

Preparing for An Administrative Review

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MISSISSIPPI
DEPARTMENT OF
EDUCATION

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Administrative Review Basics and Statutory Authority

Compiling Required Documentation

Common Findings

Self Assessment (to set you up for success!)

- Biloxi
- Carroll
- Itawamba
- Jefferson Davis
- Kemper Co
- Lamar Co
- Leland
- Ms Schools for the Blind/Deaf
- North Bolivar
- North Tippah
- Noxubee
- Quitman
- Ron's Brothers
- Tunica
- West Bolivar
- Wilkinson Co Christian Academy

AR Basics and Statutory Authority

What we are doing and Why we are doing it

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 (sensitive info and meal observations ONLY)
 - Entrance and Exit conferences with your superintendent or his/her designee will all be virtual and will be scheduled in advance



Procurement Reviews

- Conducted by OCN, Office of School Support
- 6-Year Cycle (different from 3-year AR cycle)
- For more info or TA, contact Deborah Newton (dnewton@mdek12.org)

Office of Healthy Schools Monitoring Instrument

- Conducted by OCN, Office of Healthy Schools
- May be conducted concurrently with AR of NSLP/SBP
- For more info or TA, contact the Louis King (lking@mdek12.org)



- 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 during a 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)



Where to find additional resources

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

<https://www.fns.usda.gov/nsip/administrative-review-guidance-and-tools>



Performance Standard 1: Meal Access and Reimbursement

Performance Standard 2: Meal Pattern and Nutritional Quality

General Areas of Review

Meal Access & Reimbursement	Meal Pattern & Nutritional Quality	Resource Management	General Program Compliance	Other Federal Program Reviews
<ul style="list-style-type: none"> Meal Counting and Claiming Verification Certification and Benefit Issuance 	<ul style="list-style-type: none"> Meal Components and Quantities Infant and Pre-K Meal Pattern Offer Versus Serve Dietary Specs & Nutrient Analysis 	<ul style="list-style-type: none"> Risk Assessment Nonprofit School Food Service Account Revenue from Non-Program Foods Indirect Costs USDA Foods 	<ul style="list-style-type: none"> Civil Rights SFA On-Site Monitoring Local Wellness Policy Competitive Foods Professional Standards Water Availability Food Safety, Storage, & Buy American SBP & SFSP Outreach 	<ul style="list-style-type: none"> Afterschool Snacks Fresh Fruit & Vegetable Program Special Milk Program

Critical Areas of Review: Performance Standard 1 and Performance Standard 2

- **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
- Failure to take corrective action can result in withholding payments

Technical Assistance (TA)

- Requires informal Corrective Action Plan
- No Fiscal Action
- Not listed in Public Report
- Issued to improve program operations

Finding

- Requires documented Corrective Action
- Potential for Fiscal Action
- Listed in Public Report
- Issued to Correct Non-Compliance



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 by **October 31st**. 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” Review

1. Notification by SA – Participation in Webinar
2. Completion of Off-Site Assessment in MARS (Due Oct 31st)
3. Confirmation Letter from SA (sent approximately a month prior to on site)
4. Follow up and communication from Lead Review
5. Virtual Entrance Conference
6. On-Site Review of Selected Sites (scheduled in advance)
7. Virtual Exit Conference
8. Findings or No Findings Letter
9. (if applicable) Corrective Action Plan
10. (if applicable) Closing Letter
11. Public report posted on SA website



Compiling Required Documentation

A complete guide to getting all your documentation in order

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



**NATIONAL SCHOOL LUNCH/SCHOOL BREAKFAST PROGRAM
DOCUMENTATION NEEDED AT TIME OF ADMINISTRATIVE REVIEW**

To aid in the review process, the following information should be provided to your State Agency (SA) Reviewer electronically. All documentation must be uploaded in the appropriate sections in MARS or emailed to your SA Reviewer. If you need help assistance uploading documentation, please contact your assigned SA Reviewer.

