Administrative Review Training

Maine Department of Education
Child Nutrition Team
September 13, 2018
Review Timeline

- Letter notifying superintendent
- Email director with review details
- Submit off-site documentation
- Pre-review phone call
- On-site review/Exit conference
- Review report/Corrective action form
- SFA response to corrective action
- Final letter to close review
Off Site Paperwork

Required documents:

- Off site assessment tool
- District information form
- Pre-visit information packet
Administrative Reviews

The Administrative Review provides a comprehensive evaluation process for State Agencies (SAs) to evaluate local school districts, Summer Food Service Programs and residential child care institutions that operate the school meals programs. The review process includes both Critical and General Areas of Review and offers a more robust review of program operations. This includes the implementation of the Healthy Hunger Free Kids Act (HHFKA) program requirements and the review of other Federal programs. Food and Nutrition Service provides forms, instructions, and guidance to standardize this review process to State Agencies. Programs are reviewed at least once every three years. Follow-up reviews and high risk districts reviews may be necessary in addition to the three year cycle.

Request a Copy of an Administrative Review

To request a copy of the most recent Administrative Review conducted by the State Agency as required by Public Law 111-296, Click Here and provide the district name.

SY 2019 Review Schedule

Please see the School Review Schedule SY 2019 (pdf) to mark your calendar and use the following documents to prepare for the review process.

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

Required Documents to Submit

- Off Site Assessment Tool
- Off Site Assessment Tool Instructions
- SY 2019 Administrative Review District Information Form
- SY 2019 Administrative Review Pre-Visit Information Packet

Preparing for the Review

- Administrative Review Checklist (doc)
- Dietary Specification Assessment Tool (xls)
On Site Sample Schedule For Two Day Review

Day One
• Arrive at Director’s office and review applications, verification & paperwork
• Prior to lunch service, arrive at the kitchen to observe documents, production, and meal service
• Verify accountability
• Continue review of paperwork
• Review ASSP if applicable

Day Two
• Arrive at second school and observe breakfast
• Review financials and finish paperwork
• Review FFVP if applicable
• Observe lunch at second school
• Exit interview with superintendent/designee
Review Areas

• Meal Access & Reimbursement*
  – Performance Standard 1

• Meal Pattern & Nutritional Quality*
  – Performance Standard 2

• Resource Management

• General Program Compliance

• Other Federal Program Reviews
PS1: Meal Access & Reimbursement

Certification & Benefit Issuance
Verification
Meal Counting & Claiming

Verifying that meals claimed for reimbursement were served only to eligible students.
PS1: Meal Access & Reimbursement

Certification & Benefit Issuance:
Reviewing the certification of meal benefits to ensure eligible students receive the benefits for which they are entitled and the claims for federal reimbursement are valid
Question

How long does the applications approval process take from the date the SFA receives the application from the household?
Certification and Benefit Issuance

Off-site

- Answer questions in Off-site Assessment
- Send benefit issuance file (Excel)
- Send additional documentation

On-site

- Review student eligibility documents
  - Applications
  - DC lists
  - Letters
- Review denied applications
Benefit Issuance Documentation

Electronic list (Excel) of all free and reduced priced students in the district

- 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 Documentation

- Student Name
- Eligibility Status
- Method of approval (Income, Foster, DC, ...)
- Date of approval
# Off-site Benefit Issuance Documentation

## Sample Benefit Issuance List

<table>
<thead>
<tr>
<th>Student Name</th>
<th>Benefit Status</th>
<th>Method of Certification</th>
<th>School Name</th>
<th>Approval Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walter Beesley</td>
<td>F</td>
<td>DC</td>
<td>Smith ES</td>
<td>9/2/2015</td>
</tr>
<tr>
<td>David Hartley</td>
<td>R</td>
<td>Income Application</td>
<td>Harrison MS</td>
<td>8/30/2015</td>
</tr>
<tr>
<td>Sarah Platt</td>
<td>F</td>
<td>SNAP Application</td>
<td>Jones HS</td>
<td>9/10/2015</td>
</tr>
<tr>
<td>Gail Lombardi</td>
<td>F</td>
<td>Foster</td>
<td>Jones HS</td>
<td>9/2/2015</td>
</tr>
</tbody>
</table>
On-site Benefit Issuance Documentation

- Approved meal benefit applications
- Denied meal benefit applications
- Direct certification lists
- Homeless/migrant/Head Start lists
• How are eligibility determinations transferred to the benefit issuance document?
Question

