

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

MAINE DEPARTMENT
OF EDUCATION
Child Nutrition Programs

Administrative & Procurement Review Training

Presented by: Maine DOE, Child Nutrition Team



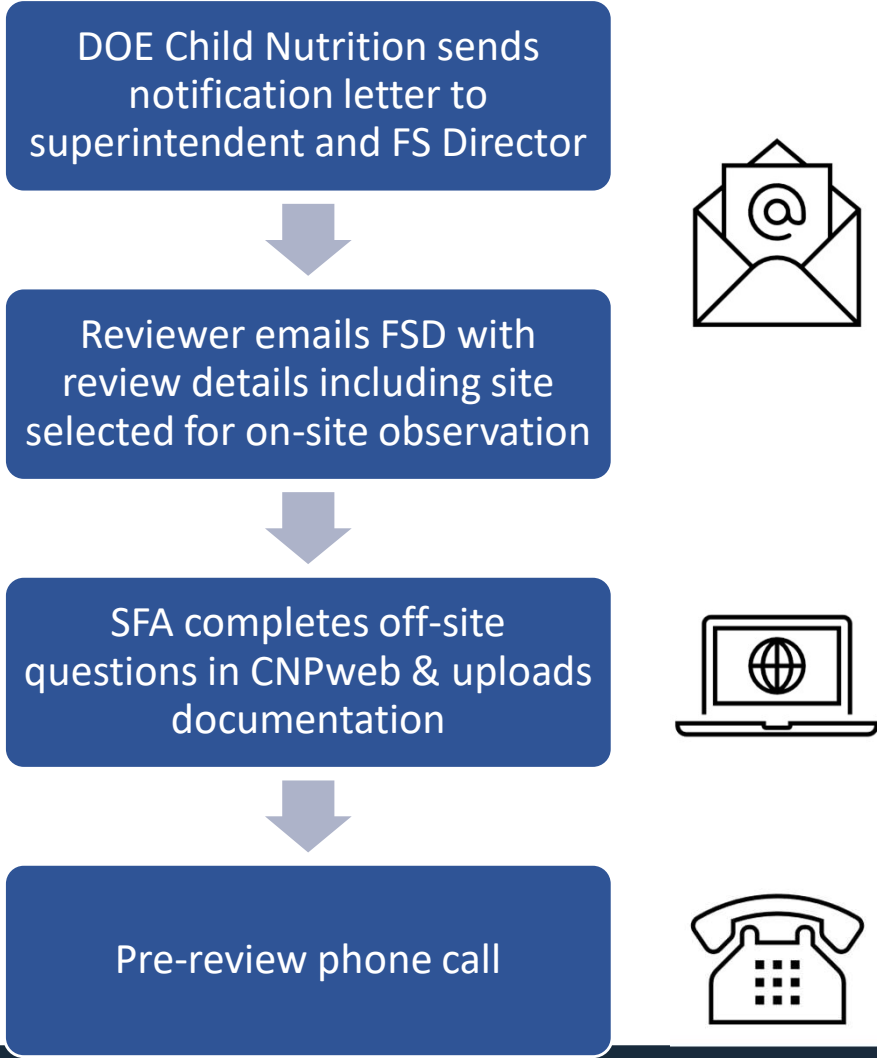
Agenda

- Pre-onsite review Activities
- CNPweb E-Review Module
- 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

On-site Review conducted/exit
conference offered to
superintendent or designee



Review report emailed &
corrective action deadlines



SFA responds to
corrective action



Final letter sent to
close review



Before the Onsite Review Activities

SFA Completes:

- Off-site questions completed in CNPweb E-review
- Upload requested documents in CNPweb
- Resources:
 - CNPweb AR Instructions
 - Checklist Documents for the Administrative Review

Child Nutrition Website

Programs → Lunch → Administrative
& Procurement Review



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 School Food Authority (SFA) will receive an email from their reviewer with next steps.

[SY27 School Review Schedule](#)

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

Required Documents for Administrative Reviews

The Offsite Tool and Corrective Action are completed in CNP Web at me.cnpus.com.
Contact child.nutrition@maine.gov for access.

[National School Lunch Program Checklist of Documents for the Administrative Review](#)

[CNPweb Administrative Review Instructions](#)

Required Documents for Procurement Reviews

[Procurement Review Tool](#)

Procurement Procedures

Code of Conduct

Vendor Paid List

The following may be requested after the above documents have been reviewed:

- Copies of selected invoices
- Documentation to support informal purchases (micro-purchases and/or small purchases)
- Documentation to support formal purchases (solicitation documents, contracts, evaluation documents, etc.)

