

# **Administrative Review Training**



### Agenda

**Pre-review Activities** 

**CNPweb E-Reviews** 

**Review Areas** 

**Procurement Reviews** 

Q and A with your Reviewer



### **School Nutrition Reviews**

- Reviews are on a 5-year cycle
- Federally Required
  - Administrative Review (AR)
  - Procurement Review (PR)
- Both reviews are done during the same year
- Follow-up reviews take place as necessary



### **Review Timeline**

SA sends review notification letter to superintendent

Reviewer emails FS director/contact with review details

**SFA** completes Off-site documentation in CNPweb

**SA & SFA Pre-review phone call** 

**On-site review/Exit conference** 

**Review report/Corrective action** 

SFA response to corrective action

**SA** sends final letter to close review



### **Pre-Review Activities**

### SFA Completes:

- Off-site e-review questions completed in CNPweb
- Documents uploaded into CNPweb
  - SNP Administrative Review Pre-visit checklist



### **Child Nutrition Website**

### Programs → NSLP → Review Information

### Administrative and Procurement Reviews

#### SY2024 Reviews

Please see the <u>School Review Schedule SY2024</u> (pdf) to mark your calendar and use the following documents to prepare for the review process.

NOTE: Due to findings, complaints, or other information provided to the state agency additional reviews may be added.

Preparing for Reviews

SY23 Administrative Review Training (pdf)

<u>Procurement Review Tool</u>
 <u>Procurement Review Training</u>



#### Required Documents to Submit for the Administrative Review

The Offsite Tool and Corrective Action are completed in CNP Web; <a href="https://me.cnpus.com/cnp/Login">https://me.cnpus.com/cnp/Login</a>. Contact Paula at <a href="paula.nadeau@maine.gov">paula.nadeau@maine.gov</a> for access. Below is an Administrative Review Quick Guide with directions and screenshots on how to use this new tool.

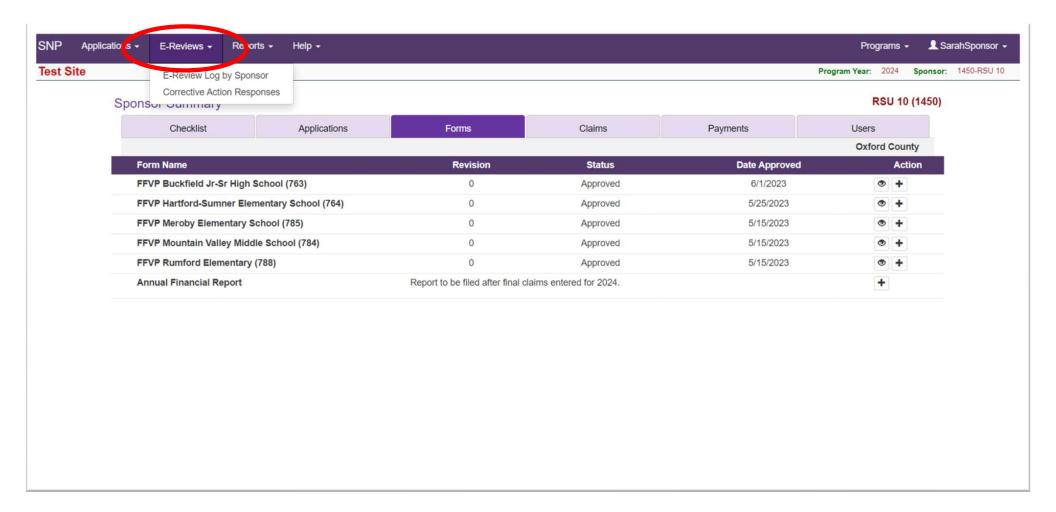
- SY24 CNPWeb Administrative Review Quick Guide for SFAs
- Administrative Review Pre-Visit Checklist





# CNPweb E-Reviews

## **CNPweb E-Reviews**





### **SNP Administrative Review Pre-Visit Checklist**

# Documents uploaded into CNPweb

#### SNP Administrative Review Pre-Visit Checklist

#### DOCUMENTS TO UPLOAD TO CNPweb E-REVIEW - Please title the document that you are uploading:

Special Provision 2 Non-Base Year (years 2-4) and CEP schools are not allowed to collect Free/Reduced Applications. Italicized items on this list will not be applicable to those schools.