• How are benefit issuance document(s) transferred to the point of service system?
Common Review Findings

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

$     $     $     $     $     $     $     $     $     $     $     $     $
PS1: Meal Access & Reimbursement
Verification

Off-site

• Answer questions in Off-site Assessment

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
• Eligibility status changes
Verification

Verification Notification and Tracking Forms
www.maine.gov/doe/nutrition/forms/index.html

HOUSEHOLD FILE CONTROL FORM

Head of Household Name: ____________________________

Date Selected: __________________ Notification Sent: _______________

Response Date: __________________ Second Notice Sent: _______________

Response Date: __________________ Missing Information: _______________

DOCUMENT ALL TELEPHONE CONTACTS ON REVERSE SIDE OF THIS PAGE.

Date Reduction/Termination Notice Sent: _______________

Food Stamp/TANF Household: [ ] Income Household: $ __________ Monthly

Confirmed by: __________________ Confirmed by: __________________

[ ] Predetermined Eligibility List  [ ] Wage stubs

[ ] Food Stamp/TANF Office  [ ] Written documents (Explain below)

[ ] ATP Card  [ ] Collateral Contacts (Explain below)

[ ] Other: __________________  [ ] Agency Record

[ ] Eligibility not confirmed  [ ] Other: __________________

Explanation: __________________

Verification Result:
[ ] No Change  [ ] Reduced to Free  [ ] Free to Reduced  [ ] Ineligible

Reason For Change: [ ] High Income  [ ] Refused to Cooperate

[ ] Food Stamp/TANF Eligibility Not Confirmed  [ ] Other - include self denial

Signature of Verifying Official: __________________

Date: __________________

Child Nutrition
Maine Department of Education
Common Verification Errors

✓ Did not use the correct method
  • Must be error prone unless receive permission
  • Mark the Error prone applications when approving
✓ Incorrect sample size- double check the math!
  • A family application who is on direct cert is NOT included in the number of applications
✓ Not following timeline protocol
✓ Eligibility changes not made timely
✓ Incorrect math used with paystub
# Meal Counting and Claiming

## Off-site
- Complete & review questions in Off-site Assessment Tool
- Review Claim from the *Review Period*

## On-site
- Review meal counts by day for review month
- Review *edit checks*
- Observe POS procedures
- Meal counts for day of review
PS1: Meal Access & Reimbursement

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

• Reimbursable meals were consolidated accurately at each school and at the SFA

• Correct meal counts were used in the Claim for Reimbursement
Meal Counting and Claiming

Off-Site Questions

• What type of back-up system is in place?
• How often are cashiers and substitute cashiers trained?
• At the end of meal service, how does the SFA obtain meal counts by category from the POS?
Meal Counting and Claiming

**Off-Site Questions**

- Offer versus 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
Meal Counting and Claiming

Off-Site Questions

- What internal controls are in place to ensure meal counts do not exceed enrollment or attendance adjusted enrollment?
# Edit Checks

<table>
<thead>
<tr>
<th>YEAR</th>
<th>STUDENT LUNCH/EDIT CHECKS</th>
<th>ADULT LUNCHES</th>
<th>TOTAL</th>
<th>PRE K/K MILK PROGRAM</th>
<th>COMMENTS</th>
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<tr>
<td></td>
<td></td>
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<tr>
<td>MONTH</td>
<td>FREE WORKERS</td>
<td>Maximum Free</td>
<td>REDUCED</td>
<td>PAID</td>
<td>TOTAL MEALS TO CHILDREN</td>
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<td>0</td>
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<td>3235</td>
<td>0</td>
<td>590</td>
<td>0</td>
<td>1234</td>
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</tbody>
</table>
Meal Counting and Claiming

• Unpaid Meal Charge Policy:
  – SFA must have a Meal Charge Policy in place
  – Meal charge policy must be communicated with households
Meal Counting and Claiming

On-Site Procedures

• Validating information on SFA-SA Agreement
• Validate Claim for Reimbursement
• Observe POS Procedures
  – Oversight at POS ensuring accurate meal counts
  – Eligibility Category
  – Without Overt Identification
  – Alternate locations (classroom)
Meal Counting & Claiming: Common Findings

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

Corrective Action

• Describe in detail how the finding was corrected

• Fiscal Action for inaccurate meal counts

$  $  $  $  $  $  $  $  $  $  $  $  $  $  $
PS2: Meal Pattern & Nutritional Quality

Meal Components & Quantities
Offer vs. Serve
Dietary Specifications & Nutrient Analysis
SFAs agree to:

• Offer students the required meal components in the required quantities

• Allow students to select required meal components on all reimbursable lines

• Record/claim only those meals that contain required components in required quantities
PS2: Meal Pattern & Nutritional Quality

**Off-site**
- SFA will send:
  - Menus
  - Completed production records
  - Component crediting documentation
  - Recipes, labels, etc.

