

A background image showing a group of diverse children in a school cafeteria. They are standing near a food service counter, looking at food options. The image is overlaid with a semi-transparent blue filter.

MAINE DEPARTMENT  
OF EDUCATION  
Child Nutrition Programs

# Administrative & Procurement Review Training

**Presented by:** Child Nutrition Team



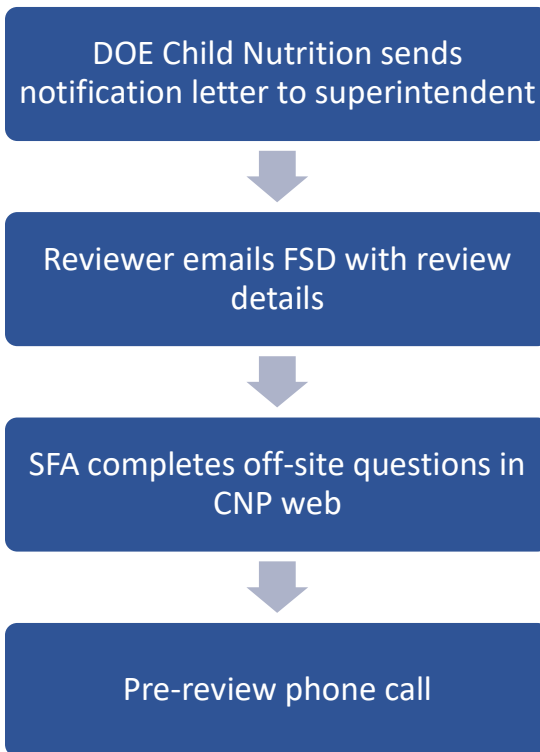
# Agenda

- Pre-review Activities
- CNP web E Reviews
- Review Areas
- Procurement Reviews
- Q and A with your Reviewer

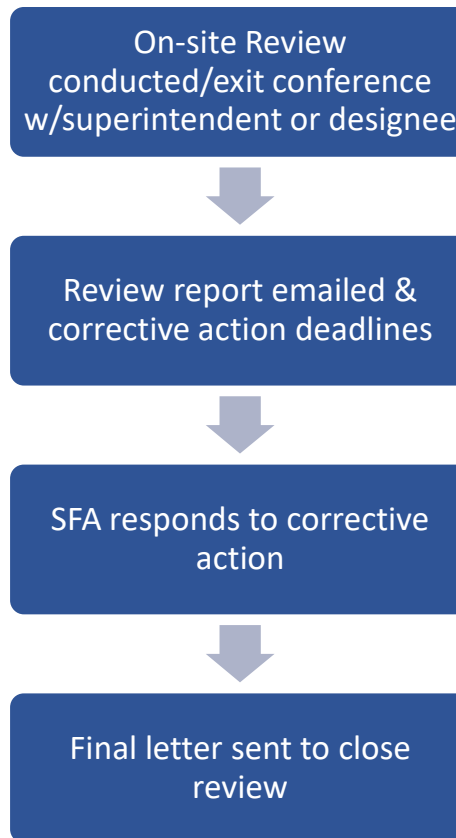
## School Nutrition Reviews

- 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



# Review Timeline



## Pre-Review Activities

SFA Completes:

- Off-site e-review questions completed in CNPweb
- Documents uploaded into CNPweb
  - Checklist Documents for Administrative Reviews

# Administrative and Procurement Reviews

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The State Agency conducts Administrative Reviews and Procurement Reviews at least once every five years. Reviews are conducted both off-site and onsite. After the Reviews are scheduled, the SFA will receive an email from their reviewer with next steps.

The School Review Schedule SY2025 will be available soon.

Note: Additional reviews may be added due to findings, complaints or other information provided to the state agency.

## Resources

[Review Training - SY 2024](#) (pdf)

[PR Overview](#)

## Required Documents to Submit for Administrative Reviews

The Offsite Tool and Corrective Action are completed in CNP Web; <https://me.cnpus.com/cnp/Login>. Contact Paula at [Paula.nadeau@maine.gov](mailto:Paula.nadeau@maine.gov) for access.