- Benefit Issuance Document (e.g., Student Master List used to maintain a student's eligibility status), if applicable
- Menu documentation for breakfast and lunch for the week of review includes menus, <u>completed</u> production records for 5 consecutive days, corresponding recipes, Child Nutrition (CN) labels and other product labels. Labels must be photocopies or photographs of the original, <u>not printed labels from the manufacturer or distributor</u>. Labels must also show the nutrition facts and ingredients.
- ☐ <u>SNP Itemized program revenues</u> (subsidies received, a la carte, meal sales and town appropriation if applicable) for March 2023\*
- ☐ SNP Itemized program expenses (food, labor and other costs) for March 2023\*
- ☐ Documentation of any SY 2023 SNP equipment purchases over \$5,000\*
- ☐ SNP SY2023 Year-end balance sheet
- ☐ FFVP menu for the review period (if applicable)
- ☐ Afterschool Snack Program menu for the review period (if applicable)
- $\hfill \Box$  Afterschool Snack Program production records for the from the first week of the review period
- \* Please note, financial documentation from the prior school year will be reviewed. Paid Lunch Equity does not apply to non-pricing schools or those with a positive/zero balance on June 30, 2022.

#### DOCUMENTS TO HAVE AVAILABLE AT THE TIME OF ON-SITE REVIEW:

☐ Professional standards training documentation and tracking form for all School Nutrition program staff including USDA Civil Rights training documentation for all staff assisting with SNP



# Tips for Organizing Pre-Visit Documents

- Clearly label documents and make sure readable
- Menu documentation
  - Label by meal and day
    - i.e. Monday lunch production record, lunch recipes, labels, etc.
- Benefit issuance/Master List- submit as Excel (traditional operations only)
  - Will make for smoother review process for everyone



#### ×

#### **E-Review Documents**

Content	No.	File Name	Upload Date	Upload By	Action
E-Review		District Information ~ Policies.pdf	4/13/2022	kmartin	•
E-Review		District Information ~ Task #1.pdf	4/13/2022	kmartin	•
E-Review		District Information ~ Task 2.pdf	4/13/2022	kmartin	•
E-Review		District Information ~ Task 3.pdf	4/13/2022	kmartin	•
E-Review		Food Service Phone Call Audit.pdf	5/5/2022	kmartin	•
E-Review		General Areas ~ Tasks 10-15.pdf	4/13/2022	kmartin	•
E-Review		Meal Access ~ Task 4.pdf	4/13/2022	kmartin	•
E-Review		Meal Access ~ Task 5 Continued.pdf	4/13/2022	kmartin	•
E-Review		Meal Access ~ Task 5.pdf	4/13/2022	kmartin	•
E-Review		Meal Access Task 6.pdf	4/13/2022	kmartin	•
E-Review		Meal Pattern ~ Task 7.pdf	4/13/2022	kmartin	•
E-Review		OHHS March 2022.pdf	5/19/2022	kmartin	•
E-Review		Questionnaire.pdf	4/13/2022	kmartin	•
E-Review		report for OHHS March Meal Counts.pdf	5/16/2022	kmartin	•
E-Review		Resource Management ~ Task 8 & 9.pdf	4/13/2022	kmartin	•
E-Review		Tick Sheets ~ OHHS March 2022.pdf	5/19/2022	kmartin	•





# Review Areas

### **5 Review Areas**

- 1. Meal Access & Reimbursement\*
  - Performance Standard 1
- 2. Meal Pattern & Nutritional Quality\*
  - Performance Standard 2
- 3. Resource Management
- 4. General Program Compliance
- 5. Other Federal Program Reviews





### PS1: Meal Access & Reimbursement

- 1. Certification and Benefit Issuance
- 2. Verification
- 3. Meal Counting and Claiming

Verifying that meals claimed for reimbursement were served only to eligible students.



### PS1: Meal Access & Reimbursement

Certification & Benefit Issuance:

Reviewing the approval of Free and Reduced Priced applications to ensure the correct benefits are being extended to eligible students and that they are claimed properly for reimbursement

For non base year Special Prov II and CEP schools this will not apply for certification and benefit issuance and verification



### Certification & Benefit Issuance

### **SFA Completes Off-site**

- Answer questions in CNPweb E-Reviews
- Submit benefit issuance file in CNPweb (Excel)\*

# Reviewer Completes On-Site

- Review student eligibility documents
  - Applications
  - DC lists
  - Letters
- Review denied applications



### **Benefit Issuance Documentation**

# Electronic list (Excel) of <u>all</u> free and reduced priced students in the <u>district</u>

- Do not include withdrawn or paid students
- List to be pulled from the Point of Service (POS)
- List should be pulled during the Review Period/Review Month
- Benefit Issuance Document Must Include:
  - Student Name
  - Eligibility Status
  - Method of approval (Income, Foster, DC, ...)
  - Date of approval
  - School



