DECODING THE SCHOOL NUTRITION PROGRAMS

ASBO
April 25, 2017

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PREPARING FOR A SCHOOL FOOD SERVICE REVIEW

The Administrative Review
AR Reinvention Goals

- The Healthy Hunger-Free Kids Act of 2010 called for a more effective and efficient review process
- Consolidated the review process
- Incorporated school breakfast, the new meal pattern, and dietary specifications, and the performance-based reimbursement
- Implement a 3-year review cycle

Why Is There a Review?

- To Ensure Program Integrity and Proper Use of Federal Funding
- A Check for SFA Compliance with Regulations
Areas of Review

Critical Areas

Performance Standard 1
- Student Eligibility
- Meal Counts
- Reimbursement

Performance Standard 2
- Meal Pattern & Components
- Dietary Specifications

General Areas
- Resource Management
- Financial
- General Program Compliance
  - Civil Rights, Food Safety, Smart Snacks, Professional Standards, etc.
- Other Federal Programs
  - After School Snack
  - Special Milk Program
  - FFVP

The Administrative Review Process

Off-Site Assessment Tool
- Evaluation Questions

On-Site Review
- Validation Questions

Post On-Site Follow Up
- Review Close
## Administrative Review Structure

<table>
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<tr>
<th>Access &amp; Reimbursement</th>
<th>Nutritional Quality/Meal Pattern</th>
<th>Resource Management</th>
<th>General Program Compliance</th>
<th>Other Federal Program Reviews</th>
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<tbody>
<tr>
<td>Eligibility Determination</td>
<td>Meal Components</td>
<td>Nonprofit School Food Service Acct</td>
<td>Civil Rights</td>
<td>Afterschool Snack</td>
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<td>Benefit Issuance</td>
<td>Offer versus Serve</td>
<td>Paid Lunch Equity</td>
<td>SFA On-site Monitoring</td>
<td>Seamless Summer Option</td>
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<td>Direct Certification</td>
<td>Dietary Specifications &amp; Nutrient Analysis</td>
<td>Revenue from Non-program Foods</td>
<td>Local Wellness Policy</td>
<td>Fresh Fruit and Vegetable Program</td>
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<td>Verification</td>
<td>Indirect Costs</td>
<td>Competition Foods/Smart Snacks</td>
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<td>SBP &amp; SSO Outreach</td>
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### Preparation IS KEY

- Use the AR Summary & Self Evaluation Checklist
- Conduct a meeting with your staff to help them understand their role in the review and begin preparations!

- **Admin Review** has 3 parts:
  - **Pre Visit Procedures**: *Business Office & Food Service*
  - **On-site Visit Review**: *Business Office, Food Service, & Others involved in program requirements*
  - **Follow-up and Close**: *Business Office & Food Service*
Pre-Visit Procedures: Completed by CANS

- Notify the Authorized Representative and Food Service Director:
  You are on the list this school year!
- Send the SFA the Off-Site Assessment document
- Review the completed Off-Site Assessment document and clarify questions
- Nail down some pre-visit information:
  - Who will be involved, specifics on the SFA’s program
  - Select sites for review
  - Schedule an on-site visit date

How You Can Prepare for the Admin Review

**Meal Access and Reimbursement** **Performance Standard (PS) 1**

- Certification and Benefit Issuance
  - Review SFA eligibility documentation and student eligibility roster
- Verification
  - Review your verified applications and process
How You Can Prepare for the Admin Review

Meal Access and Reimbursement  **PS 1**
- Meal Counting & Claiming - watch your meal counts!
  - Is someone ALWAYS stationed at the point of service meal count station?
  - Do meal count staff monitor meals for completeness and count only eligible student meals?
  - Do meal count staff properly charge a la cart prices?
  - Does your meal count method protect confidentiality of student meal benefits?
  - Are monthly edit checks completed to ensure claim accuracy?