- Non-Profit School Food Service Account General Ledger for the Prior SY
- Documentation of Indirect Costs charged to the Non-Profit School Food Service Account
- Copy of the district/school(s) calendar indicating the days on which lunch was served
- Complete documentation of the edit check (claims review) process for your designated review month
- Documentation of on-site review(s) conducted by the SFA and any corrective action taken by sites.
- Documentation of on-site review(s) used by the SFA
- Civil Rights data, including:
 - o A copy of the nondiscrimination statement used by the SFA
 - o Written procedure for receiving & processing complaints alleging discrimination within school meals programs
 - o Documentation of Civil Rights training for staff (agendas, sign-in sheets, topics covered, etc.)
 - o Public Release or general public announcement regarding the availability CN programs
- Documentation of School Health Council (SHC) activity:
 - o Copy of most current Local School Wellness Policy (LSWP)
 - o List of SHC members, including titles
 - o Documentation verifying the SHC plans to meet three times per year (meeting minutes, agendas, and sign-in sheets)
 - o 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)
- Professional Standards documentation including District Wide HACCP plans
- Food Safety Documentation including District Meal Charge Policies (If Applicable)
- District Meal Charge Policies (If Applicable)
- Documentation of on-site review(s) conducted by the SFA and any corrective action taken by sites.
- Planned menus for the month of review
- Production Records for specified sites and dates
- Copies of any recipes used not from MS Recipes for Success (MRS) or any modified MRS recipes
- Printout of Nutrient Analysis, if available. (If using Nutrient Analysis Software, the SA will need a copy of the Weekly Certification Worksheet 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)
- Complete nutrition information for any items served not from Statewide Purchasing Program

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Additional information may be requested as needed, if applicable.

- Fresh Fruit & Vegetable Program
- After School Care Program

MDE/OCN

Revised 9/2022

The following information is sensitive and will be reviewed while the SA is on site. Compile and organize this information so that it can be reviewed while the SA is on site. Make no attempt to send this data electronically (via email or MARS) to the SA.

- Documentation to Validate Eligibility for Free/Reduced Priced Meals
 - o For Pricing Schools:
 - A statistically valid random sample of Free & Reduced price meal applications as specified by your Lead Reviewer (please follow SA guidance on pulling a random sample). In SFAs with 100 students or less, all applications will be reviewed.
 - On-line (from the central office) Master Roster for the review period.
 - Complete Direct Certification documentation, including a copy of the Direct Certification Notification letter used by the SFA.
 - o For CEP & Special Provision II Schools: Documentation from your BASE Year to validate your claiming percentages.
- Complete Verification documentation (For Pricing and Special Provision II Base Year Schools) including copies of letters/correspondence sent to families during the Verification Process.

MDE/OCN

Revised 9/2022



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

IF APPLICABLE – What the SA will Need

- **Randomized Sample List of Free and Reduced (NO PAID)**
 - List of pulled students using specific, randomized interval. Can get interval from Lead Reviewer
 - Make sure you have pulled a large enough sample!
- **Alphabetized stack of student applications**
 - corresponding with list of students pulled in randomized sample of free/red
- **Alphabetized DC list**
 - all school sites on one list, if possible
- **10 paid/denied applications**
 - separate from Free/Red

See Handout for instructions and Examples!



Step 1: Put names of all free/red students in alphabetical order

Step 2: Make sure no paid students are in your list

Step 3: Obtain a starting point and a randomized interval **from your lead reviewer**

Step 4: Locate Your starting point and highlight the name

Step 5: Count down the randomized interval and highlight the name

Step 6: Repeat until you have highlighted (pulled) enough students for the sample. Make sure you pull enough!

Pulling a Random Sample

LAST	FIRST	CATEGORY
Baggins	Frodo	Free
Brady	Tom	Reduced
Brees	Drew	Reduced
Bunny	Easter	Categorically Eligible (Direct Certification)
Christ	Jesus	Free
Clause	Santa	Free
Doe	Jane	Categorically Eligible (SNAP)
Farve	Brett	Reduced
Goose	Mother	Free
Joe	Gl	Free
Johns	Papa	Categorically Eligible (SNAP)
Jones	Jimmy	Free
Longstocking	Pippy	Free
Nye	Bill	Free
Redenbacher	Orville	Reduced
Sippy	Missy	Categorically Eligible (Direct Certification)
Skywalker	Luke	Reduced
Smith	Joe	Free
Smith	John	Reduced
Spunkmeyer	Otis	Free
Suess	Doctor	Free
Tollhouse	Nestle	Reduced

- From this list of names, we have only pulled 6 names (representing 6 applications) that will be reviewed.
- In this example, the starting point was 5 and the randomized interval was 3, so we started on #5 and counted every 3rd person.
- You **MUST** get your randomized interval and starting point from your SA Lead Reviewer.

