

# Reinvention of the Administrative Review

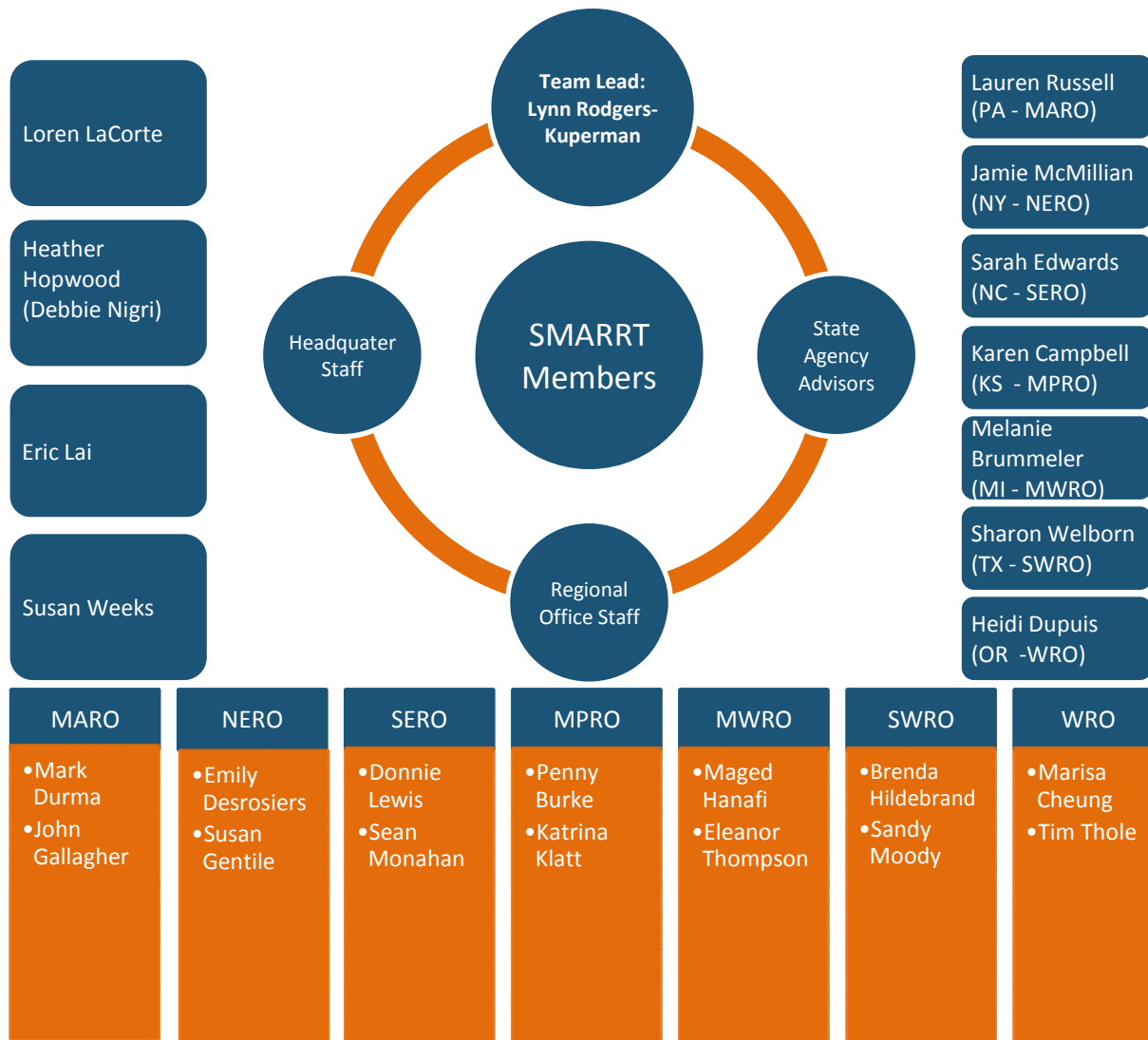
**School Meal Administrative Review  
Reinvention Team**

