Preparing for An Administrative Review in the SSO (SY 21-22)

Marianna Chauvin
Division Director II
This Presentation will Cover…

- Administrative Review Basics and Statutory Authority (PR briefly mentioned)
- Compiling Required Documentation
- Common Findings
- Self Assessment (to set you up for success!)
AR Basics and Statutory Authority

Procurement Reviews briefly mentioned
AR Basics

- SA will be conducting ARs
- SFAs will be notified in advance
- This will be a “Hybrid” Review
  - Majority conducted off-site through desk review
  - SA will conduct in-person site reviews which will be scheduled in advance
  - Entrance and Exit conferences with your superintendent or his/her designee will all be virtual and will be scheduled in advance
PR Basics

• SA will be conducting PRs
• SFAs will be notified in advance
• Reviews will be conducted entirely off-site in a desk review format.
• If you have both a Procurement Review and an Administrative Review, they will be conducted at the same time.
  • Note: You may have a different person conducting your AR and your PR, but it will be done at the same time.
Separate Review Processes

<table>
<thead>
<tr>
<th>Procurement Reviews</th>
<th>Office of Healthy Schools Monitoring Instrument</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Conducted by OCN, Office of School Support</td>
<td>• Conducted by OCN, Office of Healthy Schools</td>
</tr>
<tr>
<td>• 6-Year Cycle (different from 3-year AR cycle)</td>
<td>• May be conducted concurrently with AR of NSLP/SBP/SSO</td>
</tr>
<tr>
<td>• For more info or TA, contact Deborah Newton (<a href="mailto:dnewton@mdek12.org">dnewton@mdek12.org</a>)</td>
<td>• For more info or TA, contact the Louis King (<a href="mailto:lking@mdek12.org">lking@mdek12.org</a>)</td>
</tr>
</tbody>
</table>
Statutory Authority for Administrative Reviews (AR)

- Healthy Hunger-Free Kids Act of 2010 (HHFKA)

- The Act also requires an accountability system that conducts Administrative Reviews to evaluate Program requirements for NSLP and SBP and SSO during a 3-year cycle.
  
  - USDA has confirmed that an AR conducted during SY 21-22 of SFAs implementing the SSO program will count toward the 3-year cycle.
Federal Regulations

• 7 CFR 210.18 (NSLP)
• 7 CFR 220.13 (f) (2) (SBP)
• FNS – 113-1 (Civil Rights)
State Regulations

- MDE Board Policies, Chapter 17 (Child Nutrition)
- MDE Board Policies, Chapter 38, Rule 11 (Healthy and Safe Schools Nutrition Standards)
- MSDH Food Safety Policies (FDA Food Code 2017)
Resources

Where to find additional resources

- AR Manual
- Eligibility Manual
- FFVP Manual
- OVS Manual
- USDA Policy Memos (Partner Web)

SSOs reviews can count toward your 3-year AR cycle

SA must review the following during an SSO AR:

- the same number of sites as required in the NSLP/SBP AR
- Nutrient analysis

SA is not required to review the following during an SSO AR:

- Meal Applications
- Verification
- Paid Lunch Equity
Scope of Administrative Review

- **Performance Standard 1**: Meal Access and Reimbursement
- **Performance Standard 2**: Meal Pattern and Nutritional Quality
- **General Areas of Review**
<table>
<thead>
<tr>
<th>Meal Access &amp; Reimbursement</th>
<th>Meal Pattern &amp; Nutritional Quality</th>
<th>Resource Management</th>
<th>General Program Compliance</th>
<th>Other Federal Program Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Meal Counting and Claiming</td>
<td>• Meal Components and Quantities</td>
<td>• Risk Assessment</td>
<td>• Civil Rights</td>
<td>• Afterschool Snacks</td>
</tr>
<tr>
<td>• Infant and Pre-K Meal Pattern</td>
<td>• Infant and Pre-K Meal Pattern</td>
<td>• Nonprofit School Food Service Account</td>
<td>• SFA On-Site Monitoring</td>
<td>• Fresh Fruit &amp; Vegetable Program</td>
</tr>
<tr>
<td>• Offer Versus Serve</td>
<td>• Offer Versus Serve</td>
<td>• Revenue from Non-Program Foods</td>
<td>• Local Wellness Policy</td>
<td>• Special Milk Program</td>
</tr>
<tr>
<td>• Dietary Specs &amp; Nutrient Analysis</td>
<td>• Dietary Specs &amp; Nutrient Analysis</td>
<td>• Indirect Costs</td>
<td>• Competitive Foods</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• USDA Foods</td>
<td>• Professional Standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Water Availability</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Food Safety, Storage, &amp; Buy American</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• SBP &amp; SFSP Outreach</td>
<td></td>
</tr>
</tbody>
</table>