**Starting Point 5,
highlight the
fifth name**



LAST	FIRST	CATEGORY
Baggins	Frodo	Free
Brady	Tom	Reduced
Brees	Drew	Reduced
Bunny	Easter	Categorically Eligible (Direct Certification)
Christ	Jesus	Free
Clause	Santa	Free
Doe	Jane	Categorically Eligible (SNAP)
Farve	Brett	Reduced
Goose	Mother	Free
Joe	Gl	Free
Johns	Papa	Categorically Eligible (SNAP)
Jones	Jimmy	Free
Longstocking	Pippy	Free
Nye	Bill	Free
Redenbacher	Orville	Reduced
Sippy	Missy	Categorically Eligible (Direct Certification)
Skywalker	Luke	Reduced
Smith	Joe	Free
Smith	John	Reduced
Spunkmeyer	Otis	Free
Suess	Doctor	Free
Tollhouse	Nestle	Reduced

Random Interval 3: Count down every third name and highlight

LAST	FIRST	CATEGORY
Baggins	Frodo	Free
Brady	Tom	Reduced
Brees	Drew	Reduced
Bunny	Easter	Categorically Eligible (Direct Certification)
Christ	Jesus	Free
Clause	Santa	Free
Doe	Jane	Categorically Eligible (SNAP)
Farve	Brett	Reduced
Goose	Mother	Free
Joe	Gl	Free
Johns	Papa	Categorically Eligible (SNAP)
Jones	Jimmy	Free
Longstocking	Pippy	Free
Nye	Bill	Free
Redenbacher	Orville	Reduced
Sippy	Missy	Categorically Eligible (Direct Certification)
Skywalker	Luke	Reduced
Smith	Joe	Free
Smith	John	Reduced
Spunkmeyer	Otis	Free
Suess	Doctor	Free
Tollhouse	Nestle	Reduced



- We will analyze your planned menu
- If you experience shortages due to supply chain, we will take this into account, **IF** they are **WELL DOCUMENTED!**
- Substitutions must be reasonable!
- Watch those veg subgroup substitutions!

- The SA will need to validate the nutrient analysis of your menus as part of the AR
- If your District uses nutrient analysis 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)
- Your Lead Reviewer 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

Apr 1, 2019 thru Apr 5, 2019

Lunch 9-12

003 - ██████ Middle School

Generated on: 4/12/2019 3:55:53 PM

	Portion Size	Plan Qty	Cals (kcal)	Sodm (mg)	Sugars (g)	Carb (g)	S-Fat (g)	Tr-Fat' (g)
Fri - 04/05/2019								
Lunch 9-12	Total	500						
Chicken & Sausage Gumbo MS800	2/3 cup w/rice	400	244	539	*1	26.7	2.07	0.00
Bacon Burger 2 oz PattyMS702	1 each	50	34	68	1	3.34	0.53	0.00
Chef Salad, MS600	1 salad	50	20	119	1	1.68	0.39	0.00
Baked Ranch Fries MS1097	1/2 cup	170	44	154	0	7.25	0.18	0.00
Baked Beans MS918	1/2 cup	170	54	55	4	12.43	0.04	0.00
Tomato/Cucumbr SaladMS1134.3	1/2 cup	150	13	22	3	3.35	0.01	0.00
Fresh Blueberries MS1222	1/2 cup	170	18	0	3	4.47	0.01	0.00
Fresh Apple MS1206	1 each	150	22	0	4	5.72	0.01	0.00
Cornbread 2 WG MS1301	1 piece	250	102	293	3	17.71	0.91	0.00
Milk, FF Choc 1/2 pt.Br MS1700	1/2 pint	150	36	72	6	6.6	0.00	0.00
Milk, FFStrvbr, 1/2 pt.BrMS1702	1/2 pint	150	45	37	9	8.7	0.00	0.00
Milk, LF White 1/2 pt.BrMS1708	1/2 pint	100	20	24	2	2.2	0.30	0.00
Weighted Daily Average			651	1384	*38	100.16	4.44	0.00
% of Calories					*23.4%	61.5%	6.1%	0.0%
Nutrient Guideline			750-850	1420			<10.00	

Weighted Average			603	1180	*33	80.17	6.63	0.00
					*49.3%	53.2%	9.9%	0.0%

Nutrient	Menu AVG	% of Cals	Weekly Target	% of Target	Miss Data	Shortfall	Overage	Error Messages (if any)
Calories	603		750 - 850	80%		147		Correction Required - Calories are Low
Sodium 1 (mg)	1180		1420					
Sodium 2 (mg)	1180		1080				100	Correction Required - Sodium too High
Sugars (g)	33	21.91%			Missing			
Carbohydrate (g)	80.17	53.19%						
Saturated Fat (g)	6.63	9.89%	<10.00%					
Trans Fat' (g)	0.00	0.00%						

