

CRE in an Hour



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Coordinated Review Effort (CRE)

- State agencies must conduct a CRE in all SFAs at least once during each 5-year review cycle, provided that each SFA is reviewed at least once every 6 years.
- During a CRE, only selected schools are reviewed; not all of the schools in the SFA are reviewed.
 - CRE looks at two ***organizational levels*** – *SFA* and *school*.
 - CRE looks at ***performance in two time periods***, the *Day of Review* and *Review Period*. Some findings may extend outside the review period.



Coordinated Review Effort (CRE)

- *Two primary review components:* Critical Areas of Review and General Areas of Review.
 - In the **Critical Area** there are two Performance Standards.
 - Performance Standard 1 – Certification, Counting, and Claiming
 - Performance Standard 2 - Menu Planning
 - In the **General Area**, the following areas are reviewed:
 - Free and Reduced Price Process
 - Verification
 - Food Quantities
 - Civil Rights
 - Monitoring
 - Reporting and Recordkeeping
 - Food Safety and Sanitation
 - Procurement



CRE Review

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- Performance Standard 1 – adequate system for consolidating claims and applications properly completed and approved.
- Performance Standard 2 – were the lunches served on the day of the review complete, with all components offered and the system in place properly implemented (served or OVS).



CRE Review

Page SFA-2

- Using direct certification?
Keeping documentation on file?
Does SFA consolidate Claim for Reimbursement?
- Reviewer will validate counts for review period. Do they match the SFA claimed amounts by category?



CRE Review

Page S-1

- Basic questions
- Count of eligible students
- Counts for day of review
- Counts for this school for the review period.



CRE Review

Page S-2

- Applications – correctly filled out and approved.
- Most common errors:
 - All household members are not included (usually the household member that signs the app is not included as family member)
 - Incomplete food stamp numbers (either marked “yes” then don’t supply the number or they do not supply the FS number)
 - Foster Child – monthly spending money is not completed
 - Annual incomes calculated incorrectly (also some schools are still converting to monthly instead of required annualizing)
 - **All** household incomes are not reported even if “**no income**”
 - Incomplete App – not signed and/or **dated** by the household (need application date to determine current school year)
 - Incomplete App – no social security number (SSN) or “no SSN” box is not checked.
 - Administrative Applications – no documentation provided as to why an administrative app was completed.
 - Homeless, Migrant, Runaway submitted apps are not approved by schools liaison.



CRE Review

Page S-2 continued

- Direct certification correctly used?
- You are allowed an error factor.
- Did you change eligibility status on a timely basis?



CRE Review

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- Important part of the CRE review.
- Page is concerned with the day of the review
- Does the serving line POS provide an accurate count of meals served by category?
- Once those counts were taken, were they correctly combined and recorded?
- Menus – were all items available to the students according to the menu planning approach used?



CRE Review

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- Were lunch counts for the day of the review consistent with counts for the review period?
- Were there days when free lunch counts exceeded number of eligible or attendance adjusted eligible?
- Are there patterns in the free, reduced or paid lunch counts which appear questionable?
- Does all documentation (menus, production records, etc) for the review period indicate all required items were offered based on menu planning system?



CRE Review

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- Page where the reviewer will list all incorrectly completed applications
- Note: Start date, Missing Information, Miscategorized, Benefit Issuance Errors, PS – Violation, Date Inactive or Corrected, Number of Days Application in Error.



CRE Review

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- Summary of S-5. Looks at percentage of incorrectly claimed meals.



CRE Review

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- Looks at menu on day of review and for review period.
- Observe serving period to make sure all students have opportunity to take all 5 food items.
- Check menu for review period to make sure all 5 items offered on daily basis. Corroborate with production records.
- Potential fiscal action information.



CRE Review

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- Can be used for prior errors including meal components, application errors, etc for prior years.



CRE Review

General Review Areas

- Reporting and Recordkeeping – keep documentation for 3 years plus current year or until resolution of any audits, student parent input, Nutrition Review.
- Monitoring Responsibilities – On-site review(s) completed by February 1 with follow up review within 45 days if necessary. Edit checks for adjusted eligibles compared to daily meal counts.
- Wellness – Does SFA have wellness policy. Are FMNV being served?



CRE Review

General Review Areas

- Special Dietary needs.
- Verification – completed on time, correct number of applications, follow up in correct time frames, Verification Summary/LEARS completed.