**School Nutrition Association  
July 2013**

# Presentation Overview

2

- **Background – Why a New Review Process?**
- **SMART Activities**
- **Details of New Administrative Review – How Does it Differ from the CRE?**
- **Questions**



# Team Structure

4

- **3 Subgroups to Review Details of Program Material:**
  - Access to School Meals & Reimbursement (PS1)
  - Meal Pattern and Nutritional Quality (PS2)
  - School Environment (General Areas)
- **4 Subgroups to Address Overarching Needs:**
  - Organization and Process
  - Forms
  - Testing
  - Training

# Administrative Review Testing

5

## ▶ **Why test the process?**

- Test the theories behind the new approach
- Gather feedback from SFAs/LEAS, State Agency staff, and team members
- Allow testing to inform the new process and materials
- Examine the new flow and enhance materials as needed

# Testing Results

6

- SAs and SFAs preferred using an off-site pre-visit process to make better use of time spent on-site
- Statistical sampling method reduced time spent reviewing eligibility determinations and maintained accurate error percentages
  - (e.g., one test sample had no error compared to only one application in the review of all applications)
- Dietary Specifications Assessment Tool's determination of compliance was supported when compared to an actual nutrient analysis
  - (i.e., tool indicated low risk, nutrient analysis supported compliance)

# Testing Results

7

- The new process makes the review more of a team effort — the SA reviewers and the SFA working together — and reduces the “gotcha” aspect of the review.
- The SFA not only has more time to provide information to the SA, but also will better understand why they are providing that information.

# Administrative Review: SY 2013-2014

8

- **School year 2013-14: State Agencies have options**
  - New process in its entirety (requires a waiver)
  - Current process (i.e., CRE + nutrient analysis)
- **New Administrative Review Training & Guidance**
  - Started in early 2013 to allow SAs to consider the new review process before committing to one of the two options



# Review Frequency & Schedule

9

- **Review Frequency**

- SFA must be reviewed every 3 years
- Cycle begins July 1, 2013
- Base Year: Special provision options

- **Review Schedule**

- SA discretion
- Postponed reviews
- Non-compliant SFAs



# Follow-Up Reviews No Longer Required

10

- Performance Standard Thresholds Eliminated
- 3 year review cycle = more frequent contact
- Ensure corrective action is implemented



**Collaborative Compliance**

# New Administrative Review Structure

| <b>Meal Access &amp; Reimbursement</b>   | <b>Nutritional Quality &amp; Meal Pattern</b>   | <b>Resource Management</b>  | <b>General Program Compliance</b>  | <b>Other Federal Program Reviews</b>   |
|--|---|---|--|--|
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# Performance Standards

12

- **Critical Areas**
  - Performance Standard 1
  - Performance Standard 2
- **General Areas**
  - Resource Management
  - General Program Compliance
  - Other Federal Program Reviews

# Maximizing Resources

13

## CRE Approach

Primarily conducted on-site

## New Approach

Process structured to be conducted off-site and on-site:

- Off-site Assessment Tool
- Risk Assessment Tools

## New Approach allows for:

- Office staff assistance
- Application of risk indicators
- Better balanced workload and preparation
- More on-site technical assistance

## Off-site Components

- **Advantages:**
  - Flexibility
  - Use of specialized staff
  - Reduced staff time
- **Off-site monitoring tools:**
  - Off-Site Assessment Tool
  - Compliance Risk Assessment Tool
  - Dietary Specifications Assessment Tool
  - Resource Management Risk Indicator Tool

# Off-site Assessment Tool

15

- **The Off-site Assessment and Risk Assessment Tools allow for:**
  - Collection of information through a series of questions and, in some instances, documentation
  - Flexibility for review at various times of the year
  - When applicable, allows the SA to identify sites potentially at-risk of noncompliance with federal requirements and target them accordingly for review

# Off-site Assessment Tool

16

- Includes questions on a number of monitoring areas and is intended for completion prior to the on-site visit
- Feedback from testing:
  - Tool encourages SA and SFA to work collaboratively and helps shift the process toward the goal of combining compliance/monitoring with technical assistance
  - SFA has more time to provide information to the SA, and also will better understand why they are providing that information
  - SA has more time to review documents thoroughly, conduct reviews more consistently, and provide ongoing technical assistance to the SFA



