The Administrative Review:

An approach to collaborative compliance

Supplemental Resources

June 16-17, 2025

North Carolina Department of Public Instruction
Office of School Nutrition

Administrative Review: An approach to collaborative compliance workshop

Koury Convention Center, Greensboro, NC
June 16-17, 2025
Agenda

Day 1 - June 16, 2024	**DAY 2 – June 17, 2024**
Sign in: 12:30 – 1:00 pm	Sign in: 8:30 – 9:00 am
Workshop: 1:00 to 5:00 pm	Workshop 9:00 am to 4:00 pm (1 ½ hours forlunch)
Introduction to the Administrative Review (AR)	General Program Compliance Areas:Civil Rights
	On-Site Reviews
AR Process	Competitive Foods
	Professional Standards
Access and Reimbursement: Eligibility, Direct Certification, Benefits Issuance, and CEP	Local Wellness Policy
	Water
Verification	Food Safety
	SBP and SSO Outreach
Meal Counting, Claiming and Reimbursement	Resource Management
	Financial Management
	Procurement
	Other Federal Programs
	After School Snack Program
	Seamless Summer Option
Nutritional Quality and Meal Patterns	Fresh Fruit and Vegetable Program
Meal Components	
Offer vs. Serve Dietary Specifications, and Certification of Compliance Worksheets, and Meal Components, Offer vs. Serve	CN Technology System – Off-Site Data Entry
	Post Review Procedures and Best Practicesfor Submitting Corrective Action

The Administrative Review Process: An approach to collaborative compliance

Regulatory Authority for the Administrative Review (AR)
Regulatory authority is found in 7CFR 210 and 220, the Richard B. Russell National School Lunch Act, the SchoolNutrition Act of 1966, and Section 201 of the Healthy, Hunger-Free Kids Act of 2010 (Pub. L. 111-296, HHFKA).

The school meal programs Administrative Review focuses on two primary components:
1. Critical Areas of Review
   - Performance Standard 1: Meal Access & Reimbursement
   - Performance Standard 2: Meal Pattern & Nutritional Quality
2. General Areas of Review
   - Resource Management
   - General Program Compliance

The Administrative Review is organized into five monitoring areas:
   - Access and Reimbursement, again, which corresponds to Performance Standard 1;
   - Nutritional Quality/Meal Pattern, which corresponds to Performance Standard 2;
   - Resource Management
   - General Program Compliance
   - Other Federal Program Reviews, which are comprised of both Critical and General Areas.

AR Review Period
At a minimum, the review period must include the most recent month for which a claim was submitted, if itcontains at least 10 operating days.

Sites for the Review
To determine the number of NSLP sites required for review, the State Agency (SA) must obtain data from the School Food Authority (SFA) for all sites participating in the School Nutrition Programs. Much of this will be retrieved from claims information in the CN Technology system, based on October claim data (or most recentclaim month for those SFAs scheduled for AR prior to the October claim submission).

Using this data, the SA will use the following chart to determine the minimum number of sites for review.

Number of Sites in the SFA	Minimum Number of Sites to Review for NSLP	Number of Sites in the SFA	Minimum Number of Sites to Review for NSLP
1 to 5 1		41 to 60.. 6	
6 to 10..2		61 to 80... 8	
11 to 20 3		81 to 100.......................................10	
21 to 40 4		101 or More................................. 12*	
* 12 plus 5 percent of the number of sites over 100. Fractions must be rounded to the nearest whole number.			

Choosing additional NSLP sites must be based on the average daily participation and free meal percentage criteria. In all cases, the sites must have a free average daily participation (ADP) of 100 or more. For elementary sites, those with 97% or more free participation would be selected; for combination sites,

those with 87% or more free participation; and for secondary sites, those with 77% or more free participation wouldbe selected.

Combination sites would be schools combining grades such as K-12 or 6-12, etc. Should the number of sites selected using these criteria still not meet the required minimum number of sites to review, the SA will select additional sites using additional criteria such as high or low participation sites, recommendations from the school nutrition administrator, similar claiming patterns, sites with a new site manager, sites with alternate points of service or those not having been previously reviewed, risk for non-compliance with dietary specifications, and participation in school breakfast program (SBP). And in future years, after the first AR review cycle, schools with previous AR or TA non-compliance findings may be selected.

NOTE: It is important to keep your school site application updated. Please review Questions 19-25 for accuracy as these questions determine the "Targeted Menu" school.

Process for the AR
- Entrance Conference
- Review of School Nutrition office and school sites, including a daily debrief of observations
- Exit Conference – Preliminary Findings Report
- 1st, 2nd and 3rd Party Reviews
- Exit Packet – Letters, Report of Findings, Commendations/Recommendations
- Corrective Action Plan
- Closure Letter

Access and Reimbursement
The access and reimbursement process is the link between the SFA's eligibility process, when a student's eligibility for free or reduced-price meals is determined, and the SFA's meal counting and claiming system, when a student's benefits are received at the point-of-service to count and claim meals for reimbursement. Reviewing this section is essential to improving program integrity and ensuring those students eligible for mealbenefits are receiving them appropriately. The goal is to ensure the SFA's system for issuing benefits is timely, up-to-date, and accurately categorizes program participants in their correct eligibility benefit category (free, reduced-price or paid) at the point-of-service. The SA's examination of benefit issuance is essential to ensure eligible children receive the entitled meal benefits and claims for reimbursement are valid. Access and reimbursement cover the following:
- Benefit Issuance and Eligibility Determination
- Community Eligibility Provision (CEP)
- Direct Certification
- Verification
- Meal Counting, Claiming, and Reimbursement

The scope of access and reimbursement part of the AR now focuses on the SFA level. Ultimately, this will allowany eligibility and benefit issuance errors to be applied across the SFA, instead of by site. The review has been moved to the SFA level to provide a more accurate snapshot of the SFA's process for reviewing eligibility, verification, and updating applications. Using a statistically valid sample, fewer student certification/benefit issuances will be reviewed, but if properly selected, the review will yield results representative of the eligibility/benefit issuance activity in the SFA. A listing of all students eligible for free and reduced-price meal benefits will be submitted prior to the AR so the statistically valid sample may be selected. The lead reviewer will provide instructions for submitting this listing.

The Meal Counting and Claiming process looks at meal consolidations at both the site and SFA level; however, the actual validation of meal counts is validated at the site level, like the process for previous reviews.