MS Department of Education															
Weekly Certification Worksheet															
C - Lunch 9-12															
5 Day Week	Mon 4/1/19	Tue 4/2/19	Wed 4/3/19	Thu 4/4/19	Fri 4/5/19			Weekly Total	Weekly Rqmt.	Weekly Rqmt. Check	Weekly Fruit Juice Limit Check (<= half of total fruit)	Total Weekly Fruit	Total Weekly Fruit Juice	% of Total Weekly Fruit that is Juice	Weekly Rqmt. Check
Fruit: Minimum (cups)	1	1	1	1	1			5	5	Yes		5	0	0.00%	Yes
Vegetables: Minimum (cups)	1.375	1.125	1.25	1.5	1			6.25	5	Yes	Weekly Vegetable Juice Limit Check (<= half of total Veg)	Total Weekly Veg.	Total Weekly Veg. Juice	% of Total Weekly Veg. that is Juice	Weekly Rqmt. Check
-Dark Green	0.5	0.5	0.25	0	0.5			1.75	0.5	Yes					
-Red/Orange	0.25	0.75	1	0.5	0.375			2.875	1.25	Yes					
-Legumes	0	0.5	0	0	0			0.5	0.5	Yes					
-Starchy	0.5	0	0	0	0.5			1	0.5	Yes					
-Other	0.625	0.625	0.625	1	0.625			3.5	0.75	Yes					
Meat/Meat Alt: Minimum (oz eq)												10.25	10	Yes	
Meat/Meat Alt: Maximum (oz eq)												14.5	12	OVER	
Grain: Minimum (oz eq)												10	10	Yes	
Grain: Maximum (oz eq)												14.25	12	OVER	
Grain Based Dessert Total for all weekly meals												0	No more than 2 oz	Yes	
Whole Grain Rich Weekly Amount	Weekly Grains Total	34.25	Weekly Whole Grain Rich Total	35.25	% of Whole Grain Rich	103%			100% whole grain rich	Yes					
	Mon 4/1/19	Tue 4/2/19	Wed 4/3/19	Thu 4/4/19	Fri 4/5/19			Weekly Total	Weekly Rqmt.	Weekly Rqmt. Check					
Milk: Minimum (cups)	3	3	3	3	3			15	5	Yes					
Variety: Skim/Fat-free unflavored, Skim/fat-free flavored, Low-fat(1% or less) unflavored	Yes	Yes	Yes	Yes	Yes										
Low-fat(1% or less), flavored															
Reduced fat(2%) or whole, unflavored and flavored															

- 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 or 2022 Recipes
 - Distribute the updated recipes to your Managers/Cooks
 - Use the 2021/2022 recipes when running your reports in your Nutrient Analysis Software





- 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
 - Indirect cost documentation

