Module 7: Key Points

After completing this module, you will:

- ⇒ Know when and what to expect during the Coordinated Review Effort and the School Meals Initiative Monitoring.
- ⇒ Learn where to receive technical assistance and training.
- ⇒ Understand what and how long records must be kept on file.
- ⇒ Know what and when reports are due to the USOE.

Module 7: Tasks

You should complete the following tasks in Module 7:

- ⇒ Read the lesson
- ⇒ Read the lesson Summary
- \Rightarrow Do the Activity
- ⇒ Take the Self-Quiz
- ⇒ Review the Web sites and resources related to Module 7

Module 7: Target Audience

This module should be reviewed by the child nutrition director and all other staff involved in school meal program operations.

Module 7: Estimated Time Required

Approximately 20 minutes



Introduction: Reviews

The Utah State Office of Education (USOE) visits each School Food Authority to review and assess local program operations and provide technical assistance and training. The two required reviews, which are each conducted at least once in every five-year cycle, are the Coordinated Review Effort (CRE) and the School Meals Initiative (SMI) Monitoring.



Coordinated Review Effort (CRE)

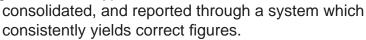
The CRE is a unified federal and state administrative review procedure. The USOE Child Nutrition Programs must conduct a CRE in each School Food Authority (SFA) at least once in every five-year cycle. The CRE examines general areas and two performance standards.

General Areas of Review

- ⇒ Free and reduced-price application processing and verification.
- ⇒ Meal production records.
- ⇒ Competitive food policies.
- ⇒ Nonprofit school food service.
- \Rightarrow Civil rights.
- ⇒ Procurement practices.
- ⇒ Food service management companies (when applicable).
- ⇒ Monitoring responsibilities.
- \Rightarrow Reporting.
- ⇒ Record keeping.

Performance Standard I

All free, reduced-price, and paid meals claimed for reimbursement must be served only to children eligible for each type. The meals must be counted, recorded,



The purpose behind Performance Standard I is to make sure that students have received the benefits for which they qualify.



Performance Standard II

Meals claimed for reimbursement must be served according to the National School Lunch and School Breakfast Program regulations. The purpose behind Performance Standard II is to make sure that the meals claimed for reimbursement contain the correct food items or components.

Corrective Action

Errors found during a review require corrective action by the SFA and may



require fiscal action by the USOE. Where the errors exceed the review threshold of one or more of the performance standards, a formal corrective action plan must be developed by the SFA and submitted to the USOE within a specified time for approval.

The corrective action plan must indicate how the deficiencies will be corrected and propose a specific schedule. The appropriate fiscal adjustment will be made after the SFA completes corrective action and

submits documentation to the USOE.

Time Frame and Procedures

SFAs will be notified of a tentative review date. If the SFA is large, a USOE team may conduct the review to reduce the time needed. When notified of a review, SFA officials should arrange to have all records and other documents available for examination and all appropriate personnel present for interviews.

Site Selection

Sites are selected for review based on the average number of free daily meals served and free participation percentage. Other sites may be selected due to perceived problems or other USOE criteria.

School Meals Initiative (SMI) Review

SFAs have a responsibility to offer meals that are consistent with the goals of the Dietary Guidelines for Americans (DGA) and the appropriate levels of Recommended Dietary Allowances (RDA) for specified nutrients and calories. The SMI Review determines compliance with these standards. The USOE is required to conduct an SMI Review of each SFA at least one time every five years.

The fundamental difference between reviews of nutrient-based systems and food-based systems is how the USOE does the review. In nutrient-based systems, the USOE reviews the nutrient analysis done by the SFA and how it was conducted, including a check of the source documents. For food-based systems, the USOE

conducts a nutrient analysis and must have access to all source documents and other information for an accurate analysis.

If the nutrition standards are not met, the USOE and the SFA must develop a corrective action plan which will lead the SFA into full compliance. If the SFA does not work in good faith to meet the terms of the plan, disallowance of reimbursement funds may be warranted.

Technical Assistance and Training

Technical assistance and training allow the USOE to address specific problems or requests. A program may need attention because of needs or goals established by the SFA, USOE and/or USDA. The State Technical Assistance Review (STAR) is a nonrequired review which prepares sites for the CRE or SMI reviews. Training may also occur as the result of a Coordinated Review Effort or a USOE audit finding.

Record Keeping

In addition to your current year's records, all past records must be kept on file for three years. These records include (1) all applications for free and reduced-price meal benefits, including denied applications, (2) verification information, (3) program reports, (4) menus, (5) meal production records, and (6) claims.

Important Dates

October 31st: Obtain numbers for October Survey (see below) and Verification

Summary Report.

November 15th: Complete verification activities.

November 15th: October Survey due.

November 15th: Racial/Ethnic Information report due.

February 15th: Report the number of verification non-respondents who reapplied

for free or reduced-price benefits and were reapproved to the USOE.

