

A background image showing a group of diverse children in a school cafeteria. They are standing in a line, looking at food options on a counter. The image is overlaid with a semi-transparent blue filter. The text is centered over the image.

MAINE DEPARTMENT
OF EDUCATION
Child Nutrition Programs

Administrative & Procurement Review Training

Presented by: The Child Nutrition Team



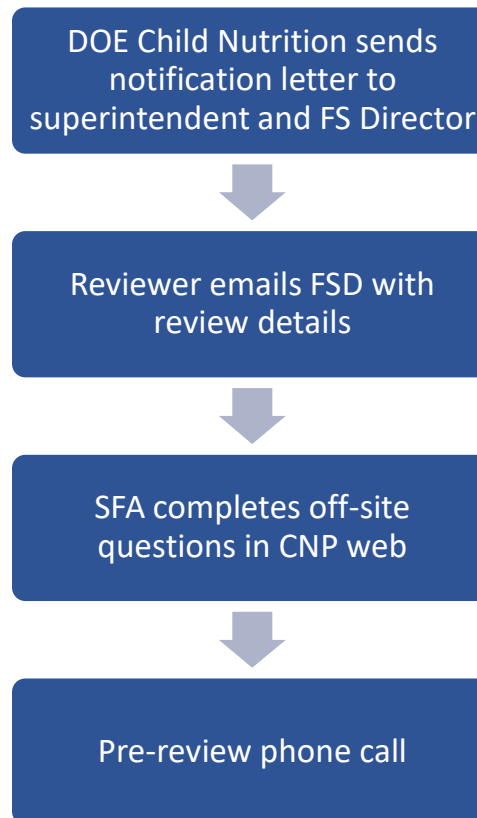
Agenda

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

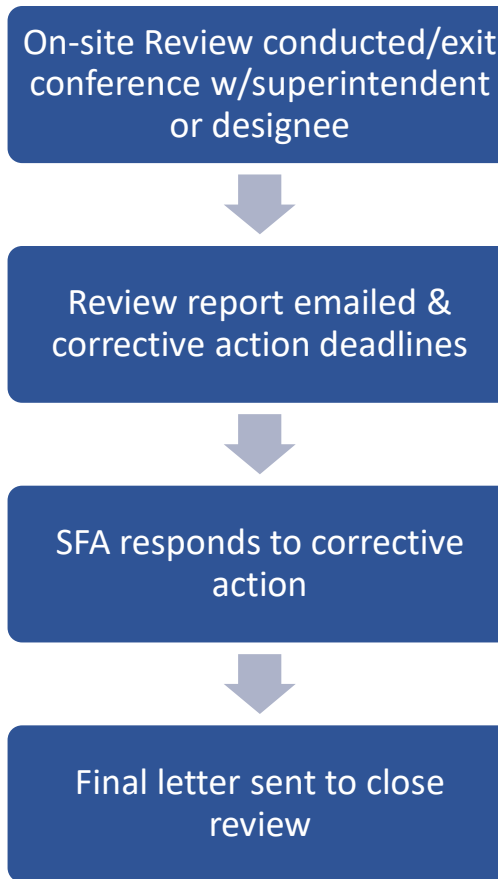
School Nutrition Reviews

- 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



Review Timeline



Pre-Review Activities

SFA Completes:

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

Administrative and Procurement Reviews

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.

[SY 2026 School Review Schedule](#)

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

Resources

- [SY2025 Review Training](#)
- [Procurement Review 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 Miles at miles.l.laidlaw@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

SNP Applications **E-Reviews** Reports Help Programs SarahSponsor

Test Site E-Review Log by Sponsor Corrective Action Responses

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
 - Double check nutrition facts labels
- 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)- we need the ability to sort.
- Will make for smoother review process for everyone

Do!

Don't!