- [Checklist of Documents for the Administrative Review](#)
- [CNPweb Administrative Review Instructions](#)

## Required Documents to Submit for Procurement Reviews

- [Procurement Review Tool](#)
- Procurement Procedures
- Code of Conduct
- Vendor Paid List

# **CNPweb E-Reviews**



# CNPweb E-Reviews

**Test Site**

Program Year: 2024 Sponsor: 1450-RSU 10

**Sponsor Summary** RSU 10 (1450)

Checklist Applications **Forms** Claims Payments Users

Oxford County

Form Name	Revision	Status	Date Approved	Action
FFVP Buckfield Jr-Sr High School (763)	0	Approved	6/1/2023	👁️ +
FFVP Hartford-Sumner Elementary School (764)	0	Approved	5/25/2023	👁️ +
FFVP Meroby Elementary School (785)	0	Approved	5/15/2023	👁️ +
FFVP Mountain Valley Middle School (784)	0	Approved	5/15/2023	👁️ +
FFVP Rumford Elementary (788)	0	Approved	5/15/2023	👁️ +
Annual Financial Report	Report to be filed after final claims entered for 2024.			+

# Checklist Documents for Administrative Reviews

- Documents uploaded into CNPweb

## Administrative Review Checklist School Nutrition Programs



The School Nutrition Administrative Review process consists of an off-site assessment and an on-site visit. You are required to answer a series of questions in CNPweb and upload several documents. The reviewer will specify the review period and due dates via email.

*\*Special Provision 2 Non-Base Year (years 2-4) and CEP must not collect Free/Reduced Applications therefore Items with an asterisk (\*) are not applicable for these schools.*

### Step 1: Answer Off-site Assessment Questions in CNPweb Prior to the On-site Review

There are several sections of questions to be answered prior to the on-site review. Log into CNPweb, select SNP, current program year, select 'E-Reviews' at the top of the screen. Follow the instructions in the *CNPWeb/E-Review Quick Guide*.

### Step 2: Upload Documents in CNPweb Prior to the On-site Review

*Follow the instructions in the CNPWeb E-Review Quick Guide. When uploading documents, please name each document so it is clear what it is.*

#### Meal Pattern Compliance

Upload documentation for all meal types (breakfast, lunch, FFVP, afterschool snack) for the assigned review period

- ☐ Menus
- ☐ Completed Production records for a 5-day week
- ☐ Standardized recipes for components with more than one ingredient
- ☐ Child Nutrition (CN) labels or product formulation statements for processed meat/meat alternate and combination meat/meat alternate and grain items

# 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

# Do!

## E-Review Documents

Content	No.	File Name	Upload Date
E-Review		District Information ~ Policies.pdf	4/13/2022
E-Review		District Information ~ Policies.pdf	4/13/2022
E-Review		District Information ~ Task #1.pdf	4/13/2022
E-Review		District Information ~ Task #1.pdf	4/13/2022
E-Review		District Information ~ Task 2.pdf	4/13/2022
E-Review		District Information ~ Task 2.pdf	4/13/2022
E-Review		District Information ~ Task 3.pdf	4/13/2022
E-Review		District Information ~ Task 3.pdf	4/13/2022
E-Review		Food Service Phone Call Audit.pdf	5/5/2022
E-Review		General Areas ~ Tasks 10-15.pdf	4/13/2022
E-Review		General Areas ~ Tasks 10-15.pdf	4/13/2022
E-Review		Meal Access ~ Task 4.pdf	4/13/2022
E-Review		Meal Access ~ Task 4.pdf	4/13/2022
E-Review		Meal Access ~ Task 5 Continued.pdf	4/13/2022