Meal Pattern and Nutritional Quality  **PS 2**
- Meal Components and Quantities
  - Watch meal service.
  - Are all the required meal components offered to all students?
  - Are staff properly telling students what they can and cannot take?
  - What happens when a food runs out?
  - What happens when a student refuses a reimbursable meal?
    Does the school charge for meals that are not reimbursable meals?
How You Can Prepare for the Admin Review

Meal Pattern and Nutritional Quality PS 2

• Offer versus Serve (OVS)
  • What is your OVS selection in your iCAN Site Application?
  • Watch meal service
  • Do staff understand the minimum component requirements?
  • Do staff know the difference between a complete (reimbursable) meal and a la carte or seconds purchase and how to charge accordingly?
  • Is signage posted for students to understand meal requirements?
  • Do staff accurately judge food quantities when food is self serve?

• Dietary Specifications and Nutrient Analysis
  • Are daily Production Records made?
  • Are all the components on the Production Records filled out?
  • Does the menu planner understand how to record a meal on the production record
  • Does the menu planner ensure that average calories, saturated fat, and sodium requirements are met; do they check labels for zero trans fat?
  • Are they asking for American agricultural products? Do they collect documentation from the vendor/manufacturer for food grown/processed outside of the US?
How You Can Prepare for the Admin Review

Resource Management

• Nonprofit Food Service Account
  • Do your reimbursements go into a dedicated foodservice account?
  • Do you have a method to verify only allowable costs are charged to this account?

• Paid Lunch Equity (PLE)
  • Is the PLE tool completed and student paid prices set properly or a source of nonfederal funding found to supplement PLE requirements?

How You Can Prepare for the Admin Review

Resource Management

• Revenue from NonProgram Foods
  • Adult meals, purchased seconds, a la cart, other foods purchased using FS dollars.
  • Is the USDA Non Program Tool completed and results are compliant?

• Indirect Costs
  • Are indirect costs charged to the FS account? Do you have approval from both a Cognizant agency and from CANS? Are indirect costs equitably charged to all federal programs?
How You Can Prepare for the Admin Review

General Program Compliance

• Civil rights
  • Is the “And Justice For All” poster in the meal service area?
  • Did staff receive **ANNUAL** Child Nutrition Civil Rights training? This is different than the Title Civil Rights training.
  • Do all students have equal access to your meal program?
  • Do your program materials and website contain the nondiscrimination statement?
  • Check how your school handles complaints of civil rights discrimination within the school meal program. Is it a written or informal policy that meets requirements in **CANS NSLP memo 108**?

• Onsite Monitoring (required for SFAs with more than 1 feeding site)
  • Has monitoring been completed for each school/feeding site prior to Feb 1?
  • Are the results recorded on the Onsite Monitoring Worksheet?

• Local School Wellness Policy
  • Does it meet the final requirements?
  • **TIP:** Use the **Wellness Policy Self-Checklist**
Wellness Policy – Final Rule July 1, 2017

• Permit parents, students, other school staff, general public to participate in reviewing and updating policy
• Identify a wellness leader to enforce compliance within district
• Inform and update the public on content of policy updates
• Include required components:
  • Goals for nutrition promotion, PE, other school wellness activities.
  • Guidelines for all foods sold in schools – meals and smart snacks
  • Policy for food and beverages available in schools – parties, incentives, fundraisers
  • Food and beverage marketing policy
  • Description of public involvement, updates, leadership and evaluation plan.

How You Can Prepare for the Admin Review

General Program Compliance

• Smart Snacks
  • Applies to all food sold to students during school day outside of reimbursable meal
  • Ensure all foods sold during school day are Smart Snack compliant
  • A la Carte
  • Vending Machines
  • Exempt Fundraisers
Smart Snack Calculator
https://foodplanner.healthiergeneration.org/calculator/

Nutrition Facts
Serving Size (1 fl oz)
Serving Per Container: 1
Amount Per Container Calories 140
Calories from Fat 7
Total Fat 3.5g
Saturated Fat 0.5g
Trans Fat 0g
Polyunsaturated Fat 1.5g
Monounsaturated Fat 0g
Cholesterol 0mg
Sodium 220mg
Potassium 150mg
Total Carbohydrates 24g
Dietary Fiber 1g
Sugar 4g
Protein 3g