E-Review Documents			
Content	No.	File Name	Upload Date
Resource Management		General Ledger Clarification.pdf	10/21/2024
Resource Management		March 2024 General Ledger with Detail.pdf	10/21/2024
976 - General Program Compliance	803.	Policy AC.docx	9/27/2024
976 - General Program Compliance	803.	Policy ACAB-R.docx	9/27/2024
976 - General Program Compliance	1000.	District Wellness Policy.pdf	9/27/2024
976 - General Program Compliance	1000.	District Wellness Policy.pdf	9/27/2024
Carrabec Community School (983) Review		BREAKFAST MENU AND DETAILS.pdf	10/22/2024
Carrabec Community School (983) Review		FFVP menu Oct 21-25.potx	10/22/2024
Carrabec Community School (983) Review		LUNCH MENU AND DETAILS.pdf	10/22/2024
Carrabec Community School (983) Review		PRODUCTION RECORDS.pdf	10/25/2024

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

This is ONLY for Sponsors collecting and using Meal Benefit Applications

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 – not uploaded into your system – actual DC list
- 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 just the upload into your program
- ✓ 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?

Answer: No!

- Meals were recorded before they were provided to students.
- Options: kitchen staff could deliver meals to classroom or checklist sent to classroom and teacher returns each day.

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?

Answer: No!

- Sign up sheets cannot be used. Student must be checked off when they receive a meal (at point of service).

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.

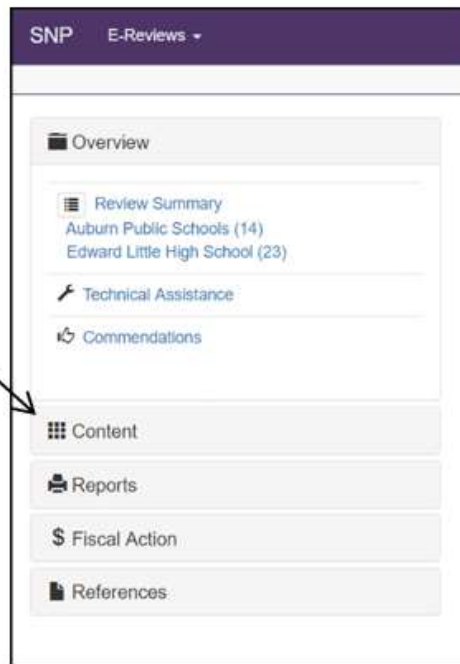
SFA complete:

- 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>													MEALS PLANNED		MEALS SERVED			
QvS: Yes <u>X</u> No <u> </u>													STUDENT MEALS					
Grades <u>9-12</u>													ADULT MEALS					
													TOTAL MEALS					
MENU ITEMS AND CONDIMENTS	RECIPE OR PRODUCT (Name or #)	SERVING SIZE/UNIT	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						1/2 c	1/2 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	1/2 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 Q and A

- Do we need 5 milk labels for the 5 days of the week? **No, only one label is needed.**
- What meal pattern does PreK follow if they eat in the classroom?
Child and Adult Care Food Program (CACFP)
- Should vegetables be recorded on the production record in ounces or cups? **Cups**