# Don't!

## E-Review Documents

Content	No.	File Name	Upload Date
E-Review		20220322_081818.jpg	4/5/2022
E-Review		20220322_081829.jpg	4/5/2022
E-Review		20220322_082802.jpg	4/5/2022
E-Review		20220322_082807.jpg	4/5/2022
E-Review		20220322_082848.jpg	4/5/2022
E-Review		20220322_082855.jpg	4/5/2022
E-Review		20220322_113758.jpg	4/5/2022
E-Review		20220322_113803.jpg	4/5/2022
E-Review		20220322_113905.jpg	4/5/2022
E-Review		20220322_113922.jpg	4/5/2022
E-Review		20220323_072532.jpg	4/5/2022
E-Review		20220323_072540.jpg	4/5/2022
E-Review		20220323_072637.jpg	4/5/2022
E-Review		20220323_072640.jpg	4/5/2022

# 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 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 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
Jane McLucas	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
Kate Fayle	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 ALL 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**

HOUSEHOLD FILE CONTROL FORM

Head of Household Name: \_\_\_\_\_

Date Selected: \_\_\_\_\_ Notification Sent: \_\_\_\_\_

Response Due: \_\_\_\_\_ Second Notice Sent: \_\_\_\_\_

Response Due: \_\_\_\_\_ 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 Records

☐ 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: \_\_\_\_\_

**Verification Notification and Tracking Forms**  
<https://www.maine.gov/doe/schools/nutrition/studenteligibility>



# Common Verification Findings

Did not use  
correct method  
(i.e. error prone)

Incorrect sample  
size- double  
check the math!

Not following  
timeline  
protocol

Eligibility  
changes not  
made timely

Incorrect math  
used with  
paystub

# Meal Counting and Claiming

## 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 and Claiming

## 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

# Meal Counting and Claiming

## 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

# Meal Counting and Claiming

## 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

# Meal Counting Scenario #1

A teacher comes to the cafeteria to collect lunches for three students. The person at the register records the three meals in the electronic POS system and the teacher delivers to the classroom.

Is this an acceptable meal counting procedure? Why or why not?

# Meal Counting Scenario #2

Pre-K eats lunch in the classroom. During morning attendance, the teacher checks off the students that want lunch and gives the sign-up sheet to the kitchen. The staff then enters it into the POS and delivers the meals to the classroom during lunch service.

Is this an acceptable meal counting procedure? Why or why not?



# 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.

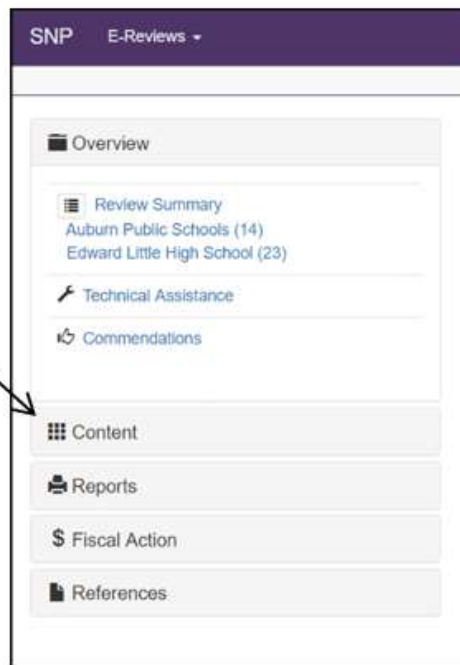
SFA complete:

- 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																		
Date: <u>9 / 27 / 2015</u>			Menu: Shepherd's Pie w/ WG Biscuit or Deli Bar											LUNCH TOTALS				
Preparation Site: <u>DOE High School</u>			Salad Bar											MEALS PLANNED		MEALS SERVED		
QvS: Yes <u>X</u> No <u>    </u>			Grapes											STUDENT MEALS				
Grades <u>9-12</u>			Mixed fruit											ADULT MEALS				
			Milk Variety											TOTAL MEALS				
MENU ITEMS AND CONDIMENTS	RECIPE OR PRODUCT (Name or #)	SERVING SIZE/PORTION	TEMPS		COMPONENT CONTRIBUTIONS										ACTUAL SERVINGS		AMOUNT LEFTOVER	PRODUCTION NOTES
			After Cook	Start of Service	Meat/MA	Cheese/ Bread	Fruit	Dark Greens Vegetables	Red/Orange Vegetables	Legumes	Starchy Vegetables	Other Veg	Total Vegetables	Student	Adult/ A la Carte			
Deli Bar:																		
Sliced Ham	USDA	1.22 oz			1												Sandwiches with no cheese (meat)	
Sliced Turkey	USDA	1.6 oz			1												get double meat (cheese).	
American Cheese	USDA, .5 oz ea	2 slices			1													
Provolone Cheese	Cheese Head, 1 oz	1 slice			1													
WG Sandwich Bread	CK #546, 28g/slice	2 slices			2													
WG Sub Roll	CK #269, 70g ea	1 ea			2.5													
WG Wrap, 10"	Wrappy, 56g	1 ea			2													
Shepherd's Pie	USDA D-43	1 piece			2							1/4 c	1/4 c					
WG Biscuit	Pbx #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	1/4 c				.5											~14 = 1/2 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 the day of service.				
Weekly component Totals																		

# 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

# Meal Pattern Activity

- Take out one day's menu, production record and supporting documentation
- Complete lunch meal pattern form
- Is there sufficient information to determine if meal pattern requirements were met?
  - If not, what is missing?
- What steps would you take back at the office?