### Off-site Benefit Issuance Documentation

### Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Walter Beesley	F	DC	Smith ES	9/2/2023
David Hartley	R	Income Application	Harrison MS	8/30/2023
Sarah Platt	F	SNAP Application	Jones HS	9/10/2023
Gail Lombardi	F	Foster	Jones HS	9/2/2023



### On-site Benefit Issuance Documentation

- Approved meal benefit applications
  - How do you sort and store applications?
- Denied meal benefit applications
- Direct certification lists
- Homeless/Migrant/Head Start lists
  - Application has check box for Homeless/Migrant. Be sure to follow up with the appropriate person and maintain documentation.



## **Common Review Findings**

- √ 30-day carryover not implemented correctly
- ✓ Incomplete Meal Benefit Applications
- ✓ Miscategorized Applications- math errors
- ✓ Incorrect SNAP/TANF number
  - ✓ Format must be 8 digit plus letter
- ✓ Missing documentation (Keep <u>ALL</u> DC lists)
- ✓ Not converting to annual income when different frequencies of income are reported
- ✓ Incorrect non-discrimination statement on letter sent home





### Verification

### **SFA Completes Off-site**

 Answer questions in CNPweb E-Reviews

# Reviewer Completes On-Site

- Review:
  - Verified Applications
  - Tracking documentation
  - Letters
  - Income documentation



### Verification

- Was it completed on time?
- Used correct method (error prone)
- Compare verification report to documentation
- Follow-ups were made (use tracking form)
- Notification letter met standards
- Copies of all correspondence kept
- Eligibility status changes



### Verification

		Internal Use Only
	HOUS	SEHOLD FILE CONTROL FORM
Head of Household N	lame:	
Date Selected:		Notification Sent:
Response Due:		Second Notice Sent:
Response Due:		Missing Information:
		ONE CONTACTS ON REVERSE SIDE OF THIS PAGE.
Food Stamp/TANF H	ousehold	Income Household: \$ Monthly
Confirmed By -		Confirmed by -
[] Predetermined Eli	gibility List	[] Wage stubs
[] Food Stamp/TAN	Office	[] Written documents (Explain below)
[] ATP Card		[] Collateral Contacts (Explain below)
[] Other:		[] Agency Records
[] Eligibility not con	firmed	[] Other:
Explanation:		

Verification Notification and Tracking Forms
<a href="https://www.maine.gov/doe/schools/nutrition/studenteligibility">https://www.maine.gov/doe/schools/nutrition/studenteligibility</a>



### **Common Verification Errors**

Did not use the correct method - 'error prone'

Incorrect sample size - double check the math!

Not following timeline protocol

Eligibility changes not made timely

Incorrect math used with paystub



### **SFA Completes Off-site**

- Complete questions in CNPweb E-Reviews
- Submit claim from the Review Period

# Reviewer Completes On-Site

- Review meal counts by day for review month
- Review edit checks
- Observe POS procedures
- Meal counts for day of review



### **Meal Counting & Claiming**

- Electronic or Manual System
- A point of service system that accurately counts reimbursable meals by category (F/R/P) at each school
- Ensures only one meal per student
- Reimbursable meals were consolidated accurately at each school and at the SFA
- Correct meal counts were used in the Claim for Reimbursement



### **Off-Site Questions**

What type of back-up system is in place? How often are cashiers and substitute cashiers trained? How are these things handled?:

- Offer vs Serve
- Incomplete Meals
- Second Meals
- Visiting Student Meals
- Adult/Non-Student Meals
- Student Worker Meals

- A La Carte Sales
- Field Trips
- Lost/forgotten IDs/Tickets
- Charging/Pre-paid Meals
- Students without funds
- New students without approved benefits



### **On-Site Procedures**

- Validating information on SFA application
- Validate Claim for Reimbursement
- Observe POS Procedures
  - Oversight at POS ensuring accurate meal counts
  - Eligibility Category
  - Without Overt Identification
  - Alternate serving locations (i.e. classroom)





### Meal Counting & Claiming: Common Findings

- Inaccurate meal counts on the claim
- Lack of training for person at POS
- Alternate serving locations (Pre-K meals or Breakfast in the Classroom)
  - Train teachers
  - Consistent monitoring to ensure requirements are being followed



### PS2: Meal Pattern & Nutritional Quality

- Meal Components & Quantities
- Offer vs. Serve





### PS2: Meal Pattern & Nutritional Quality

### **SFA Completes Off-site**

SFA will submit in CNPweb E Reviews

- Menus
- Completed production records
- Component crediting documentation
- Recipes, labels, etc.

