



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

P.O. BOX 2120

RICHMOND 23218-2120

## **SNP Memo #2016-2017-10 (Private Sponsors Only)**

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Sandra C. Curwood, PhD, RDN *sandy*  
Director, School Nutrition Programs

DATE: January 23, 2017

SUBJECT: Federal Administrative Review of Private School Food Authorities in 2016-2017

This memo provides notification to non-public sponsors of the USDA National School Lunch Program and/or School Breakfast Program in Virginia about the required federal administrative review of these programs. The Virginia Department of Education (VDOE) assumed responsibility for the private school food authorities (SFA) effective July 1, 2016, and staff from VDOE will be conducting these reviews for participating sponsors. Please see the information in this memo and its attachments for details about the three year review cycle, the 2016-2017 schedule of reviews for private sponsors, and sample documents that SFAs will receive as part of the review notification process.

The Code of Federal Regulations Title 7, Part 210.18, requires an administrative review of the federally funded breakfast, lunch, and afterschool snack programs, as applicable, in each participating school food authority (SFA). Section 207 of the Healthy, Hunger-Free Kids Act of 2010 requires implementation of a unified accountability system to ensure SFA compliance with program requirements and requires each SFA to be reviewed once every three years. For your information, the VDOE three-year review cycle for private SFAs is in Attachment A to this memo.

The federal administrative review is a comprehensive evaluation designed to assess compliance with regulations, standards, and state and federal laws. This review of the school nutrition programs involves both off-site and on-site data collection, staff interviews, document reviews, and observation of the school nutrition programs in operation. Attachment B to this memo is the 2016-2017 review schedule for those private SFAs scheduled to be reviewed during this school year. The schedule includes the dates for off-site pre-review data collection to begin and the week during which the on-site review will be conducted. SFAs scheduled for a review during the 2016-2017 school year are asked to immediately compare the on-site review dates to the SFA calendar. No later than January 31, 2017, contact Karen Patterson, using the information below, if there are any dates during the on-site review week when meals would not be offered.

Karen Patterson, VDOE SNP specialist, will also be the team leader for these administrative reviews. She will conduct orientation to the review process for each SFA scheduled for review and will provide technical assistance as needed. The SFA chief officer and school nutrition contact person will receive formal notification of the review schedule and requirements by email on the first day of the week the off-site data collection is scheduled to begin. A letter, review schedule, and off-site data collection tools will be attached to the email and will signal the beginning of the review process. A sample review letter and schedule and a list of information to be reviewed are Attachments C and D to this memo.

Questions regarding this federal administrative review process may be directed to Karen Patterson, SNP specialist, at (804) 371-4282 or by email at [karen.patterson@doe.virginia.gov](mailto:karen.patterson@doe.virginia.gov), or to Lynne Fellin, Associate Director, at (804) 225-2717 or by email at [lynne.fellin@doe.virginia.gov](mailto:lynne.fellin@doe.virginia.gov).

SCC/LAF/ag

#### Attachments

- a. Private SFA Administrative Review (AR) Three-year Cycle (PDF)
- b. Private SFA AR Schedule for 2016-2017 School Year (PDF)
- c. Sample AR Letter and Review Schedule for Private SFAs (PDF)
- d. Information to be Reviewed – Private SFAs (PDF)

<b>Virginia Department of Education            Office of School Nutrition Programs            Federal Administrative Review – Private SFA Schedule            Three-Year Cycle: Effective 2016-2017</b>		
<u>2016-2017</u>	<u>2017-2018</u>	<u>2018-2019</u>
1. AJC Episcopal School	1. Eastern Mennonite H.S.	1. Elijah House Academy
2. Calvary SDA School	2. Holy Cross Academy	2. Grafton School
3. Cathedral of Faith School	3. Little Lambs Academy	3. Jackson-Feild Home
4. The House of Restoration	4. Phillips Program	4. Park Place
5. Leary Educational Foundation	5. Tyler Village of ChildHelp	5. St. Mary’s Home for Children
6. Restorative Youth Services	6. United Methodist Family Services	6. Virginia Dependents School System/Quantico
7. St. Andrews School		
8. STEP Inc.	7. Youth for Tomorrow	