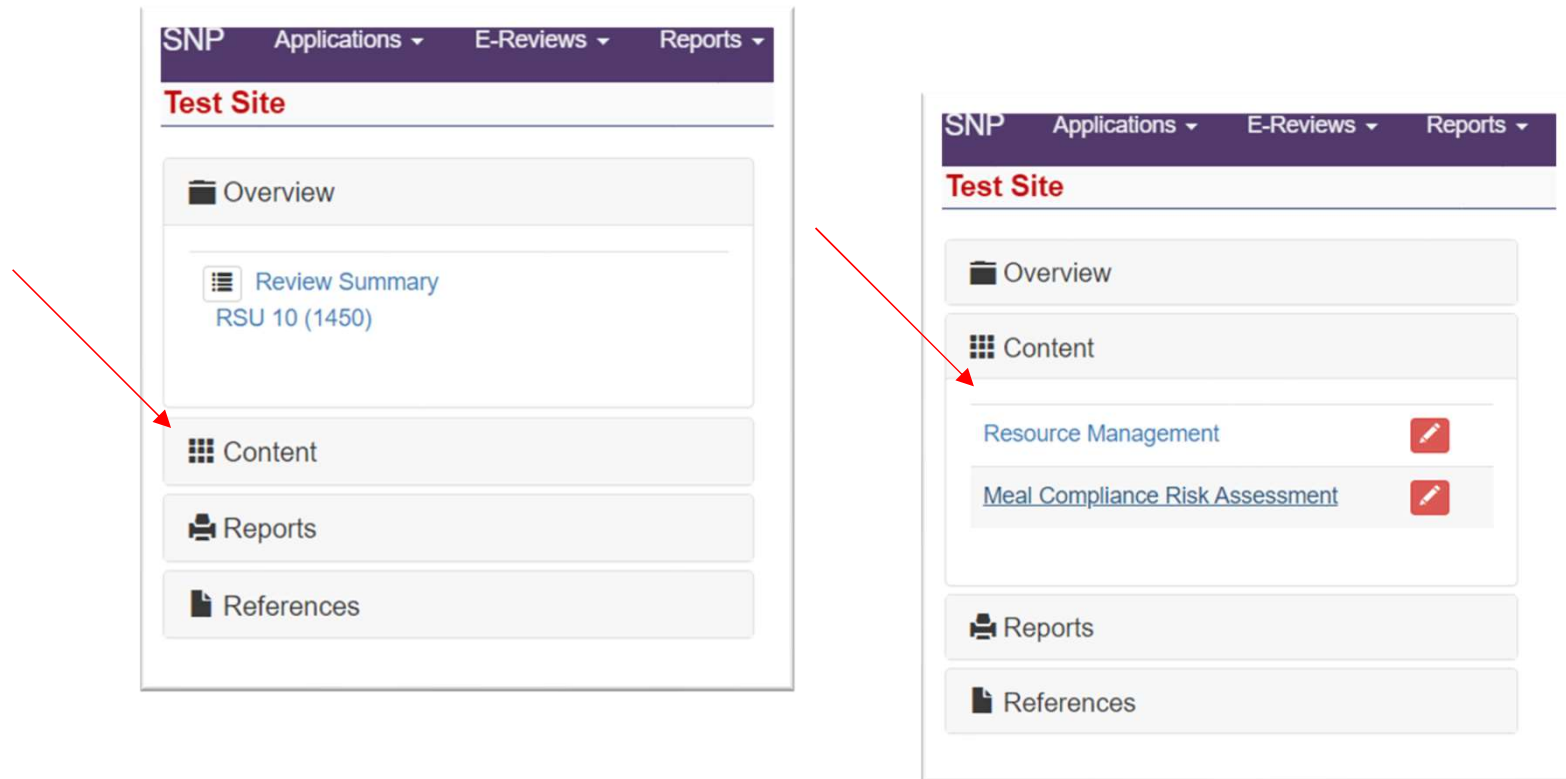
# Resource Management

1. Maintenance of the non-profit school food service account
2. Revenue from Non-program Foods
3. Paid Lunch Equity (PLE)
4. Indirect Costs






Off-site questions 700-712 completed in CNP web

# SFA Answers Questions in CNPweb



# SFA Answers Questions in CNPweb

Review Form - Resource Management			
Non-Profit FS Account		Paid Lunch Equity	Nonprogram Foods Revenue
		Indirect Costs	
Action	Question	Form	Description
	700.	OFS	SFA accurately track all revenues and expenses?
	701.	OFS	SFA have net cash resources that exceeded three months' average expenditures?
	702.	OFS	SFA transfer funds other than approved 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 ensure only allowable costs charged?

# Maintenance of Non-Profit School Food Service Account

Only allowable 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
- 3 CFR 200

› PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS







# 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 2023
    - Income and expense detail report
    - Sample of invoices/timecards



# Non-Profit FS Account

Review Form - Resource Management

Non-Profit FS Account	Paid Lunch Equity	Nonprogram Foods Revenue	Indirect Costs
Action	Question	Form	Description
	700.	OFS	SFA accurately track all revenues and expenses?
	701.	OFS	SFA have net cash resources that exceeded three months' average expenditures?
	702.	OFS	SFA transfer funds other than approved 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 ensure only allowable costs charged?

# Paid Lunch Equity

[Jump to Question](#)

Review Form - Resource Management

Non-Profit FS Account

**Paid Lunch Equity**

Nonprogram Foods Revenue

Indirect Costs

Action	Question	Form	Description
	706.	OFS	SFA use the USDA Paid Lunch Equity Tool?

# Paid Lunch Equity (PLE)

- Ensuring compliance with the pricing of paid student lunches
  - Must be equal to or greater than 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 - Resource Management			
Non-Profit FS Account		Paid Lunch Equity	
Nonprogram Foods Revenue		Indirect Costs	
Action	Question	Form	Description
	709.	OFS	SFA sell nonprogram foods?
	710.	OFS	SFA provided adult meals?
	711.	OFS	SFA 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)
  - Average per meal price is found on the Annual Financial Statement for prior year.
- Only food service staff may receive complimentary meals

# Indirect Costs

Review Form - Resource Management

Non-Profit FS Account	Paid Lunch Equity	Nonprogram Foods Revenue	Indirect Costs
Action	Question	Form	Description
	712.	OFS	SFA charged indirect costs to nonprofit school food service account?

