The *CRE Forms and Instructions* for review of schools operating under Provisions 2 and 3 are attached to this memorandum. For guidance on reviewing schools operating under CEP, please refer to SP-45-2015, “Community Eligibility Provision: Guidance and Updated Q&As.” It is important to note that the relevant guidance in SP 45-2015 refers to the “Administrative Review” process, though this guidance applies equally for reviews conducted under the CRE.

Civil Rights Nondiscrimination Statement

For any documents published after December 31, 2015 the following non-discrimination guidance must be followed. For details regarding dates please see:
<http://www.fns.usda.gov/fns-nondiscrimination-statement> .

For all FNS nutrition assistance programs other than SNAP and FDPIR, State or local agencies, and their subrecipients, must post the following Nondiscrimination Statement (all wording within quotation marks):

“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, etc.), 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 USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at 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:

Regional Directors
State Directors
Page 5

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or
(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider”

Procurement Review

State agencies are reminded that while the review of procurement practices is required, given the complexity of the procurement process and the need for ongoing technical assistance in procurement State agencies have the discretion to incorporate this review as an addition to the CRE process or through a separate review process. State agencies must address compliance with procurement requirements in 7 CFR Parts 210.21, 3016.36 and 3019.40-48, as applicable, and OMB Circulars, or 2 CFR Part 200, if already adopted. FNS is working to develop a Local Agency Procurement Review Tool for State agencies to aid in this monitoring. This tool will be tested and training will be conducted in SY 2015-2016 for implementation by State agencies in SY 2016-2017, if adopted.

Changes to CRE Systems

FNS is not requiring State agencies to amend existing electronic CRE systems for SY 2015-2016. However, State agencies must ensure that the updated *CRE Forms and Instructions* are included as part of the review of SFAs.

Please review this manual carefully. All updates within the *CRE Procedures Manual and Forms and Instructions* are highlighted for your review. State agencies should direct any questions concerning this memorandum to the appropriate FNS Regional Office.

Sincerely,



Sarah Smith-Holmes
Division Director
Program Monitoring and Operational Support

Attachments