Benefit Issuance and Eligibility Determination
As the review of applications and the eligibility process begins, a series of questions will be asked related to benefit issuance and eligibility determination. These questions provide insights into how the SFA is determining eligibility, issuing benefits, transferring benefits, etc. Some of the questions may already be answered from the information provided on the annual Application/Agreement. Information needed includes:
- Name of the determining official for direction of questions and clarification
- Name(s) of those with access to the system so the integrity of student eligibility and confidentiality is protected
- Memorandum of Agreements (MOAs) to determine if eligibility data has been released during the school year and if so, to whom and for what purpose…remember, when in doubt, don't give it out.
- Frequency of update for benefit issuance (Increase in benefits must occur within 3 days and a decrease in benefits requires an adverse action notice allowing a 10-day notice before status change.)
- How eligibility benefits are transferred from the benefit issuance document to the point of service (POS) system – i.e. use of automated system linking the benefits from the master roster to the POS
- Type of backup system used

Second Party Review of Applications
As part of an effort to decrease certification errors during the eligibility determination process, section 304 of the HHFKA requires local education agencies to conduct a second party review of applications for free and reduced-price meal benefits. The second party or independent review must be conducted by an individual notmaking the original eligibility determination. This second reviewer must determine whether the applications are complete, processed correctly by the determining official, and approvals are based on current income eligibility guidelines or categorical eligibility information, as applicable, and the master list or roster of student names correctly records the student's eligibility. Will be required in the 2024-2025 school year.

Direct Certification (DC) is the automated process accessed through the SA to automatically qualify studentsfor free meals if they are receiving foods stamps and other public assistance programs such as temporary assistance for needy families (TANF) and Food Distribution Program on Indian Reservations (FDPIR).

The DC process will be reviewed to determine if it is conducted with the required frequency of at least 3 times per year – beginning of school, 3 months into school year and 6 months into school year. Even though USDA requires only tri-annual completion, more frequent DC downloads are highly encouraged. The DC system updates daily; therefore, it is possible to complete it every day. USDA requires free benefits be extended to all household members if at least one student in the home is receiving DC benefits from food stamps or TANF. Good documentation for supporting the DC benefits extension to other household children must be maintainedto fully explain why there is no application for these students.

Other areas of assessment include:
- Conversion factors and income guidelines
- Carryover/roll-over from previous year

- Length of time for application processing
- Household notification
- Access to eligibility applications
- Non-discrimination statement

Corrective actions are required for all errors or findings within the SFA and must be applied system-wide forbenefit issuance and certification errors, including non-reviewed schools. Common findings include:

- Reimbursement claimed for student meals without approved application on file.
- Free/reduced applications are not processed within 10 days of receipt
- Data entry error results in incorrect eligibility status
- Application processed as an income application with required information missing
- Application is processed as an Income Application with incorrect income used to determine eligibility
- SFA did not use Direct Certification for students who receive food stamps
- One student is receiving free benefits due to Direct Certification while a sibling is receiving reduced orpaid meal benefits
- Foster children not processed as categorically eligible
- Student is categorized inaccurately as temporarily free
- Confidential eligibility information is released for unauthorized purposes or without prior consent
- Student eligibility status is not updated at POS/roster

Fiscal action is required for erroneous benefits issuance. Some of these errors include:

- Applications with missing/incomplete information
- Incorrect eligibility determinations or certifications categorized incorrectly
- Benefit issuance errors (i.e. student is categorized for or is receiving meal benefits for which he doesnot qualify)
- Failure to update a change in status resulting from verification and extended to all household members

Generally, if documentation of corrective action is received within specified timeframes (typically 5 days from discovery), fiscal action may be limited from the point corrective action occurs backwards to the beginning of the review period or can be taken to the original date of eligibility. However, in the case of applications missingthe last four digits of the social security number or missing the signature of an adult household member, fiscal action is not required if corrective action occurs within the specified timeframe. If these errors are not corrected within the specified timeframe, fiscal action will be applied SFA-wide instead of only for review sites.

Community Eligibility Provision (CEP) is a provision from the Healthy, Hunger-Free Kids Act of 2010 allowing schools and local educational agencies (LEAs) with high poverty rates to provide free breakfast and lunch to allstudents. CEP eliminates the burden of collecting household applications to determine eligibility for school meals, relying instead on information from other means-tested programs such as the Supplemental Nutrition Assistance Program and Temporary Assistance for Needy Families.

It is **IMPORTANT** to maintain the following documentation in the SFA:

- The spreadsheet completed with the total number of identified students and enrollment (ADM) entered in the School Nutrition Technology System (SNTS).
- Enrollment summary from POS and SIS (if SFA has POS) or Enrollment roster (if SFA has no POS) as of April 1st

- *DC file saved
- *CEP worksheet
- Extended Benefits documentation
- *Foster, Migrant, Homeless, Runaway, HeadStart, non-applicant documentation
- *POS eligibility report (if SFA has POS)
- Reviewers will validate your information is accurate for your claiming percentages.
- **Please keep all this documentation on file at the SFA.**

Meal Counting, Claiming, and Reimbursement

The purpose of the review for this area is to ensure:
- Meal counting and claiming system(s) used for the NSLP and SBP provides accurate meal counts by category (free, reduced, and paid)
- Meal counts are correctly counted, consolidated, and recorded
- Meal counting and claiming system yields accurate reimbursement claims

Meal count systems relying on plate counts, head counts, attendance rosters, entrée counts, etc. do not provide accurate counts. In addition, those systems relying on visual identification by the cashier are ineffective. Only one reimbursable meal may be claimed per student per meal service and meal counts must be taken at the point of service (POS). The point of service/sale is the point where the student has had an opportunity to choose the food items, they desire from all those offered, and the cashier can verify the studenthas chosen the appropriate components to meet the requirements for a reimbursable meal. The POS is typically the "end of the serving line." The SFA must conduct an actual count of reimbursable meals by eligibility status daily at each meal service. Averages of meals over the week or month, head counts, classroom counts, delivery counts, etc. do not provide accurate counts. In addition to reimbursable student meals, there must be an accurate, reliable system to document meals served to adults, SFS employees, visiting students, a la carte and other non-reimbursable services. Meal counts must be by eligibility category. Meal counting and claiming systems which "back out" numbers (i.e. subtract the number of free and reduced- priced meals from the total to arrive at paid meals), or those systems which do not accurately document participation by student, such as tabulators for F, R, & P or stickmen to indicate meals by category vs. by student personal identification number (PIN) are ineffective. Student eligibility must be associated with each student's PIN rather than utilizing generic free, reduced and paid meal keys. All coding systems, whether used with a manual or computerized meal counting and claiming system, must prevent overt identification. Coding must be devised in a manner making eligibility status easy to determine for SFS employees yet difficult for other students and customers to decipher.

Federally required edit checks bar potential over claims by comparing claims to attendance adjusted eligible counts and average daily membership counts. Discrepancies should be investigated and resolved before filing a claim. Document any discrepancies, as well as the corrective action implemented, and keep on file for no less than 3 years plus the current year.

Edit Checks are:
- Required by USDA
- Conducted daily at the school/site level
- Conducted monthly at the SFA level
- Used to resolve discrepancies before filing claim for reimbursement

Common meal counting and claiming findings include:
- Accurate count by eligibility category not provided for each service line at the POS
- Meal counts are incorrectly combined and consolidated or not done daily
- Questionable patterns in the meal counts for the review period
- Effective edit checks not conducted as required

One of the common errors requiring fiscal action is meal count *combining* errors. These are mathematical mistakes resulting in the school reporting incorrect meal counts to the SFA. Fiscal action is taken for the difference between the incorrect and the correct meal counts.