For more information regarding Procurement, please visit the Procurement section of our [Financial](#) page.

Resources

- [SY26 Administrative and Procurement Review Training](#)

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.			

Maine
Department of
Education

CNPweb E-Reviews

E-Review Log

[+ Add New](#)

Select	Type	Program Year	Due Date	Begin Date	End Date	Close Date	Status	Action
	SNP Administrative Review	2022	10/22/2021	9/1/2021	1/6/2022	1/6/2022	Closed	   
	Other Process	2023	3/31/2023				Closed	   
	Other Process	2025	6/30/2005	4/1/2025	4/14/2025	4/14/2025	Closed	   
	Other Process	2026	6/1/2026	4/1/2026	4/23/2026	4/23/2026	Closed	   
	SNP Administrative Review	2027	6/30/2027				Open	   

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 Documents

- Clearly label documents
- Make sure documents are readable
 - Double check nutrition facts labels, production records
- Menu documentation
 - Tip! Label documents by meal and day
 - i.e. Monday lunch production record, lunch recipes, labels, etc.
- Benefit issuance/Master List (traditional operations only)
 - Excel format
- Will make for smoother review process for everyone

File Naming Do!

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

File Naming 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 (PS1)
2. Meal Pattern & Nutritional Quality*
 - Performance Standard 2 (PS2)
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

1. Certification & Benefit Issuance:

Review the approval of student eligibility documents to ensure the correct benefits are being assigned to eligible students and that meals are claimed properly for reimbursement

- DC List now includes SUN Bucks! Pay attention to codes.

2. Verification

Review the process of confirming selected students' eligibility for free and reduced-price meals in the NSLP and SBP. 9/30/26
Training!

For non-base year Special Prov II and CEP schools the review areas of certification & benefit issuance, and verification do not apply

Hierarchy for Direct Certification

Direct Certification Hierarchy			Use for ISP for CEP	Use for SPII	Can extend sibling benefits
1	SNAP	S	✓	✓	✓
2	TANF	T	✓	✓	✓
3	Foster Care	F	✓	✓	
4	Migrant	M	✓	✓	
5	Homeless	H	✓	✓	
6	Maine Care Free	A	✓	✓	✓
7	SUN Bucks Free	B		✓	
8	Maine Care Reduced	Z		✓	✓
9	SUN Bucks Reduced	K		✓	

- Only lines 1-6 are Directly Certified and can be used for your ISP for CEP
- Lines 1-6 & Lines 8 & 9 can be used for SPII

PS1: Meal Access & Reimbursement

What is the Administrative Review procedure?

- Answer questions in CNPweb about your application and verification process
- Provide requested documentation to your reviewer from the checklist
- Reviewer reviews the applications, verification materials and supporting documents onsite

Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Jane McLucas	F	DC	Smith ES	9/2/2025
David Hartley	R	Income Application	Harrison MS	8/30/2025
Sarah Platt	F	SNAP Application	Jones HS	9/10/2025
Kate Fayle	F	Foster	Jones HS	9/2/2025

Common Review Findings

Certification & Benefit Issuance

- Incomplete F/R Meal Benefit Applications
- Miscategorized Applications due to math errors
- Incorrect SNAP/TANF number
 - Format must be 8 digit plus letter
- Missing documentation (Keep ALL DC/SUN Bucks lists from NEO)
- Verification math errors



PS1: Meal Access & Reimbursement

3. Meal Counting & Claiming

A review of the SFA's system that counts, records, consolidates, and reports the number of reimbursable meals.

This applies to all!

Meal Counting and Claiming

SFA Completes Off-site

- Answer questions in CNPweb - E-Reviews module
- Submit claim from the *Review Period*

Reviewer Completes On-Site

- Review meal counts by day for review period
- Review *edit check report*
- Observe POS procedures
- Obtain meal counts for day of review

Meal Counting and Claiming

- Electronic or Manual System
- A point of service (POS) system that accurately counts reimbursable meals at each school
- Ensures only one meal per student
- Reimbursable meal counts were consolidated accurately at each school
- 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 specific situations handled?

- Offer vs Serve
- Incomplete Meals
- Second Meals
- Adult/Non-Student Meals
- A La Carte Sales
- Field Trips

Meal Counting and Claiming

On-Site Procedures

- Validating information from the SNP sponsor & site application in CNPweb
- Validate Claim for Reimbursement
 - Edit checks are required
- Observe POS Procedures
 - Oversight at POS ensuring accurate meal counts
 - Eligibility Category
 - Without Overt Identification
 - Alternate serving locations (i.e. classroom)



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 brings the meals 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).

