

Surviving Your AR



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Surviving Your AR



Today's Learning Objectives

- List the parts of an Administrative Review (AR)
- Identify who to contact for each part of the AR
- List the areas covered in the Resource management review
- Identify ways to avoid common findings

Learning Objectives





About the Administrative Review

- Healthy, Hunger-Free Kids Act of 2010
- Changes to the review process
 - Expanded the scope of the review
 - Increased review frequency
 - Established off-site work
- Programs being reviewed

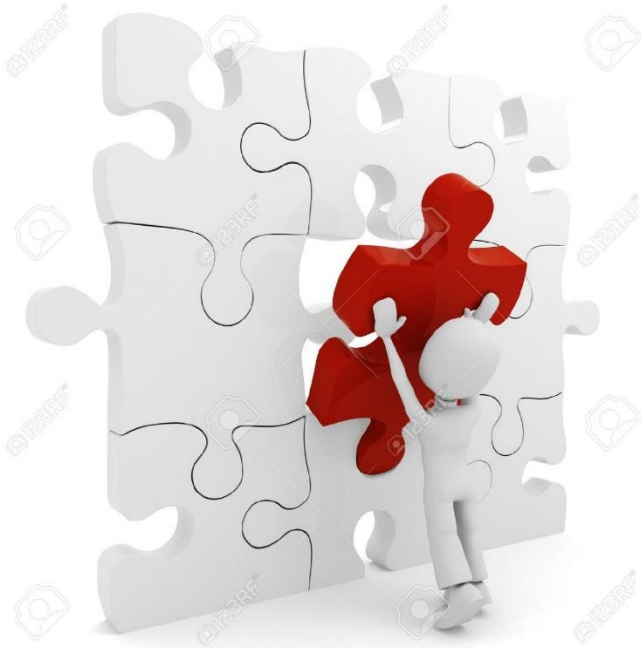


Administrative Reviews

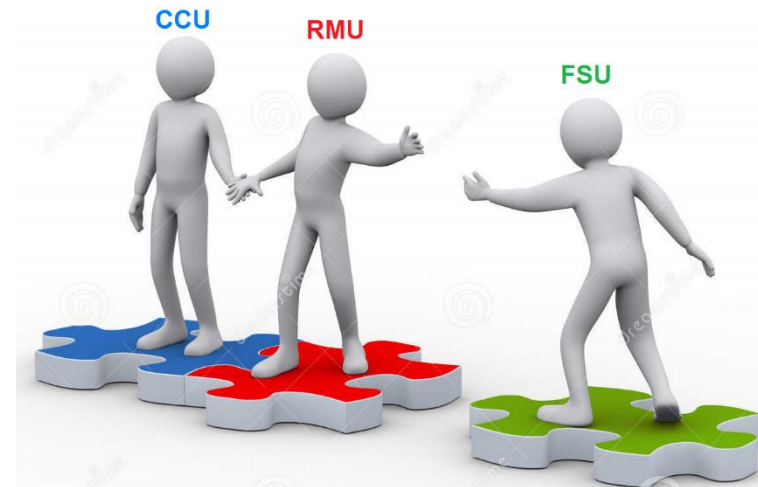


New Review Approach

- Past Approach



- New Approach





Off-Site Assessment Tool

- Now part of the Child Nutrition Information and Payment System
- Reviewed by the Compliance Coordination Unit
- Dates to remember
 - Eight weeks prior to on-site review
 - Four weeks prior to on-site review



What is the Resource Management Unit?

- Provide Policy Guidance
 - Conferences
 - Webinars and meetings
 - E-mails
 - Listservs
 - Management bulletins
- Review the 700 Series Questions
- Comprehensive Reviews



School Food Authority Shoutout





700 Series Tool

The will to succeed
means nothing
without the WILL
to prepare.

705	Did the SFA transfer funds out of the nonprofit food service account to support other school operations during, or at the end of, the school year?
	<input data-bbox="293 199 331 235" type="checkbox"/>
Supporting Documentation:	
Resources:	
Cafeteria Fund Loan Guidance from the USDA	
Title 2, Code of Federal Regulations , Section 200.449	

Comments

700 Series Tool

705		Did the SFA transfer funds out of the nonprofit food service account to support other school operations during, or at the end of, the school year?
	NO	The SFA certifies that no funds were transferred out of the nonprofit food service account to support other school operations. This excludes indirect costs identified in Question 716.

Supporting Documentation:

Resources:

	Cafeteria Fund Loan Guidance from the USDA
	Title 2, Code of Federal Regulations , Section 200.449

700 Series Tool

705	Did the SFA transfer funds out of the nonprofit food service account to support other school operations during, or at the end of, the school year?
YES	<input type="checkbox"/> The SFA certifies that the SFA transferred funds out of the nonprofit school food service account to support other operations. Loan agreements performed by the SFA must be adequately documented. Note: This transfer does not include indirect costs identified in Question 716.

Supporting Documentation:

The SFA should upload loan agreements, which indicate how and when the nonprofit food service account was or would be reimbursed. Loan agreements must be at market rates and fully executed prior to the loan taking place.

Resources:

[Cafeteria Fund Loan Guidance from the USDA](#)

[Title 2, Code of Federal Regulations , Section 200.449](#)

700 Series Tool

TA

FINDING

[Option A] If the SFA made an unallowable loan to LEA, then the LEA must repay the nonprofit food service account for the total loan amount, plus interest. SFA must provide the CDE with the journal entry evidencing the transfer. The SFA must submit to the CDE procedures for future loans to the LEA.