March 1st: Verification Summary Report due.

October Survey

Percentages derived from the October Survey aid in establishing eligibility for various other programs throughout the Utah State Office of Education.

Survey Data Includes:

Student enrollment in school meal program by site, by grade for free and reducedprice, by category (resident, non-resident) and by program (National School Lunch Program, School Breakfast Program, After School Snack Program, and Special Milk Program).



Results of the October Survey found at:

www.schools.utah.gov/cnp/freenroll.htm

Summary

- ⇒ The USOE Child Nutrition Programs conducts two required reviews, the Coordinated Review Effort (CRE) and the School Meals Initiative (SMI) Monitoring.
- ⇒ The CRE and the SMI are each conducted at least once in every five-year cycle.
- ⇒ The CRE examines general areas and two performance standards.
- The CRE general areas include free and reduced-price application processing and verification, meal production records, competitive food policies, nonprofit school food service, civil rights, procurement practices, food service management companies (when applicable), monitoring responsibilities, reporting, and record keeping.
- ⇒ The purpose of the CRE Performance Standards I is to make sure that students have received the benefits for which they qualify.
- ⇒ The purpose of the CRE Performance Standards II is to make sure that the meals claimed for reimbursement contain the correct food items or components.
- ⇒ Errors found during a review require corrective action by the SFA and may require fiscal action by the USOE.
- ⇒ When notified of a review, SFA officials should arrange to have all records and other documents available for examination and all appropriate personnel present for interviews.
- ⇒ Sites are selected for CRE based on the average number of free daily meals served and free participation percentage.
- ⇒ SFAs have a responsibility to offer meals that are consistent with the goals of the Dietary Guidelines for Americans (DGA)
 - and the appropriate levels of Recommended Dietary Allowances (RDA) for specified nutrients and calories. The SMI Review determines compliance with these standards.
- ⇒ The State Technical Assistance Review (STAR) is a non-required review which prepares sites for the CRE or SMI reviews.
- ⇒ All past records must be kept on file for three years, including (1) all applications for free and reduced-price meal benefits, including denied applications, (2) verification information, (3) program reports, (4) menus,(5) meal production records, and (6) claims.



Activity

Develop a plan for how you will train and prepare all needed staff on NSLP and SBP procedures and the USOE required reviews. Your plan should equate to a Manual of Operations, so that staff turnover does not affect the smooth running of your school meal program.



Self-C	Quiz	(Answers on	page 7	7)
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	(Answers on page 1)	
1.	The two required USOE reviews are the Monitoring.	_and the
2.	The USOE reviews take place at least once in everyyear cycle) .
3.	Name the purpose of the CRE's Performance Standards I and II. Performance Standard I Purpose:	
	Performance Standard II Purpose:	
4.	True or False: Errors found during a review require corrective action by may not require fiscal action by the USOE.	the SFA but
5.	SFAs have a responsibility to offer meals that are consistent with the go and the appropriate levels of for specified nutrients and calories.	
6.	The is a non-recombined multiple in the CRE or SMI reviews.	juired review
7.	In addition to your current year's records, all past records must be kep years.	t on file for
8.	List school meal program records which must be kept on file.	
	1) 2) 3) 4) 5) 6)	

Resources

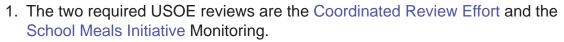


⇒ For a good summary of how the SMI review compares to the CRE review, visit www.fns.usda.gov/tn/Resources/smi_ch6.pdf.
 ⇒ For SMI frequently asked questions, visit

www.fns.usda.gov/cnd/Guidance/SMI_FAQ_050107.pdf.

⇒ For specific information on Utah reviews, consult USOE's NSLP and SBP online manual at www.schools.utah.gov/cnp/manual.html.

Self-Quiz Answers





2. The USOE reviews take place at least once in every five-year cycle.

3. Performance Standard I Purpose: The purpose of Performance Standard I is to make sure that students have received the benefits for which they qualify.

Performance Standard II Purpose: The purpose behind Performance Standard II is to make sure that the meals claimed for reimbursement contain the correct food items or components.

4. True or <u>False</u>: Errors found during a review require corrective action by the SFA but may not require fiscal action by the USOE.

Errors found during a review require corrective action by the SFA and **may** require fiscal action by the USOE.

- 5. SFAs have a responsibility to offer meals that are consistent with the goals of the Dietary Guidelines for Americans (DGA) and the appropriate levels of Recommended Dietary Allowances (RDA) for specified nutrients and calories.
- 6. The State Technical Assistance Review (STAR) is a non-required review which prepares sites for the CRE or SMI reviews.
- 7. In addition to your current year's records, all past records must be kept on file for three years.
- 8. List school meal program records which must be kept on file.
 (1) all applications for free and reduced-price meal benefits, including denied applications, (2) verification information, (3) program reports, (4) menus,(5) meal production records, and (6) claims.