

## FREQUENT ADMINISTRATIVE REVIEW FINDINGS AND BEST PRACTICES

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## Administrative Review

- The Healthy Hunger-Free Kids Act of 2010 (HHFKA), requires that participating school food authorities (SFAs) comply with National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements.
- The Administrative Review provides a comprehensive evaluation of school meals programs by the Michigan Department of Education (MDE) and includes both Critical and General Areas of Review.

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## Areas of Review

- Critical areas:
  - Access and Reimbursement
  - Meal Pattern and Nutritional Quality
- General areas:
  - Local School Wellness Policy
  - Smart Snacks
  - Water
  - Food Safety
  - SBP and SFSP Outreach
  - Civil Rights
  - Self Monitoring
  - Reporting and Record Keeping

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## Access and Reimbursement Findings & Best Practices

- Incomplete Applications
  - Missing income/frequency
  - Missing last 4 digits of the social security number or box not checked indicating no social security number
  - Missing household members
    - Person that signed application is not included in household info
  - Incorrect FAP number, must be a 9 digit # that will start with a "1"; for example 132465879

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## Access and Reimbursement Findings & Best Practices

- Double check your free and reduced price applications
- Call households to get missing info
    - Income
    - Frequency
    - Social Security numbers
    - Add missing household members
  - Write any changes on F/R application, date and initial

- Use the *Eligibility Manual for School Meals*
- [www.michigan.gov/schoolnutrition](http://www.michigan.gov/schoolnutrition)
    - Under Guidance click on *Eligibility Certification and Verification*
    - Under Guidance click on *Eligibility Manual for School Meals*

Pull the Direct Certification Report monthly

Benefit Issuance Roster pulled for the Administrative Review should only have free and reduced price students on it

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## Access and Reimbursement Findings & Best Practices

- Verification Issues
  - Not complete by November 15
  - Documentation not submitted for all dollar values as indicated on the free and reduced price application
    - What types of documentation are valid?
      - Pay stubs
      - Notice of eligibility from appropriate State Agency
      - Written evidence with household name, amount of income, frequency and date

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## Access and Reimbursement Findings & Best Practices

- Verification Issues continued...
  - Correspondence is not kept
  - Benefit issuance is not changed based on verification determination

Keep all letters sent and document any phone calls made to households

Make any required changes to benefit issuance documentation as required from the outcomes of the verification process by November 15

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## Access and Reimbursement Findings & Best Practices

- Verification Issues continued...
  - Verification is not completed correctly
    - Verification collection report not submitted
    - Verification notification letter is incomplete

Refer to *Steps to Conducting Verification*

- [www.michigan.gov/schoolnutrition](http://www.michigan.gov/schoolnutrition)
  - Under Guidance, click on *Steps to Conducting Verification*

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## Access and Reimbursement Findings & Best Practices

- Counting and Claiming
  - Adult Meals being claimed for reimbursement

Ensure POS system does not "add in" adult meals and/or second meals

  - Second Meals being claimed for reimbursement
  - Claims do not match roster sheets

Have a second person count roster sheets  
Use an excel sheet to add daily/monthly meal counts

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## Access and Reimbursement Findings & Best Practices

- Counting and Claiming continued...
  - Unacceptable point of service for Breakfast in the Classroom
  - No edit checks
  - Overt identification of F/R status

Refer to USDA's *Meal Counting and Claiming Manual*

- [www.michigan.gov/schoolnutrition](http://www.michigan.gov/schoolnutrition)
  - Under Guidance, click on *Counting and Claiming*
  - Under Guidance, click on *USDA Meal Counting and Claiming Manual*

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## Nutritional Quality and Meal Pattern Findings & Best Practices

- Insufficient Quantities  
Use measuring spoons, pre fill containers, provide examples for students on the line
- Vegetable Subgroups not available at all Points of Service  
Rotate all subgroups through each line
- OVS issues at lunch – Students not taking 3 components with one component equal to a 1/2 cup fruit and/or vegetable  
Have a fruit and/or vegetable at end of line near cashier, hold regular OVS trainings for staff, signage telling students they need to take a fruit/vegetable  
Refer to *Offer Versus Serve Guidance for the NSLP and the SBP*
- OVS issues at breakfast- Not offering enough items for proper OVS  
Bag Items  
Signage  
Training

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## Nutritional Quality and Meal Pattern Findings & Best Practices

- Signage missing or incomplete
  - Required for Non-OVS and OVS buildings  
OVS must indicate a 1/2 cup fruit and/or vegetable is required
- Two varieties of milk not being offered at breakfast and lunch  
Make sure 2 varieties of milk are always available; can be skim and 1%
- Salt packets or shakers available to students  
Use seasonings other than salt
- Always remember to:  
Use Standardized Recipes  
Utilize Cycle Menus  
Utilize Meal Component (6 Cent) Tool to determine if you have met daily and weekly minimum requirements

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## General Areas of Program Compliance Findings & Best Practices

- No School Breakfast Program and/or Summer Food Service Program Outreach

Conduct School Breakfast Program outreach three or more times per year

- Outreach must include: place, time and cost of breakfast

Provide families with a link to the SFSP Map:

- [www://www.mcgi.state.mi.us/schoolnutrition/](http://www.mcgi.state.mi.us/schoolnutrition/)

- Local Wellness Policies (LWP) have not been updated or assessed

Begin updating your Local Wellness Policies to meet the new requirements

More information is available at:

- <http://healthymeals.nal.usda.gov/school-wellness-resources>

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## General Areas of Program Compliance Findings & Best Practices

- Civil Rights

- The "And Justice for All" poster not posted
- Incorrect Non-Discrimination Statement
- No current documentation of Civil Rights training(s)
- No Civil Rights Complaint Procedure and log

Use the information on our Civil Rights website:

- [www.michigan.gov/schoolnutrition](http://www.michigan.gov/schoolnutrition)
  - Under Guidance, click on *Civil Rights Guidance*

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## General Areas of Program Compliance Findings & Best Practices

- Food Safety

- Inspections not posted in a public location
- Food Safety Plans that were outdated
- Food Safety Plans that were not relevant to current operations

Post current Local Health Department Inspections in a publicly visible location

Review for adequacy and update your Food Safety Plan yearly

- Make sure that all POS locations are included in Food Safety Plan

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## General Areas of Program Compliance Findings & Best Practices

- Self-Monitoring not completed by February 1<sup>st</sup> for NSLP
- After School Snack Program self-monitoring not completed 2 times per year
  - In the 1<sup>st</sup> four weeks of operation and again in the second half of the school year

Conduct Self-Monitoring of the NSLP at all buildings prior to February 1<sup>st</sup>

Conduct self-monitoring of the After School Snack two times per year

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## Training Plan for SY 2014-2015

- Invitation only training for those SFAs being reviewed
- Resource Management:
  - ½ Day, regional trainings took place in August and September
- All Other Sections:
  - Access and Reimbursement, Nutritional Quality and Dietary Standards, General Program, and Other Federal Programs
  - 1 Day regional trainings in September and October

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## Thank you for joining us!

- Please contact MDE if you have further questions
- School Nutrition Programs Unit:
  - 517-373-3347
  - [MDE-SchoolNutrition@michigan.gov](mailto:MDE-SchoolNutrition@michigan.gov)
  - [www.michigan.gov/schoolnutrition](http://www.michigan.gov/schoolnutrition)

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