**Virginia Department of Education - Office of School Nutrition Programs**  
**Federal Administrative Review Schedule - Private SFAs**  
**Review Dates for School Year 2016-2017**

<b>School Food Authority (SFA)</b>	<b>Notification Letter and Off-Site Pre-Review Data Collection</b>	<b>On-Site Review Site Visits Will Be Scheduled During This Week</b>
AJC Episcopal School	January 30 - February 3, 2017	February 27 - March 3, 2017
St. Andrews School	February 13-17, 2017	March 13-17, 2017
House of Restoration	February 21-24, 2017	March 20-24, 2017
Calvary SDA School	February 27 - March 3, 2017	March 27-31, 2017
Restorative Youth	March 27-31, 2017	May 1-5, 2017
Cathedral of Faith School	April 3-7, 2017	May 8-12, 2017
STEP Inc.	April 10-14, 2017	May 15-19, 2017
Leary Educational Foundation	April 24-28, 2017	May 22-26, 2017



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF EDUCATION

P.O. BOX 2120

RICHMOND 23218-2120

January 30, 2017

Chief School Officer  
ABC Private School  
One Park Place  
Anytown, VA 22222

Dear Chief School Officer:

The Code of Federal Regulations, Title 7, Part 210.18 requires the Department of Education (DOE) to conduct a federal program administrative review (FPAR) of the USDA school nutrition programs in all participating school food authorities (SFA) once every three years. Private SFAs were notified of the three year cycle and annual review schedule in SNP Memorandum Number 2016-2017-10 in January 2017. The school nutrition programs (SNP) in ABC Private School are scheduled for this federal review in the 2016-2017 school year. This letter provides details regarding the pre-review off-site data collection, information the SFA staff must provide to DOE prior to the review, and the on-site DOE review schedule. Dates and deadlines, as well as information to assist the SFA in preparation for the review, are provided in an attachment to this letter.

As the chief school officer, your participation in this federal review process is respectfully requested. Please reserve time on your calendar to participate in the entrance and exit meetings. The review will begin with an entrance meeting on Tuesday, February 28, 2017 at 8:30 am, with you, the division's SNP contact, and staff from the DOE Office of School Nutrition Programs. Karen Patterson, DOE-SNP specialist, will be the team leader for the review process. Contact information for the team leader is provided in the attachment. The review will conclude with an exit conference on Wednesday, March 1, 2017 at 3 pm.

The purpose of this review is to determine compliance with federal and state regulations governing the school nutrition programs. The scope of the review includes five compliance modules: Access and Reimbursement; Nutritional Quality/Meal Pattern; Resource Management; General Program Compliance; and, Other Federal Programs. Within these modules, school policies and practices will be assessed, documentation will be reviewed, and meal service will be observed.

Chief School Officer  
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This process for the USDA federal program administrative review includes the SFA staff as active partners in the assessment. Data collection will take place off-site prior to the review to make effective use of SFA and DOE staff time and increase efficiency during the on-site review. Please assure all deadlines are met; contact the team leader or me if issues arise. Staff from SFAs scheduled for review during the current school year will receive orientation to the review process from Karen Patterson as part of the off-site data collection process.

During this review, the DOE-SNP review team will be working with you, the SFA school nutrition program staff, administrators, and building staff to assess the school nutrition programs, evaluate compliance, and identify areas that may require technical assistance or corrective action. Please contact Karen O. Patterson, the review team leader, or Lynne A. Fellin, Associate Director, at (804) 225-2717, with questions about this review.