**Critical Areas of Review:** Performance Standard 1 and Performance Standard 2
• If you have a Parent Pick Up Waiver, we will be checking to make sure you implement it properly
• If you have a Meal Pattern Waiver, we will be checking to make sure you implement it properly
  • Utilized only to the extent necessary?
  • For example, you may have a veg subgroup waiver for your meals served on a bus, but your reviewer will need to see you are serving all subgroups on your hot line for congregate feeding in the cafeteria!
• If you are doing Door-to-door Bus Deliveries, you MUST have a system in place to validate eligible children in the household.
Possibility of Fiscal Action

• Take Note of Findings that Can have a Monetary Penalty!
  • Performance Standard 1 (Meal Access and Reimbursement)
  • Performance Standard 2 (Meal Pattern and Nutritional Quality)
  • Repeat Findings in General Areas of Review
    • Findings or TA given to you on your last review which were not corrected can result in monetary penalties

• If fiscal action is assessed, funds may be recouped from future payments through a Claim Adjustment
**Technical Assistance (TA)**

- Corrective Action not required but suggested
- No Fiscal Action
- Not listed in Public Report
- Issued to improve program operations

**Finding**

- Requires Corrective Action
- Potential for Fiscal Action
- Listed in Public Report
- Issued to Correct Non-Compliance
Issuing TA or Findings

Whenever possible, the SA Review will issue TA instead of a finding. However, if this is a repeat issue of noncompliance, or TA was previously issued and no action was taken, it is automatically a Finding.

The SA Review will also, whenever possible, allow the SFA to perform an on-site correction in response to a finding. On-Site corrections will be noted in the Public Report.
You must Complete the Off-site Assessment in MARS *(this year we are aiming to have it completed in September. Please provide as much documentation as possible in MARS as part of off-site assessment)*

Your reviewer will use MARS to document all sections of the AR, including any TA or Findings issued

You must respond to corrective Action in MARS
What to expect over the course of the “Hybrid” SSO Review

1. Notification by SA
2. Completion of Off-Site Assessment in MARS
3. Follow up and communication from Lead Review
4. Virtual Entrance Conference
5. On-Site Review of Selected Sites (scheduled in advance)
6. Virtual Exit Conference
7. Findings or No Findings Letter
8. (if applicable) Corrective Action Plan
9. (if applicable) Closing Letter
10. Public report posted on SA website
General Timeline for Procurement Review, SY 21-22

What to expect over the course of the Virtual Review

1. Notification by SA
2. Submission of Documentation and Completion of Procurement Tool (excel file)
3. Follow up and communication from Lead Review, additional information will be requested at this time
4. SA Reviewer reviews all documents
5. Virtual Exit Conference (should coincide with AR)
6. Findings or No Findings Letter
7. (if applicable) Corrective Action Plan
8. (if applicable) Closing Letter
Compiling Required Documentation

A complete guide to getting all your documentation in order
General Documentation You Will Need

Organization and Preparation are key!

• Hint: If you really want your reviewer to be in a good mood, having everything extremely well organized and electronic documents clearly labeled!

• Before your AR, you should get a list of all the documentation you will need for the AR from your Lead Reviewer or Program Specialist.

• If you don’t get it, ask for it!

