Reinvention of the Administrative Review

School Meal Administrative Review Reinvention Team

School Nutrition Association
July 2013
Presentation Overview

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

- **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

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

- 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

- 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.
• **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

- **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

- Performance Standard Thresholds Eliminated
- 3 year review cycle = more frequent contact
- Ensure corrective action is implemented
# New Administrative Review Structure

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Performance Standards

• Critical Areas
  ○ Performance Standard 1
  ○ Performance Standard 2

• General Areas
  ○ Resource Management
  ○ General Program Compliance
  ○ Other Federal Program Reviews
Maximizing Resources

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<th>CRE Approach</th>
<th>New Approach</th>
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<td>Primarily conducted on-site</td>
<td>Process structured to be conducted off-site and on-site:</td>
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**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
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

- 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

- **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
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Overview of Access & Reimbursement

**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
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)
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• SBP & SSO Outreach
Nutritional Quality & Meal Pattern Overview

Performance Standard 1

Critical Areas

Performance Standard 2

Administrative Review

Dietary Specifications & Nutrient Analysis

Meal Components & Quantities

Offer versus Serve

General Areas
Meal Pattern & Nutritional Quality
New Tools & Checklist

- **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

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
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
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Resource Management Overview

Administrative Review

Performance Standard 1

Performance Standard 2

General Areas

Resource Management
Overview of Resource Management

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

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.
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- Special Milk Program
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.
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

Corrective Action

Immediate CA
- Reported at Exit Conference
- CA Noted on SA Report to SFA
- No further action required

Absent Immediate CA
- Reported at Exit Conference
- CA Requested on SA Report to SFA
- SFA details Corrective Action Plan
Questions?