Meal count *counting* errors may also occur. These errors include:
- Meal counts do not equal the number of reimbursable meals served to eligible students
- Meal counts exceed the number of eligible students by category (i.e., free, reduced-price or paid)
- Second and/or other ineligible meals (e.g., adult meals or a la carte) are counted for reimbursement

When meal count errors are identified, reviewers must determine if the SFA has a systemic or a non-systemic error.
- Systemic errors occur when any of the contributing factors are built into the process and would likely recur if the process is not changed. The reviewer must determine the scope of the error by deciding if the same meal count procedures were in place for the review period and/or previous periods.
- An error would be considered non-systemic if the contributing factors are unusual, not part of the normal operating procedure, and the system does not have to be changed to achieve accurate results.

Fiscal action (FA) is taken for meal counts in any one category exceeding the number of students approved for meals within the category will result in fiscal action. FA is taken on all meals counted as reimbursable meals, but were ineligible for reimbursement, such as second meals, adult meals, etc. Remember, this error does not include meals which failed to contain the minimum number of required menu item/food item.

Technical assistance (TA) will be provided in either systemic or non-systemic situations. Formal corrective action (CA) is required with a systemic error and may also be required for a non-systemic error. The CA will be documented in a written Corrective Action Plan (CAP) which sets required timelines for response and corrective actions to be put in place and follow up will validate the CA has been taken appropriately.

- Eligibility Manual for School Meals Determining and Verifying Eligibility July 18, 2017

https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf
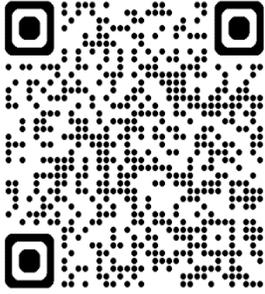
Meal Pattern and Nutritional Quality
Meal Components and Quantities are part of the Performance Standard 2 element under the Critical Areas. This section of the review includes meal components and quantities, offer vs serve, and dietary specification and nutrient analysis (if required).

This section will assess whether the school:
- Offers students the required meal components in the required quantities for specific age/grade groups
- Gives students access to select required meal components on all reimbursable meal service lines
- Records only those meals containing required components in required quantities for reimbursement

Much of this information is assessed by review of production records. Current and complete Production Records must be maintained <u>on-site</u> at the school for each meal service each day. The records must document all meal components offered in quantities appropriate for age/grade groups served. Substitution and leftover information must also be included on production records. Missing Production Records will result in immediate Fiscal Action.

Meal patterns are specific to each age-grade group, and there are specific requirements for meal components, quantities, vegetable subgroups, and dietary specifications (calories, saturated fat, and sodium).

United States Department of Agriculture (USDA) NSLP Requirements
A food-based menu planning approach must be implemented for three age-grade groups (K-5, 6-8 and 9-12). There is some overlap in the component requirements between the age-grade groups, which provides further flexibility for some schools serving more than one age-grade group at lunch (refer to the K-8 column in the chart below).

Schools must plan lunch meals meeting the calorie ranges, on average, over the course of the week; the calorie limits do not apply on a per-meal or per-student basis. Saturated fat is limited to less than 10% of total calories. Sodium limits for the School Breakfast Program and the National School Lunch program must also be met.
Students are instructed on how much each component must be selected through meal identification signage. Drinking water must be available without charge to students in the area where lunches are served.

Lunch Meal Pattern and Nutrient Specifications

Meal Pattern	Grades K-5	Grades 6 – 8	Grades K – 8	Grades 9 – 12
Calories	550-650 calories	600 – 700 calories	600-650 calories	750-850 calories
Fruit (cups)	1/2 cup per day 2 ½ cups per week	1/2 cup per day 2 ½ cups per week	1/2 cup per day 2 ½ cups per week	1 cup per day 5 cups per week
Vegetables (cups)	3/4 cup per day 3 ¾ cups per week	3/4 cup per day 3 ¾ cups per week	3/4 cup per day 3 ¾ cups per week	1 cup per day 5 cups per week
Dark Green	½ cup	½ cup	½ cup	½ cup
Red/Orange	¾ cup	¾ cup	¾ cup	1 ¼ cups
Beans/Peas	½ cup	½ cup	½ cup	½ cup
Starchy Vegetables	½ cup	½ cup	½ cup	½ cup
Other Vegetables	½ cup	½ cup	½ cup	¾ cup
Additional Vegetables	1 cup	1 cup	1 cup	1 ½ cups
Grains (oz eq)	1 oz eq per day 8 oz eq per week	1 oz eq per day 8 oz eq per week	1 oz eq per day 8 oz eq per week	2 oz eq per day 10 oz eq per week
Meats/Meat Alternates (oz eq)	1 oz eq per day 8 oz eq per week	1 oz eq per day 9 oz eq per week	1 oz eq per day 9 oz eq per week	2 oz eq per day 10 oz eq per week
Fluid Milk (cups)	1 cup per day 5 cups per week	1 cup per day 5 cups per week	1 cup per day 5 cups per week	1 cup per day 5 cups per week
Sodium	$\leq$ 1110 mg	$\leq$ 1225 mg	$\leq$ 1110 mg	$\leq$ 1280 mg
Saturated Fat	Less than 10% of total calories	Less than 10% of total calories	Less than 10% of total calories	Less than 10% of total calories

Food Components

Grains

- ✓ At least one ounce equivalent (oz eq) of grains must be offered for K-5, 6-8, or K-8 age-gradegroups each day. At least 2 oz eq of grains must be offered for the 9-12 age-grade group daily. Grain oz eq is credited per Exhibit A attached to USDA Memorandum SP30-2012, CN Labels, or Manufacturer's Product Formulation Statement.
- ✓ The minimum weekly offering varies by age-grade group (refer to the chart above); the flexibility for the maximum oz eq of grains allowed per week is extended.
- ✓ Eighty percent (80%) of all grains offered must be whole grain rich.
- ✓ There is no change to the whole grain rich criteria specified in FNS memo SP 30-2012 (Elements 1 and 2) Whole grain-rich products must contain at least 50 percent whole grainsand the remaining grains in the product must be enriched.
- ✓ Other grains in the weekly menu must be enriched.

Meats/Meat Alternates (M/MA)

- ✓ At least 1 ounce equivalent (oz eq) of M/MA must be offered for K-5, 6-8, or K-8 age-grade groups each day. At least 2 oz eq of M/MA must be offered for the 9-12 age-grade group daily; theflexibility for the maximum oz eq of M/MA allowed per week is extended.
- ✓ The minimum weekly offering varies by age-grade group (refer to the chart above).
- ✓ M/MA oz eq is credited per the Food Buying Guide, CN Labels, or Manufacturer's Product Formulation Statement.