# Additional Off-site Monitoring Tools

17

- **Meal Compliance Risk Assessment Tool**
  - Targets error-prone areas of the new meal pattern
  - Determines which site is selected for an in-depth menu review
- **Dietary Specifications Assessment Tool**
  - Assesses food service practices to determine risk for not meeting the Dietary Specifications
- **Resource Management Risk Indicator Tool**
  - Identifies whether SFAs need an on-site Resource Management Comprehensive Review

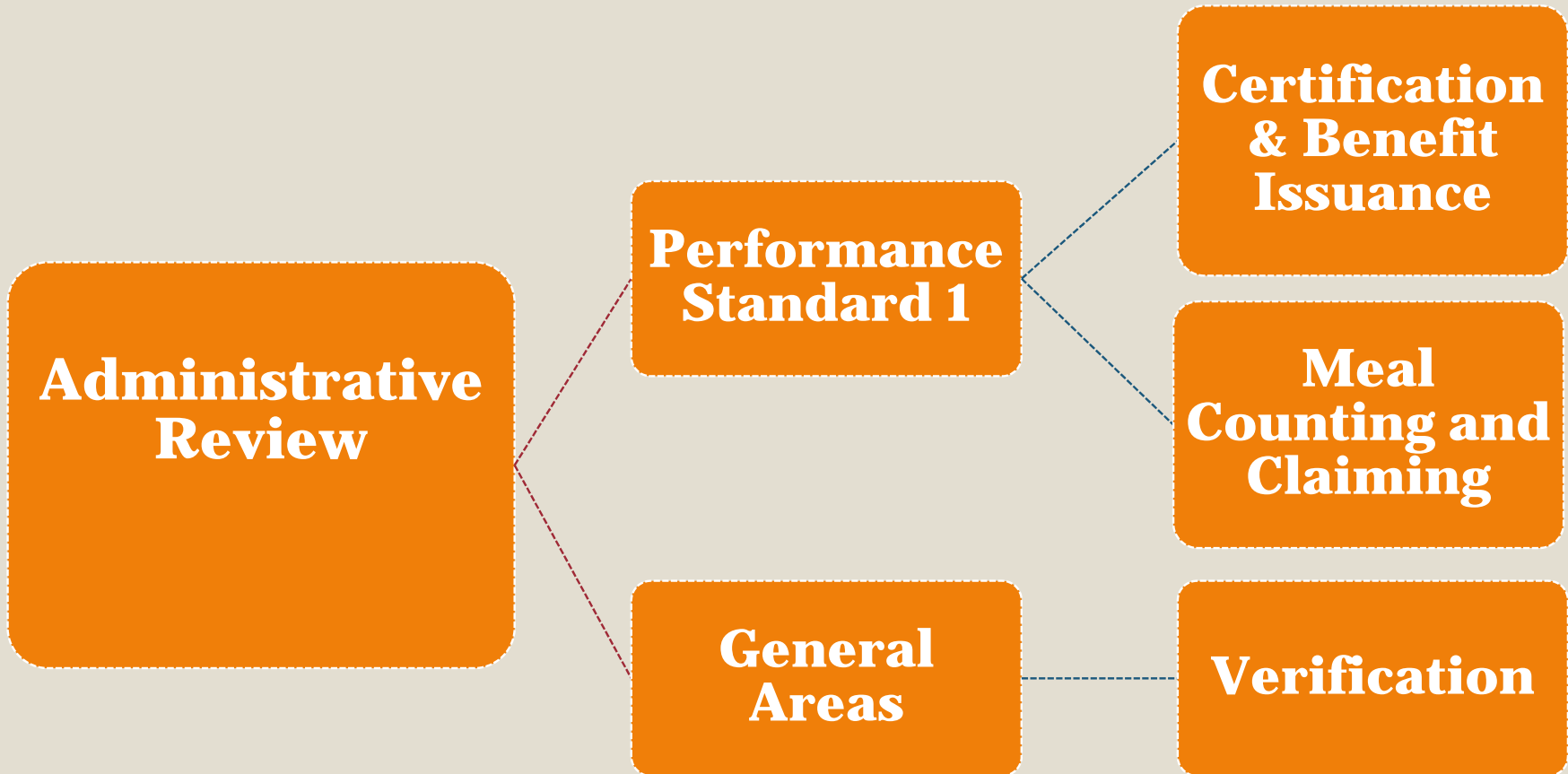
# New Administrative Review Structure

18

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# Access and Reimbursement Overview