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

Common Findings

During our Previous AR Cycle

SA conducted reviews

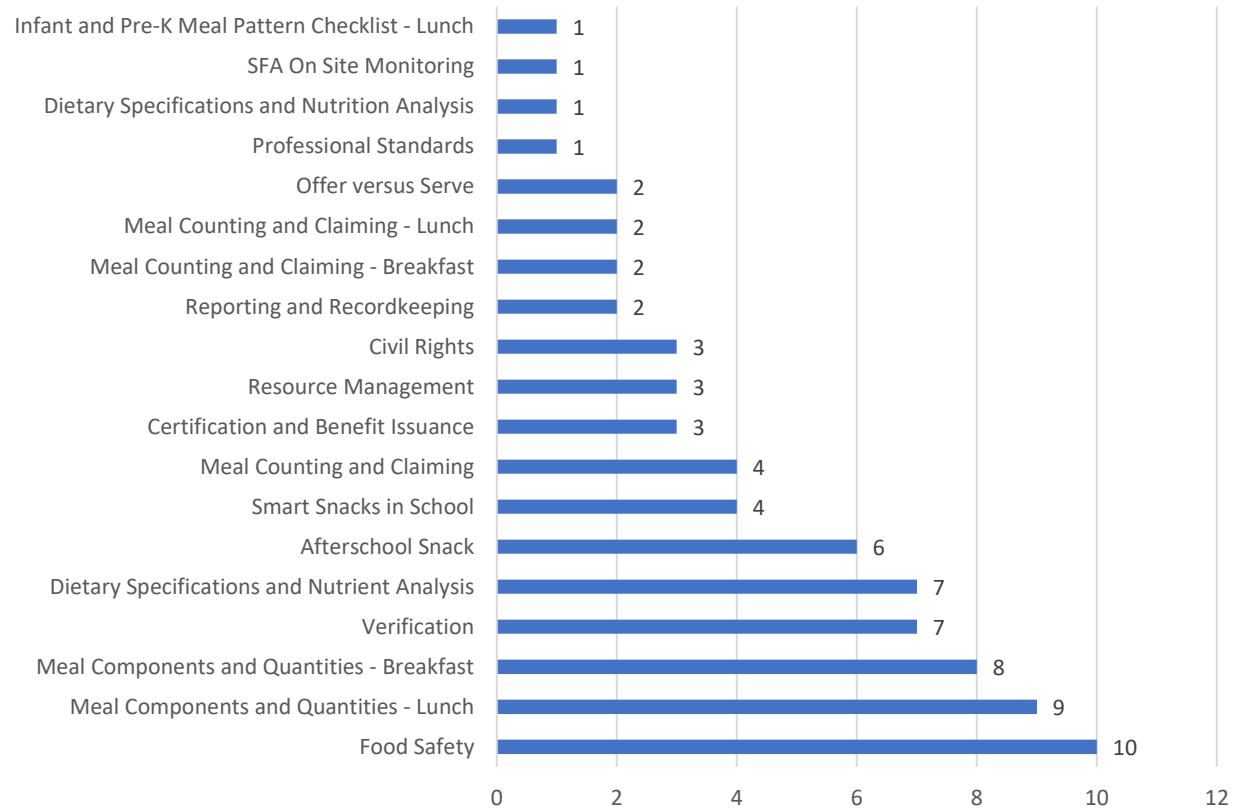


Reviewed **21** Organizations (SFAs)

Identified **78** Total Findings

Food Safety (storage) typically area with most violations, Followed closely by Meal Components and Quantities

Violations Identified – SY 22/23



Self Assessment

Not required, but an effective tool to set yourself up for success!



- 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.



Self – Assessment: Preparing for an AR

District Level

Certification and Benefit Issuance

- Have all meal applications been processed correctly using current IEGs?
- Have all families been notified of eligibility status in a timely manner?
- Have you conducted verification of an appropriate sample size and maintained documentation?

Meal Counting and Claiming

- Do you conduct monthly edit checks prior to filing your claim?
- Are your claims accurate? (for example – do you complete a second party check)
- Are your claims submitted on time?

Prior Administrative Reviews

- 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?

Resource Management

- Is your indirect cost 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?
- Are you charging enough Financial Audit Recently? Were there any findings, and if so have all issues been corrected?
- Have you completed the PLE Tool or Submitted a Request for a Waiver?
- Have you analyzed adult meal prices to ensure you are charging enough? (see SA Memo)

Civil Rights

- 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 (SEP/SFSP/Prov 2 or CEP) and are copies on file?
- Have you received any civil rights complaints?
- Is the AJFA poster prominently displayed where meals are served?

On Site Monitoring

- Have sites been monitored by the SFA prior to February 1?
- Has the SFA used the SA-approved checklist for on-site monitoring?

Professional Development

- Have all staff accrued the correct number of Hours?
 - 42 hours for CND
 - 42 hours for Managers
 - 10 hours for regular, FT Staff
 - 6 hours for regular, FT 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?

Site Level

Vending & Smart Snacks

- Does tracking tool have all USDA required elements: name/hire date/title/core duties/ FT PT status
- Are Agendas, Sign-In Sheets, and Certificates of Completion maintained on file?

Quantities and Components

- 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.

Food Prep

- Recipes out and referenced?
- Hands washed?
- Hairnets/beardnets on?

Storage

- Is FIFO implemented properly (rotating stock)?
- Are you over-stocked on products, especially Commodity Products?
- Are all food products correctly dated (all 3 dates)?
- Are chemicals stored separately from food?

Inspections

- Most recent food inspections available to Reviewer (2 Per Year or documentation of 1st to MSDH)
- Equipment Works Properly (functioning coolers/warmers, no ice build up in freezer)
- Manual on site and being followed?
- Temperature logs (freezer/cooler/dry storage/prepped food) maintained and available?

Reimbursable Meals

- Are non-reimbursable meals getting past the POS?
- Can staff understand what constitutes a reimbursable meal and can he/she verbalize to Reviewer?
- Signage posted at each serving line?
- School sites implemented OVS?
- Staff at OVS sites pre-plating all items on trays as students move through the line?

Nutrient Analysis

- Are saturated fat, and sodium on target for the Review Week?
- Are all menu items in your nutrient analysis? (don't forget your condiments!)

After School Snack Program

- 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 1 egg hamburger? Check your production boots!)
- Are your cafeteria managers, sites producing and serving the PLANNED menu?