Fruit

- ✓ At least 1/2 cup of fruits must be planned and offered to for K-5, 6-8, or K-8 age-grade groupseach day. At least 1 cup of fruit must be offered for the 9-12 age-grade group daily.
- ✓ If fruit juice is offered, it must be 100% juice and may comprise only 50% of the fruit component offerings.
- ✓ Fruits may be fresh, canned, frozen, or dried.

Vegetables

- ✓ At least 3/4 cup of vegetables must be planned and offered to for K-5, 6-8, or K-8 age-grade groups each day. At least 1 cup of vegetable must be offered for the 9-12 age-grade group daily.
- ✓ Specific vegetable sub-group requirements must be met over the week.
- ✓ If vegetable juice is offered, it must be 100% juice and may comprise only 50% of the vegetable component offerings.
- ✓ All vegetable subgroups must be offered on each independent serving line over the week toensure a student can select a reimbursable meal in any line they may choose.
- ✓ Schools can substitute vegetables from the dark green, red/orange, or beans/peas for "other" vegetables if they desire, but they may not substitute starchy vegetables for "other" vegetables.

Fluid Milk
- ✓ Only fat-free (unflavored or flavored) or low-fat (unflavored or flavored) milk may be offered.
- ✓ For all age-grade groups, the meal pattern requires at least 1 cup of milk daily.
- ✓ At least two options of milk must be offered from the allowable types.
- ✓ Milk may be unflavored or flavored provided unflavored milk is offered at each meal service.
- ✓ Milk fat and flavor restrictions also apply to meals for children in the 3 to 5-year-old age group.One variety of fat-free OR low-fat unflavored milk is required for this age group.
- ✓ Non-dairy milk substitutes must continue to meet the nutrition requirements per USDA Memorandum SP35-2009.
- ✓ Operators of the National School Lunch Program and School Breakfast Program to offer flavored, low-fat milk (1 percent fat) for students in grades K through 12 and for sale as a competitive beverage. It also allows flavored, low-fat milk in the Special Milk Program for Children and in the Child and Adult Care Food Program for participants ages 6 and older.

Non-Offer vs. Serve Meals
- Schools must offer 5 food components (milk, fruits, vegetables, grains, meats/meat alternates). A menu planner may split a component into more than one item to meet the daily minimum requirement.
- Students must be served the full planned menu for meals to be reimbursable.
- To meet the weekly requirements for K-5, 6-8, or K-8, more than 1 oz eq of grain and M/MA must beplanned and served on some days.

A la carte Offerings
- A la carter offerings at lunch must meet the nutrition standards in Smart Snacks in School rule. Any entrée item offered as part of the NSLP is exempt from all competitive food standards if it is offered asa competitive food on the day of, or the day after, it is served in the NSLP.
- Side dishes offered as part of the NSLP and sold a la carte must always meet the nutrition standards contained in the Smart Snacks in School rule. Side dishes and snacks offered as part of a reimbursablelunch are not exempt from the Smart Snacks nutrition requirements.

Resources:
https://www.fns.usda.gov/schoolmeals/nutrition-standards
https://www.fns.usda.gov/usda-fis/foods-available
https://www.fns.usda.gov/cn/labeling/authorized-labels-manufacturers
https://schools.healthiergeneration.org/resources_tools/
https://www.fns.usda.gov/cn/qas-milk-substitution-children-medical-or-special-dietary-needs

United States Department of Agriculture (USDA) SBP Requirements
A food-based menu planning approach must be implemented for three age-grade groups (K-5, 6-8 and 9-12).There is significant overlap in the component requirements between the age-grade groups, which provides further flexibility for schools serving more than one age-grade group at breakfast (refer to the K-12 column inthe chart below).

Schools must plan breakfast meals meeting the calorie ranges, on average, over the course of the week; thecalorie limits do not apply on a per-meal or per-student basis. Saturated fat is limited to less than 10% of total calories. Level 1 sodium restrictions apply.

Students are instructed on how much of each component must be selected through meal identification

signage.Drinking water must be available without charge to students in the cafeteria during breakfast.

Weekly Breakfast Meal Pattern and Nutrient Specifications

Component	Age-Grade Group K-5	Age-Grade Group 6-8	Age-Grade Group 9-12	Age-Grade Group K-12
Grains	7 oz eq	8 oz eq	9 oz eq	9 oz eq
Fruit	5 cups	5 cups	5 cups	5 cups
Milk	5 cups	5 cups	5 cups	5 cups
Calories	350-500	400-550	450-600	450-500
Sodium	$\leq$ 540 mg	$\leq$ 600 mg	$\leq$ 640 mg	$\leq$ 540 mg
Saturated Fat	Less than 10% of total calories	Less than 10% of total calories	Less than 10% of total calories	Less than 10% of total calories

Food Components

Grains
- ✓ At least 1 ounce equivalent (oz eq) of grains must be offered for all age-grade groups each day.
- ✓ The minimum weekly offering varies by age-grade group (refer to the chart above).
- ✓ Eighty percent (80%) of all grains offered must be whole grain rich.
- ✓ There is no change to the whole grain rich criteria specified in FNS memo SP 30-2012 (Elements 1 and 2) Whole grain-rich products must contain at least 50 percent whole grainsand the remaining grains in the product must be enriched.
- ✓ Other grains in the weekly menu must be enriched.

Optional Meats/Meat Alternates
- ✓ There is no separate requirement to offer meats/meat alternates in the SBP meal pattern.
- ✓ Meats/meat alternates may be offered in place of part of the grain's component *after* the minimum daily grain's requirement is included in the planned menu. The planned 1 oz eq serving of meats/meat alternates may credit as 1 oz eq of grains.
- ✓ Alternately, meats/meat alternates may be planned and offered as *extra* food and not creditedtowards any component if it fits within the nutrient specifications.

Fruit
- ✓ At least 1 cup of fruit (and/or vegetables within restrictions) must be planned and offered to all age-grade groups daily.
- ✓ If fruit or vegetable juice is offered, it must be 100% juice and may comprise only 50% of the fruit component offerings.
- ✓ Vegetables and fruits may be offered interchangeably; Schools choosing to offer vegetables at breakfast one day per school week have the
  option to offer a vegetable from any of the vegetable subgroups.
- ✓ Schools that choose to substitute vegetables for fruits at breakfast on two or more days

per school week are required to offer vegetables from at least two different subgroups.

Fluid Milk
- ✓ Only fat-free (unflavored or flavored) or low-fat (unflavored or flavored) milk may be offered.
- ✓ For all age-grade groups, the meal pattern requires at least 1 cup of milk daily.
- ✓ At least two options of milk must be offered from the allowable types.
- ✓ Milk may be unflavored or flavored provided unflavored milk is offered at each meal service.
- ✓ Milk fat and flavor restrictions also apply to meals for children in the 3 to 5-year-old age group. One variety of fat-free OR low-fat unflavored milk is required for this age group.
- ✓ Non-dairy milk substitutes must continue to meet the nutrition requirements per USDA Memorandum SP35-2009.