See Handout
# General Documentation You Will Need

## Document Checklist

<table>
<thead>
<tr>
<th>SEARLESS SUMMER OPTION PROGRAM DOCUMENTATION NEEDED AT TIME OF ADMINISTRATIVE REVIEW</th>
</tr>
</thead>
<tbody>
<tr>
<td>To aid in the review process, the following information should be provided to your State Agency (SA) Reviewer. All documentation must be uploaded in the appropriate sections in MARE. If you need help uploading documentation, please contact your assigned SA Reviewer.</td>
</tr>
<tr>
<td>- Non-Profit School Food Service Account General Ledger for the Prior SY</td>
</tr>
<tr>
<td>- Documentation of indirect costs charged to the Non-Profit School Food Service Account</td>
</tr>
<tr>
<td>- Copy of the district/schools calendar indicating the days on which lunch was served</td>
</tr>
<tr>
<td>- Data used in reconciling the Claim for Reimbursement for your designated review month (please check with your Lead Reviewer)</td>
</tr>
<tr>
<td>- Daily reconciliation sheets for your designated review month (please check with your Lead Reviewer)</td>
</tr>
<tr>
<td>- Complete documentation of the edit check (claims review) process for your designated review month</td>
</tr>
<tr>
<td>- Documentation of an online review conducted by the SFA and any conciliatory action taken by sites.</td>
</tr>
<tr>
<td>- Civil Rights files, including:</td>
</tr>
<tr>
<td>- A copy of the nondiscrimination statement used by the SFA</td>
</tr>
<tr>
<td>- Written procedure for receiving &amp; processing complaints alleging discrimination within SNAPs,</td>
</tr>
<tr>
<td>- Documentation of Civil Rights training for staff (agenda, sign-in sheets, topics covered, etc.)</td>
</tr>
<tr>
<td>- Public Release or general public announcement regarding the availability of programs</td>
</tr>
<tr>
<td>- Documentation of School Health Council (SHC) activity:</td>
</tr>
<tr>
<td>- Copy of most current Local School Wellness Policy (LSWP)</td>
</tr>
<tr>
<td>- List of SHC members, including titles</td>
</tr>
<tr>
<td>- Documentation verifying the SHC plans to meet three times per year (meeting minutes,</td>
</tr>
<tr>
<td>- agendas, and minutes sheets)</td>
</tr>
<tr>
<td>- Documentation of the most recent assessment to assist with the development of the LSWP (a Summary Report may be provided instead of the full report)</td>
</tr>
<tr>
<td>- Professional Standards documentation of yearly accrued training hours for each CN employee. This should include a professional standards tracking tool.</td>
</tr>
<tr>
<td>- Food Safety Documentation including District Wide HACCP plans and Site-Specific Temperature Logs for all relevant equipment and food.</td>
</tr>
<tr>
<td>- District Meal Charge Policies (If Applicable)</td>
</tr>
<tr>
<td>- Planned menus for the designated review month (please check with your Lead Reviewer)</td>
</tr>
<tr>
<td>- Production Records for specified sites and dates (please check with your Lead Reviewer)</td>
</tr>
<tr>
<td>- Copies of any recipes used from MS Recipes for Success (MRS) or any other similar MRS recipes</td>
</tr>
<tr>
<td>- Portrait of Nutrient Analysis, if available. (Using Nutridata, the SA will need a copy of any of the Weekly Certification Informations for the Targeted Review Week as well as the Base Menu Spreadsheet for the Targeted Review Week. The SA Lead Reviewer can provide instructions on which week to select)</td>
</tr>
<tr>
<td>- Complete nutrition information for any items served not from State Purchasing Program</td>
</tr>
<tr>
<td>Additional information may be requested as needed, if applicable.</td>
</tr>
<tr>
<td>- Fresh Fruit &amp; Vegetable Program</td>
</tr>
<tr>
<td>- After School Care Program</td>
</tr>
</tbody>
</table>

Revised 4/28/21

MEO/OSC
IMPORTANT NOTE!

DO NOT send any sensitive information (including student names, eligibility status, or other personally identifiable information) over email or upload this information in MARS!

We should be able to complete the review without this type of information, but if you think you have something we need to see that is sensitive in nature, contact your Lead Reviewer.
Conducting a Nutrient Analysis

• If you have an approved meal pattern waiver in place, your reviewer will take that into account.

• You will be held accountable for all portions of the Meal Pattern that have not been waived specifically by the SA in your Meal Pattern Waiver.

• Remember! You should only be utilizing meal pattern waivers to the extent that they are necessary!
Conducting a Nutrient Analysis

• The SA will need to validate the nutrient analysis of your menus as part of the AR
• If your District uses Nutrikids software, there are two reports the SA needs to see:
  1. **Base Menu Spreadsheet**
     (Week of the Targeted Review for Breakfast & Lunch for *all* age groups)
  2. **Weekly Certification Worksheet**
     (Week of the Targeted Review for Breakfast & Lunch for *all* age groups)
• If you have a different menu for your cafeteria and for your Grab Go or bus deliveries, we need to see both menus analyzed!
• Your Lead Reviewer or Program Specialist can provide you with instructions on how to pull reports correctly from Nutrikids prior to the AR.
• Note: having a specific type of Nutrient Analysis software is NOT necessary. However, we have used Nutrikids as an example because we know that many of our schools utilize this software.
## Example of a Base Menu Spreadsheet

**MS Department of Education**

**Planned Menu Spreadsheet**

**Weighted Values - Detailed**

**Page 3**

<table>
<thead>
<tr>
<th>Date: 04/05/2019</th>
<th>Lunch 9-12</th>
<th>Apr 1, 2019 thru Apr 5, 2019</th>
</tr>
</thead>
</table>