My Product is a...

a) Snack
b) Side
c) Entree
d) Beverage

Is the first ingredient of your product a...

a) Fruit
b) Vegetable
c) Dairy
d) Protein food
e) Whole Grain
f) None of the above

What type of vegetable is your product?

a) Fresh Vegetable
b) Low sodium/No salt added canned vegetables with no added fats
c) Frozen Vegetables with no added ingredients except water
d) Dried vegetables with no added nutritive sweeteners
e) Potato is the first ingredient
f) Other

Ingredients List
Dried Potatoes, Corn Starch, Corn Oil, Sugar, Salt, Dextrose, Soy Lecithin, Molasses (contains Wheat Starch and Soy Flour), Onion Powder, Brown Sugar, Fructose, Natural Flavors (Contains Milk, Barley, and Chicken), Tomato Yeast, Chili Pepper, Tomato Powder, Soybean Oil, Garlic Powder, Citric Acid, Spices, Paprika Extract, Yeast Extract, and Annatto Extract (Color).

Your product is NOT compliant.
This derogative product does not meet the following nutrition standards:
- Sodium exceeds 230 mg
- Serving exceeds 1.1 oz
Smart Snack Beverages: ALL **GRADES**

**WATER**
(with or without carbonation)

**NON FAT MILK**
(plain or flavored)

**LOW FAT MILK**
(plain only)

**100% JUICE**
(fruit or vegetable)

100% JUICE DILUTED W/WATER (no added sweeteners)

SERVING SIZE LIMITS:
8 oz. ES
12 oz. MS/HS
Smart Snack Beverages: High School ONLY

**Diet Beverages (20 oz.)**
- (<5 kcal/8 oz. OR ≤10 kcal/20 oz.)

**Low-Calorie Beverages (12 oz.)**
- (≤40 kcal/8 oz. OR ≤60 kcal/12 oz.)

Smart Snack Calculator
https://foodplanner.healthiergeneration.org/calculator/

![Nutrition Facts](image)
Smart Snack Calculator
https://foodplanner.healthiergeneration.org/calculator/

For middle school?

- Your product is NOT compliant.
  - Only plain water, plain low fat milk, plain or flavored non-fat milk or 100% fruit or vegetable juice (may be diluted with water) with no added sweeteners are allowed for Middle School.

Nutrition Facts
Serving Size 1 Bottle (555 mL)
Serving Per Container 1

- Calories 30
- Total Fat 0g
- Sodium 160mg
- Total Carbohydrate 8g
- Sugars 2g

Not a significant source of vitamins, minerals, or other nutrients.

WATER, SUGAR, CITRIC ACID, NATURAL FLAVORS, SODIUM CITRATE, SALT, MONOSODIUM PHOSPHATE, SUCRALOSE, SOUR SALT, POTASSIUM CITRATE.

Is your beverage:
- a) Plain water or plain carbonated water
- b) Plain low fat milk
- c) Plain non-fat milk
- d) Flavored low fat milk
- e) Flavored non-fat milk
- f) 100% fruit or vegetable juice
- g) Other flavored and/or carbonated beverages

This beverage is being sold in:
- a) Elementary School
- b) Middle School
- c) High School

Your product is compliant!
- Your beverage is compliant for High School!
How You Can Prepare for the Admin Review

General Program Compliance

- Professional Standards
  - Every school must have at least one “Food Service Director”
  - Do all staff have the appropriate minimum number of training hours?
  - Are they recorded?
    - Food Service Director – 12 hours
    - Food Service Manager – 10 hours
    - Food Service Staff – 6 hours
    - Part-time Staff – 4 hours

- Water
  - Available for Breakfast AND Lunch?