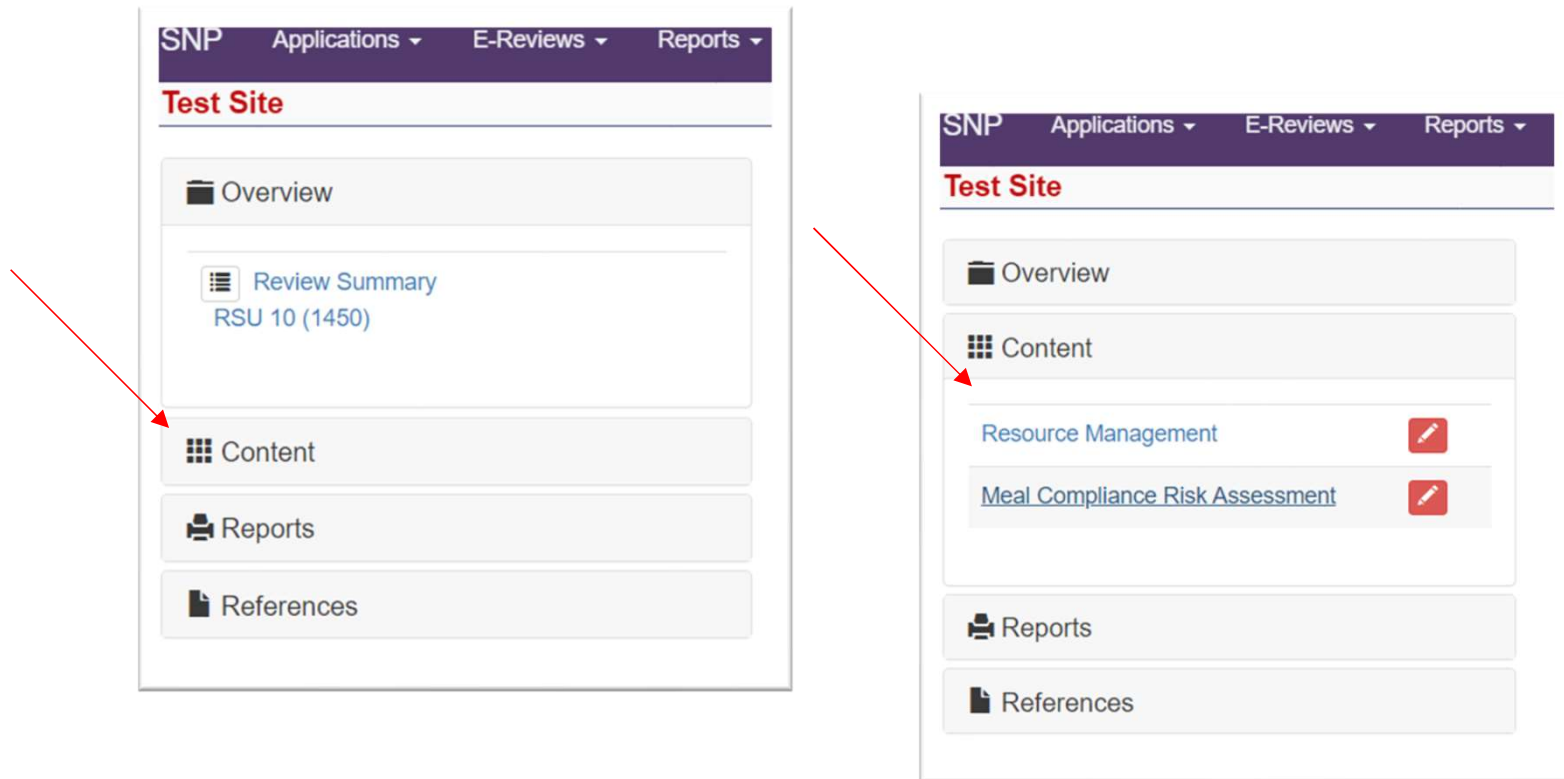
Resource Management

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 for SY 2025 by vendor in total.
 - How much to your supplier for the year: Dennis Paper, SYSCO, PFG, Gordons, milk, grains, staff
 - Submit documentation of program revenues and expenses from March 2025
 - Income and expense detail report
 - Sample of invoices/timecards that have been requested

Non-Profit FS Account

Review Form - Resource Management			
<div> <div>Non-Profit FS Account</div> <div>Paid Lunch Equity</div> <div>Nonprogram Foods Revenue</div> <div>Indirect Costs</div> </div>			
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
- <https://www.maine.gov/doe/index.php/schools/nutrition/financial>
- [Student and Adult Pricing and Charging](#) - Information and guidance for student and adult pricing, bad debt, unallowable costs, and the most recent meal prices for districts across the state.

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

And now for something new

- SP 23-2024
- Buy American tracking.
- % of meal components that must meet Buy American Compliance
 - SY 2026 10% Buy American compliant
 - SY 2029 8% Buy American compliant
 - SY 2032 5% Buy American compliant

What, Where, When....