Sincerely,

*Sandy*

Sandra C. Curwood, PhD, RDN  
Director  
Office of School Nutrition Programs

SCC/LAF/ag  
Enclosure

c: Ms. Mary Smith, School Nutrition Program Contact Person  
Karen O. Patterson, DOE-SNP Team Leader  
Lynne A. Fellin, Associate Director, School Nutrition Programs

**VIRGINIA DEPARTMENT OF EDUCATION  
SCHOOL NUTRITION PROGRAMS  
FEDERAL ADMINISTRATIVE REVIEW 2016-2017**

School Food Authority: ABC Private School - 5555

DOE-SNP Team Leader Karen O. Patterson

Phone: 804 371-4282 E-mail: Karen.patterson@doe.virginia.gov

**Pre-Review Off-Site Data Collection**

Sent to Division: January 30, 2017 Due from SFA: February 13, 2017

**Off-Site Review Form:**

Review, Edit, Return Off-Site Form to: SNPWEBDOC@doe.virginia.gov

**USDA Menu Certification Workbooks/Dietary Specifications/Potential Nutrient Analysis:**

**Menu Week to be Used for All Federal Review Compliance Assessment: February 13-17, 2017**

- Complete USDA Menu Certification Workbooks for lunch and breakfast for each grade group served (K-5, K-8, 6-8, and 9-12) for each unique menu offered during the week used for review. The Simplified Nutrient Assessment section of the workbooks is not required. Menu certification workbooks must be completed and available for review on first day of on-site review week.
- Complete Dietary Specifications Assessment questions once received from the DOE-SNP Team Leader and return to [SNPWEBDOC@doe.virginia.gov](mailto:SNPWEBDOC@doe.virginia.gov).
- Compile information for potential nutrient analysis to be ready on first day of onsite visit.

**Benefit Issuance (If Applicable for Pricing Programs):**

- Division-wide Benefit Issuance List of all Active Free and Reduced Eligible Students Include: Student Name; Application Number; Eligibility Status; School Name; Eligible by Application or D/C; Verification. Do not include Denied. Submit in Excel format. CEP divisions, contact Team Leader for information.
- Send via Secure, Confidential SSWS Dropbox to Team Leader and copy Lynne Fellin (see instructions attached for how to use the SSWS Dropbox)

**On-Site Review Information**

**Review Schedule:** Tuesday, February 28, through Wednesday, March 1, 2017

**Entrance Meeting followed by Central Office Review:**

Tuesday, February 28, 2017, 8:30 a.m.

**Exit Meeting:** Wednesday, March 1, 2017, 3 p.m.

**On-site school observations will include breakfast, lunch and other federal programs, if operating.**

School	Date	Reviewer
1. ABC Private School	Wednesday, March 1	Karen Patterson

## Reports and Documentation Required for the 2016-2017 Federal Administrative Review of School Nutrition Program

Your Team Leader will provide detailed instructions for submitting the **Off-Site Assessment Tool** and the **Benefit Issuance** list to VDOE prior to the Onsite Review.

### **Onsite Review, School Nutrition Central Office**

The following records and information must be available for DOE School Nutrition Program reviewers at the time of the entrance meeting on the first day of the Onsite review. Any electronic documents, including online applications, must be accessible to the reviewers throughout the review.