- Food safety
  - Do we have a food safety plan (HACCP)?
  - Have staff reviewed the plan?
  - Do we take temperatures and correct if temp is not right?
  - Have we had 2 health inspections per year?
How You Can Prepare for the Admin Review

Other Federal Programs
- Afterschool Snack Program
  - Offsite OR Onsite review
- Seamless Summer Option
  - Onsite review the same year of a school lunch review
- Fresh Fruit and Vegetable Program
  - Onsite review
- Special Milk Program
  - Offsite OR Onsite review

Administrative Review Guidance & Tools

http://doe.sd.gov/cans/nslp.aspx

General Reminders

- **Restricted Food Service Account**
  - All revenue that goes into the account must be allowable
  - Moving reimbursement from FS account into another account is not allowable in most cases
  - For example: Afterschool snack reimbursement is received in FS Account and then paid to another account for 21st Century payment = **Not Allowed!**
- **Allowable/unallowable costs**
- **Procurement:**
  - Using the Most Restrictive of Federal, State, and Local rules
Definition of Nonprofit School Food Service Account

Nonprofit school food service account means the restricted account in which all of the revenue from all food service operations conducted by the school food authority principally for the benefit of school children is retained and used only for the operation or improvement of the nonprofit school food service. This account shall include, as appropriate, non-Federal funds used to support student paid lunch prices, and proceeds from nonprogram foods.

7 CFR 210.2 and 210.14

Paid Lunch Equity (PLE Tool)

• Must be completed every year
• The tool for SY17-18 is posted on the CANS NSLP website
• If you meet specific criteria, you can apply for a waiver this year
Adult Meal Prices…Why are they higher?

- Schools do not get reimbursed for adult meals
- They are nonprogram foods
- Adult portions should reflect the same portions as student meals (high school serving size)

A simple calculation to figure out the lowest adult meal charge:

Your Free Rate of Reimbursement + Federal Performance Rate of Reimbursement + Value Of USDA Foods (commodity value)

\[\$3.18 + \$0.06 + \$0.23 = \$3.47\]

NonProgram Food Revenue Tool

**Need to Know**

- Cost of Reimbursable Meal Food
- Cost of Nonprogram Food
- Total Food Cost
- Total Nonprogram Food Revenue
- Total Revenue
NonProgram Food Revenue Tool

- What are nonprogram foods?
  - Adult meals, extra milk, seconds, and any food that is paid for out of the school food service account that is not a reimbursable meal
- How to fill out the tool:
  - Enter information into the peach/tan colored boxes
  - Use the prior school year information or a reference period for an estimate
- What the tool does:
  - Determines whether or not your school is charging enough for nonprogram foods

Requirements of Nonprogram Foods Revenue

Formula:

\[
\frac{\text{Total Nonprogram Foods Revenue}}{\text{Total Program Revenue}} \geq \frac{\text{Total Nonprogram Food Costs}}{\text{Total Food Costs}}
\]
Calculate Average Meal Cost

- How much does it cost, on average, to produce a meal in your school district?

- Determine the **raw food cost** of the item offered for sale.
- Identify the desired **food-cost percentage** for the school nutrition program operation.
- To **establish a base selling price**, divide the item’s food cost by the desired food cost percentage mark-up.

Revenue Requirement Calculation Example

Cost for Reimbursable (Program) Food: $45,000
Cost of Nonprogram Food: $5,000
Total Food Costs: $50,000
Total Revenue: $100,000

*By math: Your Total Nonprogram Food Revenue: $5,000*

This example shows the SFA is $5,000 dollars short of Nonprogram Food Revenue to meet minimum requirement.
Unpaid Meal Requirements

• Each district must have a **written and communicated policy** in place by July 1, 2017
• Required to have a policy or standard procedures on **how zero and negative balances (unpaid meal charges) are handled by the SFA**
• Must be **provided to all households** at the start of the SY and to transferring households

Unpaid Meal Charges Example

“Elementary students will be allowed to charge the value of up to 5 lunch meals to their account except for the last two weeks of school when no charging is allowed. After the student reaches a negative balance equivalent to 5 lunch meals, a hot meal will no longer be served and the student will be provided an alternative meal until the account has a positive balance. Once a student has $5.00 remaining in his or her account, a low balance notification will be sent home with the student. This low balance notification will continue to be sent home daily until the account is more than $5.00 positive. Parents also may sign up to receive electronic notification of low balances via the online school lunch payment system.”
Unpaid Meal Charges Example

Middle school students is the same as elementary except they are told discreetly while going through line and given a note to take home.