- All meal components must meet the 10%
 - Pineapple, mandarin oranges, juice, bananas...
 - Allowed as long as with in the allowed percentage
- Must be tracked to show meeting compliance
- Not in CNPweb will be looked at as part of review

Tracking Buy American Compliance

#	SCHOOL NAME	INVOICE NUMBER	INVOICE DATE	SOURCE	FOOD COMPONENT	ALL FOOD ITEMS OR NON-DOMESTIC	EXCEPTION TYPE	TOTAL AMOUNT ALL FOOD ITEMS	TOTAL NON-DOMESTIC FOOD ITEMS	
Count.	If relevant.	If relevant.	(MM/DD/YYYY)	What is the origin of the invoice?	Select the most appropriate food component label for the product purchased.	<p>Was this product produced in one of the 50 states, the District of Columbia, Puerto Rico, or any U.S. territory? If not, confirm by selecting "Non-domestic".</p> <p>Does this product consist of more than 51 percent of domestically grown food by weight or volume? If not, confirm by selecting "Non-domestic".</p>	<p>Exception 1. The product is listed on the Federal Acquisitions Regulations Nonavailable articles list found at 48 CFR 25.104 and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality.</p> <p>Exception 2. Competitive bids reveal the cost of a U.S. product is significantly higher than the non-domestic product.</p>	<p>Enter the total cost for this line.</p> <p>If you choose to include price per unit and number of units, you can use this column to calculate the total by multiplying price per unit by number of units.</p>		% NON DOMESTIC FOOD PRODUCTS
TOTALS								\$ 985.32	\$ 75.34	7.65%
EXAMPLE		1	10/01/25	Bobs Orchard	FRUIT	NON DOMESTIC		\$ 75.00		
EXAMPLE		ad56b18e	01/02/25	Smitties Truck service	ALL FOOD ITEMS	ALL FOOD ITEMS		\$ 1,500.00		
1		358cdt	09/13/25	Dennis paper	ALL FOOD ITEMS	ALL FOOD ITEMS		\$ 985.32		
2		358cdt	09/13/25	Dennis paper	ALL FOOD ITEMS	ALL FOOD ITEMS	canned pineapple		\$ 75.34	
3										
4										
5										
6										
7										

Clothes washing/drying machine

Who can use it?

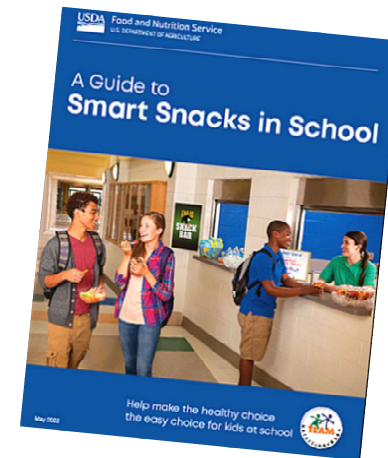
- Anyone.
- Only custodians and kitchen staff.
- Only kitchen staff to wash personal items.
- Only kitchen staff for items used within the program.

Maintenance of Non-Profit School Food Service Account

- Submit requested documentation to support revenue and expenses for what timeframe?
 - March 2023
 - SY 2025
 - March 2025
 - Nothing, we are good, had a positive fund balance