✓ Operators of the National School Lunch Program and School Breakfast Program may offer flavored, low-fat milk (1 percent fat) for students in grades K through 12 and for sale as a competitive beverage. Flavored, low-fat milk in the Special Milk Program for Children and in the Child and Adult Care Food Program for participants ages 6 and older may also be served.

Additional requirements for specific products-added sugar
- Breakfast cereals may have no more than 6 grams of added sugars per dry ounce.
- Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).
- Flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces or, for flavored milk sold as a competitive food for middle and high schools, 15 grams of added sugars per 12 fluid ounces.

Non-Offer vs. Serve Meals
- At least 1 oz eq grain, 1 cup fruit, and 1 cup milk must be served daily. To meet the weekly grain requirements, more than 1 oz eq of grain must be planned and served on some days.
- Students must be served the full planned menu for meals to be reimbursable.

A la carte Offerings
A la carte offerings at breakfast must meet the nutrition standards in Smart Snacks in School rule. As with NSLP entrée items, any entrée item offered as part of the SBP is exempt from all competitive food standards if it is offered as a competitive food on the day of, or the day after, it is served in the SBP. A school food authority (SFA) is permitted to determine which grain item(s) are the entrée items for breakfasts offered as part of the SBP. For example, if the SFA serves whole-grain rich pancakes as the main dish for the SBP, then they can be considered an entrée and be exempt from the standards on the day of and the day after they are served.

Side dishes offered as part of the SBP and sold a la carte must always meet the nutrition standards contained in the Smart Snacks in School rule. Side dishes and snacks offered as part of a reimbursable breakfast are not exempt from the Smart Snacks nutrition requirements. In the above example, the other items offered as part of the pancake meal would be considered side dishes and, as such, would not be exempt from the Smart Snacks requirements. Refer to USDA Memorandum SP35-2014 for additional information.

Meal Preparation and Service Observations On-site
- Observe meal preparation
- Ensure all reimbursable meal lines offer all required components

- If multiple age/grade groups, examine how requirements are met for each
- Alert staff to missing components and give opportunity to correct
- Observe meals at point of service on each line at start, middle, end of service
- Determine if meals contain components & quantities for age/grade group
- Ensure students have access to, and know how to select, reimbursable meal

Meal Pattern and Nutritional Quality Violations:
- Missing meal component(s)
- Vegetable subgroup requirements not followed
- Two milk types not offered
- Insufficient meal component quantities
- Whole-grain Rich items not offered

Fiscal action for missing meal components is required. Fiscal action may be assessed for subgroup, milk, insufficient component quantity, and whole grain-rich violations. Repeat violations from a previous review may result in fiscal action in these areas.

Offer versus Serve (OVS)
OVS is a sub-topic of Meal Components and Quantities and is part of the Performance Standard 2 element under the Critical Areas.

There are two key areas a reviewer must determine regarding OVS: menu planning/offering and the determination of reimbursable school meals.
- Make sure the school prepares enough food for students to select reimbursable meals.
- Ensure students exiting the POS selected enough components to make a reimbursable meal, including the requirement for at least ½ cup of fruits or vegetables.

Two OVS questions to ask at POS:
1. Did the student select at least ½ cup fruit or vegetable?
2. Did the student select at least 2 additional meal components meeting at least the minimum amount required by the meal pattern for the grade group at lunch or 2 additional items as designated by the menu planner at breakfast?

Offer vs. Serve Breakfast Meals
- At least four items must be offered daily, and students must select three items, one of which must be at least ½ cup fruit component.
- The menu planner determines the reimbursable meal structure for the four items.
- All five components (Grain, Meat/alternate, Fruit, Vegetable, and Milk) can be used by the menu planner to develop a breakfast menu.

Offer vs. Serve Lunch Meals
- Schools must offer five food components (milk, fruits, vegetables, grains, meat/meat alternates). Students can decline two of the five required food components but must select at least ½ cup of either a fruit or vegetable. Students must select the other food components at least equal to or greater than the daily minimum required amounts for the meal pattern for the age/grade group.
- A menu planner may split a component into more than one item to meet the daily minimum requirement.
- Under OVS, the student must take at least the daily minimum required by the meal pattern for the specific grade group. For example, a K-5 school offers two-ounce equivalents of grains: spaghetti

(1 oz eq) with a dinner roll (1 oz eq). Since the minimum daily grains requirement for grades K-5 is only 1 oz eq, the student may take either the dinner roll (1 oz eq) or the spaghetti (1 oz eq) and count as meeting the grains component under OVS. This also applies to the meat/meat alternate component. In grades 9-12, since the daily minimum is 2 oz eq, students must select at least 2 oz eq of grains or meat/meat alternate to count toward these components.

Dietary Specifications
The Dietary Specifications section of the Administrative Review is part of the Performance Standard 2 element under the Critical Areas. The reviewer will determine if the SFA is serving reimbursable meals per the Dietary Specifications. Calories, Sodium, and Saturated Fat standards are to be met on average over the school week. Calorie requirements have a weekly average range; however, the sodium and saturated fat requirements have maximum targets which may not be exceeded. This means the levels of these nutrients in any one meal could exceed the standard if the average number for the week meets the standard.

Meal Components and Quantities Review
All sites selected for the review would undergo the meal components and quantities review to make sure all menus are sufficient. The USDA Compliance Worksheet(s), or local software equivalent, should be completed for each distinct menu offered in the school district.

Meal Compliance Risk Assessment Tool (MCRAT)
Prior to the on-site AR, Meal Compliance Risk Assessment Tool will be completed automatically through questions answered prior to the start of school using data from the online agreement. The assessment questions are intended to target error-prone areas of the meal pattern and will be completed for all selected sites. The results are based on a one-hundred-point scale which will rank and score each site to determine the highest score based on answers to the assessment. The one site with the highest risk score will be selected for the targeted menu review and an additional assessment will be completed for the school to determine if a nutrient analysis will be conducted or validated by the SA. During the on-site review of this targeted review school, the assessment results will be validated. In other words, does the off-site risk assessment accurately indicate what is happening in this school.