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)
 - Best practice – keep accountability within food service
 - Consistent monitoring to ensure requirements are being followed
 - Properly training/monitoring teachers if they are distributing meals
 - Standardized meal count sheet with instructions for consistency
- Student meals being counted BEFORE they are served to a student
- Edit check report

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:

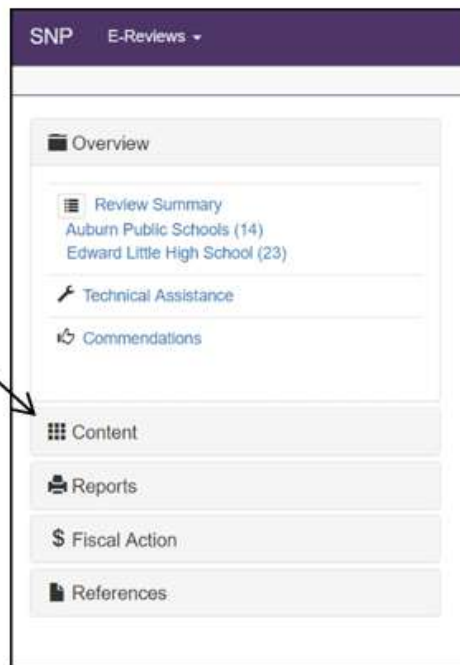
- Meal Compliance Tool

Reviewer Completes On-Site

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

For selected site(s)

Meal Compliance Risk Assessment



Meal Components & Quantities

1. 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> Preparation Site: <u>DOE High School</u> QvS: Yes ☒ No ☐ Grades <u>9-12</u>			Menu: Shepherd's Pie w/ WG Biscuit or Deli Bar Salad Bar Grapes Mixed fruit Milk Variety										<table border="1"> <thead> <tr> <th colspan="3">LUNCH TOTALS</th> </tr> <tr> <th></th> <th>MEALS PLANNED</th> <th>MEALS SERVED</th> </tr> </thead> <tbody> <tr> <td>STUDENT MEALS</td> <td></td> <td></td> </tr> <tr> <td>ADULT MEALS</td> <td></td> <td></td> </tr> <tr> <td>TOTAL MEALS</td> <td></td> <td></td> </tr> </tbody> </table>					LUNCH TOTALS				MEALS PLANNED	MEALS SERVED	STUDENT MEALS			ADULT MEALS			TOTAL MEALS		
LUNCH TOTALS																																
	MEALS PLANNED	MEALS SERVED																														
STUDENT MEALS																																
ADULT MEALS																																
TOTAL MEALS																																
MENU ITEMS AND CONDIMENTS	RECIPE OR PRODUCT (Name or #)	SERVING SIZE/UTENSIL	TEMPS		COMPONENT CONTRIBUTIONS										ACTUAL SERVINGS		AMOUNT LEFTOVER	PRODUCTION NOTES														
			After Cook	Start of Service	Meat/MA	Grain/ Bread	Fruit	Dark Green 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								¾ c	¾ c																		
WG Biscuit	Pbk #5495	1 each				2																										
Salad Bar	SB recipe #1	1 Cup					.5	.5	.5	.5	.5	2.5																				
Mixed fruit, canned	USDA	½ cup				.5																										
Grapes, fresh	Apple Farm	½ c				.5												~14 = ½ cup														
Salad Dressing, lf	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 (if applicable)

Meal Components and Quantities

2. 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
- <https://www.fna.usda.gov/tn/nslp/offer-versus-serve-posters>

Meal Components & Quantities

Common Findings

- ✓ Incomplete production records
 - ✓ No salad bar production record
 - ✓ Amount prepared/leftover not recorded
 - ✓ Correct serving size not recorded
- ✓ Insufficient quantities of a component offered
- ✓ OVS not implemented correctly
- ✓ Unallowable milk substitutions
- ✓ Lack of Standardized Recipes

