Trends in School Nutrition Administrative Reviews

Laurie Brackett and Ann Mo
Child Nutrition Consultants

Panel

- Julie Calderon, Director of Child Nutrition, Adelanto Elementary School District

- Dena England, Executive Director, Child Nutrition Services, San Marcos Unified School District

- Lieling Hwang, Assistant Director, Long Beach Unified School District

- Corina Ulloa, Nutrition Services Director, West Covina Unified School District

Objectives

- Review top trends of 2018–19 administrative reviews (AR)

- Provide strategies and best practices

Number of Findings by Area (1)

- Meal Components and Quantities – (970)
- Certification and Benefit Issuance – (380)
- Food Safety – (286)
- Professional Standards – (227)
- Meal Counting and Claiming – (224)
- Civil Rights – (169)
- SFA On-site Monitoring – (163)
- Resource Management (159)
- LSWP – (140)
- Verification – (135)

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Number of Findings by Area (2)

- Afterschool Snack – (122)
- Offer Versus Serve – (73)
- Smart Snacks – (51)
- Special Provision Options – (44)
- School Breakfast and SFSP Outreach – (41)
- Infant Meal Pattern (31)
- Reporting and Record Keeping – (17)
- Dietary Specification (14)
- Water Availability – (13)
- FFVP – (3)

Meal Components and Quantities

Menu Production Records (MPR)

Missing Meal Components

Meal Pattern Shortages

Missing Signage

Menu Production Records (1)

Trends

- Missing or incomplete MPRs
- MPRs lack sufficient detail to support meal pattern resulting in missing components or shortages

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Menu Production Records (2)

Ask the panel:

- What systems are in place to ensure MPRs are completed accurately and thoroughly?

Menu Production Records (3)

Strategies

- Check for MPRs during site monitoring
- Train staff to complete MPRs thoroughly
- Maintain original documentation
- Ensure substitutions are notated on MPRs

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Missing Meal Components

Trends
- Observed food service lines run out of one or more components
- Unmonitored food components after the point of service (POS) i.e., milk coolers and salad bars

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Missing Meal Components (2)

Ask the panel:

- When the POS is placed at the front of the line, what system is in place to ensure all food components are made available to the student before checking for a reimbursable meal?

Missing Meal Components (3)

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Strategies

- Stop the meal service line before food components run out.

- Uninterrupted monitor or dedicated staff to check for reimbursable meals.

Meal Pattern Shortages (1)

Trends

- Lack of milk variety
- Lack of or incomplete MPRs result in shortages
- Shortages in vegetable subgroups, grain/bread, and fruit at breakfast

Meal Pattern Shortages (2)

Ask the panel:

- What best practices are implemented to prevent shortages?

Meal Pattern Shortages (3)

Strategies

- Obtain production contribution information before putting it on the menu.

- Ensure all vegetable subgroups are available on every line or more than one day.

- Ensure the signage reflects what the menu planner intended.

- Refer to USDA Flexibilities for school year 2019-20 issued on September 23, 2019

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Certification and Benefit Issuance (1)

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Application Certification Errors

Direct Certification Matching Errors

Roster Errors

Certification and Benefit Issuance (2)

Trends

- Applications were not approved correctly
- Direct certification was not correctly conducted
- Incorrect transfer of benefit to POS

Certification and Benefit Issuance (3)

Ask the panel:

- What works for you in processing applications to prevent errors?

- What systems are in place to document how benefits were extended to other household members?

- How do you ensure the correct transfer of eligibility to the roster or POS?

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Certification and Benefit Issuance (4)

Strategies

- Have a second person or electronic system to double-check the certification

- Maintain original documentation

- Document method of benefit extension

- Implement Community Eligibility Provision (CEP)

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Food Safety

Buy American Provision

Food Safety Plan

Temperature Logs

Health Inspections

Buy American Provision (1)

Trends

- Lack of documentation to support compliance with Buy American requirements

- Lack of system to monitor for compliance with Buy American requirements

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Buy American Provision (2)

Ask the panel:

- How is Buy American Provision monitored and what does that look like?

Buy American Provision (3)

Strategies

- Refer to U.S. Department of Agriculture (USDA) Policy Memo SP 38-2017

- Use the California Department of Education (CDE) tools for exceptions and micropurchases.

- Review vendor contract language for Buy American Provision clauses.

- "Distributed by…" requires additional follow up

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Food Safety Plan (1)

Trends

- Food safety plan was missing or not available at all locations where food is stored, prepared, or served

- Food safety plan was not implemented

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Food Safety Plan (2)

Ask the panel:

- How is the plan made available at all sites?

Food Safety Plan (3)

Strategies

- Check for food safety plan during site monitoring.

- Review food safety plan before school starts.

Temperature Logs (1)

Trends

- Missing or incomplete temperature logs for all refrigeration and freezer units

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Temperature Logs (2)

Ask the panel:

- What strategies do you implement to ensure staff record temperatures daily?

