

United States
Department of
Agriculture

Food and
Nutrition
Service

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DATE: October 01, 2014

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SUBJECT: Collaboration with School Food Authorities in
Conducting Administrative Reviews and Assessing
Compliance with Smart Snacks in Schools

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Collaboration between FNS, State agencies, and School Food Authorities (SFAs) is essential to successfully implement National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements.

State agencies play a vital role in safeguarding program integrity by conducting administrative reviews in accordance with regulations at 7 CFR Part 210.18 to ensure NSLP and SBP requirements are met. FNS recently released updates to the Administrative Review Manual and related tools and forms for School Year (SY) 2014-2015. FNS will also issue necessary updates to the Coordinated Review Effort (CRE) Procedures Manual, forms, and instructions, for those States opting to continue with the CRE process in SY 2014-2015. FNS encourages States to share the Administrative Review Tools with SFAs and local educational agencies (LEAs) in advance of the review to encourage preparing for the review process.

State agencies are encouraged to maintain an open dialogue during the review process and to provide collaborative technical assistance. In accordance with SP 54-2014 "*Administrative Reviews and Certification for Performance-Based Reimbursement in SY 2014-2015*," dated July 11, 2014, during the first 3-year review cycle (i.e., SY 2013-2014 through SY 2015-2016), State agencies will continue to work closely with SFAs by providing technical assistance to support their efforts to comply with Program requirements and limit fiscal action only to meals missing components. (Refer to 7 CFR Part 210.18(m)(2) for more information). In SY 2014-2015, State agencies and SFAs should also work cooperatively to promote the consumption of healthful foods in schools and support healthy school environments.

As part of this effort, State agencies must assist SFAs and LEAs in the implementation of the Smart Snacks in Schools rule that became effective July 1, 2014. A new module is included in the Administrative Review Manual and the CRE Procedures Manual directing State agencies on how to assess compliance with Smart Snacks standards. No fiscal action is associated with Smart Snacks, but the Administrative Review provides State agencies with an opportunity to monitor implementation progress and provide technical assistance accordingly.

State agencies also are reminded that FNS issued flexibility to use enriched pasta products during SY 2014-2015 and SY 2015-2016 for SFAs demonstrating a negative impact or hardship in obtaining acceptable whole grain-rich pasta products. SFAs must receive State agency approval to serve enriched pasta during SY 2014-2015 and SY 2015-2016, if needed. Refer to SP 47-2014 *“Flexibility for Whole Grain-Rich Pasta in School Years 2014-2015 and 2015-2016 Questions and Answers attached - Revised,”* dated September 30, 2014, for more information.

Lastly, State agencies experiencing a negative impact to their administrative and oversight responsibilities by transitioning to the 3-year review cycle may request a waiver of the current 3-year review cycle requirement. In the waiver request, State agencies must identify any exceptional circumstances prompting such a waiver. States are reminded that requests for waivers must be received by FNS no later than June 30, 2016 (the end of the current 3-year review cycle) and waiver requests may not exceed more than two additional years, ending no later than June 30, 2018. Refer to SP 55-2014 *“State Agency 3 Year Administrative Review Cycle Requirement: Waivers for Exceptional Circumstances,”* dated July 11, 2014, for more information.

In an effort to facilitate collaboration, FNS will continue to communicate closely with States and develop oversight, technical assistance, and training resources for State agency use.

State agency personnel with questions are encouraged to contact their respective Regional Office.

Original Signed

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