**On-site**
- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site review

**Reviewer:**
- Meal Compliance Tool
- Dietary Specifications Tool
Meal Components & Quantities

Off-Site: Documentation
- Menu (breakfast, lunch)
- Menu 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 date due 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

- **Date:** 9/27/2015
- **Preparation Site:** DOE High School
- **Order:** Yes [ ] No [X]
- **Grades:** 9-12

#### Menu:
- Shepherd's Pie w/WG Biscuit or Deli Bar
- Salad Bar
- Grapes
- Mixed fruit
- Milk Variety

#### Component Contributions:

<table>
<thead>
<tr>
<th>Menu Items and Condiments</th>
<th>Recipe or Product</th>
<th>SERVING SIZE</th>
<th>TEMPS</th>
<th>COMPONENT CONTRIBUTIONS</th>
<th>ACTUAL SERVINGS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dell Bar</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sliced Ham</td>
<td>USDA</td>
<td>1.22 oz</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sliced Turkey</td>
<td>USDA</td>
<td>1.6 oz</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>American Cheese</td>
<td>USDA, 5 oz/ea</td>
<td>2 slices</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provolone Cheese</td>
<td>Cheese Head, 3 oz</td>
<td>1 slice</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WG Sandwich Bread</td>
<td>CK #516, 8g/slice</td>
<td>2 slices</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WG Sub Roll</td>
<td>CK #260, 70g</td>
<td>1 ea</td>
<td>2.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WG Wrap, 10”</td>
<td>Wrappers, 58g</td>
<td>1 ea</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shepherd’s Pie</td>
<td>USDA D-43</td>
<td>1 piece</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WG Biscuit</td>
<td>Phy #5-185</td>
<td>1 each</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Salad Bar</td>
<td>MB recipe #1</td>
<td>1 Cup</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mixed fruit, canned</td>
<td>USDA</td>
<td>½ cup</td>
<td>.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grapes, fresh</td>
<td>Apple Farm</td>
<td>½ c</td>
<td>.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Salad Dressing, If</td>
<td>Recipe #102</td>
<td>2T</td>
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<td></td>
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</tbody>
</table>

#### Minimum Daily Lunch Component Totals:
- 2 2 1 5 5 5 5 2.5

#### Notes:
- This is a sample production record that a Director would give to kitchen staff to complete on the day of service.
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 and Quantities

Dietary Specifications & Nutrient Analysis

- Dietary Specifications Tool (reviewer)
- Determines if Nutrient Analysis is necessary
- Based on menu documentation submitted and on-site observation
Meal Components & Quantities

Common Findings
✓ Insufficient quantities of a component offered
✓ Missing meal components
✓ OvS not implemented correctly
✓ Unallowable milk substitutions
✓ Incomplete production records
✓ Lack of Standardized Recipes
✓ Field Trip/Bag Lunches – accountability & meal pattern
Meal Components & Quantities

Corrective Action

• Describe in detail how the finding was corrected
• Attach Documentation
• Fiscal Action for missing meal components and some repeat violations
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 2/2 every day & ask what if?
Water

• Free, potable water must be available to students
  – Breakfast
  – Lunch
Resource Management

Maintenance of the non-profit school food service account

Paid Lunch Equity

Revenue from Non-program Foods

Indirect Costs

Procurement
Maintenance of Non-Profit School Food Service Account

• Only allowable costs are charged to the food service account

• Documentation of program revenues and expenses
  – Income and expense detail report
  – Sample of invoices/timecards
Paid Lunch Equity

• Was the paid lunch equity tool completed correctly?
• Was the minimum weighted average price charged?
• Did the SFA use non-federal funds?
  – If so, need to do more in depth review in this area
Revenue from Non-Program Foods

- Applies to: a la carte, catering, vending, school stores, adult meals, etc.
- What is the procedure and controls for ensuring all revenue is deposited into the food service account?
Adult Meals & Pricing