Temperature Logs (3)

Strategies

- Check all units during site monitoring, including those units not housed in the cafeteria.

- Review food safety plan for monitoring procedures.

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Professional Standards (1)

Training Tracking Tool

Training Hours Not Met

Lack of Documentation to Support Training

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Professional Standards (2)

Trends

- Missing or incomplete tool
- Training hours are not met within the required timeframes for applicable food service staff.
- Lack of documentation to support trainings

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Professional Standards (3)

Ask the panel:

- How do you ensure the tool you're using has all the required areas?

- How frequently is training added to the tool and updated?

- When is the bulk of training conducted?

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Professional Standards (4)

Strategies

- Use CDE's waiver for providing training over two years.

- Maintain supporting documentation for trainings

- Use an approved tool such as CDE's Training Tracking Tool

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Meal Counting and Claiming (1)

Meal Counting and Claiming Procedures

Consolidation Errors

Unpaid Meal Charge Policy

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Meal Counting and Claiming Procedures (2)

Trends

- Meal counts are not recorded at the point of service (POS)

- Meal counting and claiming procedures did not reflect all types of POS where meals are claimed, including alternate POS

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Meal Counting and Claiming Procedures (3)

Alternate POS

- Meals served outside of the cafeteria
- POS at beginning of the line
- Salad bar after POS
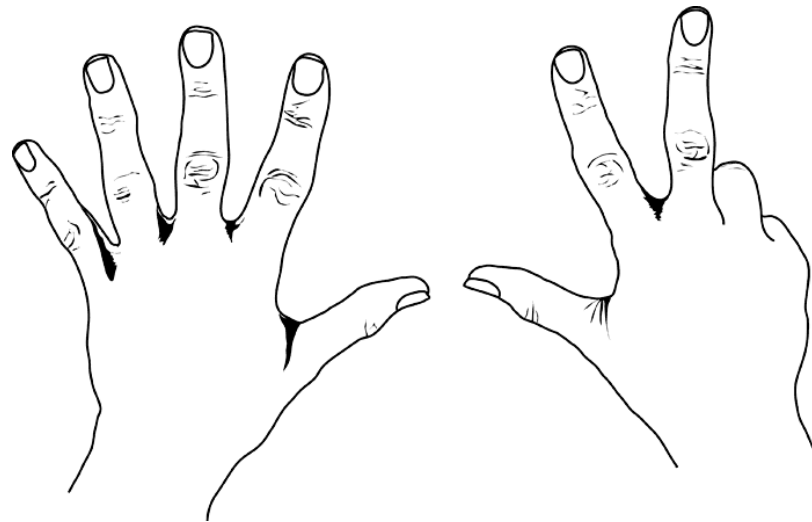- Field trips
- Saturday school

Meal Counting and Claiming Procedures (4)

Ask the panel:

- Provide an example of how meals are counted at an alternate point of service.

Meal Counting and Claiming Procedures (5)

Strategies

- Identify alternate POS

- Review and update meal counting and collection procedures annually

- Use CDE's Meal Count and Collection Procedure worksheet, available in the Child Nutrition Information and Payment System

Consolidation Errors (1)

Trends

- Meal count data incorrectly recorded, transferred, or totaled at the site level or school food authority level.

Consolidation Errors (2)

Ask the panel:

- What systems are in place to eliminate errors?

Consolidation Errors (3)

Strategies

- Keep original source documents with the claim
- Validate the claim consolidation with a second person.

Unpaid Meal Charge Policy (1)

Trends
- Missing or incomplete policy
- Lacking communication of policy
  - One or more methods of communication(s)

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Unpaid Meal Charge Policy (2)

Ask the panel:

- How was the policy assessed for the minimum requirements?
- What systems are in place to communicate the policy?

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Unpaid Meal Charge Policy (3)

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Strategies
- Refer to the Nutrition Services Division (NSD) Management Bulletin (MB) SNP-22-2019, Senate Bill 265: Pupil Meals: Child Hunger Prevention and Fair Treatment Act of 2017 and USDA Meal Charge Policy Requirements

PAST DUE

Successful AR

- Ensure your procedures are up to date

- Monitor sites

- Check daily and weekly menu meal pattern

- Check that OVS procedures are implemented correctly

- Work with your reviewer

SUCCESS

Today's Professional Standards

- Presentation Time: 1 hour

- Key Area: 3000 Administration

- Training Topic: Program Management

- Learning Objective: 3260 AR preparation

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- Share your experiences with us

- Tell us how we can help you

- Offer specific feedback

- Request follow up or technical assistance from NSD teams

- Take online at anytime, in about 5 minutes

- Visit the NSD Customer Service Survey web page at https://www.cde.ca.gov/ls/nu/nsdcs.asp

Call to Action
Farm to School Census

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- **Farm to school census**
  o Intended for all schools
  o Deadline extended to November 22

- **For Assistance:**
  Please submit business card

Questions?

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Thank you!