### SFA complete:

Meal Compliance Tool

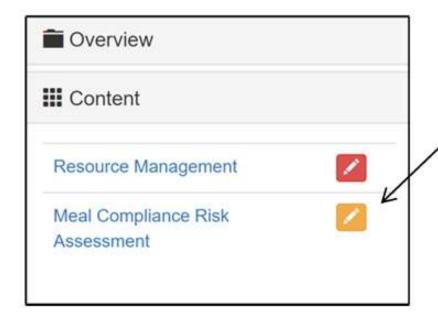
# Reviewer Completes On-Site

- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site information



## Meal Compliance Risk Assessment







### Meal Components & Quantities

### Off-Site: Documentation

- Menu (breakfast, lunch)
- Production Records (complete)
- Standardized Recipes food component contribution, ingredients, serving size, yield
- Crediting Information
  - Nutrition Labels (ingredients and nutrition facts)
  - Child Nutrition (CN) Labels
  - Manufacturer's Product Formulation Statements
- Review before submitting can you determine how everything credits?
- Submit by deadline to reviewer



### Meal Components & Quantities

Off-Site: Documentation

Organize documentation in order by day

Monday's Menu: Breaded Chicken Patty on a WG Bun, Broccoli, Carrot Sticks, Strawberry Cup, Milk Choice

#### Folder should contain:

- Completed PR from Monday
- Product documentation including:
  - CN label for Chicken Patty
  - Ingredient & nutrition facts label for the roll
  - Indication of serving size on PR for fruits & vegetables
  - Labels for milk



### Sample Complete Production Record

#### **Lunch Production Record LUNCH TOTALS** Shepherd's Pie w/ WG Biscuit or Deli Bar Date: 9 / 27 / 2015 Salad Bar **MEALS MEALS** PLANNED SERVED Grapes Preparation Site: \_\_DOE High School Mixed fruit STUDENT OvS: Yes X No \_\_\_\_ Milk Variety MEALS

ADULT MEALS

TOTAL MEALS

Grades \_\_\_\_9-12\_\_

	BECIDE		TEN	1PS		COMPONENT CONTRIBUTIONS								ACTUAL SERVINGS			
		SERVING SIZE/UTENSIL	After Cook	Start of Service	Meat/MA	Grain/ Bread	Fruit	Dark Green Vegetables	Red/Orange Vegetables	Legumes	Starchy Vegetables	Other Veg	Total	Student	Adult/ A la Carte	AMOUNT LEFTOVER	PRODUCTION NOTES
Deli Bar:																	
Sliced Ham	USDA	1.22 gz			1												Sandwiches with no cheese (meat)
Sliced Turkey	USDA	1.6 gz			1												get double meat (cheese).
American Cheese	USDA, .5 oz ea	2 slices			1												
Provolone Cheese	Cheese Head, 1 gz	1 slice			1												
WG Sandwich Bread	CK #546, 28g/slice	2 slices				2											
WG Sub Roll	CK #269, 70g ea	1 ga				2.5											
WG Wrap, 10"	Wrappy, 56g	1 ea				2											
Shepherd's Pie	USDA D-43	1 piece			2							% c	% с				
WG Biscuit	Pby #5495	1 each				2											
Salad Bar	SB recipe #1	1 Cup						.5	.5	.5	.5	.5	2.5				
Mixed fruit, canned	USDA	1/2 cup					.5										
Grapes, fresh	Apple Farm	1/2 C					.5										~14 = ½ cup
Salad Dressing, If	Recipe #102	2T															
	Minimum Daily Lunch Component Totals		2	2	1	.5	.5	.5	.5	.5	2.5	Notes: This is a sample production record that a  Director would give to kitchen staff to complete on					
	Weekly	compone	ent To	otals								the day of service.					