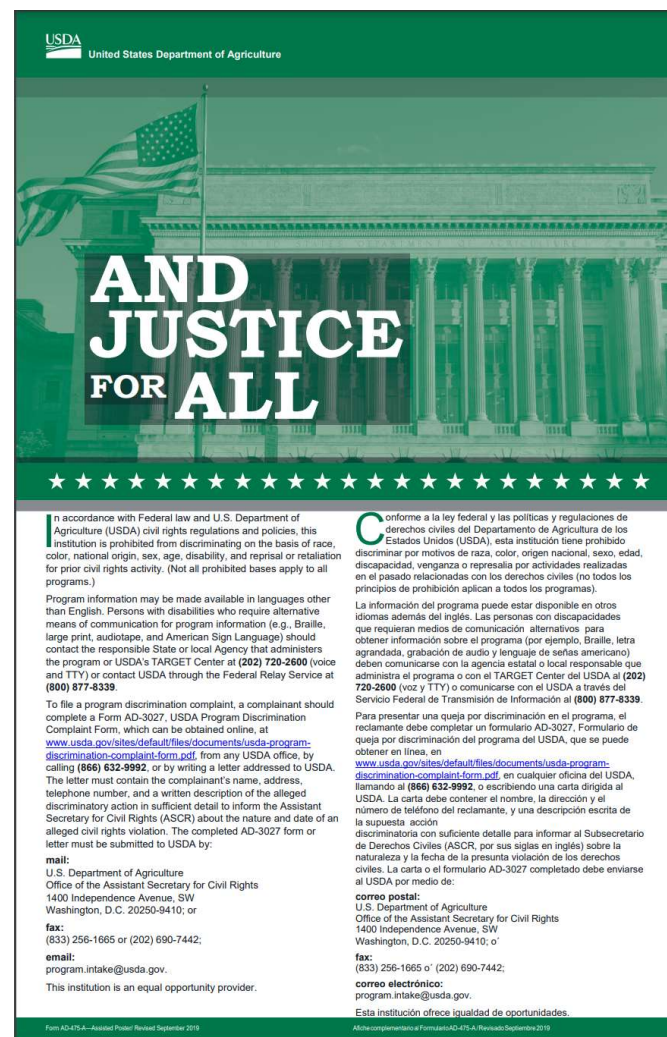
General Program Compliance

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



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: Posted Public View
- Certified Food Protection Manager (ex. Serv Safe)
 - One per kitchen
- “Ghost trays” - required by DOE

State of Maine Health Inspection Report

Inspected by: 02/08/2024		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				
CDT, ACD, N/A: For each numbered item, Mark "X" in appropriate column: Not Observed Not Applicable CDD-Compliant (N/A)				
Item	CDT	ACD	N/A	Compliance Status
1. Handwashing and				Potentially Hazardous
2. Hand				Proper use
3. Glove use				Proper use
4. Uniform & hairnets				Proper use
5. Practices				Proper use
6. Use of hand sanitizer				Proper use
7. Food storage				Time as a factor
8. Food by date				Compliance Status
9. Food				Consumer information
10. Food on approved				Compliance Status
11. Food				Compliance Status
12. Food supplied & accessible				Compliance Status
13. Food				Compliance Status
14. Food				Compliance Status
15. Food				Compliance Status
16. Food				Compliance Status
17. Food				Compliance Status
18. Food				Compliance Status
19. Food				Compliance Status
20. Food				Compliance Status

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

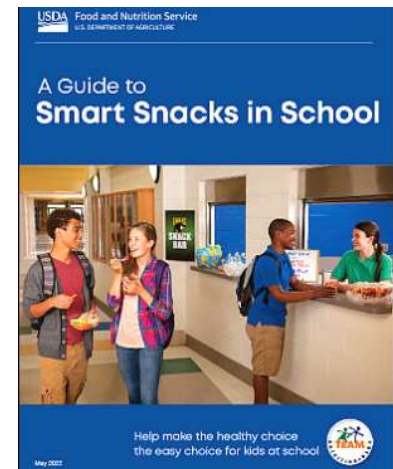
Smart Snacks/Competitive Foods

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 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
 - [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
 - 2nd 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)

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	

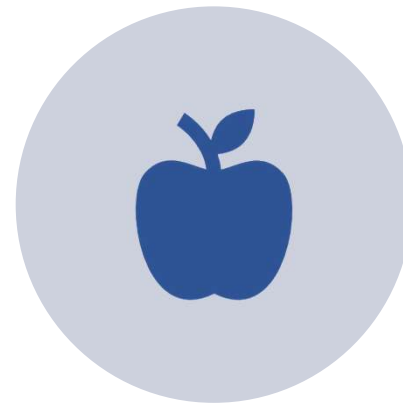
General Program Compliance Q and A

- What program must have two monitoring visits a year? **After School Snack Program.**
- When must on-site monitoring be completed by? **February 1st.**

Other Federal Program Reviews



FRESH FRUIT &
VEGETABLE PROGRAM



AFTERSCHOOL SNACK
SERVICE

Fresh Fruit and Vegetable Program (FFVP)

Determine if FFVP guidelines are met

- Review - 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 funds?