### Menu Items

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Portion Size</th>
<th>Plan Qty</th>
<th>Calories (kcal)</th>
<th>Sugars (g)</th>
<th>Carb (g)</th>
<th>S-Fat (g)</th>
<th>Tr-Fat (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicken &amp; Sausage Gumbo M8600</td>
<td>2/3 cup w/rice</td>
<td>400</td>
<td>244</td>
<td>1</td>
<td>26.7</td>
<td>0.07</td>
<td>0.00</td>
</tr>
<tr>
<td>Bacon Burger 2 oz Patty M8702</td>
<td>1 each</td>
<td>50</td>
<td>34</td>
<td>1</td>
<td>3.34</td>
<td>0.53</td>
<td>0.00</td>
</tr>
<tr>
<td>Chef Salad, M8900</td>
<td>1 salad</td>
<td>50</td>
<td>20</td>
<td>1</td>
<td>1.68</td>
<td>0.39</td>
<td>0.00</td>
</tr>
<tr>
<td>Baked Ranch Fries M1097</td>
<td>1/2 cup</td>
<td>170</td>
<td>44</td>
<td>0</td>
<td>7.25</td>
<td>0.18</td>
<td>0.00</td>
</tr>
<tr>
<td>Baked Beans M5918</td>
<td>1/2 cup</td>
<td>170</td>
<td>54</td>
<td>4</td>
<td>12.43</td>
<td>0.04</td>
<td>0.00</td>
</tr>
<tr>
<td>Tomato/Cucumber Salad M1134.3</td>
<td>1/2 cup</td>
<td>150</td>
<td>13</td>
<td>2</td>
<td>3.35</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Fresh Blueberries M1222</td>
<td>1/2 cup</td>
<td>170</td>
<td>18</td>
<td>0</td>
<td>4.47</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Fresh Apple MS1306</td>
<td>1 each</td>
<td>150</td>
<td>22</td>
<td>0</td>
<td>5.72</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>Cumbered 2 W3 M2123</td>
<td>1 piece</td>
<td>250</td>
<td>102</td>
<td>293</td>
<td>3</td>
<td>17.71</td>
<td>0.00</td>
</tr>
<tr>
<td>Milk, FF Choc 1/2 pt Br M1700</td>
<td>1/2 pint</td>
<td>150</td>
<td>36</td>
<td>7</td>
<td>6.6</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Milk, FF 6% Milk 1/2 pt Br M1700</td>
<td>1/2 pint</td>
<td>150</td>
<td>45</td>
<td>37</td>
<td>9</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Milk, LF White 1/2 pt Br M1700</td>
<td>1/2 pint</td>
<td>100</td>
<td>20</td>
<td>24</td>
<td>2</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

### Nutrient Guidelines

- **% of Calories**
  - Carbohydrates: 55.3%
  - Protein: 45.3%
  - Fat: 5.3%
  - Sodium: 0.5%

### Daily Average

- Weighted Average: 603 kcal
- Weighted Daily Average: 1420 kcal

### Error Messages (if any)

- **Calories**: 603 kcal
  - Missing: 5%
  - Overage: 10%

- **Sodium**: 1180 mg
  - Overage: 100%
  - Error Message: Correction Required - Sodium too High!
## Example of Weekly Certification Worksheet