### On-Site: Meal Components & Quantities

### Meal Observation – Day of Review

### **Prior to Meal Service**

- Will the meal pattern be met?
- Review menu & production records
- Review 'general areas'

### **During Meal Service**

- Observe POS
- Checking that meals claimed are done so correctly

### **After Meal Service**

Obtain meal counts by eligibility



## Meal Components and Quantities

#### Offer Versus Serve

- Signage explaining how to select a reimbursable meal – include requirement to select ½ cup f/v
- Staff at POS trained and able to recognize a reimbursable meal



## Meal Components & Quantities

### Common Findings

- ✓ Insufficient quantities of a component offered
- ✓ OVS not implemented correctly
- ✓ Unallowable milk substitutions
- ✓ Incomplete production records
- ✓ Lack of Standardized Recipes
- ✓ Pre-K not comingled with other students (must follow CACFP meal pattern)
- ✓ Field Trip/Bag Lunches accountability & meal pattern



### Recommendations

- ✓ Check menu & production records
  - Daily/weekly minimums
- ✓ Credit components correctly
- ✓ Observe meal service
  - Is the kitchen following the meal as planned?
  - Can staff accurately identify a reimbursable meal at the POS?
- ✓ Plan a 2G/2M/MA every day



## Resource Management

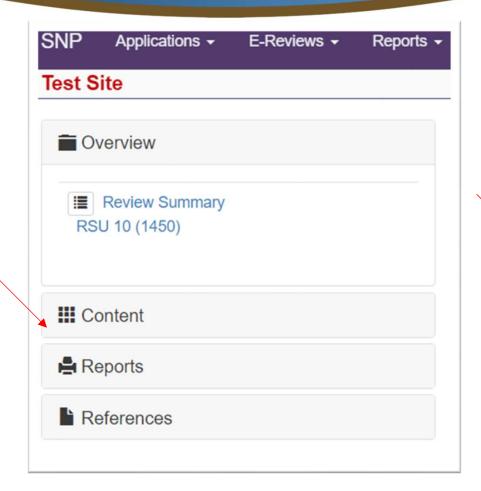
 Maintenance of the non-profit school food service account

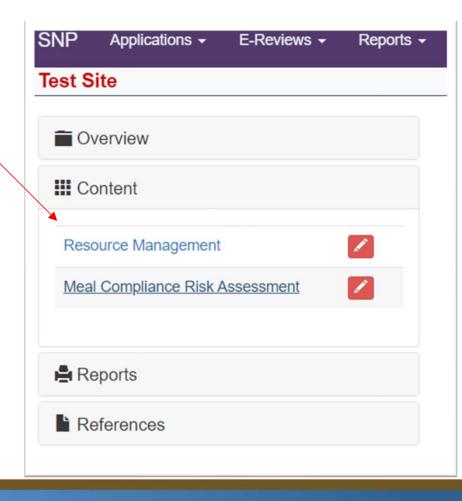
- 2. Revenue from Non-program Foods
- 3. Paid Lunch Equity (PLE)
- 4. Indirect Costs
- 5. Other areas at SA discretion (SCA funds)

Off-site questions 700-712 completed in CNP web



### **SFA Answers Questions in CNPweb**







## **SFA Answers Questions in CNPweb**

Non-Profit FS Account		Paid Lunch Equity		Nonprogram Foods Revenue	Indirect Costs	
Action	Question	Form	Descrip	tion		
1	700.	OFS	SFA acc	urately track all revenues and expe	enses?	
1	701.	OFS	SFA hav	SFA have net cash resources that exceeded three months' average expenditures?		
1	702.	OFS	SFA tran	SFA transfer funds other than approved indirect costs?		
/	703.	OFS	SFA rece	SFA receive prior approval from State agency for equipment costing \$5,000 or more?		
	704.	OFS	SFA have any financial findings on previous reviews?			
7	705.	OFS	SFA have internal controls to ensure only allowable costs charged?			



# Maintenance of Non-Profit School Food Service Account

Only <u>allowable</u> costs are charged to the food service account (7 CFR 210.14)

- Used only for the operation and improvement of the school food service
- Net cash resources do not exceed three months' average operating expenses



## Maintenance of Non-Profit School Food Service Account

- Review Procedures:
  - Answer questions in CNPweb based on prior school year
  - Submit documentation of program revenues and expenses from March 2022
    - Income and expense detail report
    - Sample of invoices/timecards



## Non-Profit FS Account

Review F	orm - Resc	ource Managem	ent		
Non-Profit FS Account		Paid Lunch Equity	Nonprogram Foods Revenue	Indirect Costs	
Action	Question	Form	Description		
1	700.	OFS	SFA accurately track all revenue	nues and expenses?	
1	701.	OFS	SFA have net cash resources that exceeded three months' average expenditures?		
1	702.	OFS	SFA transfer funds other than ap	pproved indirect costs?	
	703.	OFS	SFA receive prior approval from	State agency for equipment costing \$5,000 or more	
	704.	OFS	SFA have any financial findings on previous reviews?		
	705.	OFS	SFA have internal controls to en	sure only allowable costs charged?	