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

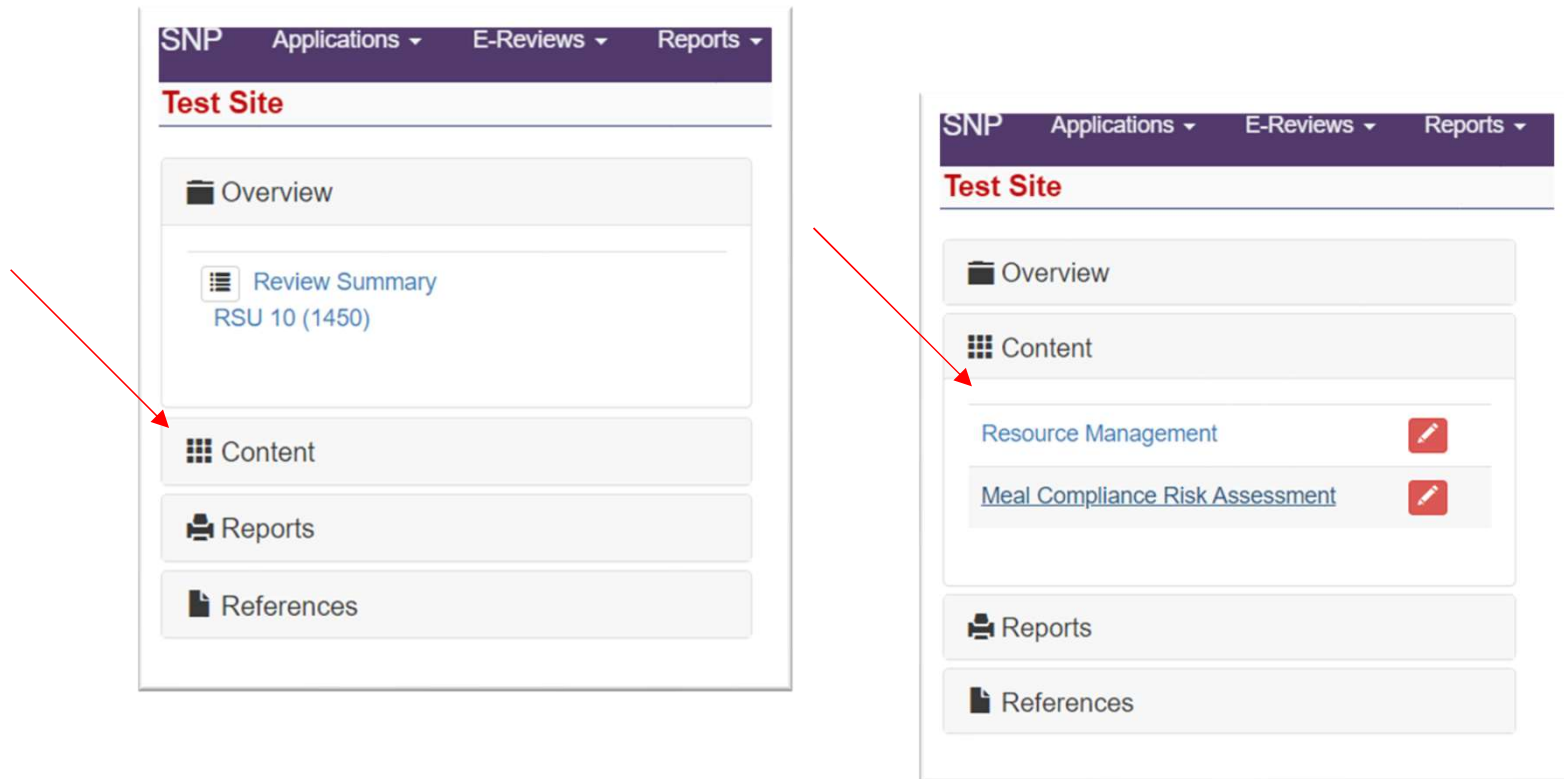
As part of the review we will look at financials from March of the previous school year (March 2026)

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

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?
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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

- Non-program foods – foods & beverages sold outside of a reimbursable meal
 - 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 - review invoice & documentation 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 Report (CNPweb) 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

- USDA Policy Memo SP 23-2024 Buy American Provisions
- Buy American tracking
- % of meal components that must meet Buy American Compliance
 - SY 2026 10% Cap on Non-domestic purchases
 - SY 2029 8% Cap on Non-domestic purchases
 - SY 2032 5% Cap on Non-domestic purchases

What, Where, When.....

- Non-domestic meal components must meet the 10% cap
 - 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.	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". Does this product consist of more than 51 percent of domestically grown food by weight or volume? If not, confirm by selecting "Non-domestic".	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. Exception 2. Competitive bids reveal the cost of a U.S. product is significantly higher than the non-domestic product.	Enter the total cost for this line. 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.		% NON DOMESTIC FOOD PRODUCTS
TOTALS								\$ 985.32	\$ 75.34	7.65%
EXAMPLE		1	10/01/25	Bobs Orchard	FRUIT	NON DOMESTIC		\$ 985.32	\$ 75.34	
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										

Resource Management Common Findings

- Buy American tracking not being completed
- Adult Meal Pricing
 - Not equal to or greater than the per meal cost of production
- Students not being charged for milk only
- Staff outside of nutrition receiving a "free" meal

Resource Management Q&A

Clothes washing/drying machine owned by the kitchen, who can use it

- Only kitchen staff for items used within the program.

