



United States Department of Agriculture



FNS Management Evaluations and FDPIR Annual Review Requirements

NAFDPIR Conference
October 19, 2022



Today we will discuss

- FNS FDPIR Management Evaluations (MEs)
 - Purpose
 - Process
 - How to prepare for MEs
 - ME report
 - Common ME findings
- FDPIR Program Annual Review
 - Requirements
 - Tools & Documentation





FNS Management Evaluations



Management Evaluation - Purpose

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

Bottom line: MEs are intended to ensure that FDPIR programs operate in a way that meet your needs while following rules/policies



Management Evaluations – Format

- Historically, most MEs have been conducted on site.
 - FDPIR MEs were conducted virtually in FY 2022 due to COVID-19 travel restrictions.
- As part of the ME, some documents may be reviewed ahead of time.
 - This may be referred to as a “desk review.”



Management Evaluation – Module

FNS FDPIR ME Module Review Areas:

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



Management Evaluation - Timeline

- At least 60 calendar days (or less if warranted) before scheduled ME, FNSRO will:
 - Provide notification via letter
 - Request documents to review ahead of ME
- MEs generally last 2-5 days
- MEs include an entrance and exit conference
- ME report is issued within 60 calendar days of the exit conference



Management Evaluation - Timeline

- ITO/State agency must provide initial corrective action plan response within 60 days
- Correct action plan discussion continues until FNSRO validates that all findings have been addressed via the corrective action plan.
- FNSRO 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 – ME Review

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



Process – ME 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 sheet for annual 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 review (i.e., the following week)*



Tips for the ME

- Invite all interested parties to the entrance and exit conferences
- 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!



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 noncompliance 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

- 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 and develop procedures to ensure that staff receive training annually

VALIDATION: ITO sent FNS the CR training used and sign-in sheets with date and signatures of staff/volunteers. Additionally, ITO states that they will work with FNSRO to ensure that staff who do not attend conferences or meetings receive annual training



Common ME Findings

- Excess USDA Foods inventories (greater than 3 months on-hand per category)
- Late reports (FNS-152, FNS-101, SF-425)
- Certification – Error Trends
 - Missing documentation of full 30 days of wage statements
 - Missing documentation of check for SNAP status
 - Incorrect wage conversion used
- FDPIR staff have not received Civil Rights Training
- Self-Assessment/Annual Review not completed





Questions on MEs?



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'



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



Annual Review – Tools & Documentation

- Programs may develop their own tools and/or use a tool developed by another ITO
- The completed annual review, plus any corrective actions taken, must be documented
 - FNS will do a check for the annual review as part of our ME



Questions?



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