• Price must be greater than per meal cost
  – If not, difference must be offset by non-federal funds (i.e. town support, general fund)

• Only food service staff may receive free meals
Indirect Costs

• Cannot charge indirect costs to food service program

• Includes:
  – Utilities (propane) unless separate meter
  – Percentage of staff time to food service account
    • i.e. custodian, van driver
Common Findings

• Paid lunch equity tool not done correctly
• Not reporting costs accurately
• Propane, utilities (indirect costs) charged correctly to program
Procurement

- The multi-step *process* used to purchase goods and/or services.
- Goal is to purchase high quality products and services at the lowest cost.
Procurement Guidance


• It’s part of our job – and yours to ensure that federal funds are used fairly.

• The process must be competitive and transparent
Procurement Areas for Review

• Procurement Policy & Code of Conduct
• At what dollar amount are you required to go out to bid? (small purchase threshold)
• Documentation to support:
  – Micro-purchases
  – Small Purchases
  – Formal Procurement (Bids)
• Buy American
Procurement Procedures

• SFA Procurement Plan & Code of Conduct:
  – Does the SFA have written procurement procedures?
  – Does the SFA have written code of conduct
  – Do the procedures reflect Federal, State and local procurement laws and regulations?
Procurement Methods

Informal
1. Micro-purchases: $10,000 or less, spread equitably
2. Small Purchases: $10,000-$250,000 (or most restrictive), price quotes, lowest price

Formal – *required for purchases over the small purchase threshold*
3. Invitation for Bid (IFP)
4. Request for Proposals (RFP)
Procurement: Buy American

• SFAs must purchase, to the maximum extent practicable, domestic commodities or products.
  – an agricultural commodity that is *produced* in the United States and a food product that is *processed* in the United States using substantial agricultural commodities that are produced in the United States.
Buy American: Limited Exceptions

1. The product is not produced in the U.S. in sufficient quantities; or

2. Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

Keep documentation.
Common Findings

• Procurement practices (new review area)
• No documentation to support purchasing methods
• Missing or incomplete procurement plans
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
8. Other Program Reviews (FFVP, ASSP, SMP)
Civil Rights

First item we look for and so should you...

- Posted where your customers can see it
- Make sure you have the newest copy!
Civil Rights

- “And Justice for All” poster
- Non-discrimination statement
  - Need permission to use short statement
- Procedures for receiving and processing civil rights complaints within FNS programs
- Documentation for annual civil rights training for staff
- Accommodating students with special dietary needs
General Program Compliance

Food Safety
On-Site Documentation

• Food Safety Plan (SOP’s):
  – Should be **customized** for each site
  – Customizable sample from ICN (NFSMI)

• Recordkeeping: Temperature logs, calibration logs

• Certified Food Protection Manager (ServSafe)
On-Site Documentation

• Health Inspections
  
  – Must post recent health inspection in visible location (post a copy, not the original)

  – Keep on file old health inspections

  – USDA requires two per year.
On-Site Observations

Kitchen & Storage areas

• Proper personal hygiene- refer to SOP
• Cleaning/sanitizing procedures
• Food stored 6 inches off the floor
• Ghost trays - are required by DOE
Local Wellness Policy

**Off-site**

- Off-site Assessment Tool: #1000-1006
- Submit copy of current wellness policy or link to policy on district website

**On-site**

- Validate policy is implemented
Local Wellness Policy (LWP)

- Each local educational agency that participates in the National School Lunch Program is required by federal law to establish a local school wellness policy for all schools under its jurisdiction
- Ensuring the required elements are in place is part of the review process
  - If not, corrective action is needed
Does Your Wellness Policy Measure Up?

• Where can the policy be found?
  - *Must be available for public view*
    • Example: Website

• When was last updated/assessed?
  – *Policies must be assessed every three years*
    For:
    • Compliance with the wellness policy
    • Progress towards meeting goals
Does Your Wellness Policy Measure Up?

• Measurable goals for:
  – Nutrition Promotion
  – Nutrition Education
  – Physical Activity
  – Other school-based activities to promote student wellness

• Nutrition guidelines for all foods and beverages available, including
  • Food Items sold to students meet Smart Snacks standards
  • Addresses foods and beverages not sold to students during the school day (e.g. classroom parties and rewards)
Does Your Wellness Policy Measure Up?

The Wellness Policy must address food and beverage marketing.

