

Common findings during the Administrative Review 2013-14

Valerie Crouch, SNS
Programmatic Delivery Section
School Branch/KDE

FINDING: Reimbursement claimed for student meals when there is not an approved application on file...

- *Except during the *carry-over period, meals may not be claimed under the free or reduced price meal category unless:*
 - *an approved application is on file;*
 - *student is directly certified or extended benefits;*
 - *student is certified to be foster child, homeless, runaway, migrant or Even Start/Head Start*

Eligibility and Benefits Issuance

FINDING: Free/reduced applications are not processed within 10 days of receipt...

- *Applications should be reviewed and an eligibility determination made IMMEDIATELY, but no later than 10 days from receipt*

Eligibility and Benefits Issuance

FINDING: Data entry error results in incorrect eligibility status...

- Incorrect household size or failure to include all household members;
- Incorrect income amount and/or frequency of pay period;
- Incorrect eligibility guidelines used in determining eligibility, including in the eligibility software.
- Application is incomplete or missing key data

Eligibility and Benefits Issuance

FINDING: Application processed as an income application but required information is missing.

- *Income applications must contain the following:*
 - ✓ **Names** of ALL household members
 - ✓ **Income** (and frequency of receipt) for **ALL** household members OR indication of **No Income**
 - ✓ **Signature** of Adult head of household
 - ✓ **Last 4 digits of the Social Security Number** of person signing application OR indication of “no” Social Security Number

Eligibility and Benefits Issuance

FINDING: Application is processed as an Income Application, but incorrect income is used to determine eligibility...

- *Current gross income is used to determine eligibility, unless special circumstances exist, i.e. self-employed, deployed family member, combat pay, etc.*
 - *Current income is:*
 - *Income received in month of application*
 - *Income received in prior month of application*
 - *Anticipated/projected income (if not received yet)*

Eligibility and Benefits Issuance

FINDING: Sponsor did not use Direct Certification for students who receive FNS and TANF.

- By law, all sponsors must Directly Certify children from household receiving SNAP/FNS (food stamps).

Although not required, sponsors are encouraged to use Direct Certification for students from TANF households.

Eligibility and Benefits Issuance

FINDING: One student is receiving free benefits due to Direct Certification, but his sibling is reduced or full pay.

- *REMEMBER...Free eligibility may be extended to other school-aged children living in the SAME household , based on another household member's receipt of SNAP/FNS Benefits or TANF.*

Eligibility and Benefits Issuance

FINDING: Foster child NOT processed as Categorically Eligible...

- *Foster children are considered Categorically Eligible when formally placed by a State Child Welfare agency or court system.*

Eligibility and Benefits Issuance

FINDING: Student is categorized as “Temporary Free.”

- *Temporary approval of an application is **no longer applicable** because of year long duration of eligibility.*

If SFAs are concerned with the authenticity of the information provided on an application, they may, on a case by case basis, verify the application for cause.

Eligibility and Benefits Issuance

FINDING: Confidential eligibility information is released for unauthorized purposes or without prior consent.

- *Release of free/reduced eligibility information is very limited and for specific Federal programs on a **NEED TO KNOW** basis in order to provide a service or carry out an authorized activity...*

Eligibility and Benefits Issuance

FINDING: Student eligibility status is not updated in Point Of Sale (POS) or roster...

- *Eligibility must be current and correct at POS and on eligibility rosters at all times, including at the end of the 30 operating day carry-over period and at the end of the Verification process.*

*Remember...change in status must occur no later than **3 days for an increase** in benefits and **10 calendar days for decrease** in benefits.*

Eligibility and Benefits Issuance

- The verification process did not begin on October 1.
- The verification process did not end by November 15.
- Verification did not take place at all.
- An application was pulled for DC student.
- SFA uses the incorrect verification method as determined by the State Agency.
- SFA does not understand the Sample size, or finds that the verification software language is not consistent with USDA and the incorrect method is selected.
- The sample pool does not round up therefore there are not enough applications verified...remember USDA requires that the exact number selected be verified...not more, not less!
 - For example, if the verification selection pool is 25.01 applications, the SFA must select 26 applications to be verified.
- The SFA does not update the vendor's software, which may include verification updates.
 - Remember the eligibility/verification software is not approved by USDA nor the State Agency.

Common Verification Errors

- Each service line does not provide an accurate count by eligibility category at the Point of Sale (POS).
- Meal counts are incorrectly combined and consolidated or not done daily.
- There are patterns in the meal counts for the review period which appear questionable.
- Effective edit checks are not conducted as federally required.
- Cash receipts are not counted and verified by two persons

Meal Counting and Claiming

- **Meal Count Combining and Counting Errors**
 - Fiscal Action for difference between incorrect and correct meals
 - Meal counts do not equal number of meals served to eligible students
 - Meal counts exceed number of eligible students by category
 - Second and/or ineligible meals were counted

Errors and Fiscal Action



- Incorrect calculations of crediting of meat/meat alternate components
- Incorrect calculations on nutrition information, i.e., Nutrition label is for a 4 nuggets and 5 is served. In this situation you need to reference the CN label.
- Lack of supporting documentation from allowable sources.

Menu Compliance: Pre-visit Menus

- Missing Meal Components = Immediate fiscal action is required
- For Meal Components & Quantities a REPEAT VIOLATION includes:
 - any repeated finding at the SFA level
 - any findings at a subsequent AR
 - a repeat violation of any of the same meal component requirements (milk type, vegetable subgroup, whole-grain rich) or quantities.

Meal Components & Quantities
Fiscal Action: Repeat Violation

Severe Noncompliance

- Performance Standard 2 Violations
 - Missing Meal Components
 - Missing Vegetable Subgroups
 - Inadequate and/or Excessive Quantities
 - Minimum Component Requirements Not Met for Grains and/or Meat/Meat Alternates
 - Trans fat! Nutrition labels indicate trans fat in products used.

Targeted Menu Review

- Required Signage is not posted that aids students identifying the reimbursable meal.
- Staff at POS are not trained to recognize a reimbursable meal correctly.
- School not offering enough food on all reimbursable meal service lines.
- Students having difficulty is selecting components/items to make reimbursable meal.

Offer vs. Serve Common Findings

- Required elements for LWP are not present.
- Schools not in compliance with the LWP
- Schools' progress towards LWP goals not monitored/measured.
- Public not notified of the results of the most recent assessment of the LWP

Local Wellness Policy

- Site Eligibility Issues – Information for qualifying site not available.
- Counting/Claiming Violations
- Inappropriate Food Components
- Insufficient Quantities/Missing Components
- District self reviews not completed
- Production records not kept
- Meal counts not taken at the point of service.

After School Snack Program Issues