If a student wants milk only, do they have to pay for it?

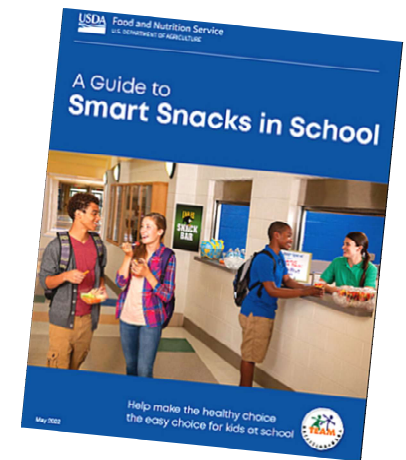
- YES! Only complete reimbursable meals are at no charge.

Submit requested documentation to support revenue and expenses for what timeframe?

- March 2026

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



Food Safety

On-Site Documentation

- Food Safety Plan (SOP's):
 - Should be customized for each site
- Recordkeeping: Temperature logs (food and equipment), calibration logs
- Recent health inspection posted for Public View
- Certified Food Protection Manager (ex. Serv Safe)
 - One per kitchen
- “Ghost trays” - required by DOE

Item	Compliance Status	Potentially Hazardous
16	N/A	Proper date
17	N/A	Proper date
18	N/A	Proper date
19	N/A	Proper date
20	N/A	Proper date
21	DOT	Proper date
22	N/A	Time as a
23	N/A	Consumer
24	N/A	Proper date
25	N/A	Proper date
26	N/A	Time as a

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 DOE NSLP Program Webpage**

Does Your Wellness Policy Measure Up?

Local Wellness Policy Checklist

A local school wellness policy is a written plan that includes methods to promotes student health and wellness. This optional checklist can be used to review and update a local educational agency's (LEA) wellness policy to ensure it meets all requirements in *7CFR 210.31*.

A copy of the local wellness policy can be found online:
Date the local wellness policy was last updated:

Content of the Policy

At a minimum, the local wellness policy must contain:

- ☐ Specific goals for:
 - nutrition promotion
 - nutrition education
 - physical activity
 - other school-based activities to promote student wellness

Does Your Wellness Policy Measure Up?

Local Wellness Policy Triennial Assessment

A local school wellness policy is a written plan that includes methods to promotes student health and wellness. This optional assessment form can be used to complete the assessment of the policy, which must be conducted at least once every three years.

The required components of the assessment include:

- Compliance with the local school wellness policy;
- How the local school wellness policy compares to model local school wellness policies; and
- Progress made in attaining the goals of the local school wellness policy.

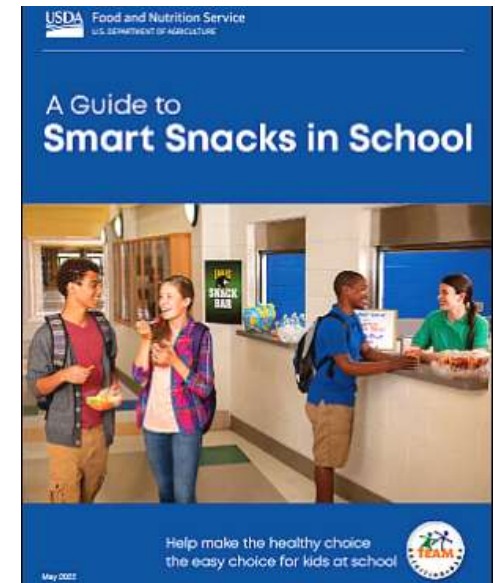
Smart Snacks/Competitive Foods

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	
	300	Hot C
Hot C	450	Hot C
Hot C	600	Big Br
Big Br	580	Deluxe
Deluxe	660	Brea
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 Form NSLP Afterschool Snack Program

The Afterschool Snack Program must be reviewed two times each year at each site. The first review must occur within the first 4 weeks of snack service.