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 (Smart Snacks) 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 media or in print media such as newspapers and magazines, clothing with brand images worn on school grounds or advertising on product packaging.
Does Your Wellness Policy Measure Up?

- Have a team in place for the development, implementation, review of the policy.
  *The team may include:*

  Parents                             Students
  School Food Service      Health Professionals
  Administrators                School Board members
  Parents

- Designate one school official to ensure the district complies with the wellness policy
Does Your Wellness Policy Measure Up?

Finally!

• Inform and update the public on the content and implementation, including progress made in meeting the goals of the policy.
  – Examples: school board meetings, website
LWP Resources

- MSMA sample wellness policy
- Wellness policy checklist - Does your wellness policy measure up?
Smart Snacks/Competitive Foods

Standards that pertains to any food and beverage sold to students at school during the school day.

Including:
• a’ la carte items
• vending machines
• school store
Smart Snacks

• USDA – Guide to Smart Snacks in School
• https://www.fns.usda.gov/tn/guide-smart-snacks-schools

A Guide to Smart Snacks in Schools

This publication, A Guide to Smart Snacks in Schools, was updated for School Year 2018–2019. It is a helpful resource for anyone managing school vending machines, fundraisers, or snack bars to better understand the Smart Snacks standards.

Publication date: July 2016. Slightly revised August 2018.

Availability: Download PDF. If you have difficulty opening
## Smart Snacks Standards for Snacks and Entrée's

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>Snack</th>
<th>Entrée</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calories</td>
<td>200 calories or less</td>
<td>350 calories or less</td>
</tr>
<tr>
<td>Sodium</td>
<td>200 mg or less</td>
<td>480 mg or less</td>
</tr>
<tr>
<td>Total Fat</td>
<td>35% of calories or less</td>
<td>35% of calories or less</td>
</tr>
<tr>
<td>Saturated Fat</td>
<td>Less than 10% of calories</td>
<td>Less than 10% of calories</td>
</tr>
<tr>
<td>Trans Fat</td>
<td>0 g</td>
<td>0 g</td>
</tr>
<tr>
<td>Sugar</td>
<td>35% by weight or less</td>
<td>35% by weight or less</td>
</tr>
</tbody>
</table>
Beverages

Remember:
Sizes differ by grade grouping

Elementary
Middle
High School

With the exception of plain water – w/without carbonation, there is no size limit no size limit
Low- and No-Calorie Beverages (High School Only)

Low- and no-calorie beverages, with or without caffeine and/or carbonation; calorie-free, flavored water

“Lower Calorie” Maximum 40 calories/8 fl oz. Maximum 60 calories/12 fl oz. (Equivalent to 5 calories per fluid ounce).

“No Calorie” Less than 5 calories/8 fl oz. Maximum 10 calories/20 fl oz.
Smart Snacks Calculator
(https://foodplanner.healthiergeneration.org/calculator/)

List of foods that have been predetermined Smart Snacks compliant.
https://foodplanner.healthiergeneration.org/products)
Smart Snacks in School
Foods Flowchart

Is the food sold to students on the school campus during the school day?

Yes → Is the food item sold a la carte?

Yes → Does the food item meet at least one of the following Food Standards?
   • Is the 1st ingredient whole grain? OR
   • Is the 1st ingredient a fruit, vegetable, dairy product or protein food? OR
   • Does the food contain at least ¼ cup fruit and/or vegetable?

   Yes → Does the food item (including accompaniments) meet the following Nutrient Standards?
   - Calories
     • Snack ≤ 200 / Entrée ≤ 350
   - Sodium
     • Snack ≤ 200 mg** / Entrée ≤ 480 mg
   - Fat
     • Total fat ≤ 35% of calories
     • Saturated fat < 10% of calories
     • Trans fat zero grams
   - Sugar
     • ≤ 35% of weight from total sugars in foods

   Yes → Allowable
   No → Not Allowable

No → Is it an entrée served as part of a reimbursable meal or on the day after?

Yes → Allowable
No → Not Allowable
NUTRIGRAIN

Serving size 37g
Calories: 120
Total Fat: 3g
Saturated Fat: .5
Trans: 0g
Sodium: 125mg
Sugar: 11g

Whole Grain Oats, Enriched Flour, Whole Wheat Flour, Vegetable Oil, Sugar,
My Product is a ...