19



# Overview of Access & Reimbursement

20

## **CRE Approach**

- Certification, Benefit Issuance and Verification examined at selected sites only
- Verification process also examined at SFA level
- Two samples are used to examine Certification and Benefit Issuance
- Review almost entirely conducted on-site

# Overview of Access & Reimbursement

21

## **New Approach**

### **Process Based Approach**

- System evaluation (off-site assessment)
- System validation (on-site)

### **Scope is now SFA-wide**

- Certification and Benefit Issuance errors are applied across the SFA instead of by site
- Verification will be reviewed at the SFA level; SA will review a random sample of verified applications

### **Streamlined process**

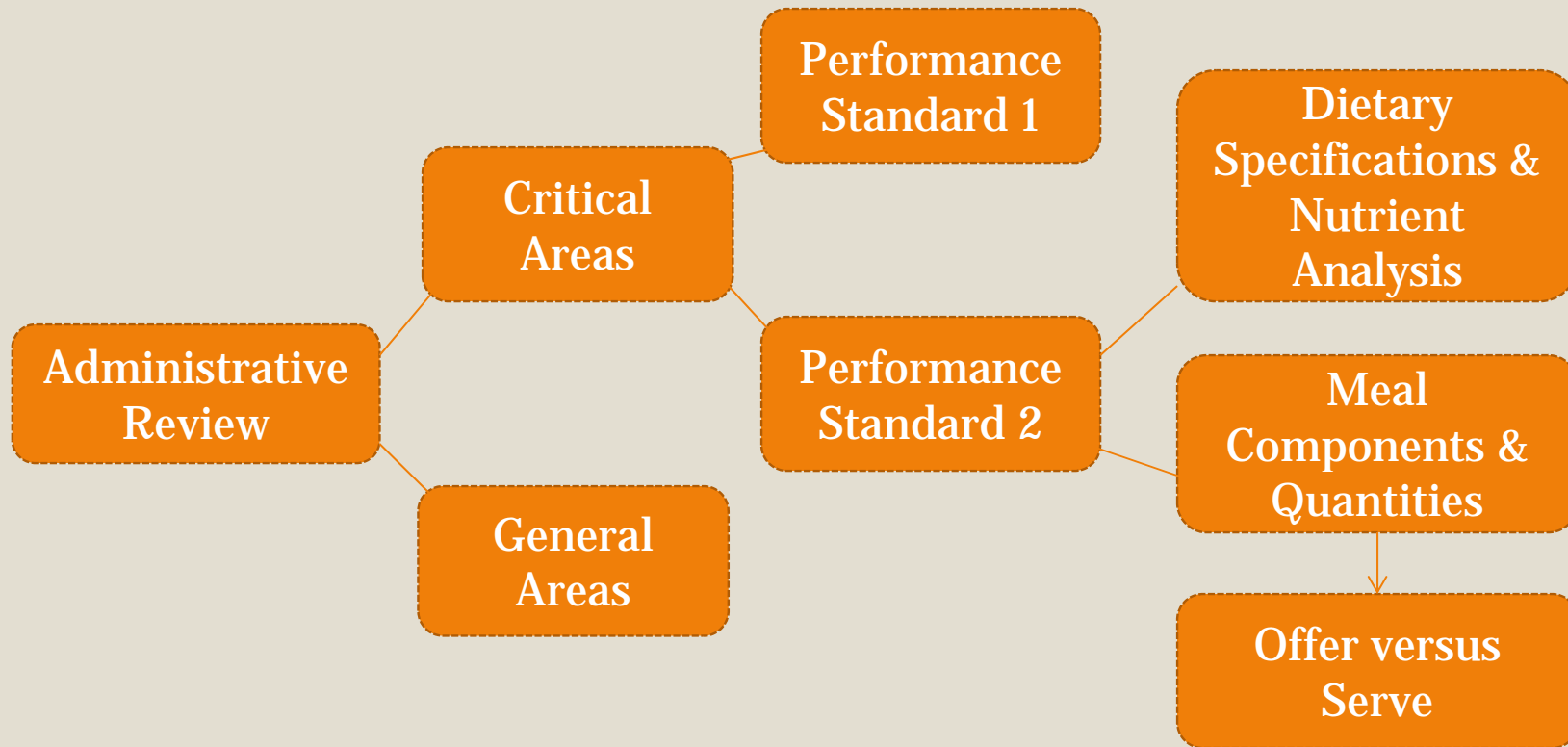
- Certifications will be used to examine BI list
  - Verification will be examined as part of the certification review
- ❖ No changes to the Meal Counting and Claiming approach (except for adding breakfast review)