High school students is similar however once they have reached negative 5 meals they are no longer served unless they want to pay in cash.

MAXIMIZING YOUR ENTITLEMENT DOLLARS
Commodities/USDA Foods
USDA Foods Entitlement Usage

How is entitlement determined?

• The total lunches served (TLS) in the prior completed school year multiplied by a planned assistance level (PAL) set each year in July based on certain indexes set by Congress in the original act

• TLS X PAL = Entitlement

USDA Foods Entitlement Usage

How can Entitlement be spent?

• Each year, by March, surveys are open on iCAN for agencies to allocate how they want the state agency to purchase USDA Foods

  • Survey types are for:
  • Direct Delivery (brown box) to South Dakota’s warehouse
  • FFAVORS – USDA Foods Fresh DoD
  • Processor Delivery (Bulk to Processor)
  • Net Off Invoice (NOI)
USDA Foods Entitlement Usage

Direct Delivery (brown box) to South Dakota’s warehouse
- Frozen 40 pound box or smaller
- Number 10 can or smaller
- Refrigerated 40 pound container or smaller

Processor Delivery (Bulk to Processor)

USDA Foods Entitlement Usage

FFAVORS – USDA Foods Fresh DoD
- USDA Foods entitlement funds set aside for fresh fruits and vegetables purchases
- Agencies log into the DoD FFAVORS website and place orders for weekly or bi-weekly deliveries through the contracted distributor
- Currently the South Dakota FFAVORS contract is with CashWa Distributing
USDA Foods Entitlement Usage

Net Off Invoice (NOI)
- A few schools in South Dakota have asked to procure their own processing items through distributors
- Additional training is required for new agencies
- Purchases are tracked from the processor to the agency storeroom and monitored through processor supported websites

How can a business manager track entitlement?

By accessing iCAN!
### Agency Entitlement

- **TLS** = Total Lunches Served from prior completed SY
- **Agency Entitlement** = Your entitlement dollars
- **DOD** = Money moved to DOD Fresh (formerly FFAVORS)

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**Entitlement Distribution Detail - NSLP**

- Click on any blue words/numbers and it will jump to detailed screen

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**Food Distribution Program**

**Contract Entitlement - NSLP**

- Agency Number: 
- Program: NSLP
- Program Year: 2016 - 2017
- TLS = Approved: 487,412
- Entitlement Distribution: $174,479.95
- Entitlement Used: $135,433.01
- Entitlement Remaining: $39,046.94
### Year End Report: Report >> Value of Commodities Shipped

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<th>Description</th>
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### HOT TOPICS & DISCUSSION

What’s On Your Mind?
### Block Grant impact on Pierre

- Total paid Lunches for last school year X’s .29 $55,296.00
- Total lunches all categories X’s .06 $17,155.00
- Total Breakfast reimbursement all meals $48,100.00
- Total USDA foods received last year $84,711.00
- If any summer or other programs FFV total funds N/A

**DISTRICT TOTAL** $205,262.00

### Block Grant impact on Brandon Valley

- Total paid Lunches for last school year X’s .29 $108,191.00
- Total lunches all categories X’s .06 $32,820.00
- Total Breakfast reimbursement all meals $87,778.00
- Total USDA foods received last year $172,573.00
- If any summer or other programs FFV total funds N/A

**DISTRICT TOTAL** $401,362.00
Where does the lack of funding get made up?

- The General Fund and this equals fewer dollars spent on education.
- Capped funds
- Does our state have the bandwidth to manage?
- State could determine funds may be allocated differently to schools.
- If more free/red added to district where do funds come from for these new students?
- Natural disasters or major layoffs would significantly impact funding used up faster and again where will the funds be made up?

- We need you to make sure our Senators and Congresswoman know our state can’t afford Child Nutrition programs to be Block Grants
Contact Us!

CANS Office
• Email: DOE.SchoolLunch@state.sd.us
• Phone: 605-773-3413

School Nutrition Association of SD
http://www.snasd.org/

This institution is an equal opportunity provider.