Fresh Fruit and Vegetable Program

- Are you purchasing only allowable products? (for example, you don't want milk sitting outside of a cooler for too long)
- Remember that dips for fruits are not allowable
- Remember that dips for veggies have to be no/low fat
- 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

District Level

Self Assessment

District Level – Includes all Sites in the District

- 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?



District Level – Includes all Sites in the District

- 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*)



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 and are copies on file?
- Have you received any civil rights complaints?
- Is the AJFA poster prominently displayed where meals are served?

Incorrect Versions of the Poster



Wrong Non-Discrimination Statement

This menu has the wrong statement



MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
<p>EVERY MEAL INCLUDES OPTIONAL ½ PINT MILK ½ CUP 100% FRUIT JUICE</p>	<p>THIS FACILITY IS AN EQUAL OPPORTUNITY EMPLOYER</p>			<p>Cheese Piz Hot Dog Chef Salad Succotash WG Chips Milk/Juice WG Rolls Fruit</p>
<p>4 Baked Chicken WG Grilled Cheese Chef Salad Brown Rice/Gravy Kidney Beans Fruit Juice/Milk</p>	<p>5 Chicken Spaghetti Hamburger Chef Salad Sautéed Squash Brown Sugar Carrots Rolls/Fruit Milk/ Juice</p>	<p>6 OVEN FRIED CHICKEN Baked Ham Chef Salad Black Eye Peas Collard Greens Mac & Cheese Cornbread Milk/ Juice</p>	<p>7 Baked Spaghetti Chicken Nuggets Chef Salad Corn Steamed Broccoli Fruit/WG Rolls Milk Juice</p>	<p>8 Chili Cheese Cheese Quesadilla Baked Fries Spinach Sala Juice/ Fruit</p>
<p>11 Crispy Chicken Sandwich</p>	<p>12 Enchilada Casserole</p>	<p>13 Baked Chicken Ham & Swiss</p>	<p>14 Mini Corn Dogs Baked Chicken breast</p>	<p>15 Pepperoni Pizza</p>

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?



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?

Employee Name	Site	Hire Date	Employee Position	Required Hours of Training	FT/PT	Avg. Hrs per week	Manager Recert July 3, 2022	NAO July 26, 2022	ICN Online Safety Training Aug 2, 2022	Back to School Prof Dev Aug 3, 2022	School Year Training Applied To	Completed Training Hours Year to Date
Helena Troy	Adm. Office	4/12/2018	Director	12	FT	40		8	3	8	2022-23	19
Jane Doe	High School	8/6/1997	Manager	10	FT	40	8		3	8	2022-23	19
Missy Sippy	High School	12/3/2012	Caf. Staff	6	FT	40			3	8	2022-23	11
John Deer*	High School	1/2/2023	Caf. Staff	6	PT	20					2022-23	0

***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.

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


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	
Amount Per Serving	
Calories 260	Calories from Fat 130
% Daily Value*	
Total Fat 15g	23%
Saturated Fat 9g	44%
Trans Fat 0g	
Cholesterol 60mg	20%
Sodium 80mg	3%
Total Carbohydrate 28g	9%
Dietary Fiber 1g	3%
Sugars 23g	
Protein 4g	
Vitamin A 10%	• Vitamin C 0%
Calcium 15%	• Iron 4%

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

SMART SNACKS PRODUCT CALCULATOR

ALLIANCE FOR A HEALTHIER GENERATION

✘ 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

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 one of our most common findings!



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

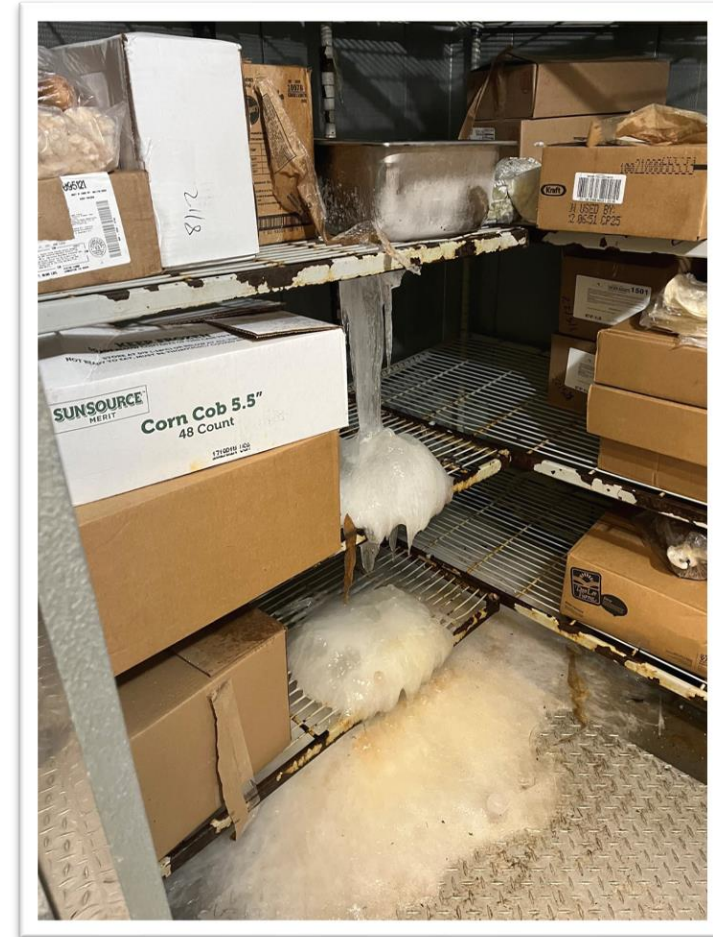
- Is FIFO implemented properly (rotating stock)
- Are you over-stocked on products, especially Commodity Products?
- Are all food products correctly dated (visible, all 3 dates)?
- Are chemicals stored separately from food?