CRE Review

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- Accountability – pre-payment advertised? Does system prevent overt identification at POS? Priced as a unit? Adult meals follow guidelines? Reduced prices not to exceed maximums.
- Meal Service – at least two fat content milks offered. Production records document prepared, served, and leftover. Meal planning system followed in regards to items served, portions served, etc.? OVS properly implemented?



CRE Review

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- Food Safety and Sanitation – is food safety plan available at the site? SOPs for employee use? HACCP Process Approaches being used? Temperature logs in use? Hazardous or unsanitary conditions? Food inspection posted in visible location?
- School Breakfast Program – menu meet regulatory requirements, accurate POS?



SFA Forms to Complete

- G-3 Food Safety and Sanitation
- Procurement
- Food Service Management Company
- USDA Foods

Post Award Civil Rights Compliance Review

COORDINATED REVIEW – NATIONAL SCHOOL LUNCH PROGRAM

- DO NOT MAIL THIS FORM -



POST AWARD CIVIL RIGHTS COMPLIANCE REVIEW

Agreement #	SFA	Name of Building(s) Selected for Review:			
		1)	2)	3)	4)

Part I: RACIAL-ETHNIC DATA (Complete this section for the entire school organization.)

	RACIAL IDENTITY						ETHNIC IDENTITY			
	American Indian or Alaskan Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White	Total ^{1*}	Hispanic or Latino	Not Hispanic or Latino	Total ^{2*}	
# of Free Students (Approved):										
# of Reduced Students (Approved):										
# of Staff (Food Service Only):										

*Each approved free or reduced student and food service staff must be classified for both Racial Identity and Ethnic Identity. The numbers listed in the Total¹ Column must be the same as the Total² Column.

DENIED APPLICATIONS (Based on Verification) Are they disproportionately composed of minorities? YES NO

	RACIAL IDENTITY						ETHNIC IDENTITY			
	American Indian or Alaskan Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	White	Total ^{1*}	Hispanic or Latino	Not Hispanic or Latino	Total ^{2*}	
# of Free Students (Denied):										
# of Reduced Students (Denied):										

*Each denied free or reduced student must be classified for both Racial Identity and for Ethnic Identity. The numbers listed in the Total¹ Column must be the same as the Total² Column.

Part II: CHECK APPLICABLE BOX

- A. School/Institution has sent out a public release for free and reduced price meals to the parents/guardians and community/local minority and grass roots organization.
- B. School/Institution has a procedure in place to inform the constituents of all aspects of the program (availability, benefits, etc.).
- C. Program materials include the non-discrimination statement.
- D. Materials provide the provision that discrimination complaints may be filed directly with the Secretary of Agriculture.
- E. A USDA non-discrimination poster is displayed in a prominent place accessible to the students in each school.
- F. School/Institution completes an annual review of all buildings to ensure Civil Rights compliance.
- G. School/Institution provides training to new/current employees to ensure competency in civil rights compliance.
- H. School/Institution provides bilingual personnel/materials if necessary.
- I. School/Institution admission procedures do not restrict enrollment by race, color, national origin, sex, age or disability.
- J. School/Institution has an established procedure to accept complaints or grievances that are based upon race, color, national origin, sex, age or disability.
- J₁. Have there been any complaints?
- J₂. If yes, how many? _____ "No" answer does NOT require explanation for # J - 1.
- J₃. Reported to the state agency?

- | | | |
|---|-----------------------------|------------------------------|
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> N/A |

PART III: EXPLAIN ALL "NO" OR "N/A" ANSWERS (Attach a separate sheet to this form)

PART IV: CERTIFICATION

I certify _____ will take any kind of action necessary to be in full civil rights compliance with: Title VI of the Civil Rights Act of 1964 - nondiscrimination based on race, color, national origin; Age Discrimination Act of 1975 - nondiscrimination based on age; Title IX of the Education Amendments of 1972 - nondiscrimination based on sex; Section 504 of the Rehabilitation Act of 1973 - nondiscrimination based on disability.

DATE: _____ SIGNATURE (Superintendent/Principal/Administrator): _____

PART V: CORRECTIVE ACTION REQUIRED? YES NO

If "Yes", was corrective action explained to SFA?

YES NO N/A INSPECTION DATE: _____

SIGNATURE (State Representative): _____

Rev. 12/05



Questions