# New Administrative Review Structure

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# Nutritional Quality & Meal Pattern Overview

23



# Meal Pattern & Nutritional Quality

## New Tools & Checklist

24

- **Meal Compliance Risk Assessment Tool**
  - 9 questions
  - Targets error-prone areas of the new meal pattern
  - Determines which site is selected for an in-depth menu review
- **Dietary Specifications Assessment Tool**
  - 26 questions
  - Assesses food service practices to determine risk for meeting the Dietary Specifications
    - ✦ High Risk – a nutrient analysis is required
    - ✦ Low Risk – a nutrient analysis may not be required
- **Nutrient Analysis & Validation Checklist**
  - Checklist of items needed to accurately conduct or validate a nutrient analysis



# Overview of Nutritional Quality & Meal Pattern

25

## **CRE/SMI Approach**

- Meal components and quantities assessed at all reviewed sites:
  - Menu/production record review
  - Meal observation
- Evaluate Offer vs. Serve implementation
- Nutrient analysis required for each menu type at one site

# Overview of Nutritional Quality & Meal Pattern

26

## **New Approach:**

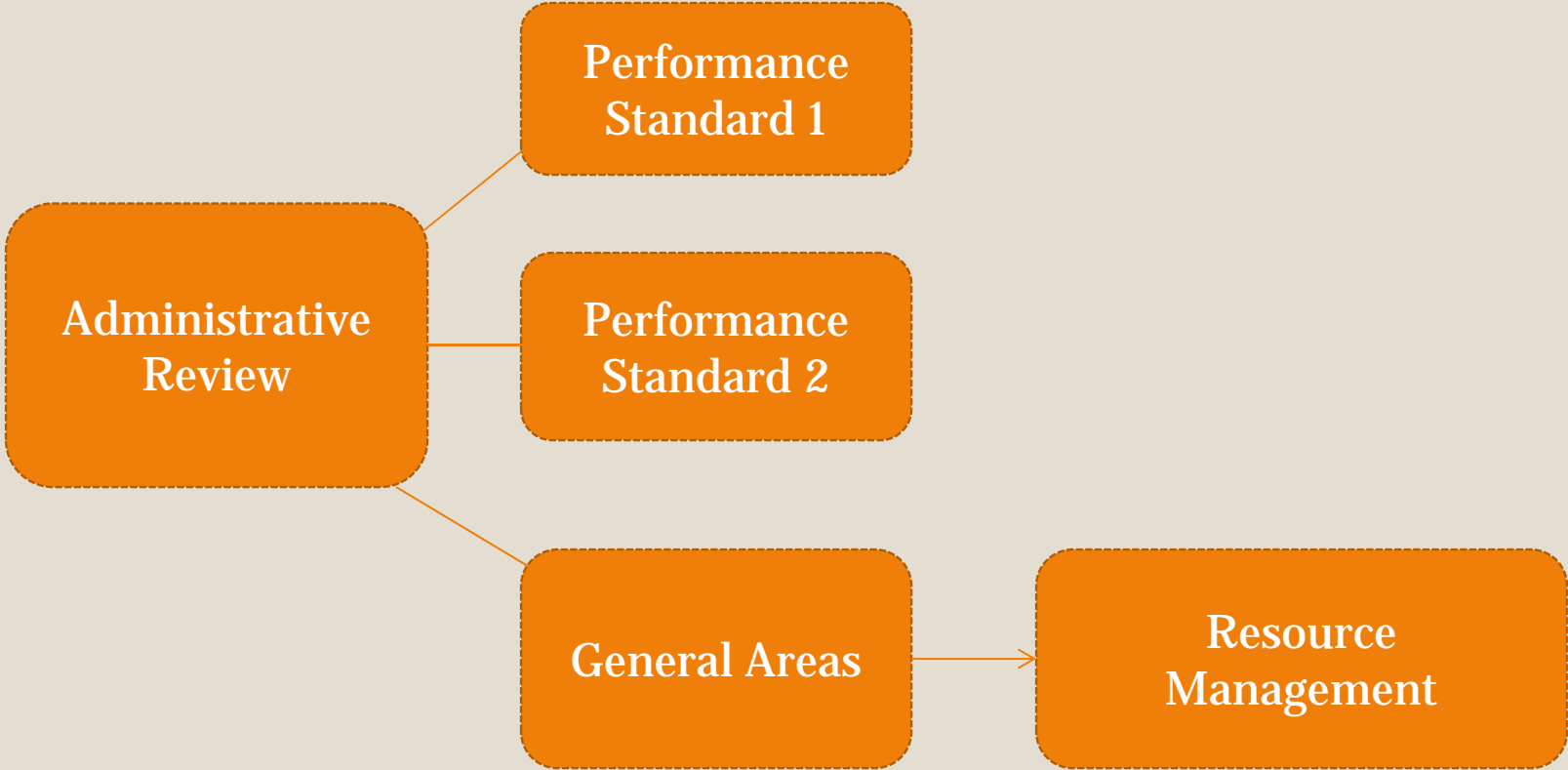
- Meal components and quantities assessed at all reviewed sites
  - Menu/production record review
  - Meal observation
- Evaluate Offer vs. Serve implementation
  - Ensure reimbursable meals contain  $\geq \frac{1}{2}$  cup of fruits or vegetables
- Nutrient analysis for each menu type **only required at high-risk sites**

# New Administrative Review Structure

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# Resource Management Overview

28



# Overview of Resource Management

29

## **CRE Approach**

- Resource Management is NOT included in the CRE although State Agencies are required to review a SFA's financial processes and practices.
- Some states have developed their own review questions and include them as part of the CRE; other states may review financial information as part of the annual SA-SFA agreement.