- a) Snack
- b) Side
- c) Entree
- d) Beverage

Serving size 37g
Calories: 120
Total Fat: 3g
Saturated Fat: .5
Trans: 0g
Sodium: 125mg
Sugar: 11g

Whole Grain Oats, Enriched Flour, Whole Wheat Flour, Vegetable Oil, Sugar,
Is the first ingredient* of your product a ...

- a) Fruit
- b) Vegetable
- c) Dairy
- d) Protein food
- e) Whole Grain
- f) None of the above

Serving size 37g
Calories: 120
Total Fat: 3g
Saturated Fat: .5
Trans: 0g
Sodium: 125mg
Sugar: 11g

Whole Grain Oats, Enriched Flour, Whole Wheat Flour, Vegetable Oil, Sugar,
<table>
<thead>
<tr>
<th>Nutrition Facts</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Serving Size oz (about g) 37 g</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Servings Per Container 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amount Per Serving</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calories 120</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calories from Fat</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Fat (g) 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saturated Fat (g) .5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trans Fat (g) 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sodium (mg) 125</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbohydrates</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sugars (g) 11</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Serving size 37g
Calories: **120**
Total Fat: **3g**
Saturated Fat: **.5**
Trans: **0g**
Sodium: **125mg**
Sugar: **11g**
Your product is compliant!

Your whole grain product meets all nutrient standards for entrees or snack foods.

Brand

Serving Size
37.00 g

Product

First Ingredient
Common Findings

- Mixed grade schools – must follow most restrictive guidelines
- Non-compliant products
- Documentation that products are compliant
- Calories not posted at point of decision
SFA On-Site Monitoring

• Review of the counting and claiming system
• For districts with 2 or more schools
  – 50% of the schools that operate SBP
  – All sites with NSLP
• Prior to Feb 1st
• Implement any needed corrective action
• Sample form available on our website
Reporting and Record Keeping

Records must be kept for 3 years plus current! (menus, production records, student applications...)

Financial records must be kept for 7 years
Professional Standards

Hiring and training standards to ensure that school nutrition program personnel have the knowledge and skills to manage and operate the programs successfully.

- How is staff training being tracked?
- Is it in relevant areas?
- Are there other school staff that assist the school nutrition program?
Professional Standards

**Off-site**
- List of employees paid by the SN Account
- # hours worked
- Summary of training to date
- Plan for the year

**On-site**
- Validate training documentation for current/prior year

Child Nutrition
Maine Department of Education
Other Program Reviews

• School Breakfast Program
• Fresh Fruit & Vegetable Program
• Afterschool Snack Program
• Special Milk Program
School Breakfast Program

• At the beginning of each school year, notification to households that this program is available.
• Review of offsite paperwork
• Onsite observation
  – Meal offered
  – Accountability
Fresh Fruit and Vegetable Program

- Determine if FFVP guidelines are met
- Documentation is kept- invoices
- Widely publicized in school
- Food safety & sanitation
  - How are leftovers handled?
- Are you budgeting properly?
  - Visit our FFVP reports in NEO
After School Snack Program

• Train staff that are overseeing the program and follow up
• Accountability is taken once snack is received
  – 2 different components = 1 snack
• Fruit/Vegetable offered is ¾ cup serving
• Self-Review twice a year
  – First 4 weeks
  – Prior to end of school year
  – Document
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/Desigee
  – Corrective Action Plan (if needed)
  – Potential fiscal action

• Administrative Review Report & Corrective Action form sent
  – Email to superintendent & FS director
  – Mail a hard copy
Corrective Action

• Any findings will result in corrective action
• Corrective action form outlining steps to correct issue in the future:
  – To be submitted by deadline
  – Signed by Superintendent
Corrective Action & Final Letter

- State Agency reviews submitted corrective action
  - Is it complete?
  - Does it resolve the identified finding/s?

- If sufficient, a final letter sent to close review
What is fiscal action?

– Recovery of overpayment
– Disallowance of meals

• Automatically calculated for meal application/benefit issuance errors and missing meal components
  – Potential fiscal action
Repeat Findings

• State Agency **must** assess fiscal action:
  – Missing vegetable subgroups over the course of the week
  – Only one type of milk is offered
  – Missing meal component

• State Agency **may** assess fiscal action:
  – Insufficient food quantities and/or whole grain foods
Resources

Admin Review Checklist

Child Nutrition website- Review Information

http://www.maine.gov/doe/nutrition/review/index.html

DOE Staff- David, Adriane, Sarah, Stephanie, Michele and Kate
Questions?