NOTE: Food Storage is considered part of Food Safety.

Remember that Food Safety is one of our most common findings!



Significant Ice Build Up in the Freezer



FIFO not Implemented

No Visible Dates



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

- Proper size serving spoon/ladle/instrument used?
- All required components offered on each line?
- Each component available in the proper quantity according to Meal Pattern? (ex: offering a full cup of fruit at HS lunch; all levels offered a full cup of fruit at breakfast)
- 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!

Water Cannot Compete With Milk

Milk should be on the line BEFORE water. Should NEVER be in same cooler.



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?
- Have all High School Sites implemented OVS?
- 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



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!



MS Department of Education

Planned Menu Spreadsheet

Weighted Values - Detailed

Page 3

Apr 1, 2019 thru Apr 5, 2019

Lunch 9-12

003 - ██████ Middle School

Generated on: 4/12/2019 3:55:53 PM

	Portion Size	Plan Qty	Cals (kcal)	Sodm (mg)	Sugars (g)	Carb (g)	S-Fat (g)	Tr-Fat ¹ (g)
Fri - 04/05/2019								
Lunch 9-12	Total	500						
Chicken & Sausage Gumbo MS800	2/3 cup w/rice	400	244	539	*1	26.7	2.07	0.00
Bacon Burger 2 oz PattyMS702	1 each	50	34	68	1	3.34	0.53	0.00
Chef Salad, MS600	1 salad	50	20	119	1	1.68	0.39	0.00
Baked Ranch Fries MS1097	1/2 cup	170	44	154	0	7.25	0.18	0.00
Baked Beans MS918	1/2 cup	170	54	55	4	12.43	0.04	0.00
Tomato/Cucumbr SaladMS1134.3	1/2 cup	150	13	22	3	3.35	0.01	0.00
Fresh Blueberries MS1222	1/2 cup	170	18	0	3	4.47	0.01	0.00
Fresh Apple MS1206	1 each	150	22	0	4	5.72	0.01	0.00
Cornbread 2 WG MS1301	1 piece	250	102	293	3	17.71	0.91	0.00
Milk, FF Choc 1/2 pt.Br MS1700	1/2 pint	150	36	72	6	6.6	0.00	0.00
Milk, FFStrwbr, 1/2 pt.BrMS1702	1/2 pint	150	45	37	9	8.7	0.00	0.00
Milk, LF White 1/2 pt.BrMS1708	1/2 pint	100	20	24	2	2.2	0.30	0.00
Weighted Daily Average			651	1384	*38	100.16	4.44	0.00
% of Calories					*23.4%	61.5%	6.1%	0.0%
Nutrient Guideline			750-850	1420			<10.00	

Weighted Average			603	1180	*33	80.17	6.63	0.00
					*49.3%	53.2%	9.9%	0.0%

Nutrient	Menu AVG	% of Cals	Weekly Target	% of Target	Miss Data	Shortfall	Overage	Error Messages (if any)
Calories	603		750 - 850	80%		147		Correction Required - Calories are Low
Sodium 1 (mg)	1180		1420					
Sodium 2 (mg)	1180		1080					
Sugars (g)	33	21.91%			Missing		100	Correction Required - Sodium too High
Carbohydrate (g)	80.17	53.19%						
Saturated Fat (g)	6.63	9.89%	<10.00%					
Trans Fat ¹ (g)	0.00	0.00%						

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)*



Fresh Fruit and Vegetable Program (FFVP)