## Paid Lunch Equity





## Paid Lunch Equity (PLE)

- Ensuring compliance with the pricing of paid student lunches
  - Must be equal to or greater that then free federal reimbursement
  - N/A for non-pricing sponsors
  - Waive for pricing sponsors with a zero/positive balance on June 30, 2022



## Nonprogram Foods Revenue

Review Form - Res	ource Managem	ent		
Non-Profit FS Account	Paid Lunch Equity	Nonprogram Foods Revenue	Indirect Costs	S
Action	Question	For	m De	escription
	709.	OF:	S SF	FA sell nonprogram foods?
	710.	OF	S SF	FA provided adult meals?
	711.	OF:	S SF	FA charged for adult meals?



## Revenue from Non-Program Foods

- A la carte, catering (within the school or outside organizations), vending, adult meals, etc.
  - Does revenue from non-program food sales generate sufficient revenues?
- What is the procedure and controls for ensuring all revenue is deposited into the food service account?
- Catering, may review a sample invoice & copy of payment received



## **Adult Meal Pricing**

- Does the price of adult meals cover the expense, including the value of USDA foods?
  - If not, difference must be offset by non-federal funds (i.e. town support, general fund)
- Only food service staff may receive complimentary meals



## **Indirect Costs**

Review Fo	orm - Res	ource Managem	ent		
Non-Profit F	S Account	Paid Lunch Equity	Non	orogram Foods Revenue	Indirect Costs
Action	Questi	on F	orm	Description	
	712.	(	OFS	SFA charged indirect co	ests to nonprofit school food service account?



#### **Indirect Costs**

- Ensure no indirect costs are charged to the food service program
  - Cannot charge without prior approval
- Example:
  - Utilities (propane) unless separate meter
  - Percentage of staff time to food service account
    - i.e. custodian, van driver



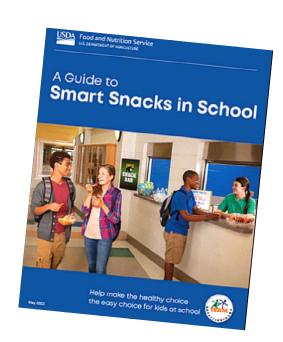
## **Common Findings**

- Not reporting costs accurately
- Propane, utilities. Percentage of staff time charged to program (indirect costs)
- A la Carte program losing money
- Non-program staff being charged to the school nutrition account



## General Program Compliance

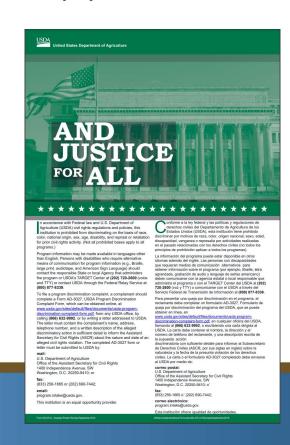
- 1. Civil Rights
- 2. Food Safety
- 3. Local Wellness Policy
- 4. Smart Snacks Competitive Foods
- 5. SFA On-site monitoring
- 6. Reporting and Recordkeeping
- 7. Professional Standards





## Civil Rights

- "And Justice For All" Poster
  - Posted where your customers can see it
  - Make sure you have the newest copy!





## Civil Rights

- Non-discrimination statement placed on program notifications
- Procedures for receiving and processing civil rights complaints within FNS programs
- Documentation for <u>annual</u> civil rights training for staff
- Accommodating students with special dietary needs



## Food Safety

#### On-Site Documentation

- Food Safety Plan (SOP's):
  - Should be <u>customized</u> for each site
- Recordkeeping: Temperature logs, calibration logs
- Recent health inspection posted
- Certified Food Protection Manager (ex. Serv Safe)
  - One per kitchen
- "Ghost trays" required by DOE



## Local Wellness Policy (LWP)

- Ensure the required elements are in place
- When was it last updated/assessed?
- Check against wellness policy checklist- does your wellness policy measure up?

 Triennial assessment extended to June 2023 (USDA) waiver)

#### Does Your Wellness Policy Measure Up?

A local school wellness policy is a written document that guides a local educational agency (LEA) or school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn. This optional checklist can be used to review and update your district's wellness policy to ensure it meets all requirements as written in section 204 of Public Law 111-296 Local School Wellness Policy Implementation.