# Indirect Costs

- Ensure no indirect costs are charged to the food service program
  - Cannot charge without prior approval from the Dept. of Education.
- Example:
  - Utilities (propane) unless separate meter
  - Percentage of staff time to food service account
    - i.e. custodian, van driver
    - MUST have a time card showing hours worked.

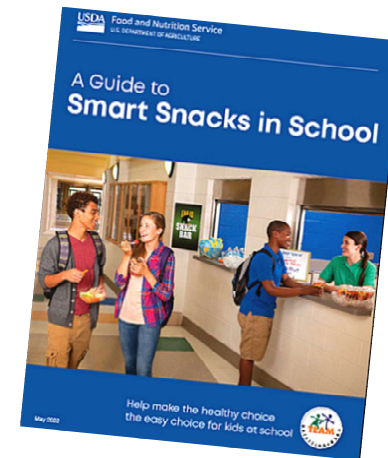


# Common Findings

- 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



- “And Justice For All” Poster
  - Posted where your customers can see it



# Civil Rights

- Non-discrimination statement
  - Meal benefit determination letters
  - Verification letters
  - Program website
- 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

# Food Safety

## On-Site Documentation

- Food Safety Plan (SOP's):
  - Should be customized 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

### State of Maine Health Inspection Report

Inspected by: 02/08/2017		Critical Violations
		Non-Critical Violations
		Certified Food Protection Manager
Address	City	
MECHANIC ST	FREEPORT	
Business Name	Purpose of Inspection	
BAKI LLC	Regular	
DISEASE ILLNESS RISK FACTORS AND PUBLIC HEALTH INTERVENTIONS		
01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100		Mark "X" in appropriate box
01, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100		CCO-Inspected (Y/N)
Item	Pass	Compliance Status
Handwashing and		Potentially Hazardous
1. Handwashing		10. Proper cooking
2. Handwashing		11. Proper refrigeration
3. Handwashing		12. Proper thawing
4. Handwashing		13. Proper hot holding
5. Handwashing		14. Proper cold holding
6. Handwashing		15. Proper labeling
7. Handwashing		16. Proper time/temperature control for safety
8. Handwashing		17. Proper time/temperature control for safety
9. Handwashing		18. Proper time/temperature control for safety
10. Handwashing		19. Proper time/temperature control for safety
11. Handwashing		20. Proper time/temperature control for safety
12. Handwashing		21. Proper time/temperature control for safety
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# 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- required every three years
  - Assessment tool on our website!

## 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.
  - Policies for foods and beverages, not sold to students, but available throughout the school day (e.g. classroom parties, foods given as reward, classroom snacks, etc.).

☐ 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

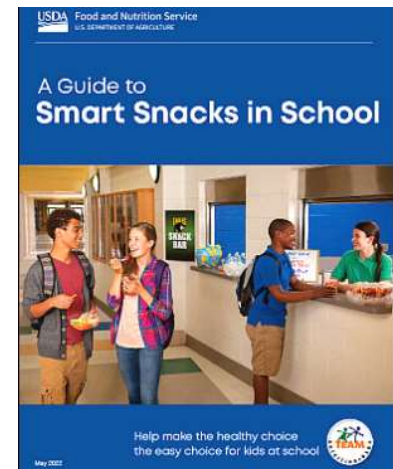
# Smart Snacks/Competitive Foods

Standards that pertain to foods and beverage sold 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 and vending machine items



	Calories	
Hot C	300	Hot C
Hot C	450	Hot C
Big Br	600	Big Br
Deluxe	580	Deluxe
Brea	660	Brea
	560	
	570	



# SFA On-Site Monitoring

- SFA's must conduct a review of the counting and claiming system prior to Feb 1<sup>st</sup> 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
  - [ASSP On-site Monitoring Form](#) To be completed twice a year. At the beginning and mid-year
  - [FFVP On-Site Monitoring Form](#)
  - [SNP On-site Monitoring Form](#)

# 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 1<sup>st</sup> 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 )