[Option B] If the SFA is making unallowable loan repayment to LEA, then the LEA must repay the nonprofit school food service account for the disallowed payments. The SFA must provide the CDE with the journal entry evidencing the transfer. The SFA must provide the CDE with procedures for future loans to the nonprofit school food service account from the LEA.

The CDE recommends the SFA take the financial management and procurement courses offered by the Institute of Child Nutrition.

Comprehensive Review Documentation

9. Payroll Documentation:

- a. **Single Funded Employees:** In accordance with 2 *CFR*, Part 225, Appendix B, Item 8.h(3) all single funded employees directly charging their time and effort to Fund 13; Please provide:
 - A list of all single funded employees from the review month of SY (**enter year**)
 - Duty statements/Job Descriptions for each employee classification appearing on that list
- b. **Multi-Funded Employees:** In accordance with 2 *CFR*, Part 225, Appendix B, Item 8.h(4) and (5) all multi-funded employees directly charging their time and effort to Fund 13; Please provide:
 - A list of the multi-funded employees from the review month of SY (**enter year**). Documentation for each employee that shows the function code to which their salary and benefits are charged to
 - Each employee's personnel activity report, or equivalent documentation
 - In addition to a PAR for custodians the following documentation will be necessary:
 - Duty statement or Job Description
 - Bell schedule showing the meal service times
 - For all M&O employees charging their time and effort to Fund 13
 - PAR, or if this is absent then they will need to provide work orders for the employees total activities for each day they charged time to Fund 13 (this includes non-food service activities) – lacking this documentation, the salary and benefit charge(s) will be disallowed
 - Please notify all multi-funded employees that they might be interviewed by RMU



Preparation for on-site Review Component

- Tips for success
- Top five findings from School Year (SY) 2014–15 ARs
- Tools and resources





Tips for Success

- Complete the off-site assessment
- Request guidance and clarification, if needed
- Monitor your sites
- Review and update your procedures





Tips for Success (continued)

- Start early
- Complete a self-assessment
- Observe objectively
- Attend a mandatory prereview workshop





Preparation for Your On-site AR

On-site Guidance

- All areas of review
- CDE management bulletins and other guidance
- Federal and state regulations
- Additional information



Top Five Review Findings for SY 2014-15

1. Meal components and quantities
2. Food safety
3. Meal counting and claiming
4. Certification and benefit issuance
5. Civil rights





Avoid Findings – Meal Components and Quantities

- Check menus for daily and weekly requirements and quantities for each age group served
- Check menus for vegetable subgroups, whole grains, and two milk types
- Observe all your meal service lines
- Check that ½ cup of fruit or vegetable is taken at breakfast and lunch with each reimbursable meal
- Check offer versus serve signage and procedures








Offer Versus Serve Signage

Make sure its clear

Offer versus Serve

The **5 Meal Components** for School Lunch

1 Meat or Meat Alternate 	2 Grain 	3 Fruit 	4 Vegetable 	5 Milk 
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You choose **at least 3** including

- ½ cup of fruit or vegetable
- at least two other full components

For best nutrition, **choose all 5!**


Avoid Findings – Meal Components and Quantities

Meal Preparation:

- Check standardized recipes (be sure the recipes are being used)
- Check that product specifications and Child Nutrition labels (CN) are available and accurate
- Check that menu production records are up to date and accurate
- Include documentation for menu substitutions.

Provide training as appropriate





Avoid Findings---Food Safety

- Prepare and maintain a written food safety plan, Hazard Analysis Critical Control Point
- Maintain refrigerator/freezer temperatures logs
- Request two food safety inspections
- Post food inspection report in public view



Avoid Findings – Meal Counting and Claiming



- Document counting and claiming procedures at each location where reimbursable meals are served and claimed.
- Observe all meal service lines at the point of service.
- Review your back-up system



Avoid Findings – Meal Counting and Claiming

Observe the meal service lines, especially those outside of the cafeteria:

- Kiosks
- Special education classes
- Preschool classes
- Breakfast in the classroom
- Grab and go breakfast
- Continuation classes



Avoid Findings – Meal Counting and Claiming Afterschool Snack

- Meal counts may **not** exceed attendance
- Back-up documentation for your claim
- Monitor within the first four weeks of service
- All participants must receive two full components





Avoid Findings-- Meal counting and claiming

- Perform daily and monthly edit checks.
- Review the meal consolidation for all sites for accuracy .
- Review your claims for reimbursement for accuracy.
- Provide training to appropriate staff (cashiers, cooks).





Avoid Findings – Certification and Benefit Issuance

- Check accuracy of certification of meal applications
- Check documentation of direct certification
- Check that certification documents match your point-of-service roster
- Check that roster is updated timely





Avoid Findings – Civil Rights

- Provide current civil rights procedure with all of the required elements
- Provide documentation of annual training with all mandatory topics
- Provide medical statements for special needs diets
- Provide proof of services to families with limited English





Annual Civil Rights Training Topics

- Collection and use of data
- Effective public notification systems
- Complaint procedures
- Resolution of noncompliance
- Reasonable accommodation
- Language assistance
- Conflict resolution
- Customer service



Summary

- Three-year review cycle
- Off-site and on-site review parts
- More robust review of cafeteria funds
- Mandatory prereview workshop





Summary continued

- Start early
- Complete a Self-assessment
 - ✓ Review your procedures
 - ✓ Monitor your sites
 - ✓ Use the menu review check lists
- Use the Administrative Review Guidance
 - ✓ Prepare for the on-site review



Questions?



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