Sponsor Name		Site Name		☐ Area-eligible
				☐ Non-area eligible
1 st Review Date	Arrival Time	Departure Time	Snack Service Time	
2 nd Review Date	Arrival Time	Departure Time	Departure Time	

Snack Menu (Record All Food Items Served and Serving Sizes)

Program Eligibility & Meal Counting		Comments		Comments
Is the school/SAU the sponsor of the afterschool enrichment program?	☐ Yes ☐ No		☐ Yes ☐ No	
Area -eligible: snacks are counted at the point of service and claimed in the free category	☐ Yes ☐ No ☐ N/A		☐ Yes ☐ No ☐ N/A	
Non-area eligible: snacks are counted by student name at the point of service and claimed by free, reduced-price and paid (traditional claiming) or by claiming percentage (special provisions).	☐ Yes ☐ No ☐ N/A		☐ Yes ☐ No ☐ N/A	
A daily attendance roster is kept.	☐ Yes ☐ No		☐ Yes ☐ No	

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 year!

Includes menus, production records, student applications, monitoring forms, health inspections, etc.

Professional Standards

Hiring and training standards
SFA's must meet

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

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

Staffing Level	Hours Per School Year
Director	12
Manager	10
All Other Staff	6
Part Time (Less than 20 hours/week)	4
Acting Temp Personnel	4

Professional Standards – Document!

- Training documentation – maintain agenda and sign in sheet!
- Keep a tracking tool/form for all school nutrition staff

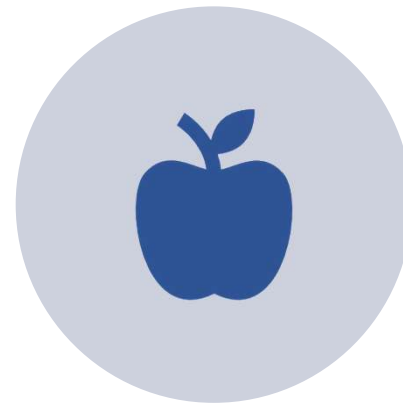
State of Maine Child Nutrition Professional Development Hours Tracking Tool			District Name			School Name		
Required Annual Hours FALSE			School Year			First Name		
Hours Remaining 0.00			Position			Last Name		
Date	Training Provider	Hours	Key Area	Key Topics	Subject	Comments		

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

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?
- Onsite review of FFVP completed before Feb 1

After School Snack Service

- Check that accountability is taken only once the snack is received
 - 2 different components= reimbursable snack
- Under 50% schools must take counts by student name and claim F/R/P or 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
 - Breakfast cereal must have no more than 6 grams of added sugars per dry ounce
 - At least 80 percent of grains offered weekly (by ounce equivalents) must be whole grain-rich

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

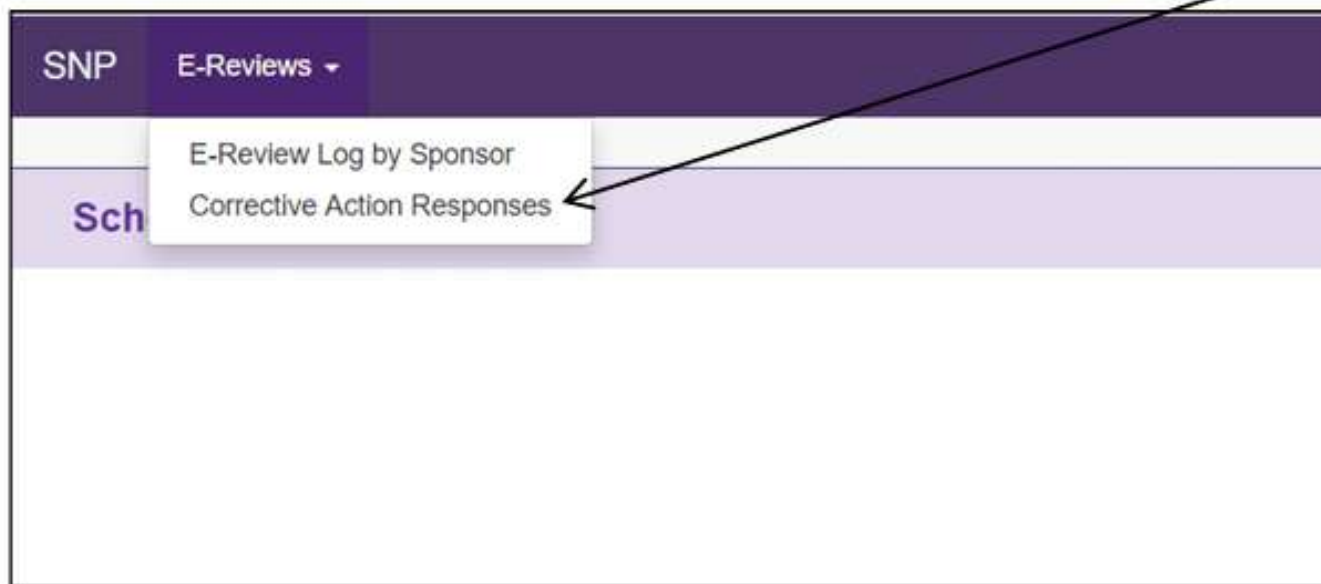
Administrative Review Report & Corrective Action Plan

- 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
 - Email reviewer that documents have been uploaded into CNPweb
- Respond to corrective action in CNP web (see quick guide)
- **Observations/ Technical Assistance (TA)** only; generally, no Corrective Action Plan (CAP) is required.
- **Repeat Observations/TA:** If the same issue is identified during the next Administrative Review, it may be elevated to a **finding requiring corrective action**.

