

August 2, 2024

## Dear CHIEF ADMINISTRATOR:

The Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger-Free Kids Act of 2010 (HHFKA), requires a unified accountability system, known as the Administrative Review (AR), designed to ensure that participating School Food Authorities (SFAs) comply with National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. The Act also requires an accountability system that conducts ARs to evaluate Program requirements for NSLP and SBP. The Pennsylvania Department of Education, Division of Food and Nutrition (PDE, DFN) is currently conducting ARs on a five-year cycle. The AR includes both an Off-Site Assessment and an On-Site Review component.

The AR is a comprehensive evaluation of school meal programs by the State Agency (SA) of SFAs participating in the NSLP and SBP and includes both Critical and General Areas of Review. It is an assessment of the SFAs administration of the NSLP, SBP, and other School Nutrition Programs (SNPs). The objectives of the AR are to:

- Determine whether the SFA meets Program requirements
- Provide technical assistance
- Secure any needed corrective action
- Assess fiscal action and, when applicable, recover improperly paid funds

The on-site portion of your review will be conducted in **November**, **2024**. The test month is **September**. The claim for reimbursement for **September** must be submitted by **October 8**.

Information concerning the SNP AR process, timeline, and required documentation is available via the School Nutrition Toolbox (SNT) e-learning at http://www.schoolnutritiontoolbox.org, *School Nutrition Program (SNP) Administrative Review Process*. It is highly recommended that all SFA staff involved in the AR take advantage of this training. This includes staff that are responsible for the following areas:

- > Financial Management
- Eligibility Determination and Verification Processes
- Wellness Policy
- Menu Planning and Nutrient Analysis
- Meal Counting and Claiming
- Professional Standards

The purpose of this SNT training is to assist those responsible for the areas listed above to adequately complete the Off-Site Assessment. Topics covered during the training include:

- SFA access to the off-site assessment tool
- Specific off-site forms that must be completed by the SFA
- Identify tool tips that will assist the SFA when completing the off-site forms
- Identify methods for attaching required documentation

The SFA may need to involve a team of staff when responding to the questions on the Off-Site Assessment. Currently, the SFA employee who has CN PEARS access to your Sponsor and Site applications will be granted access rights to the Off-Site Assessment. This employee will therefore have the ability to enter information and answer questions on the Off-Site Assessment in CN PEARS. Additional SFA personnel that may need to access the Off-Site Assessment will be required to complete the CN PEARS User Authorization Form. This form is located on CN PEARS Download Forms under the section titled SNP - 03000 | Application Information for New Sponsors. The form must request access to "Compliance Access (Administrative Review)" for the appropriate user to receive access to the Off-Site Assessment forms. The Chief Administrator who is responsible for the Program must electronically complete and place a password-protected digital signature on the form (do not lock the form when sending/saving). The form includes instructions for completing and emailing to the PDE, DFN Harrisburg office.

As with the SFA, applicable staff will be required to complete the off-site component of the AR and provide all supporting documentation that may be requested. The Off-Site Assessment is automated through CN PEARS. The off-site forms are accessible to the SFA upon receipt of this letter. The deadline for the SFA to complete the off-site component of the AR is **September 13**. Note that failure to complete the off-site forms and provide all required documentation will result in Corrective Action for failure to respond to the SA.

SFAs who received Supply Chain Assistance (SCA) funds are required to maintain documentation that demonstrates SCA funds were only used to purchase minimally processed foods. The SFA will be required to provide SCA Fund Allocation Logs (sample located on CN PEARS Download Forms) during the AR process.

In addition, SFAs are required to attach the following information to the 800 Civil Rights section of the Off-Site Assessment forms:

- Non-discrimination statement used for appropriate SNP materials.
- Procedure for receiving and processing Civil Rights complaints.
- Annual Civil Rights training agenda, attendance (sign-in sheet), and training materials.
- Documentation to support the SFAs collection of racial and ethnic data.

In response to a prior Management Evaluation, PDE, DFN is required to include corrective action when Civil Rights violations occur. If the SFA corrects the issue prior to the On-Site Review, the issue must still be documented within the AR's corrective action section.

Within a few days, additional correspondence will be sent to the SFA that includes specific information and documentation that will be required as part of the Resource Management portion of the Off-Site Assessment.

Included with this letter, as an attachment, is a timeline that will allow you to track communications received from PDE and established deadlines for several aspects of the Off-Site Assessment and On-Site Review process. Approximately six weeks prior to the month of the On-Site Review, the Lead Reviewer will notify you of selected sites for the On-Site Review(s) for lunch, breakfast, and the Fresh Fruit and Vegetable Program (FFVP) if you participate in that Program. Approximately two weeks prior to the On-Site Review, the Lead Reviewer will send an Appointment Letter. This letter will inform you of the specific date of the On-Site Review and the expected arrival time.

After completing the Off-Site Assessment, by **September 13**, DFN staff will be in contact with the SFA staff to discuss the Off-Site Assessment components.

NOTE: This AR Announcement is sent to the Chief Administrator and Primary Contact listed on the Sponsor Application. If the SFA employee responsible for the AR is not one of these two SFA employees, forward this AR Announcement to the applicable SFA employee.

Thank you in advance for your cooperation and assistance in providing this information in a timely manner. If you have any questions concerning this upcoming review, direct any questions by email to RA-AdminReview@pa.gov and the questions will be forwarded to the appropriate staff.

Sincerely,

Lindsay Seibert
Field Services Program Manager
Division of Food and Nutrition
Bureau of Budget and Fiscal Management

cc: PRIMARY CONTACT