# Overview of Resource Management

30

## **New Approach**

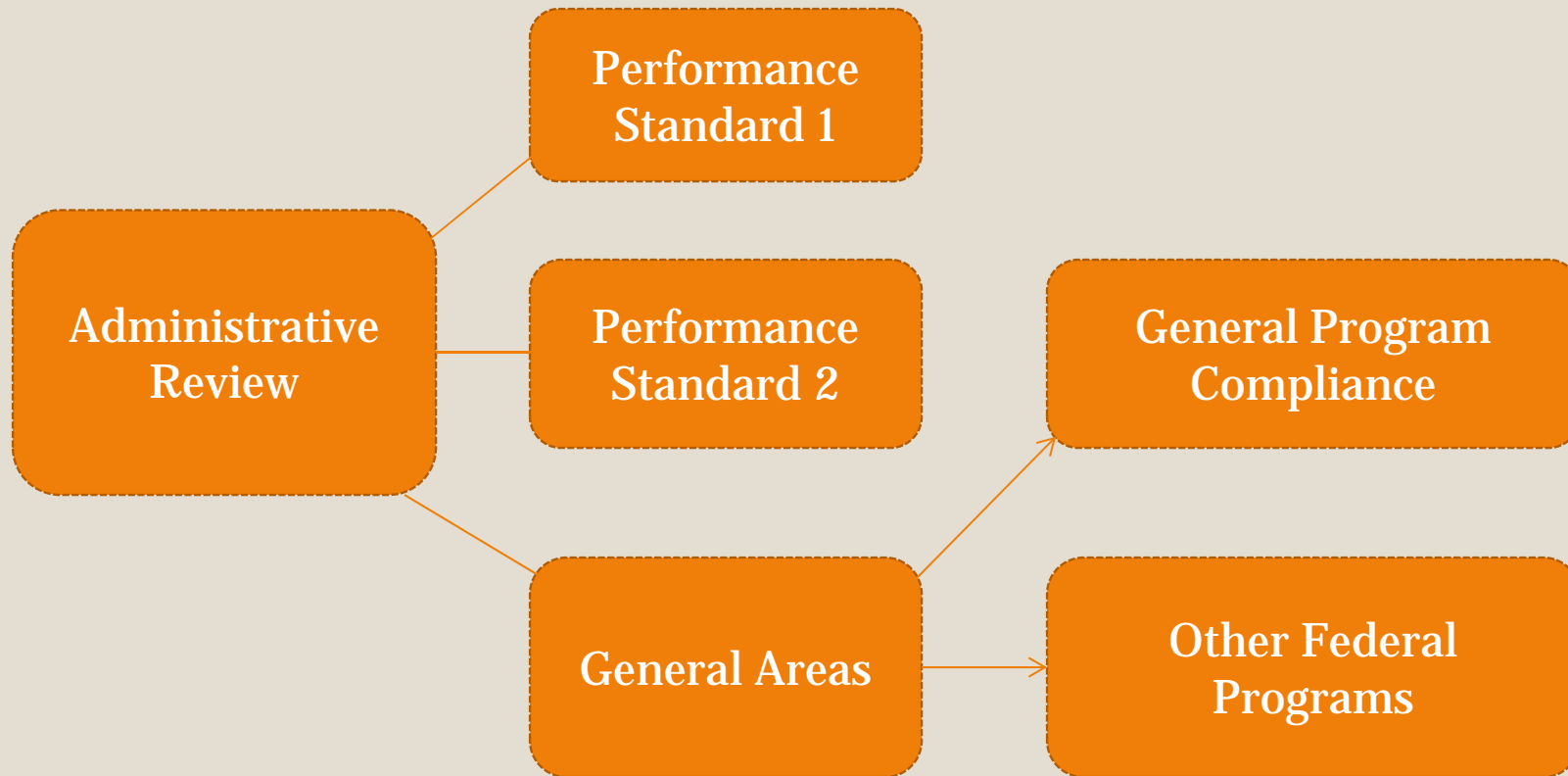
- Includes a resource management section, streamlining the review process in this area
- Requires SFA to submit information via the Off-site Assessment Tool to the SA at least 4 weeks prior to on-site review
- A Resource Management Risk Indicator Tool assesses information provided in the Off-site Assessment Tool to determine if potential risk for noncompliance exists
- If three or more risk indicators are triggered by the Risk Indicator Tool, the SFA will have an on-site Resource Management comprehensive review.

# New Administrative Review Structure

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# General Program Compliance/Other Federal Programs Overview

32





# General Program Compliance/Other Federal Programs Overview

33

## **CRE Approach – General Program Compliance:**

- Monitored on-site during the course of review OR
- Not part of the CRE process

## **CRE Approach – Other Federal Programs**

- Afterschool Snacks and Special Milk Program reviews only required during a FOLLOW-UP review
- FFVP not included in CRE
- One SSO site must be reviewed during summer before or after the SY in which the SFA's administrative review occurs.

# General Program Compliance/Other Federal Programs Overview

34

## **New Approach – General Program Compliance:**

- Mix of off-site and on-site responsibilities
- Some exclusively off-site/Some exclusively on-site
- Some reviews with a combination of both

## **New Approach – Other Federal Programs**

- Afterschool Snack Program – documentation review only during initial review/off-site or onsite/observation optional
- Seamless Summer Program – unchanged
- Fresh Fruit and Vegetable Program – part of initial admin review/site selection procedures/claim validation (off-site) & program observation (day of review)
- Special Milk Program - unchanged

# Corrective Action Procedures

35



# Questions?

36

