

ASSESSMENT OF THE ADMINISTRATIVE REVIEW PROCESS IN SCHOOL MEAL PROGRAMS (SUMMARY)

Background

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are federally funded meal programs operating in almost 100,000 public and nonprofit private schools and residential childcare institutions serving nutritious meals to almost 30 million children daily. The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) administers these programs at the Federal level. At the State level, education, agriculture or human services agencies operate the programs through agreements with school food authorities (SFAs), which are the entities responsible for the administration of the school meal programs at the school level. State oversight of SFAs is part of the administrative procedures of the school meal programs. The Administrative Review (AR) is the process State agencies use to assess compliance with Federal requirements of SFAs participating in the programs. The current AR process was implemented in school year (SY) 2013-2014. Regulations at 7 Code of Federal Regulations (CFR) 210.18(b) define the AR as a comprehensive offsite and onsite evaluation of all SFAs participating in the programs that must be conducted at least once during a 3-year review cycle.

This study examines the AR process in the school meal programs. In addition to examining results from a purposive sample of ARs, the study also describes how nine selected State agencies conduct their ARs, and ways the process could be further improved.

Methodology

The study examined two sets of Administrative Review forms selected and submitted by the 52 State agencies utilizing the AR process. This included 194 ARs for SY 2013-14 and SY 2014-

15. Also, 18 ARs for SY 2016-17 were selected from the nine States that were selected for in-person interviews. These nine States were selected to achieve diversity in size, FNS Region, and use of AR systems, among other factors.

Results: Review of AR Forms

Results from the AR forms reviewed in this study generally showed low levels of noncompliance.

- **Meal Access and Reimbursement:** The number of application errors reported for all SFAs was small, similar to Regional Office Review of Applications¹ study findings.
- **Meal Pattern and Nutritional Quality:** Missing meal components in meals served was infrequently observed.
- **Resource Management:** Risk flags usually did not result in a finding. When a flag did result in a finding, it usually occurred within the areas of revenue from nonprogram foods and indirect costs.
- **Fiscal Action:** Most reviews containing fiscal action workbooks had no fiscal action or fell below the \$600 disregard threshold.

Results: Interviews with States

- **Staffing:** State agencies use a variety of approaches to staff AR activities. Five of the nine State agencies use contractors to help complete ARs. Additionally, many States have staff that act as specialists for particular areas of the AR and are available to provide assistance when needed in their area of expertise.
- **Systems:** Seven of the nine State agencies have automated AR systems; one State agency

¹ U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Regional Office Review of Applications (RORA) for School Meals 2015, by

uses a set of linked Excel workbooks to complete ARs; and one uses a manual process.

- **Training:** State agencies conduct annual trainings for their review staff. All nine State agencies use a similar process for training new review staff, which focuses on teaming a new reviewer with an experienced review staff.

State Agency Suggestions for Improvement

Consider additional flexibilities to the Administrative Review to reduce burden while also maintaining program integrity.

- Make the breakfast observation optional for some or all SFAs, especially in very small or remote schools.
- Allow reviewers the option to complete the simplified nutrient assessment instead of a full nutrient analysis for high-risk sites.
- Allow additional flexibilities in some areas of the AR including the comprehensive review in the Resource Management section and the assessment of staff training hours in the professional standards section.

Improve Administrative Review forms, guidance, and resources.

- Cognitively test all forms that USDA provides, use fewer acronyms and confusing terminology, and designate the type of SFA staff that may be able to inform each question.
- Ensure all questions are single questions, embed additional background information in questions, create a place to record previous review findings, simplify forms' instructions, improve forms' layouts on multi-tab worksheets, and create a separate form for the review of the Fresh Fruit and Vegetable Program.
- Provide additional background on why questions are asked, add hyperlinks to reference materials, create flowcharts for review findings, and explain how they lead to

technical assistance, corrective action and/or fiscal action.

- Provide updates to materials no later than the February prior to the upcoming school year to allow State agencies time to train reviewers, notify SFAs, and update their systems.

Recommendations for Improvement

Consider flexibilities in the 3-year review cycle for ARs or other ways to reduce State agency burden. Allowing flexibilities in the frequency of reviews or the depth of reviews of SFAs that have demonstrated good performance could help ease burden on State agency reviewers and ensure that State agencies have the time and resources to provide technical assistance to SFAs in order to improve Program compliance and operations.

Utilize stakeholder feedback for continuous improvement. Receive feedback from on-the-ground reviewers. Update and share best practices and tools in order to help ensure the AR process is capturing the necessary information to ensure compliance with Program requirements. In addition, careful consideration should be given to timing and types of changes in the AR process.

Provide training in a variety of formats. As State agencies continue to hire new reviewers over time, having training materials and other resources regarding the AR process available in an easily accessible online format could help ensure their success. FNS should consider periodic in-person and online training sessions, at the national or regional levels, to allow for valuable cross-State exchange of information.

For More Information

U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support. *Assessment of the Administrative Review Process in School Meal Programs*, by Melissa Rothstein, Mary Gabay, Chris Manglitz, and Terisa Davis. Project Officer: Jinee Burdg. Alexandria, VA: August 2020.