- Benefit Issuance documentation
  - Household applications approved for Free or Reduced-Price benefits
  - Direct certification information from division liaison(s) (homeless, foster, migrant, etc.)
  - All Denied applications
- Verification, all documents and records
  - Notice to Households of selection for Verification
  - Notice of Adverse Action or Letter of Verification Results
  - Completed Verification Summary Report
  - Racial\Ethnic Data Report
- All schools in the division for the review period
  - SNP-12 *Daily Meal Claim and Cash Income Record* or comparable document
  - Edit Check report and supporting documentation
  - Principals' Report with Average Daily Attendance and Membership
  - Local Level Accountability Review, National School Lunch Program (NSLP)
  - Local Level Accountability Review, School Breakfast Program (SBP) for 50% of all schools
  - Afterschool Snack Program (ASP) Accountability Review, if applicable
- Afterschool Snack Program documentation most recent period
- SNP020 Financial Report
  - Year-end Annual Report for prior school year
  - Monthly or semi-annual report for most recent claim month
- Financial records to support information reported in the SNP020 and monthly reconciliation of SNP account
- USDA Revenue from Non-program Foods Tool for prior year SY2015-16
- Menus – for each grade group:
  - Cycle menu for the review period
  - Menu for the month of the Onsite review
    - Breakfast and Lunch
    - Afterschool Snack Program (ASP)
- USDA Certification Workbook – for each grade group:
  - Breakfast and Lunch for the week indicated on the Onsite review schedule
- Fresh Fruit and Vegetable Program (FFVP) claim documentation, if applicable
- Special Provisions, if applicable
  - Counting and Claiming procedures
  - Community Eligibility Provision (CEP) identified student percentage report for April 1
  - Supporting documentation for the validated Identified Student Percentage (ISP)

**Reports and Documentation Required for the 2016-2017  
Federal Administrative Review of School Nutrition Program**

**Onsite Review, School Nutrition Central Office (continued)**

- Information for potential nutrient analysis of one week's menus for one school, to include: standardized recipes, Nutrition Facts labels, manufacturer's specification information or nutrition data submission forms, portioning information, meal component crediting information, and completed production records. All information must be for menus served during the week indicated for nutrient analysis on the Onsite review schedule and by your Team Leader.
- Smart Snacks in School documentation and compliance information from SNP, school principal, PTA, student organizations and others for all foods/beverages sold to students during the school day
- Food Safety and HACCP Plan
- Local Wellness Policy (LWP)
  - Copy of Local Wellness Policy
  - Evidence of how public is informed of the LWP and how they may participate What constitutes evidence?
  - Evidence of assessment of LWP implementation
  - Results of assessment or report provided to public
- Monthly inventory of food and supplies including USDA foods, if applicable Move to school level checklist?
- Documentation of most recent civil rights training for school nutrition program staff
- Roster of all SNP employees by job category and scheduled hours (director, manager, full-time and part-time)
- Professional Standards Annual Training Requirements documentation for all SNP staff
  - Training hours completed and planned for the current school year, including Civil Rights training
- School Breakfast Program\Summer Food Service Program Outreach documentation
- All program records for the prior three years plus the current year must be on file and available for review.

Contact the Team Leader for your review if you have any questions about these requirements.

## Reports and Documentation Required for the 2016-2017 Federal Administrative Review of School Nutrition Program

### Onsite Review, School Site

The following records and information must be available for review by DOE-SNP staff upon arrival at each school selected for an Onsite review.

- Claims - SNP-12 for the review period with supporting documentation:
  - Claim for reimbursement
  - Daily Sales Activity Reports
  - Bank deposit receipts
  - Eligibility reports
- Count and Collection procedures
- Cash reconciliation procedures
- Food Production Records
  - Breakfast, Lunch, Afterschool Snack for review period
  - Breakfast, Lunch, Afterschool Snack for month of Onsite review
- Meal pattern compliance
  - Menus for the review period and the month of the Onsite review
  - Standardized recipes
  - Portioning instructions
  - Manufacturer specifications
  - Other information
- Signage at the point of service to communicate daily menu choices and offer vs. serve instructions
- Smart Snacks in School documentation and compliance information from SNP, school principal, PTA, student organizations and others that sell foods\beverages to students during the school day
- Documentation for accommodations and\or meal substitutions for student(s) with special dietary needs
- Food Safety
  - Inspection Reports from the local health department
    - Current school year
    - Prior school year
    - Corrective Action documentation, if applicable
  - Food Safety and HACCP Plan manual
    - Training documentation
- Fresh Fruit and Vegetable Program documentation, if applicable
- Parent/student involvement documentation
- All school level program operation records for the prior three years plus the current year must be on file and available for review.

Contact the Team Leader for your review if you have any questions about these requirements.