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

- A multi-step process used to obtain goods & 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

- A review of the prior school year (SY 2026)
- Assessing the SFAs compliance with procurement regulations
- Procurement documentation is submitted via email to the reviewer



Procurement Review Timeline

Step 1a: Review notification sent to superintendent and FS Director



Step 1b: Review notification email sent to FS Director with AR/PR details & due date for initial documentation



Step 2: Submit Procurement Information to the Reviewer by September 30



Step 3: Submit requested documentation for select procurements



Procurement Review Timeline

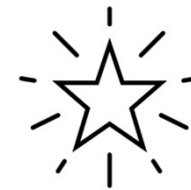
Step 4: State Agency conducts the review



Step 5: Review report is sent to the SFA. Corrective Action Due within 30 days.



Step 6: Once corrective action is accepted, review will be closed



Child Nutrition Website

Programs→Lunch→ Administrative & Procurement Review



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 School Food Authority (SFA) will receive an email from their reviewer with next steps.

[SY27 School Review Schedule](#)

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

Required Documents for Administrative Reviews

The Offsite Tool and Corrective Action are completed in CNP Web at me.cnpus.com. Contact child.nutrition@maine.gov for access.

[National School Lunch Program Checklist of Documents for the Administrative Review](#)

[CNPweb Administrative Review Instructions](#)

Required Documents for Procurement Reviews

[Procurement Review Tool](#)

Procurement Procedures

Code of Conduct

Vendor Paid List

The following may be requested after the above documents have been reviewed:

- Copies of selected invoices
- Documentation to support informal purchases (micro-purchases and/or small purchases)
- Documentation to support formal purchases (solicitation documents, contracts, evaluation documents, etc.)

For more information regarding Procurement, please visit the Procurement section of our [Financial](#) page.

Resources

- [SY26 Administrative and Procurement Review Training](#)

Procurement Review Documents (Due September 30)

- ☐ Vendor Paid list for the School Nutrition account - SY 2026
- ☐ Completed Procurement Review tool
- ☐ Procurement Code of Conduct (Policy DJ-H)
- ☐ Procurement Procedures (Policy DJ-R)

Vendor Paid List

- A list of all vendors by name paid from the school nutrition account in SY26
- Must include:
 - Name of vendor
 - Total amount paid to the vendor
- Exported from District's accounting software

Vendor Paid List

Credit cards – will ask for the vendor PAID

Expenditure Summary Report

Fiscal Year: 2024-2025

Criteria:

From Date: 07/01/2024

To Date: 06/30/2025

Report Sort: Remit Name

Total for FOOD SERVICE - ENTERPRISE FUND			
Total for Northcenter Foods			
PINE TREE FOOD EQUIPMENT			
Check#	Fund	Program	Function
FOOD SERVICE - ENTERPRISE FUND			
6070	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
6103	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
Total for FOOD SERVICE - ENTERPRISE FUND			
Total for PINE TREE FOOD EQUIPMENT			
RM FLAGG COMPANY			
Check#	Fund	Program	Function
FOOD SERVICE - ENTERPRISE FUND			
6026	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
Total for RM FLAGG COMPANY			
ROTO ROOTER			
Check#	Fund	Program	Function
FOOD SERVICE - ENTERPRISE FUND			
6207	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
Total for ROTO ROOTER			
SHIMMER & SHINE HOOD CLEANING_1314			
Check#	Fund	Program	Function
FOOD SERVICE - ENTERPRISE FUND			
5992	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
6381	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
Total for FOOD SERVICE - ENTERPRISE FUND			
Total for SHIMMER & SHINE HOOD CLEANING_1314			
Treas State Of Maine			
Check#	Fund	Program	Function
FOOD SERVICE - ENTERPRISE FUND			
6028	FOOD SERVICE - ENTERPRISE FUND	OVERHEAD	FOOD SERVICE OPERATIONS
Total for Treas State Of Maine			