☐ District has a current wellness policy. It can be found online at:	
--	--

☐ Date it was last updated:

- ☐ Wellness policy includes measurable goals for:
  - o nutrition promotion
  - o nutrition education
  - o physical activity
  - o other school-based activities to promote student wellness
  - o nutrition guidelines for all foods and beverages available during the school day including

-Smart Snacks in School nutrition standards for items sold to students. -Polices for foods and beverages, not sold to students, but available throughout the school day (e.g. classroom parties, foods given as reward, classroom snacks,

☐ Wellness policy addresses food and beverage marketing. Maine State statute is as follows: §6662. Foods outside school meal program

3. Food and beverage advertising. Brand-specific advertising of food or beverages is prohibited in school buildings or on school grounds except for food and beverages meeting standards for sale or distribution on school grounds in accordance with rules adopted under subsection 2.

For the purposes of this subsection, "advertising" does not include advertising on broadcast

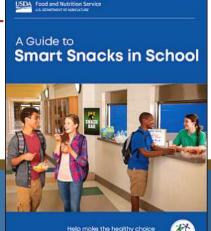
## **Smart Snacks/Competitive Foods**

Standards that pertain to foods and beverage <u>sold</u> to students at school during the school day

- A la carte items
- Vending machines
- School store

Determine if food items meet Smart Snacks standards

- Printouts from Smart Snacks Calculator
- https://foodplanner.healthiergeneration.org/





## State of Maine Law- calories must be posted at point of decision for a la carte items





## **SFA On-Site Monitoring**

- SFA's must conduct a review of the counting and claiming system prior to Feb 1st each year
- For districts with 2 or more schools
  - All sites with NSLP
  - 50% of the schools that operate SBP
- Forms are available on our website



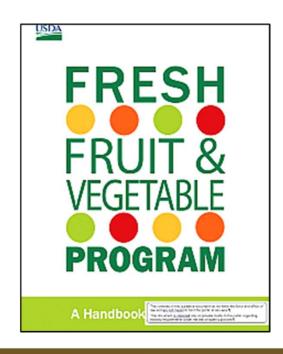
# On-Site Monitoring - After School Snack Service

- Completed twice each year.
  - First 4 weeks of operation AND
  - 2<sup>nd</sup> review later in the school year
  - Must be completed during snack service



# On-Site Monitoring - Fresh Fruit and Vegetable Program

- Completed by February 1st each school year
- Completed for each FFVP site





## Reporting and Record Keeping

Program records must be kept for 3 years plus current! (menus, production records, student applications, monitoring forms, health inspections)

Financial records must be kept for 7 years



#### **Professional Standards**

-Hiring and training standards SFA's must meet to ensure personnel have the knowledge and skills to operate the nutrition programs successfully.

In the current or prior year did staff meet the training requirements?

- Training documentation
- Tracking tool/form used for all school nutrition staff



## **Professional Standards**

STAFFING LEVEL	Yearly Hours
Director	12
Manager	10
All Other Staff	6
Part Time Staff, Less than 20 hours a week	4
Acting Temp Personnel	4
Hours Must be meet each School Year	



## Other Federal Program Reviews







AFTERSCHOOL SNACK PROGRAM



SPECIAL MILK PROGRAM



## Fresh Fruit and Vegetable Program



Determine if FFVP guidelines are met

Documentation is kept-invoices/cost documentation



Widely publicized in school



Food safety & sanitation

How are leftovers handled?



Are the schools on track with budget?



## After School Snack Program

Accountability is taken once snack is received

• 2 <u>different</u> components =reimbursable snack

Fruit/Vegetable offered is 3/4 cup serving

Was onsite monitoring conducted? 2x/year



## Special Milk Program



Available only to half- day Pre-K and K who do not have access to breakfast or lunch



Eligibility documentation must be kept



Checklist by name if not all students qualify as free

Track number of free and paid milks



#### **Post Review Activities**

## Exit Conference with Superintendent/Designee

- Corrective Action Plan (CAP) for findings
- Potential fiscal action

## Administrative Review Report & Corrective Action

- Emailed to superintendent & FS director
- Mail a hard copy
- CAP documents uploaded into CNP web

