



Administrative Review

Idaho School Nutrition Reference Guide

OVERVIEW

The administrative review (AR) is the process the USDA requires the State agency (SA) to use to assess program compliance with Federal regulations. Modules associated with the AR can be accessed in MyIdahoCNP in the Compliance section. The National School Lunch Program (NSLP) review process is on a three year cycle; however, School Food Authorities (SFAs) may be reviewed more often at the SA's discretion. The process is designed to allow the SA to conduct specific aspects of the review on-site while other aspects are completed off-site.

The scope of the AR focuses on two primary review components: Critical Areas of Review and General Areas of Review. The Critical Areas encompass two performance standards. Performance Standard One focuses on certification, benefits issuance, and meal counting and claiming. Performance Standard Two focuses on meeting meal pattern and nutritional quality requirements. The General Areas of Review encompass areas including: resource management, civil rights, SFA on-site monitoring, local school wellness policy, Smart Snacks, food safety, and professional standards. If the SFA implements another Federal Child Nutrition Program in addition to the NSLP, such as the School Breakfast Program (SBP), Special Milk Program (SMP), Afterschool Snack Program (ASSP), and Fresh Fruit and Vegetable Program (FFVP), the program(s) will also be reviewed during the AR process. Please refer to the USDA Administrative Review Manual for additional guidance on the AR process and all topics discussed in this section.

TERMS TO KNOW

Please use the below terms and their definitions as a reference when completing the off-site module questions in MyIdahoCNP, prior to the AR.

Benefit issuance list— A continually updated document that lists each student enrolled in a school site and their school meal eligibility status (free, reduced, or paid). It shows the source of the student's free meal status (i.e., free because of direct certification (DC), household extended, foster status, household free/reduced income application, or due to being certified as homeless, migrant, or runaway by the designated liaison). A benefit issuance list of all students and their eligibility status must be maintained / updated and must document dates when benefits changed. This document must be kept confidential. Accurate maintenance of this document is a requirement of USDA School Meal Programs.

Certification/determination - Process used in determining the eligibility status of each student, which includes approving or denying free and reduced applications, matching children on the direct certification list, and using certified lists from the school district's homeless / migrant / runaway liaison.

Civil rights - Includes the annual civil rights training, complaint process, non-discrimination statements, and accommodations to ensure all students have equal access to the meal program, regardless of race, color, national origin, age, sex, or disability. Sponsors must keep copies of all training documentation including agendas and sign-in sheets for three years plus current.

Dietary specifications and nutrient analysis - Assessing the menu for compliance with calories, saturated fat, trans fat, and sodium USDA guidelines.

Local wellness policy (LWP) - A district policy that addresses the health and well-being of students and the school environment.

Meal counting and claiming - The daily process for counting and claiming reimbursable meals based on a student's eligibility category.

Reimbursable meal – A meal that meets Federal requirements for meal components and dietary specifications.

Resource Management - Review of the financial situation of the food service account. The district audit and detailed food service account (revenue and expenditures) are reviewed by the SA. The questions in this module are to be completed by the SFA four weeks prior to the on-site review.

School Breakfast and Summer Food Service Program outreach – Refers to how families are made aware of the school breakfast and summer food program benefits, if offered at that school.

SFA on-site monitoring - Process to ensure that all schools are meeting program requirements; includes Point of Service (POS) counting reviews for breakfast and lunch. Reviews are performed by February 1 of each year.

Smart Snacks - Regulations affecting all food sold in school that is not served as part of the reimbursable meal.

Special Provisions Options - Operation of Provision 2 or CEP (Community Eligibility Provision) in school meal programs.

Verification – Confirmation of eligibility for free or reduced-price meals; requires a household to submit proof of income to the school or institution operating the NSLP or SBP, or proof of eligibility in SNAP (Supplemental Nutrition Assistance Program), FDPIR (Food Distribution Program on Indian Reservations), or TAFI (Temporary Assistance to Families in Idaho). All SFAs participating in the NSLP or SBP must complete the verification process and report no later than November 15. Schools participating in Provision 2 lunch and breakfast or CEP, as well as RCCIs

(residential child care institution) need only complete the report, not the verification process. Schools participating only in the SMP are exempt from verification requirements.

WHAT IS THE ADMINISTRATIVE REVIEW?

The review process consists of an off-site portion and an on-site portion. Both the SFA and the SA will complete some work off-site, thus allowing the on-site review portion to be less cumbersome. As part of the off-site portion, the SFA is responsible for answering the questions in each module in the Off-Site Review Forms Section of MyIdahoCNP (with the exception of Form 600 – Dietary Specifications and Nutrition Analysis). Each site being reviewed will also have specific module questions that must be answered.

The SFA must submit documents to the SA for review prior to the on-site visit. A notice of review letter is e-mailed to the SFA prior to the date of the on-site review, providing a detailed list of exactly which documents should be uploaded in the Compliance > Review Attachments section of MyIdahoCNP.

The on-site portion of the review validates the information provided by the SFA and allows the SA to observe the operation of the school nutrition programs implemented in that district. Again, refer to the notice of review letter for a detailed list of exactly which documents must be ready for review when the SA arrives on site. In addition to reviewing documents, the SA will also conduct the following while on site:

- Entrance conference (optional)
- Observation of meal production including use of production records and standardized recipes
- Observation of meal services, both breakfast and lunch, including the counting and claiming procedures and service of reimbursable meals
- Observation of the kitchen, cafeteria, and any other areas where student meals or food are served and stored including dry storage, refrigerators, and freezers
- Observation of additional Child Nutrition Programs that are offered including the SMP, FFVP, and ASSP
- Validation that vending machines, a la carte items, and other non-reimbursable food items sold during the school day are in compliance with Smart Snacks regulations

An exit conference is conducted at the end of the on-site portion of the review. It is expected the food service director, school superintendent, and any other staff involved in the implementation and monitoring of the school meal programs are present at the exit conference (e.g., business manager, food service supervisors). The exit conference will summarize:

- Administrative review findings
- Corrective action plan and timeframe for completion
- Technical assistance provided
- Commendations

Once all corrective action items have been submitted to the SA and approved for acceptance, including but not limited to submission of documents, written confirmation of tasks completed, etc., a closure letter will be sent to the SFA.

Failure to submit the required corrective action by the due date (or request an extension) will result in payments being withheld until the review is finalized.

WHY IS THE ADMINISTRATIVE REVIEW IMPORTANT?

The review process allows SFAs to demonstrate compliance with federal regulations. Demonstrating compliance is important to ensure the SFA continues receiving reimbursement for the operation of Child Nutrition Programs. The review provides an opportunity to ask questions of the SA and receive technical assistance in areas that are challenging for the SFA. Many sponsors find this one-on-one assistance helps streamline certain areas of the program. Additionally, the review addresses problems and may help correct mistakes before they become significant. The process of review allows for changes to be made as it pulls together the food service director, business manager, and the superintendent of the district. The review process brings everyone to the table allowing for better access to information and encourages discussions on ways to improve the program.

RESOURCES

Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides and helpful links to relevant subject matter.

For Questions Contact

Child Nutrition Programs
Idaho State Department of Education
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