### MS Department of Education
Weekly Certification Worksheet

**C - Lunch 9-12**

### 5 Day Week

<table>
<thead>
<tr>
<th></th>
<th>Mon 4/1/19</th>
<th>Tue 4/2/19</th>
<th>Wed 4/3/19</th>
<th>Thu 4/4/19</th>
<th>Fri 4/5/19</th>
<th>Weekly Total</th>
<th>Weekly Report</th>
<th>Weekly Report Check</th>
<th>Weekly Food Juice Limit Check (&lt;= half of total fruit)</th>
<th>Total Weekly Fruit</th>
<th>Total Weekly Fruit Juice</th>
<th>% of Total Weekly Fruit that is Juice</th>
<th>Weekly Report Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruit Minimum (cups)</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>5</td>
<td>Yes</td>
<td></td>
<td>5</td>
<td>0</td>
<td>0.00%</td>
<td>Yes</td>
</tr>
<tr>
<td>Vegetables Minimum (cups)</td>
<td>1.375</td>
<td>1.125</td>
<td>1.25</td>
<td>1.5</td>
<td>1</td>
<td>6.25</td>
<td>5</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Dark Green</td>
<td>0.5</td>
<td>0.5</td>
<td>0.25</td>
<td>0</td>
<td>0.5</td>
<td>1.75</td>
<td>0.5</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Red/Orange</td>
<td>0.25</td>
<td>0.75</td>
<td>1</td>
<td>0.5</td>
<td>0.375</td>
<td>2.875</td>
<td>1.25</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Légumes</td>
<td>0</td>
<td>0.5</td>
<td>0</td>
<td>0</td>
<td>0.5</td>
<td>0.5</td>
<td>0.5</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Starchy</td>
<td>0.5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.5</td>
<td>1</td>
<td>0.5</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-Other</td>
<td>0.625</td>
<td>0.625</td>
<td>0.625</td>
<td>1</td>
<td>0.625</td>
<td>3.625</td>
<td>0.75</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meat/Meat Alt: Minimum (oz eq)</td>
<td>2</td>
<td>2</td>
<td>2.25</td>
<td>2</td>
<td>2</td>
<td>10.25</td>
<td>10</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meal/Meat Alt: Maximum (oz eq)</td>
<td>2.5</td>
<td>3</td>
<td>2.75</td>
<td>2</td>
<td>4.25</td>
<td>14.5</td>
<td>12</td>
<td>OVER</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain: Minimum (oz eq)</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td>10</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain: Maximum (oz eq)</td>
<td>2.75</td>
<td>2.5</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>14.25</td>
<td>12</td>
<td>OVER</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain Based Dessert Total for all meals</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Whole Grain Rich Weekly Amount</td>
<td>Weekly Grains Total</td>
<td>34.25</td>
<td>Weekly Whole Grain Rich Total</td>
<td>35.25</td>
<td>% of Whole Grain Rich</td>
<td>103%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Milk: Minimum (cups)</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>15</td>
<td>5</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Variety: Skim/Fat-free unflavored, Skim/Fat-free flavored, Low-fat(1% or less) unflavored</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Low-fat(1% or less), flavored</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduced fat(2%) or whole, unflavored and flavored</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Conducting a Nutrient Analysis

• Make sure you have the most up to date version of MRS recipes!

• We still see a lot of MRS 2015 Recipes

• Make sure you are using the 2021 Recipes
  • Distribute the updated recipes to your Managers/Cooks
  • Use the 2021 recipes when running your reports in your Nutrient Analysis Software
Providing Financial Reports

- The SA will need to perform a Resource Management Review based on the results of your completed Risk Assessment (off-site assessment in MARS)

- You may be required to provide financial reports including:
  - General Ledger
  - FETS report for all fund codes used during the previous year (2110, 2121, 2131)

NOTE: you may need to get your business manager to provide you with these financial reports
Common Findings

During our Previous AR Cycle
Reviewed 37 Organizations (SFAs)

Identified 126 Total Findings

NOTE: several reviews cancelled due to COVID
Food Safety (storage) typically an area with most violations

2019-2020 AR Cycle

All Findings 2019-2020 AR Cycle
Self Assessment

Not required, but an effective tool to set yourself up for success!
Conducting a Self Assessment

• In order to prepare yourself and your staff for the best possible outcome with an AR, we suggest you conduct a self-assessment before MDE/OCN conducts the AR.
• The Self-Assessment is completely voluntary! It is only meant as a preparation tool.
• The following slides contain common errors/findings that are uncovered over the course of an AR. If you are able to identify and correct these errors before your review, you will decrease the number of findings and/or TA issued by the Reviewer.
District Level

Self Assessment
Did you have any findings on last AR? Have they been corrected?

Did you have any TA on last AR? Have all issues been corrected?
Is your **indirect cost** calculated correctly and applied evenly across all Federal Programs in your district?

Do you have an **excess balance** in the school food service account? (must have less than 3 months operating expenses)

Are you charging enough money for each “**extra sale**” item?

Have you had a **General Financial Audit** Recently? Were there any findings, and if so have all issues been corrected?

Have you analyzed **adult meal prices** to ensure you are charging enough? *(the SA will send a memo out every year)*
Civil Rights

District Level – Includes all Sites in the District

☑ Do you have the CORRECT non-discrimination statement on all letters and program materials?
  ☑ Do you have the LONG version on all eligibility letters?
  ☑ Is the font size at least the size of the body of the letter?

☑ Have you conducted staff training on civil rights?

☑ Have you conducted outreach to inform families of availability of CN programs (this year will be SSO) and are copies on file?

☑ Have you received any civil rights complaints?