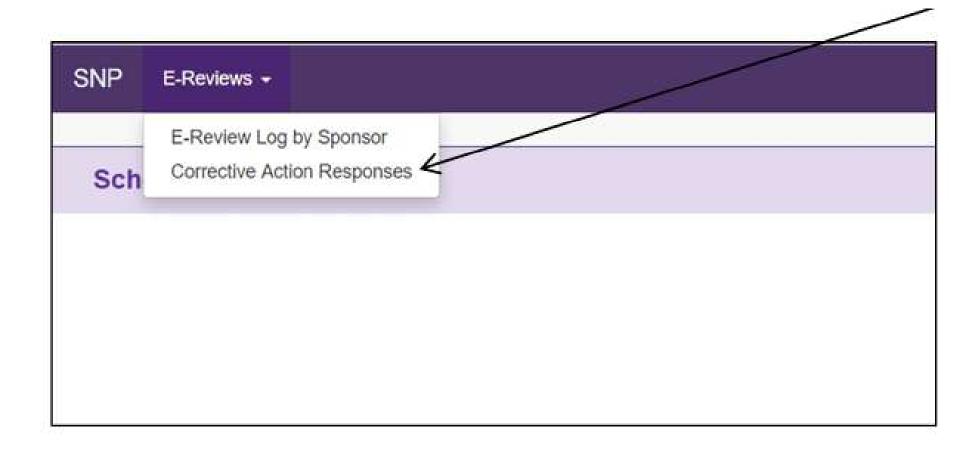


#### **Corrective Action**

- Any <u>findings</u> will result in corrective action
  - Submit by deadline
    - If 30 days past deadline, have ability to withhold payment
  - Can grant extensions, if needed
- Corrective action responses must be uploaded into CNP web (see quick guide)
- Observations: technical assistance only



## Responding to Corrective Action





## **Example: Missing Meal Component**

#### **Corrective Action**

- Describe in detail how the finding was corrected
- Show documentation (i.e. production records)
- Fiscal Action for missing meal components (if repeat)



#### Fiscal Action

#### What is fiscal action?

- Recovery of overpayment
- Disallowance of meals that should not have been reimbursed
- Assessed for repeat missing meal components, and meal counting and claiming errors





## **Procurement Reviews**

#### **Procurement Review**

- Separate review process, but same year as AR
- Desk review process
  - Documents due September 30<sup>th</sup>
- Documentation requested is from the prior school year (SY23)
- Separate written report and CAP



#### **Procurement Review Timeline**

SFA sends documentation to reviewer by established deadline



SA reviews information and requests invoices and additional documentation



SA will communicate findings with point of contact and email report/corrective action to superintendent



## **Procurement Review Timeline**

Corrective action is received by established deadline (if applicable)



Final letter is sent to close review



#### **Procurement Review Documents**

- SFA Procurement Review Questions
- District/School Nutrition Code of Conduct
- District/School Nutrition Procurement Procedures
- SY 2023 Vendor Paid list for School Nutrition Department
- All emailed to reviewer (PR not in CNPweb)



#### Sample Procurement Procedures/Code of Conduct

#### Template for School Nutrition Programs Procurement Procedures and Code of Conduct

School Food Authorities (SFAs) may use this template to identify their procurement plan for USDA School Nutrition Programs. Each SFA is responsible for customizing these procedures and ensuring compliance with Federal, State, and Local procurement regulations. Federal purchase thresholds are used in this template: \$0-\$10,000 micro-purchase; \$10,001 - \$250,000 small purchase; and over \$250,000 formal procedures. However, if a District's purchase thresholds are more restrictive, the more restrictive thresholds must be followed and be reflected in this plan.

#### A. General Procurement

- The NAME plan for procuring items for use in the School Nutrition Programs is as follows.
   The procurement procedures maximize full and open competition, transparency in transactions, comparability, and documentation of all procurement activities.
- 2. When purchasing an item or items with an aggregate total of \$10,000 or less [insert local amount if more restrictive], the NAME will follow micro-purchase procedures. To the extent practicable, the NAME will distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded if NAME considers the price to be reasonable as required by 2 CFR 200.67.
- For purchases between \$10,00.01 and \$250,000 [insert local amount if more restrictive],
   NAME will conduct informal procurement at a minimum. The NAME will draft specifications

https://www.maine.gov/doe/schools/nutrition/financial



#### **Vendor Paid List**

- The dollar amount paid to each vendor for the school year
- Must come from district's accounting software
  - Work with your business manager
- Allows us to select invoices for review



## **Vendor Paid List**

#### REGIONAL SCHOOL UNIT NO 38 Vendor History

Report # 39922

Vendor: 196 Posting Dates: 07/01/2018 - 06/30/2019

Vendor Status: Active

Sort By: Vendor Code Include Remittance Addresses: No

Include Purchase Information: No

Include Distribution Information; No

Include Payment Information: No Include Student Activity Dishursements: No.

Vendor Code	Vendor Name	Vendor Status	Reporting Period
			Purchases Payments
196	DENNIS PAPER & FOOD SERVICE	Active	94,369.34 94,369.34

1 Vendor Listed.



### Resources

#### Child Nutrition website- Review Information

https://www.maine.gov/doe/schools/nutrition/programs/nslp/ar

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# Questions



