

FDPIR Program Integrity: Monitoring & Evaluation

**NAFDPIR Conference
June 11, 2018**



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Today we'll discuss

- **FNS FDPIR Management Evaluations (ME)**
 - Purpose
 - Process
 - How to prepare for MEs
 - ME Report
 - Common ME Findings

- **FDPIR Program Annual Review**
 - Requirements
 - Tools & Documentation



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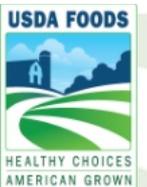


FNS Management Evaluations

Your experiences and expectations of MEs?



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Management Evaluations – Purpose

- Ensure compliance with Federal regulations and other guidance materials
- Identify needs for technical assistance
- Take back best practices to share

Bottom line: make sure that your program operates in a way that meets your needs while still following the rules

Management Evaluations – Format

- Most MEs are conducted on-site, with a desk review of some documents and/or case files prior to the on-site portion of the review
- Some MEs may be conducted as “focused” MEs and consist of an off-site review of case files or other documentation



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Management Evaluations – Module

FNS FDPIR ME Module Review Areas:

- State agency Operations and Staffing
- Certification and Household Actions
- Household Documents
- Inventory Controls and Warehouse Operations
- Distribution
- Financial Management
- Civil Rights
- Training



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Management Evaluations – Timeline

- **Within 45 – 60 calendar days before on-site review:**
 - Notify ITO/State agency of ME via letter
 - Requested documents/questionnaire due to Regional Office

- **On-site review**
 - Typically 2 – 5 days
 - Will include an entrance and exit conference

- **Within 60 calendar days of the on-site review or exit conference:**
 - ME Report due to ITO/State agency

Management Evaluations – Timeline

- **Within 60 calendar days of the report:**
 - **ITO/State agency initial Corrective Action Plan response due to Regional Office**
- **Corrective Action Plan negotiation continues until Regional Office validates Corrective Action Plan**
- **Regional Office sends closure letter**

Process - Before Onsite Review

- Regional Office will negotiate schedule for review
- Regional Office will send official notification letter
- Regional Office may request documents needed for pre-on-site/desk review, which may include:
 - Plan of Operations
 - Case files
 - Self-assessment
 - Questionnaire



Process – During On-site Review

- Entrance Conference
- Discussions with:
 - Program Director
 - Financial/grants management staff
 - Other staff as needed (i.e. warehouse, certifiers)
- Look at:
 - Condition of the warehouse
 - Office area
 - Temperature logs
 - Food storage organization
 - Client area



Process – During On-site Review

- **Review:**
 - **Case files**
 - **Equipment/vehicle list (FNS Handbook 501, Section 2412)**
 - **Training materials and logs of trainings held (i.e. certificates or sign in sheets for all that received Civil Rights training)**
- **Observe (*when possible*):**
 - **Tailgate distribution**
 - **Certification appointments**
 - **Inventory procedures**
- **Exit Conference**
 - **Discussion on potential findings and observations**
 - ***May be held following the on-site review***



Tips for the On-site Review

- Invite all interested parties to the entrance conference
- Share any cultural tips or etiquette that you want reviewers to know
- Have documents organized and ready for review
- Hold a staff meeting to introduce reviewers to help put everyone at ease
- Be prepared to share best practices, ideas, challenges, complaints, etc. We appreciate the feedback!



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Group Discussion #1 – ME Feedback

- What do you like about the Management Evaluations?
- What don't you like about the MEs?
- What are 5 tips for FNS reviewers conducting the MEs?

ME Report – What to Expect

- **Executive summary/Scope, Methodology, and Objectives**
 - What the reviewers looked at/brief description of findings and observations
- **Noteworthy initiatives**
 - Projects, processes, and practices that exceed regulatory requirements (*may be shared with other programs*)
- **Findings**
 - Identification of non-compliance with program regulations, FNS instructions, policy memoranda, and/or other program documents
- **Required Corrective Actions**
 - Statement of the action(s) that must be taken to correct noncompliance
 - *All required corrective actions require a response*
 - ***MUST BE VALIDATED***



ME Report – What to Expect (cont.)

- **Observations**
 - Identification of a weakness in program operations or management (*not in violation of program regulations, etc.*)
- **Suggestion**
 - Statement of actions that should be considered to correct an observation of a weakness

ME Report – Validation

FNS cannot “close” a finding until we validate that the corrective action has taken place to correct the finding

For example:

- **Finding:** No Civil Rights Training
Required Corrective Action: The ITO must train FDPIR staff on Civil Rights at least annually/develop procedures to ensure
VALIDATION: ITO sent FNS the CR training used and sign-in sheets with date and signatures of staff/volunteers
- **Finding:** During FFY 2017, five FNS-152 reports were late.
Required Corrective Action: The ITO must submit FNS-152 reports to FNS within 15 days after the end of the reporting month/develop procedures to ensure
VALIDATION: ITO developed internal procedures to ensure FNS-152 reports are submitted on time. FNS monitors the submission of reports for the next three months to ensure that reports are on time.



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Common ME Findings

- Excess USDA Foods inventories (greater than 3 months on-hand)
- Late reports (FNS-152, FNS-101, SF-425)
- Certification – Error Trends
 - Missing documents in case file
 - Missing check for SNAP status
 - Incorrect wage conversion used
- FDPIR staff have not received Civil Rights Training
- Self-assessment not completed annually



Group Discussion #2 – Common ME Findings

In groups at your table, discuss the following:

- 1) Why might these things happen?
- 2) How does/could your program prevent these things from happening (any strategies or processes)?
- 3) How would you fix these items if they were findings on a ME?



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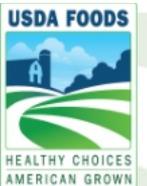
How to Prepare for the ME

- The best way to prepare for an ME is to complete an annual self-assessment and ongoing monitoring of your program
- Review the FNS FDPIR ME module to anticipate what reviewers look for and will request
 - Reach out to your Regional Office for a copy of the module
- Anything else?

Annual Review Requirements



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Annual Review – Requirements

FNS Handbook 501, Section 1240

- The ITO/State agency must monitor and review its operations and local agency operations, as appropriate, at least annually
- Program deficiencies must be documented and specific plans for corrective action must be initiated to correct the deficiencies noted
- May also be called a ‘self-assessment’



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Annual Review – Requirements

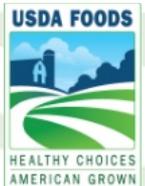
FNS Handbook 501, Section 1241

- **Reviews must include but not be limited to**
 - **Certification (including review of case files)**
 - **Determination of food preferences**
 - **Distribution of USDA foods**
 - **Civil Rights compliance**
 - **Fair hearing procedures**
 - **Warehousing and inventories**
 - **Timeliness and accuracy of reports to FNS**

- **Program reviews and corrective action plans must be available to FNS upon request**



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Annual Review – Tools & Documentation

- Programs can develop their own tools, or share tools that other FDPIRs have developed, for the self-assessment
- The completed annual review, plus the corrective action plan, must be documented
 - FNS will do a check for the self-assessment on a ME

Group Discussion #3 – Annual Review

In groups at your table, discuss the following:

- 1) When does your program do the self-assessment/how often?
- 2) Who does it?
- 3) What tools do you use?
- 4) What common issues do you find?
- 5) What corrective actions do you take?
- 6) How do you document the self-assessment?

Any last questions or comments?

THANK YOU!



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