☑ Is the AJFA poster prominently displayed where meals are served?
Wrong AJFA Poster

Incorrect Versions of the Poster
This menu has the wrong statement

<table>
<thead>
<tr>
<th>MONDAY</th>
<th>TUESDAY</th>
<th>WEDNESDAY</th>
<th>THURSDAY</th>
<th>FRIDAY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EVERY MEAL INCLUDES</strong>:</td>
<td><strong>THIS FACILITY IS AN EQUAL OPPORTUNITY EMPLOYER</strong></td>
<td></td>
<td></td>
<td>Cheese Pie Hot Dog Chef Salad Succotash WG Chips Milk/ Juice WG Rolls Fruit</td>
</tr>
<tr>
<td><strong>1/2 PINT MILK</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1/2 CUP 100% FRUIT JUICE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Baked Chicken</strong></td>
<td><strong>Chicken Spaghetti</strong></td>
<td><strong>OVEN FRIED CHICKEN</strong></td>
<td><strong>Baked Spaghetti</strong></td>
<td><strong>Chili Cheese</strong></td>
</tr>
<tr>
<td><strong>Cheese Grilled</strong></td>
<td><strong>Hamburger</strong></td>
<td><strong>Baked Ham</strong></td>
<td><strong>Chicken Nuggets</strong></td>
<td><strong>Cheese Quesadilla</strong></td>
</tr>
<tr>
<td><strong>Cheese Salad</strong></td>
<td><strong>Chef Salad</strong></td>
<td><strong>Chef Salad</strong></td>
<td><strong>Chef Salad</strong></td>
<td><strong>Baked Fries</strong></td>
</tr>
<tr>
<td><strong>Brown Rice/Gravy</strong></td>
<td><strong>Sautéd Squash</strong></td>
<td><strong>Black Eye Peas</strong></td>
<td><strong>Steamed Broccoli</strong></td>
<td><strong>Spinach Salad</strong></td>
</tr>
<tr>
<td><strong>Kidney Beans</strong></td>
<td><strong>Brown Sugar Carrots</strong></td>
<td><strong>Collard Greens</strong></td>
<td><strong>Mac &amp; Cheese</strong></td>
<td><strong>Milk/ Juice</strong></td>
</tr>
<tr>
<td><strong>Fruit Juice/Milk</strong></td>
<td><strong>Milk/ Juice</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>4</strong></td>
<td><strong>5</strong></td>
<td><strong>6</strong></td>
<td><strong>7</strong></td>
<td><strong>8</strong></td>
</tr>
<tr>
<td><strong>Crispy Chicken Sandwich</strong></td>
<td><strong>Enchilada Casserole</strong></td>
<td><strong>Baked Chicken Ham &amp; Swiss</strong></td>
<td></td>
<td><strong>Pepperoni Pizza</strong></td>
</tr>
<tr>
<td><strong>11</strong></td>
<td><strong>12</strong></td>
<td><strong>13</strong></td>
<td><strong>14</strong></td>
<td></td>
</tr>
</tbody>
</table>
On Site Monitoring

District Level – Includes all Sites in the District

- Have all sites been monitored by the SFA?
- Has the SFA used the SA-approved checklist for on-site monitoring?
Professional Development

District Level – Includes all Sites in the District

- Have all staff accrued the correct number of Hours?
  - 12 hours for CND
  - 10 hours for Managers
  - 6 hours for FT Staff / 4 hours for PT Staff

- Do you have an updated/current tracking tool for staff professional development?
  - Are all staff on one sheet, showing the total hours accrued for each person?
  - Does tracking tool have all USDA required elements: name/hire date/title/core duties/ FT or PT status

- Are Agendas, Sign-In Sheets, and Certificates of Completion maintained on file?
## Example of Professional Development Tracking Tool

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Site</th>
<th>Hire Date</th>
<th>Employee Position</th>
<th>Required Hours of Training</th>
<th>FT/PT</th>
<th>Avg. Hrs per week</th>
<th>Manager Recert</th>
<th>ICN Online Safety Training</th>
<th>Back to School Prof Dev</th>
<th>School Year Training Applied To</th>
<th>Completed Training Hours Year to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Helena Troy</td>
<td>Adm. Office</td>
<td>4/12/2018</td>
<td>Director</td>
<td>12</td>
<td>FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>2020-21</td>
<td>19</td>
</tr>
<tr>
<td>Jane Doe</td>
<td>High School</td>
<td>8/6/1997</td>
<td>Manager</td>
<td>10</td>
<td>FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>2020-21</td>
<td>19</td>
</tr>
<tr>
<td>Missy Sippy</td>
<td>High School</td>
<td>12/3/2012</td>
<td>Caf. Staff</td>
<td>6</td>
<td>FT</td>
<td>40</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>2020-21</td>
<td>11</td>
</tr>
<tr>
<td>John Deer*</td>
<td>High School</td>
<td>1/2/2022</td>
<td>Caf. Staff</td>
<td>6</td>
<td>PT</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td>2020-21</td>
<td>0</td>
</tr>
</tbody>
</table>