After School Snack Service

- Check that accountability is taken once the snack is received
 - 2 different components= reimbursable snack
- Under 50% schools must take counts by student name and claim F/R/P if traditional claiming or base year provision
- Fruit/vegetable component is $\frac{3}{4}$ cup serving (different from lunch)
- yogurt must contain no more than 12 grams of added sugars per 6 ounces
- At least 80 percent of grains offered weekly (by ounce equivalents) must be whole grain-rich
- breakfast cereal must have no more than 6 grams of added sugars per dry ounce

After School Snack Service

- Was on-site monitoring conducted?
 - Must be at least 2x/year
- After-school enrichment activities must be school-sponsored with open/ drop-in enrollment.

Other Federal Programs Q and A

Do menus and production records need to be maintained for after-school snacks? **Yes**

Post Review Activities

Exit Conference with Superintendent/Designee

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

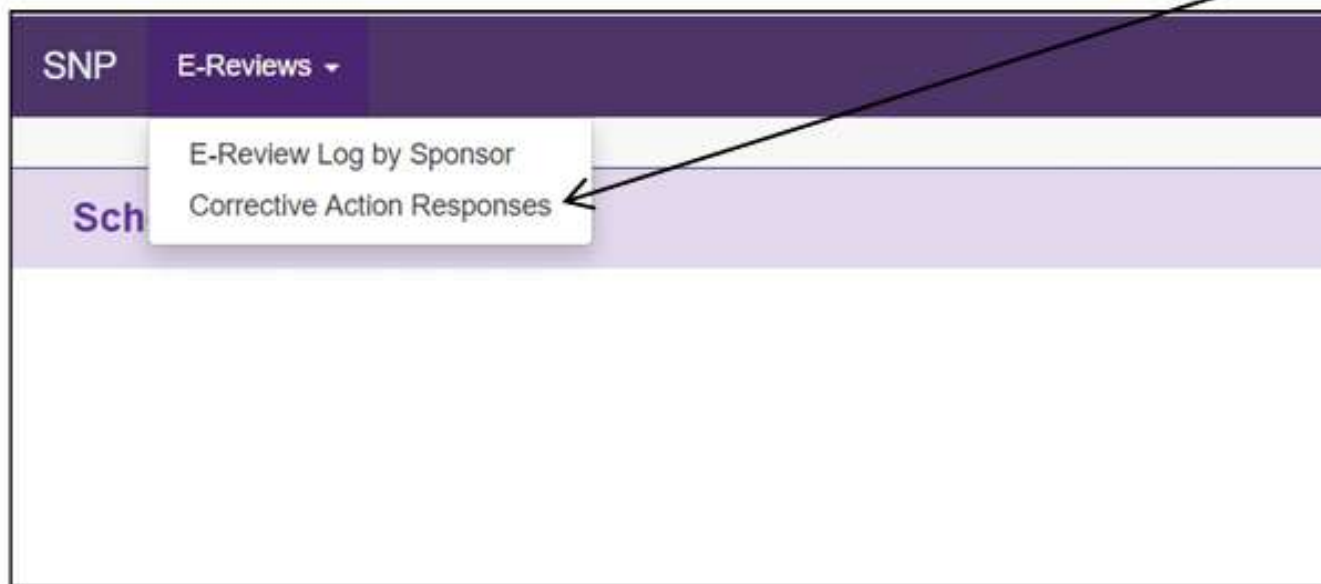
Administrative Review Report & Corrective Action Plan

- 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

- The process of purchasing 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 Timeline

- Schools were notified in August
- Reviewer send email notification in September (may vary)
 - Due date for documentation (phase 1)
- Due date for documentation (phase 2) vary
- Procurement Review Report 1-3 months later
- Corrective Action – 30 days to respond