The nine questions for the risk assessment are:

1. In addition to the National School Lunch Program, which of the following Child Nutrition Programs operate at the site?
   - School Breakfast Program
   - Seamless Summer Option
   - Afterschool Snack Program
   - Fresh Fruit and Vegetable Program
   - Special Milk Program

   SBP (15 pts) SSO (5 pts) ASP (5 pts) FFVP (2.5 pts) SMP (2.5 pts)

2. What are the age/grade groups served in the school?
   - Pre-K
   - K-5 only (or K-1, K-2, K-3, K-4)
   - 6-8 only (or 6-7, 7-8)
   - 9-12 only (or 10-12)
   - K-8
   - 6-12
   - K-12

PK (0) K-5 only (0) 6-8 only (0) 9-12 only (0) K-8 (5 pts) 6-12 (15 pts) K-12 (15 pts)

3. Were Performance Standard 1 or Performance Standard 2 violations identified at the previous administrative review or during follow-up activities?

yes (10 pts)   *no (0)*

4. How many reimbursable meal service lines are in operation? If the site does not have traditional lines, indicate how many different locations students may select from vegetable subgroup offerings.
   - 1
   - 2-3
   - 4+

1 (0)   2-3 (5 pts) 4+ (10 pts)

5. Do students serve themselves foods via food bars, serving stations, and/or salad bars?

yes (10 pts)   no (0)

6. Does the site utilize cycle menus?

yes (0) no (10 pts)

7. Are meals served at alternate meal service locations?

yes (5 pts)   no (0)

8. Is the school a HealthierUS Challenge award recipient certified January 1, 2010 or later?

Yes, certified Jan 1, 2010 or later (0)   no (5 pts)

9. Does the site have a new kitchen manager, cook, or site manager?

yes (5 pts)   NO (0)

On-site Validation
The data provided for the off -site Dietary Specifications Assessment and information in the Meal Component and Quantity Review will be validated during the on-site review and observations may include food storage areas, food safety plans and practices, production records, and standardized recipes. Questions considered during the on- site review include:

- Is the site in compliance with the meal patterns?
- Are Production Records completed accurately?
- Are Standardized Recipes maintained and utilized correctly?
- Are Nutrition Fact Labels consistent with products used?

Menu Analyses
A nutrient analysis may be validated or conducted if the result of the off-site or onsite Dietary Specifications Assessment result is **high-risk**. Your School Food Authority should be conducting a Nutrient Analysis for every menu.

Non-compliance and Fiscal Action
Immediate TA and CA must occur if Performance Standard 2 violations are identified during the on-site review. These violations may include:
- Missing Meal Components
- Missing Vegetable Subgroups
- Inadequate and/or Excessive Quantities
- Minimum Component Requirements Not Met for Grains and/or Meats/Meat Alternates

Fiscal action (FA) is limited to the review site where the violation is found even if the same cycle menu is

being served at other sites. The SA has the discretion to expand FA to the entire review week, review month, or retroactively to beginning of school

General Program Compliance Areas

The general program areas include:
- Civil Rights
- On-site reviews
- Local wellness policy
- Professional Standards
- Competitive Foods
- Water
- Food safety
- SBO and SFSP Outreach
- Procurement

Civil Rights

No child shall be denied benefits or discriminated against because of race, color, national origin, sex, disability, age, or reprisal or retaliation in the operation of School Programs. State agencies and Local Educational Agencies (LEAs) are required to comply with requirements of Title VI (6) of the Civil Rights Act of 1964; Title IX (9) of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Department of Agriculture regulations on nondiscrimination and FNS Instruction 113-1. Indicators of compliance with civil rights requirements include:
- "And Justice for All" posters placed in visible location where students are served
- Children are receiving equal benefits without discrimination at each school during each meal service reviewed
- Program materials contain the correct non-discrimination statement
- Required annual continuing education has occurred and is documented
- Required SFA and Site monitoring has occurred by December 15
- Completion and filing of civil rights worksheet
- Compliant procedures and complaint form are available
- Successful and compliant resolution to any complaints, including notification to the SA

On-site Review / Self-Assessment

SFAs are required to monitor school nutrition programs, and the AR will look at written documentation showing the appropriate monitoring and follow up occurred. The SA reviewer will determine if the appropriate form includes questions/answers to requirements such as monitoring the meal counting and claiming system, accurate eligibility application processing, benefits issuance documents are updated correctly and are accurate at the POS, daily edit checks, HACCP and food safety, accurate and current production records, etc. has been used.

LEAs and Residential Child Care Institutions (RCCIs) must conduct an annual on-site review for every approved site operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction of the meal counting and claiming system and the readily observable general areas, no later than February 1st of the school year. All non-public schools and Charter schools are required to conduct bi-annual self-assessments for every approved site operating the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) under its jurisdiction of the meal counting and claiming system and the readily observable general areas, no later than November 1st and April 1st of the school year. Corrective action and follow-up to any violations must occur within 45 days of the finding.

Competitive Foods/Smart Snacks

During the AR, food and beverage sales will be observed to determine those occurring during the school day, to determine proceeds collected from these sales before the end of lunch are returned to the non-profit SN program, and if all foods and beverages being sold comply with the federal and state regulations.

Competitive foods or beverages are any items sold in competition with the reimbursable NSLP or SBP meals. Schools participating in the NSLP and SBP are responsible for prohibiting the sale of foods or beverages in competition with school meals, and the SFA must prohibit the sale of foods not complying with federal regulations during meal periods. The current Smart Snacks Standards for All Foods Sold in Schools rule is often called the Smart Snacks Rule. The Smart Snacks in School (SSIS) final rule was issued on July 29, 2016, by the U.S. Department of Agriculture (USDA) under Title 7, Code of Federal Regulations (7 CFR), Section 210.11 which means it is in effect. The changes found in the final rule became effective on September 27, 2016; however, effective July 1, 2014, schools have been expected to implement the requirements. This rule applies to all competitive foods – for example, foods and beverages sold a la carte in the cafeteria, in school stores, at snack bars, from vending machines or any other venues selling food to students on the school campus during the school day. In other words, these standards apply to all areas of the school campus accessible to students during the school day where competitive foods are sold. This would not include areas for the exclusive use of the faculty and staff, such as teachers' lounges, if students do not have access during the school day. SFAs must collect the nutrition labels, ingredient listing, and results of the Smart Snack Calculator review for all competitive foods sold during the school day (in the cafeteria and elsewhere) and make available to the reviewers in an organized manner (folder, notebook, etc.) during the on-site portion of the AR.

In addition to these USDA Smart Snack Standards, North Carolina has existing policies related to competitive food and beverage sales conducted outside of the School Nutrition Program from 12:01 AM until after the end of the last lunch period. No food or beverages can be sold at elementary schools during the school day. Foods and beverages meeting Smart Snack nutrient standards can be sold only after the end of the last lunch period at middle and high schools.

What happens in North Carolina schools after lunch is over? There are 5 options for compliance and each Board of Education makes the decision best for local needs:
- Extend the existing NC Competitive Foods rule to 30 minutes after the school day ends. No competitive food sales would be allowed during the day until 30 minutes after school.
- Allow School Nutrition Services to control all food and beverage sales before, during and after lunch is over and receive the proceeds of the sales. All vending and other sales would become the responsibility of the School Nutrition Program.
- Purchase qualifying snacks and beverages from School Nutrition and sell after lunch is over. The school would be "purchasing" the expertise of the School Nutrition Administrator to ensure all products met the Smart Snack requirements and would keep appropriate labels. The School Nutrition Administrator would determine the appropriate mark-up and procedures for the sales.
- Locally control sales of foods and beverages after the end of the lunch period, keep all required nutrient and sales documentation, and be subject to frequent and unannounced reviews for compliance. This option would not involve School Nutrition Services for product review or record keeping and could become burdensome for the school administration.
- *Combination of Options – Prior approval of the State Agency is required if the LEA chooses a combination of options. Submit documentation to lynn.harvey@dpi.nc.gov detailing why more than one option is necessary.