*PLEASE NOTE: John Deer is a newly hired employee who hasn’t received any training yet this SY. The SFA will have to submit a plan to the SA Reviewer for how he will receive training to reach his 6 required hours this SY.
Is the continued use of the approved waiver appropriate? (ex. If all sites 100% traditional learning, might not be appropriate)

If the District has an approved PPU Waiver, does the district have a procedure to verify the number of eligible children?

If the District has an approved Meal Pattern Waiver, is it implemented only in situations for which it was approved? (ex. Trying to use a veg subgroup waiver for hot meals served in the cafeteria, when it was only approved for bus deliveries)

If you are doing Door-to-door Bus Deliveries, you MUST have a system in place to validate eligible children in the household.
Record Keeping

District Level – Includes all Sites in the District

- Records maintained for 3 years plus the current year
  - Far back as the base year for CEP and Prov 2
Site Level

Self Assessment
Vending and Smart Snacks

Site Level – Includes all Sites selected by the SA for Review

- Are all items sold (vending/cafeteria/school store) smart snack compliant?
- Do you have documentation of smart snack compliance on file for each item sold?
- Are all of your vending machines locked or timed to prohibit purchases within an hour prior to meal service?
- Do any of your vending machines “advertise” non-compliant products such as high calorie soft-drinks? (this is not allowable)
Snack sold is NOT Smart Snack Compliant

Tip: Use the Smart Snack Calculator from the Alliance for a Healthier Generation

Nutrition Facts
Serving Size 1/2 cup (101g)
Servings Per Container 4

<table>
<thead>
<tr>
<th>Amount Per Serving</th>
<th>Calories from Fat % Daily Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calories 260</td>
<td>Calories from Fat 130</td>
</tr>
<tr>
<td>% Daily Value</td>
<td></td>
</tr>
<tr>
<td>Total Fat 15g</td>
<td>23%</td>
</tr>
<tr>
<td>Saturated Fat 9g</td>
<td>44%</td>
</tr>
<tr>
<td>Trans Fat 0g</td>
<td></td>
</tr>
<tr>
<td>Cholesterol 50mg</td>
<td>20%</td>
</tr>
<tr>
<td>Sodium 80mg</td>
<td>3%</td>
</tr>
<tr>
<td>Total Carbohydrate 28g</td>
<td>9%</td>
</tr>
<tr>
<td>Dietary Fiber 1g</td>
<td>3%</td>
</tr>
<tr>
<td>Sugars 23g</td>
<td></td>
</tr>
<tr>
<td>Protein 4g</td>
<td></td>
</tr>
</tbody>
</table>

*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.

Your product is NOT compliant.

Your non-beverage dairy product does not meet the following nutrient standards:

- Calories exceed 200.
- Calories from total fat exceed 35%.
- Calories from saturated fat are not less than 10%.
- Sodium exceeds 200 mg.

Brand: Ben & Jerry’s
Product: Dublin mudslide

Browse products that meet the Smart Snacks in School Standards.

Confused by this result? Contact us for more information.

The person or group responsible for the point of sale to students on campus should verify a product’s
Food Prep

Site Level – Includes all Sites selected by the SA for Review

- Recipes out and referenced?
- Hands washed?
- Hairnets/beard-nets on?
Site Level – Includes all Sites selected by the SA for Review

- Are 2 Most recent food inspections available to Reviewer
  - 2 Per Year or documentation of request to MSDH
- Equipment Works Properly
  - functioning coolers/warmers,
  - no ice build up in freezer
- HACCP manual on site and being followed?
- Are temperature logs maintained and available for review?
  - Freezers
  - Coolers (don’t forget milk coolers!)
  - Dry Storage
  - Prepped Food

Remember that Food Safety is our most common finding!
Is FIFO implemented properly (rotating stock)
Are you over-stocked on products, especially Commodity Products?
Are all food products correctly dated (visible, all 3 dates)?
Are chemicals stored separately from food?

NOTE: Food Storage is considered part of Food Safety.

Remember that Food Safety is our most common finding!
Significant Ice Build Up in the Freezer
FIFO not Implemented

No Visible Dates
Components and Quantities

Site Level – Includes all Sites selected by the SA for Review

- Proper size serving spoon/ladle/instrument used?
- All five components offered on each line?
- Each component available in the proper quantity according to Meal Pattern? (ex: need a full cup of fruit at HS level)
- Is denial of food used as a punishment? All students should have equal access to meals.