Procurement Review

- Completed on the same review cycle as Administrative Reviews
- Typically occurs offsite
- Documentation requested is from the prior school year (SY 2025)



Procurement Review Documents (Phase 1)

- ☐ SY 2025 Vendor Paid list for the School Nutrition account
- ☐ Complete Procurement Review tool
- ☐ MOU/Vended Meals Contracts (if applicable)
- ☐ Procurement Code of Conduct
- ☐ Procurement Procedures

PR documents are not completed in CNPweb – please email them to your reviewer

Vendor Paid List

- A list of all vendors paid using school nutrition funds for SY 2025
- Must include:
 - Name of vendor
 - Total amount paid to the vendor
- Exported from 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.

Procurement Review Tool

SFA PROCUREMENT TABLE

SFA Name:

List name(s), position(s)/title(s) and contact information of those person(s) responsible for procurement on behalf of the school food authority (SFA).

Name	Position/Title	Procurement Responsibilities	Contact Information

MICRO & SMALL PURCHASE THRESHOLD INFORMATION:

What is the LEA/SFA micro-purchase threshold? \$

What is the LEA/SFA small purchase threshold? \$

INSTRUCTIONS: Complete the tables below based on the vendor paid list from the business office. This is a list of vendors and the total amount paid for the

Micro-Purchases: Complete chart below for all vendors where micro-purchase procedures were used.

Micro-purchase procedures may be used when the value of the purchase is equal to or less than \$10,000, (or \$50,000* if self-certified). SFA threshold may be more restrictive.*

Did the SFA use micro-purchase procedures?

Yes No

Vendor Name	Goods/Services Provided	Annual \$ Amount Paid to Vendor	One-time or multiple Purchases?	Comments
Ex. ABC Store	Food	\$3,465.83	multiple	This is the only store within a reasonable distance where we can get items when there is a delivery shortage.

Procurement Review Tool

- Classify by procurement type (basically):
 - micro-purchases – didn't get price quotes & under \$10,000
 - small-purchases – under \$250,000 & price quotes
 - formal purchases – over \$250, 000/Buying group/RFP & IFB
- Also, by the process that was followed
 - For ex. Price quotes & purchase was \$5,000 → Small Purchase

I Buy from ABC Distributor Because...

- “That’s who we’ve always used”
- “We are in a remote area, other vendors won’t deliver to our school”
- “They don’t have the products we want”

You need documentation or the justification...ALWAYS!

I Buy from ABC Distributor Because...

- “That’s who we’ve always used”
 - This is never a valid justification!
- “We are in a remote area, other vendors won’t deliver to our school”
- “They don’t have the products we want”
 - When was the last time you asked?
 - Reaching out annually
 - Keep copies of emails & notes from phone calls

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 (Phase 2)

Sample of selected vendors

- Justification for using selected procurement
- Receipts/invoices
- Solicitation documents
- Bidder responses
- Evaluation
- Signed contracts & renewals

Documentation (Phase 2)

Micro-purchase Documentation – from selected vendors

- Copies of purchase orders/invoices/receipts
- 3 invoices from each selected vendor
- Written explanation of why micro-purchase
 - May request supporting documentation

Documentation (Phase 2)

Small-purchase Documentation – from selected vendors

- Solicitation document (include Buy American language!)
- Specifications
- Quotes/responses
- Contract terms – include Buy American! (if applicable)
- Evaluation
- Receipts/invoices

Show you did a competitive process!

Documentation (Phase 2)

Formal Purchase Documentation

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

We have this for buying groups!

Technical Assistance & Corrective Action

- Will be listed in the report
- Corrective Action, if applicable
 - Update policies
 - Contact other potential vendors
 - Revise solicitation
 - Obtain signed contract with vendor
 - Renewal contract

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](#)

Procurement Review Q and A

- What are the federal purchasing thresholds?
 - Micro purchase? \$10,000
 - Small purchase? \$250,000

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

Nic LaBreck



Questions?