RemitName

Total

AIRLINE ACTIVITY FUND

\$ 569.28

AMAZON CAPITAL SERVICES

\$ 33.47

[REDACTED]

\$ 34.01

Dennis Paper & Food Service

\$ 24,179.93

[REDACTED]

\$ 166.45

Northcenter Foods

\$ 344.23

PINE TREE FOOD EQUIPMENT

\$ 1,183.75

RM FLAGG COMPANY

\$ 290.89

ROTO ROOTER

\$ 250.00

SHIMMER & SHINE HOOD CLEANING_1314

\$ 1,000.00

Treas State Of Maine

\$ 100.00

Procurement Review Tool

- Using the vendor paid list, complete the Procurement Review Tool
- For each vendor, identify which procurement method was followed
- For credit card transactions, put the vendor on the PR Tool
- Do not list the following on the PR Tool:
 - Mileage reimbursement
 - Employee pay & benefits
 - Kitchen licensing
 - SNA memberships

Procurement Review Tool

- Input the information based on HOW you did the procurement (basically):
 - Micro-purchases – didn't get price quotes & purchase amount is less than your threshold
 - Small-purchases – followed a competitive process, have documentation, purchase amount is less than your threshold
 - Formal purchases – followed a formal, competitive process, have documentation, value of contract is over your threshold
 - Child Nutrition Buying Groups

Ex. Price quotes & purchase was \$5,000 → Small Purchase

Procurement Review Tool

SFA PROCUREMENT TABLE		SFA Name:	
List name(s), position(s)/title(s) and contact information of those persons responsible for procurement on behalf of the school food authority (SFA).			
Name	Position/Title	Procurement Responsibilities	Contact Information
Is this SFA a member of a child nutrition purchasing group? Yes No If yes, list the name:			
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 school year from the school food service account. Each vendor must be listed on this tool.			

Tip! Micro & small purchase thresholds can be found in the district's federal procurement procedures/policy (DJ-R)

Procurement Review Tool - micro

[illegible]

Procurement Review Tool - small

[illegible]

Procurement Review Tool - formal

[illegible]

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”

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, and other vendors won’t deliver to our school”
- “They don’t have the products we want”
 - When was the last time you asked?
 - Make an honest attempt to contact potential vendors annually
 - Keep copies of emails & notes from phone calls

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.

Federal Procurement Procedures

- Written procurement procedures for federal procurement practices to ensure compliance with federal procurement regulations
- Reference Federal, State and local regulations and required language
- Should also be customized to reflect your actual practices
 - Purchase thresholds
 - Buy American

Documentation (Phase 2)

Detailed documents to support procurement transactions:

- Selected vendors from different procurement types
 - Micro-purchase
 - Small Purchase
 - Formal purchase
- MOU/Vended Meals Contracts (if applicable)
- Food Service Management procurement documents (if applicable)

Documentation (Phase 2)

Micro-purchase Documentation – from vendors selected for review

- Purchase orders
- Invoices/receipts

Documentation (Phase 2)

Small-purchase Documentation – from selected vendors

- Written solicitation – what were you asking for?
 - Specifications
 - Evaluation criteria
 - (include Buy American language for food!)
- Quotes/responses
- Evaluation of responses – was purchase made from lowest priced offer?
- Receipts/invoices

Show you did a competitive process!

Documentation (Phase 2)

Formal Purchase Documentation

- Solicitation documents (RFP/IFB)
 - Specifications
 - Evaluation criteria
 - Contract terms & conditions
 - Federal contract provisions
- Vendor Responses
- Evaluation
- Executed signed contract/contract renewals
- Advertisement/public notice
- Receipts/invoices

We have this for buying groups

Common Findings

- Purchasing from a vendor because “we always have”/not attempting to contact other potential vendors
- Not maintaining written solicitation for small purchases
- Not obtaining price quotes for small purchases
- No signed contract with vendor (formal procurement)
 - Renewal contract
- Formal RFP/IFB not containing federal contract provisions

Procurement Resources

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

- Annual procurement training is required
- Quick Guides

Procurement Methods

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

Resources

[Procurement Quick Guide](#)

[Informal Procurement Checklist](#)

[Formal Procurement Checklist](#)

[Real World Informal Procurement Scenarios
You'll Actually Use](#)

Templates & Tools

[Contract Provisions](#)

[Micro-purchase & Small Purchase Logs \(Excel\)](#)

[Sample Code of Conduct \(Word\)](#)

[Sample Procurement Procedures \(Word\)](#)

DOE Child Nutrition Staff

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

Adriane Ackroyd

Michele Bisbee

Kate Fayle

Sarah Platt

Stephanie Stambach



Questions?