The Smart Snacks Rule makes a provision for School Food Authorities to request exemptions from the

Smart Snack nutrition standards for occasional fundraisers. However, the North Carolina State Board of Education (SBE) has not granted exemptions for fundraisers. This means there can be no food or beverage fundraising activities during the entire school day unless the sales occur by the school nutrition program.

Therefore, all fundraisers involving the sales of foods and beverages must take place 30 minutes after the school day ends. This also includes the sales of tickets, vouchers, etc. for future delivery of foods and beverages. The rule does not affect Non-food and beverage fundraisers which can take place during school hours if allowed by the school administration.

Professional Standards
Professional Standards for school nutrition professionals are a key provision of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The rule, published March 2, 2015, requires a minimum amount of annual professional development hours for all school nutrition program directors, managers, and staff. Required professional development topics will vary depending upon position and job requirements. There are also minimum hiring standards for new state directors of school nutrition programs, state directors of distributing agencies overseeing USDA Foods, and school nutrition program directors. The final rule effective April 30, 2019 provides hiring flexibilities for small LEAs to expand the pool of candidates qualified to serve as leaders in the school nutrition programs while continuing to ensure that school nutrition professionals can perform their duties effectively and efficiently.

Local Wellness Policy

N.C. Local Wellness Policy Checklist

USDA's final ruling on Local Wellness Policies, effective August 29, 2016, required Local Educational Agencies (LEAs) to fully comply with the final rule by June 30, 2017. The specific required content areas are listed in the checklist below and are found in the federal regulations at 7 CFR part 210. (Form revised February 2019)

Local Wellness Policy – requirements for the written policy	YES	NO	COMMENTS
Policy Leadership: LEAs are required to identify the official responsible for LWP oversight or the position/title of the person.			
Public Involvement: Include language related to permitting the public to participate in LWP development, implementation, & review of policy. Includes a broad representation of stakeholders.			
School Meals: LEAs are required to adhere to federal meal regulations; include language related to this in the written policy.			
Foods sold outside of school meals program: LEAs must adhere to federal (Smart Snacks) and state rules that govern competitive food sales; include language related to this in the written policy.			
Foods provided but not sold: USDA has not defined specific guidelines for these; however, LEAs are responsible for defining their own guidelines in their written policy.			
Food and Beverage Marketing: LEAs may only market products that adhere to Smart Snacks guidelines, or stricter local guidelines, during the school day and include language related to this in their written policy.			
Nutrition Education: LEAs must include at least one or more goals for Nutrition Education, using evidence-based strategies.			
Nutrition Promotion: LEAs must include at least one or more goals for Nutrition Promotion, using evidence-based strategies, such as "Smarter Lunchroom" strategies (Cornell Univ).			
Physical Activity: LEAs must include at least one goal for Physical Activity in the LWP. Evidence-based strategies should be reviewed and used.			
Other School-Based Strategies for Wellness: LEAs must include at least one goal on School-Based Activities that Promote Student Wellness, using evidence-based strategies.			
Triennial Assessment: LWPs must include language regarding the plan for completion of a triennial assessment.			
Review/Update/Inform the Public: LEAs are required to annually inform the public about the content and implementation of the LWP, any updates to the policy, the results of the most recent assessment of the policy, and specify in the policy how the SFA will be in compliance with this requirement.			
Signature of Reviewer:			Date:

Water Availability
Questions and Answers:
https://fns-prod.azureedge.us/sites/default/files/cn/SP28-2011osr.pdf#page=3

Resource Management

Procurement
The AR process will assess procurement activities for the SFA by evaluating the SFA's written Board of Education-approved School Nutrition procurement plan, invitation for bid or request for quote/proposal documents, bid specifications, bid terms and conditions, etc. along with listing of to whom bids were issued, copies of advertisements, pre-bid meeting information, public bid openings, evaluation procedures to determine who was lowest, responsible bidder, award decisions and reason for the decision, award and denial notification letters. Contracts for catering and other services, and roll-over bids, including the original and each subsequent roll-over bid period will be evaluated to determine if proper procurement procedures have been followed.

Competition must be sought for all purchases, including services, made with school nutrition funds, regardless of the dollar amount. The SFA's purchasing threshold determines what form the procurement process must take -- i.e. formal vs. informal procurements. Competition must be free and open to allow any/all vendors to participate in the procurement bid/quote process.

Federal procurement regulations reference Code of Federal Regulations (CFR) as required in 2 CFR §200.317- 326 and NC General Statutes Article 8, Chapter 143.

Procurement Decision Process Diagram:
https://www.dpi.nc.gov/documents/schoolnutrition/procurement-decision-processrev-apr2023/download?attachment

Offsite Data Entry

Instructions for Completing the Off-Site Review Forms

Step 1: Log in to the SN Technology System at https://www.ncchildnutrition.org

Step 2: Select "*Compliance*" tab

Applications	Claims	Compliance	Reports	Security	Search

Compliance >

Step 3: Select "Review Tracking"

| Item	Description
Statewide Review Dashboard	Provides statewide statistics regarding reviews.
Review Tracking	Functions for tracking reviews.
Bulk Review Scheduling	Functions for scheduling reviews in bulk.
Bulk Review Assignments	Functions for bulk assignments to reviews.
Historical Reviews	Functions for tracking historical CRE Reviews.
Menu Planning and Nutrient Analysis	Functions related to menu planning and meal pattern compliance.
Procurement Review Tracking	Functions for tracking procurement reviews.
Procurement Review Bulk Scheduling	Functions for scheduling procurement reviews in bulk.

Step 4: Select Details

Expand

Actions	Review ID	Review Year	Review Type	Lead Reviewer	Scheduled Date	Closed Date	Nbr of Sites	Status
Details	5231	2024 - 2025	Administrative	Squires, Jeffrey	4/20/2024		0	Open

Step 5: Select 'Review Forms"
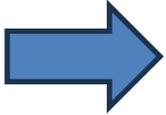
	Detail	Review Forms

Step 6: Select "*Modify*" by each form displayed on the screen to complete each section

View | Modify	100 - Certification and Benefit Issuance
View | Modify	200 - Verification
View | Modify	300 - Meal Counting and Claiming
View | Modify	600 - Dietary Specifications and Nutrition Analysis
View | Modify	700 - Resource Management
View | Modify	800 - Civil Rights
View | Modify	900 - SFA On Site Monitoring
View | Modify	1000 - Local School Wellness Policy
View | Modify	1100 - Smart Snacks
View | Modify	1200 - Professional Standards
View | Modify	1600 - School Breakfast and SFSP Outreach
View | Modify	Other Federal Programs
View | Modify	2100 - Special Provision Options

Remember to save each form after completing it by selecting "Validate" at the bottom of the form.