Remember that this section was our second most common finding!
Production Records

Site Level – Includes all Sites selected by the SA for Review

- Are production records maintained at each site?
- Do production records document all meals claimed?
- Are production records reviewed regularly by the CND?
- Are managers correctly documenting components and quantities?
- Are managers serving the PLANNED menu?
Offer Versus Serve (OVS)

Site Level – Includes all Sites selected by the SA for Review

- Is implementation of OVS appropriate to the service or meal distribution strategy?
- While it is not required during the 21-22 SY for HS to implement OVS, are they doing so whenever possible?
- Are any non-reimbursable meals getting past the POS?
- Does cashier understand what constitutes a reimbursable meal and can he/she verbalize that to the Reviewer?
- Is there OVS signage posted at each serving line?
- Are serving staff at OVS sites pre-plating all items on trays as students move through the line? (not allowed!)
Improper Implementation of OVS

Non-Reimbursable Lunch Tray
Improper Implementation of OVS

Lunch tray is NOT reimbursable at the HS level, but would be ok for Elementary
Dietary Specs & Nutrient Analysis

Site Level – Includes all Sites selected by the SA for Review

- (if applicable) Are you following what is in your meal pattern waiver? Is your waiver even applicable to this serving method?
- Are your calories and saturated fat on target for the Review Week?
- Are you including all menu items in your nutrient analysis? (don’t forget your condiments!)
- When conducting a nutrient analysis using nutrient analysis software, have you correctly entered planned/prepared quantities of each food item to give you correct weighted values? (example: are you really only serving 100 hamburgers? Check your production books!)
- Are your cafeteria managers/sites producing and serving the PLANNED menu?
Not in compliance with Meal Pattern

May have a waiver for sodium, but calories are too low!
After School Care Program (ASCP)

Site Level – Includes all Sites selected by the SA for Review

- AJFA poster at point of service delivery? *(may need to be in the classroom or on a cart)*
- Are educational or enrichment activities offered directly before/during/after the distribution of snacks?
- Is a system in place to provide ACCURATE meal counts?
- Do you have a system in place to safely store food products? *(for example, you don’t want milk sitting outside of a cooler for too long)*
Are you purchasing only allowable products?
- Remember that dips for fruits are not allowable
- Remember that dips for veggies have to be no/low fat

Have you limited your administrative costs for the program?

Are you serving only to elementary students?
- Remember that teachers who pass out fruit/vegetables are allowed to partake so as to model positive eating habits
## FFVP Unallowable Cost

Cannot purchase any type of dip for fruits

<table>
<thead>
<tr>
<th>Item I.D./Desc.</th>
<th>Ordered</th>
<th>Shipped</th>
<th>Unit</th>
<th>Price</th>
<th>Net</th>
<th>TX</th>
</tr>
</thead>
<tbody>
<tr>
<td>PINEAPPLE CHUNKS 5</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>39.50</td>
<td>158.00</td>
<td>E</td>
</tr>
<tr>
<td>CANTALOPE CHUNKS</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>36.50</td>
<td>146.00</td>
<td>E</td>
</tr>
<tr>
<td>GRAPE GIGGLES 50'S</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>28.90</td>
<td>115.60</td>
<td>E</td>
</tr>
<tr>
<td>APPLE W/ CARAMEL 50</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>42.50</td>
<td>170.00</td>
<td>E</td>
</tr>
<tr>
<td>BANANAS, CASE</td>
<td>2.00</td>
<td>2.00</td>
<td>EACH</td>
<td>22.90</td>
<td>45.80</td>
<td>E</td>
</tr>
<tr>
<td>TANGERINE 100'S</td>
<td>2.00</td>
<td>2.00</td>
<td>EACH</td>
<td>36.90</td>
<td>73.80</td>
<td>E</td>
</tr>
<tr>
<td>HONEYDEW CHUNKS 50</td>
<td>5.00</td>
<td>5.00</td>
<td>EACH</td>
<td>37.99</td>
<td>189.95</td>
<td>E</td>
</tr>
</tbody>
</table>
This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:

Questions?
Marianna Chauvin
Division Director II
mchauvin@mdek12.org
Handouts that Should Accompany this Presentation

• AR Document Checklist

• Instructions on Pulling Reports from Nutrikids
  
  *note – you may use a different type of Nutrient Analysis Software*

• Simplified version of self-assessment