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

- 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

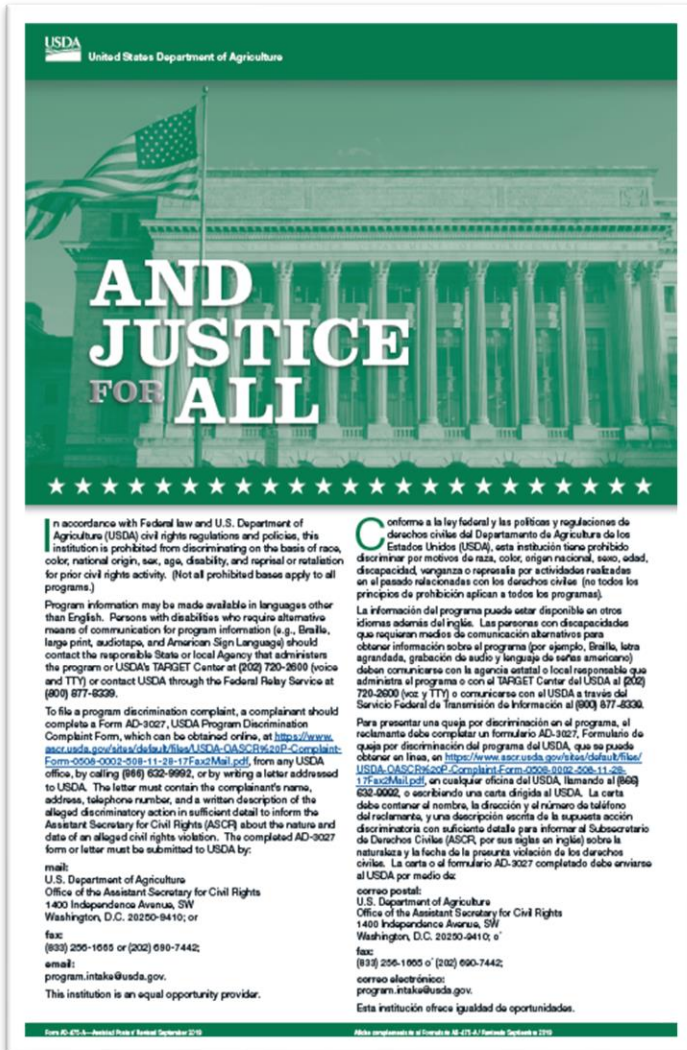
Item I.D./Desc.	Ordered	Shipped	Unit	Price	Net	TX
PINEAPPLE CHUNKS 5	4.00	4.00	EACH	39.50	158.00	E
CANTALOUPE CHUNKS	4.00	4.00	EACH	36.50	146.00	E
GRAPE GIGGLES 50'S	4.00	4.00	EACH	28.90	115.60	E
APPLE W/CARAMEL 50	4.00	4.00	EACH	42.50	170.00	E
BANANAS.CASE	2.00	2.00	EACH	22.90	45.80	E
TANGERINE 100'S	2.00	2.00	EACH	36.90	73.80	E
HONEYDEW CHUNKS 50	5.00	5.00	EACH	37.99	189.95	E



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Full Non-Discrimination Statement link:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>



The poster features the USDA logo at the top left, with the text "United States Department of Agriculture" below it. The background is a green-tinted image of a classical building with columns and an American flag. The title "AND JUSTICE FOR ALL" is prominently displayed in white, bold, sans-serif font. Below the title is a row of white stars. The main body of the poster contains two columns of text, one in English and one in Spanish, detailing the institution's commitment to non-discrimination and providing contact information for filing a complaint. At the bottom, there are two small lines of text: "Form 427-S - Revised Print & Revised September 2016" and "Este cumplimiento de la Ley 427-S (E) - Revisado Septiembre de 2016".

AND JUSTICE FOR ALL

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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and American Sign Language) should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form, which can be obtained online, at <https://www.acee.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-008-11-28-17%20Mail.pdf>, from any USDA office, by calling (800) 658-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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

fax:
(800) 256-1005 or (202) 690-7442;

email:
program.intake@usda.gov.

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La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra grande, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <https://www.acee.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-008-11-28-17%20Mail.pdf>, en cualquier oficina del USDA, llamando al (800) 658-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; o

fax:
(800) 256-1005 o (202) 690-7442;

correo electrónico:
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.

Form 427-S - Revised Print & Revised September 2016

Este cumplimiento de la Ley 427-S (E) - Revisado Septiembre de 2016



Questions?



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Director of Monitoring

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mdek12.org



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- 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