<< Back to Form List   Validate

Once "Validate" is selected, the system will determine if all questions have been answered. If any question has not been answered the following message will display:

Validation Confirmation
The form contains errors.
< Edit   Finish

To determine which questions still need to be answered, select "Edit" and look for the red stop sign with an exclamation point.

When all questions have been answered, Pending Review will appear on the previous screen!

To complete this section, you must have Application Rights in the School Nutrition Technology System.

Other Federal Program Reviews

The After-School Snack Programs, Seamless Summer Options, and the Fresh Fruit and Vegetable Programs are also reviewed as part of the AR. SFAs operating these programs will find the following information very important.

After School Snack Program (ASSP)
The Afterschool Snack Program is operated under the National School Lunch Program (NSLP). Schools should continue to follow existing meal patterns for ASSP. Schools are encouraged to adopt aspects of the new meal pattern, such as increase whole grain-rich foods. When offering milk as an afterschool snack component, schools may offer only fat-free or low-fat milk. Procurement measures must be in place if a district is going to take advantage of the new guidance for 1% flavored milk. For operational ease, milk variety is not required in the Afterschool Snack service. It is recommended to offer water in the ASSP to the extent practical.

The AR will ensure the SFA retains final administrative and management responsibility for meeting all afterschool snack requirements by interviewing SFA staff and examining documentation related to:
- Eligibility
- Accountability/Meal Counting and Claiming
- Meal Pattern/Production Records
- Monitoring
- General Areas

A review of afterschool snack documentation for each school selected for the administrative review operating the snack program will be conducted. The review aims to ensure students are served a nutritionally balanced snack, appropriate enrichment activities are offered, site eligibility is determined accurately, and the program is well-managed.
Below are some common findings when reviewing the AASP:
- Checklist for Qualifying an After-School Snack Program is not available for each site and completed prior to startup of snack service.
- Two ASSP on-site reviews not conducted, one within the first 4 weeks of operation.
- Production Record indicates inadequate serving sizes for meal components.
- Meal counts not taken at the point of service.
- The School Nutrition Manager conducts the onsite reviews.

Afterschool snack site eligibility concerns, counting/claiming problems, and inappropriate/ inadequate/missing components would result in violations. If a violation is identified, technical assistance is provided, and immediate corrective action is required. A required corrective action plan should explain what action(s) were taken to correct the violation and procedures the SFA/school will implement to ensure such violations do not occur in the future. Fiscal actions will be taken if appropriate.

Seamless Summer Option (SSO)
The AR will assess the operation of at least one SSO site. If there are no SSO sites in operation at the schools selected for Administrative Review, but other schools in the SFA have a SSO operation, a school outside the pool of schools selected for Administrative Review will be reviewed. The SSO program assessment will:
- Evaluate site eligibility
- Assess menus and production records to ensure the site offers required meal components
- Review meal counting and claiming procedures, area eligibility, and/or rosters
- Examine food safety records and practices
- Assess whether the SFA performs required self-monitoring activities (Review all sites by the 4th week of operation)
- Determine how SFAs plan/prepare meals for, and differentiate between, age/grade groups
- Observe community participation at the site and determine whether the site advertises meals as described in its application.
- While NCDPI conducts a statewide media release that satisfies the open site requirement, you are highly encouraged to advertise all open sites in your community. Review advertisements (the requirement is to make reasonable efforts to advertise open sites to community, and advertisements have non-discrimination statement).

Technical assistance and corrective actions must be provided for all problems identified to bring the SSO operation into compliance. Effective technical assistance includes helping the site manager identify deficiencies and necessary corrections to ensure the site does not repeat errors.

The same corrective action and technical assistance procedures for all findings applying to the NSLP and SBP apply to the SSO. The SA must provide technical assistance and require immediate corrective action for any missing meal components found during on-site observation for the day of review and review period. Any missing meal component must be immediately added before any additional meals are claimed for reimbursement on the day of review, or on future days in which the cycle menu is served. The SFA may also be required to submit a corrective action plan to ensure such violations do not occur in the future.

Unlike missing meal components identified during the on-site observation, for missing meal component violations identified from the review of production records, the SA may allow the SFA to provide documentation – such as invoices, food inventory tracking -- to support the missing meal component was offered. If the SFA cannot provide, or the SA chooses not to accept, such documentation, the SA must evaluate the number of meals found in error, assess fiscal action, and require a corrective action plan. The corrective action plan must detail the steps the SFA will take to ensure violations do not occur in the future.

Civil Rights violations will require the SA to submit these violations to the SERO.

Fresh Fruit and Vegetable Program (FFVP)
As set forth in FNS Policy Memo 12-2013, the FFVP, as applicable, will be reviewed during the AR. Much like the review of the NSLP and the SBP, the FFVP is evaluated by assessing compliance at a sample of participating sites within the SFA. The assessment includes:
- Review of a pre-established number of FFVP schools
- Claim validation
- FFVP meal service observation

USDA has provided guidance on school selection depending on the number of schools selected for the AR operating the FFVP per the chart below.

Number of Schools Selected for AR and operate FFVP	Minimum Number of FFVP Schools to be Reviewed
0-5	1
6-10	2
11-20	3
21-40	4
41-60	6
61-80	8
81-100	10
101 or more	*12
*12 plus 5% of the number of schools over 100 rounded to the nearest whole number	

To complete the claim validation, the school's cost documentation for the selected review month will be compared to the costs claimed for reimbursement. School cost documentation may include but is not limited to purchase orders, invoices, timesheets, and other documentation. Furthermore, the school's cost documentation must show it is for allowable Program charges. The claim will only be considered validated if the costs claimed for reimbursement are the same as the costs established by the supporting documentation and all such costs are allowable. If the claim cannot be validated for either one of these reasons, corrective action is required.

An on-site review will also be conducted to ensure compliance of the following:
- FFVP snack is offered within the instructional school day, but outside the meal service times of the NSLP and SBP.
- Frozen, canned, dried, and other types of processed fruits are not allowable expenses.
- The following products are not allowed: fruit/vegetable juice (not even 100% juice), nuts, cottage cheese, trail mix, fruit or vegetable pizza, smoothies, fruit strips, drops or leather. (See the FNS FFVP Handbook for a more exhaustive list.)
- Fresh fruits and vegetables are not provided to adults except for teachers who are in the classroom providing educational instruction during the FFVP meal service
- Storage of the fresh fruits and vegetables for FFVP snacks
- Observation of the preparation of the FFVP snack of the day
- Documentation of FFVP menus
- Procedure for leftovers for the FFVP snack of the day

Corrective Action must be used to address all FFVP violations. The Corrective Action prescribed must bring the participating school and/or SFA into compliance with Program requirements. Violations uncovered through the claim validation process must be addressed through Fiscal Action. The SA would recover payment made to the SFA which is inconsistent with FFVP requirements.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
   U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410; or
2. **fax:**
   (833) 256-1665 or (202) 690-7442; or
3. **email:**
   program.intake@usda.gov

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