# 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

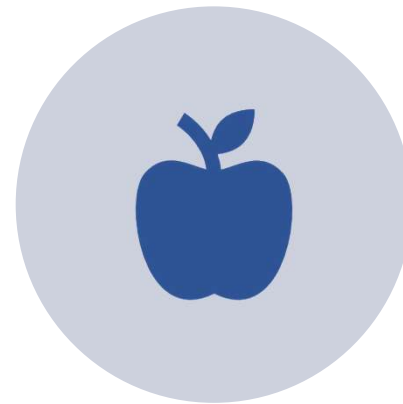
# Professional Standards

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 met each School Year	

## Other Federal Program Reviews



FRESH FRUIT &  
VEGETABLE PROGRAM



AFTERSCHOOL SNACK  
SERVICE

# Fresh Fruit and Vegetable Program (FFVP)

- Determine if FFVP guidelines are met
- Review documentation- invoices and cost documentation
- Widely publicized in the school?
- Review food safety and sanitation (how are leftovers handled if distributed in classroom?)
- Are the participating schools on track with spending?



# After School Snack Service

- Check that accountability is taken once snack is received
  - 2 different components= reimbursable snack
- Fruit/vegetable component is  $\frac{3}{4}$  cup serving (different from lunch)
- Was on-site monitoring conducted?
  - Must be at least 2x/year

# Post Review Activities

## Exit Conference with Superintendent/Designee

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

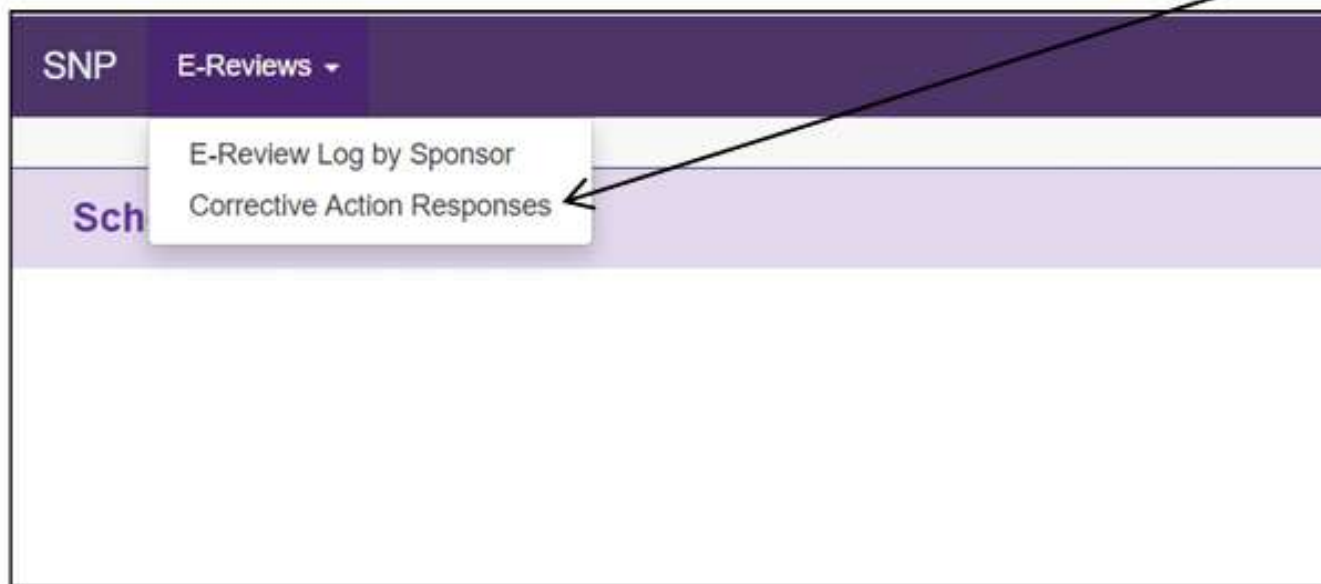
## Administrative Review Report & Corrective Action Plan

- Emailed to superintendent & FS director
- CAP documents uploaded into CNP web
- Posted on CN website

# Corrective Action

- Findings result in corrective action
  - Submit corrections by deadline
    - If 30 days past deadline, may withhold payment
- Respond to corrective action in 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 Review

# Procurement

- Multi-step process used to obtain goods and services
- All entities using Federal Funds, including school nutrition programs, must follow procurement regulations found in [2 CFR Part 200](#).
- USDA School Nutrition Program regulations [7 CFR Part 210](#), [215](#), [220](#).



