Review Process for Administrative Reviews



National School Lunch Program



Joe Clark, Senior Account Administrative Review Training September 6, 2023 ALSDE CNP School Programs



Administrative Review

- It's very important that the deadlines in the notification letter are followed.
- The off-site assessment gives us an idea of any areas that may need additional focus.
- Your edit checks will show the number of meals served compared to the number of children in attendance.
- If you have more meals served than children in attendance on any day in the review period, please have an explanation.

Administrative Review

- Check for proper signage.
- Make sure all paperwork is current.
- Conduct monitoring visits.
 - Follow up as needed.

Try not to Stress!

Preparing for the Administrative Review

- Send list of free and reduced students, preferably in Excel format.
- We will perform a random sample and inform director which applications will need to be pulled.
- If electronic application, it will either need to be printed or staff will need access to system.
- If student on list is directly certified, be prepared to show them on the DC list.
- Application review will be one of the first things done on site, after the entrance conference.

Documents

Eligibility Forms (Applications)/Verification

- CEP Roster (April 1 data)
- Benefit Issuance Document
- Income Eligibility Forms (IEFs) Free, Reduced, and Paid Applications
- Court Orders (Detention Centers)
- Verification Documentation

Documents

Meal Counts:Daily Meal Count documentation for RCCI and Private SchoolsEdit Checks for Public Schools

Month of Review:

- Meal count reports must include the students' eligibility (Free, Reduced, or Paid), CNP staff meals, faculty/staff adult meals, visitor meals, and a la carte sales.
- If you are serving breakfast in the classroom, we will have to review the source documentation for meals served. If the students come through the cafeteria to receive their breakfast, the source documentation will most likely be through the POS.
- If meals are delivered to the classroom and the meals are recorded on a roster, stress to the teachers the importance of making sure each child receives a fully reimbursable meal.

Financial Documents

Financial Reports

- Trial Balance (Public Schools McAleer/Nex Gen Reports)
- CNP Annual Report (RCCI and Private Schools)
- Bank Statement for September 30, 2023 (Public Schools must include the FY 2022 Reconciliation Report for McAleer/Nex Gen)
- Net Cash Resources
- Internal Controls
- Pass Thru
- Indirect Cost
- Paid Lunch Equity (unless utilizing waiver)
- Nonprogram Food Revenue Tool

Unpaid Meal Charge Policy

Federal Requirements:

- Documentation demonstrating the policy was communicated to all households at the start of the year.
- Documentation demonstrating the policy was communicated to all staff members responsible for the policy.
- Bad debts must be written off as operating losses; this particular operating loss may not be absorbed by the NSFSA but must be restored using non-Federal funds.
- Once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements.

ibald-meal-

Unpaid Meal Charge Policy

Revised memo from Dr. Mackey was issued on July 21, 2022.

- Encouraged to provide a reimbursable meal to any child that does not have funds.
- Discouraged from embarrassing or punishing students who have outstanding debt.
- **Requires**: Policy must be written and communicated to families at beginning of school year and to transfers. Must be shared with school staff (enforcement and assist students). Must address charging extras or a la carte items. Non-students may not charge.
- A copy is provided for other requirements.

Unpaid Meal Charge Policy

Copy of the Board Approved Policy State Guidelines: Financial Procedures for Local Schools

- 1. Will the district charge a bad check fee (best practice)? If so, a log must be maintained.
- 2. If returned checks are not collected, then funds from a non-public local fund source must be deposited to the CNP fund to cover the insufficient funds.
- 3. The local school or school system must take necessary actions to collect the check amount and must document those actions and procedures.
- 4. If applicable if a school system utilizes nonpublic local funds to cover NSF checks rather than an NSF fee, the system must have documentation on file to reflect transfers to the appropriate funds that received NSF checks that were not recovered.
- 5. *If applicable* the Board must maintain a log or other record to document that NSF fees collected exceed the amount of any checks that have been determined not to be collectable.

Administrative Review: Common Findings

Main Office

- Policies
 - Incomplete
 - Not followed
- Inadequate IEFs
 - Incomplete (not signed, no determination)
 - Approved incorrectly
 - Conversion Factors

Onsite School Level

- Policies
 - Not followed
- Offer Versus Serve
- Signage
- Meal Counting and Claiming
 - Reimbursable Meal/BIC
- Inventory/Storage/HACCP
- Smart Snacks
- Buy American

Administrative Review

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*This language was added pursuant to the May 5, 2022, USDA memorandum. However, the inclusion and applicability of this language is currently under challenge in the matter of *The State of Tennessee, et al. v. USDA, et al.*, Case No. 3:22-cv-00257, and may be subject to change.

Process for Adminitrative Review

Questions?