# Procurement Review

- Completed on the same review cycle as Administrative Reviews
- Typically occurs offsite
- Documentation requested is from the prior school year (SY24)
  - Deadline for submission in Review Notification letter

# Procurement Review Documents

- Complete Procurement Review tool
- SY 2024 Vendor Paid list for School Nutrition Department
- District/School Nutrition Code of Conduct
- District/School Nutrition Procurement Procedures
  
- All emailed to reviewer (not in CNPweb)

# Procurement Review Tool

- Step 1: District name and contact information
- Step 2: List vendor information for purchases where micro-purchases procedures were followed
- Step 3: List vendor information for purchases where small-purchases procedures were followed
- Step 4: List vendor information for purchases where formal purchases procedures were followed

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

# Vendor Paid List

- The dollar amount paid to each vendor from the school nutrition account for the entire school year
- District's accounting software
- Allows us to select invoices for review

# Vendor Paid List

REGIONAL SCHOOL UNIT 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 Disbursements: 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.					

# Required Policies/Procedures

## 1. Procurement Code of Conduct

- Prevent conflicts of interest in procurement
- Govern the actions of employees

## 2. Procurement Procedures

# Procurement Code of Conduct

1. Prohibit real, or apparent conflicts of interest for employees engaged in selection, award, and administration of contracts
2. Indicate that employees are prohibited from accepting and soliciting gifts/incentives
3. Include disciplinary actions for violations

You or someone close to you cannot benefit personally from your program's purchases.

# Procurement Procedures

- Required procedures that are followed to ensure compliance with procurement regulations
- Reference Federal, State and local regulations and required language
- Should also be customized to reflect your actual practices
  - Ex. Buy American

## 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

1. The NAME plan for procuring items for use in the School Nutrition Programs is as follows:



# Documentation

## Micro-purchase Documentation

- Justification for using micro-purchase procedures
- Receipts/invoices

# Documentation

## Small-purchase Documentation

- Solicitation document
- Quotes/responses
- Evaluation
- Receipts/invoices

# Documentation

## Formal Purchase Documentation

- Solicitation documents
- Vendor Responses
- Evaluation
- Contract/contract renewals
- Receipts/invoices

# Technical Assistance/Findings

- Will be listed in the report
- Corrective Action, if applicable
  - Update policies
  - Revise solicitation
  - Obtain signed contract with vendor
    - Renewal contract
  - Re-solicit

# Procurement Resources

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

- Annual procurement training is required
- Quick Guides

## ^ Procurement

Procurement is a multi-step process used to obtain goods and services. All entities using Federal Funds, including school nutrition programs, must follow procurement regulations found in [2 CFR Part 200](#). USDA School Nutrition Program regulations [7 CFR Part 210, 215, 220](#).

### Procurement Methods

The procurement method you use depends on the estimated dollar value of the goods or services you are purchasing.

- [Procurement Quick Guide](#)
- [Informal Procurement Checklist](#)
- [Formal Procurement Checklist](#)

### Procurement Resources

- [Contract Provisions](#)
- [Micro-purchase & small purchase Logs](#)
- [Sample Code of Conduct](#)
- [Sample Procurement Procedures & Code of Conduct](#)

## **DOE Child Nutrition Staff**

Reach out to your reviewer if you have questions about the review process. We are here to help!

**David Hartley**

**Sarah Platt**

**Stephanie Stambach**

**Michele Bisbee**

**Kate Fayle**



## Questions?

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