The Administrative Review Process

An Approach to Collaborate Compliance

June 16-17, 2025

PUBLIC SCHOOLS OF NORTH CAROLINA
State Board of Education | Department of Public Instruction

Welcome
The Office of School Nutrition

Let's Get Started….

COMMON TERMS AND ABBREVIATIONS

You may see the following terms and abbreviations used in the Administrative Review Workshop presentation:

1. North Carolina Department of Public Instruction (NCDPI)
2. State Agency (SA)
3. Administrative Review (AR)
4. School Food Authority (SFA)
5. Public-School Unit (PSU)
6. School Nutrition Technology System (SNTS)
7. Technical Assistance (TA)
8. Hazard Analysis Critical Control Point (HACCP)
9. Community Eligibility Provision (CEP)
10. Identified Student Percentage (ISP)
11. Paid Lunch Equity (PLE)
12. Local Wellness Policy (LWP)
13. Fresh Fruit and Vegetable Program (FFVP)
14. Residential Child Care Institutions (RCCIs)
15. Point of Sale (POS)

REVIEW FREQUENCY & SCHEDULE

Review Frequency

- 5-year cycle

Review Schedule

- State Agency discretion for High Risk School Food Authorities
- New SFAs
- FSMC

ADMINISTRATIVE REVIEW PROCESS

Entrance Letters

Off-site Assessment

Entrance Conference

Review at School Nutrition office and sites

Exit Conference and Preliminary Findings

1st, 2nd Party Reviews

Exit Letters, Report of Findings, Commendations, Recommendations

Corrective Action Plan

Closure Letter

ADMINISTRATIVE REVIEW (AR) PERFORMANCE STANDARDS

Critical Areas

- Performance Standard 1
- Performance Standard 2

General Areas

- Resource Management
- Procurement
- Financial Management
- General Program Compliance

ADMINISTRATIVE REVIEW STRUCTURE

5 Monitoring Areas

- Access and Reimbursement
- Nutritional Quality/Meal Pattern
- Resource Management
- General Program Compliance
- Other Federal Program Reviews

REVIEW PERIOD

The Review Period is defined as the most recent month for claim submission prior the onsite AR

Must include > 10 operating days

Special provisions for
- Reviews early in school year
- Year round, multi-track, & provision schools

Example: The AR is being conducted during the week of **November 18, 2025**, the review month would be **October 2025**.

DAY OF REVIEW PERIOD

The day of review period is defined as the month the AR is conducted on site at the School Food Authority.

- ✓ Example: The review is conducted during the week of November 18, 2025, the day of the review period is the month of November 2025. The AR Lead Specialist will have to wait until the November 2025 claim is submitted by the 10th of December 2025 to complete some of the AR forms.

DATA FOR SITE SELECTION

– Data for site selection from October claim (or most recent claim for ARs scheduled prior to October)

– Site type

– Number of serving days

– Number eligible for free meals

– Number of free meals claimed

MINIMUM NUMBER OF REVIEW SITES

- Review all sites with free ADP of 100 and free participation factor of $\geq$ 100% (except RCCI)

SFA sites	Review sites
1 to 5	2
6 to 10	2
11 to 20	3
21 to 40	4
41 to 60	6
61 to 80	8
81 to 100	10
101 or More	12*
*12 plus 5 percent of the number of sites over 100	

SELECTION CRITERIA FOR ADDITIONAL SITES

Additional NSLP sites:

- Elementary sites with $\geq$ 100 free ADP and $\geq$ 97% free participation
- Combination sites with $\geq$ 100 free ADP and $\geq$ 87% free participation
- Secondary sites with $\geq$ 100 free ADP and $\geq$ 77% free participation

State Agency criteria

STATE AGENCY CRITERIA

Results of Dietary Specification risk-based assessments

High or Excessively Low Student Participation

School Breakfast Program

After School Snack Program

Schools with previous AR or TA non-compliance findings

SCHOOL SITE SELECTIONS

Most Recent October Claim

Targeted Menu School

Additional Sites of Review

Questions 19-25 – School Site Application.
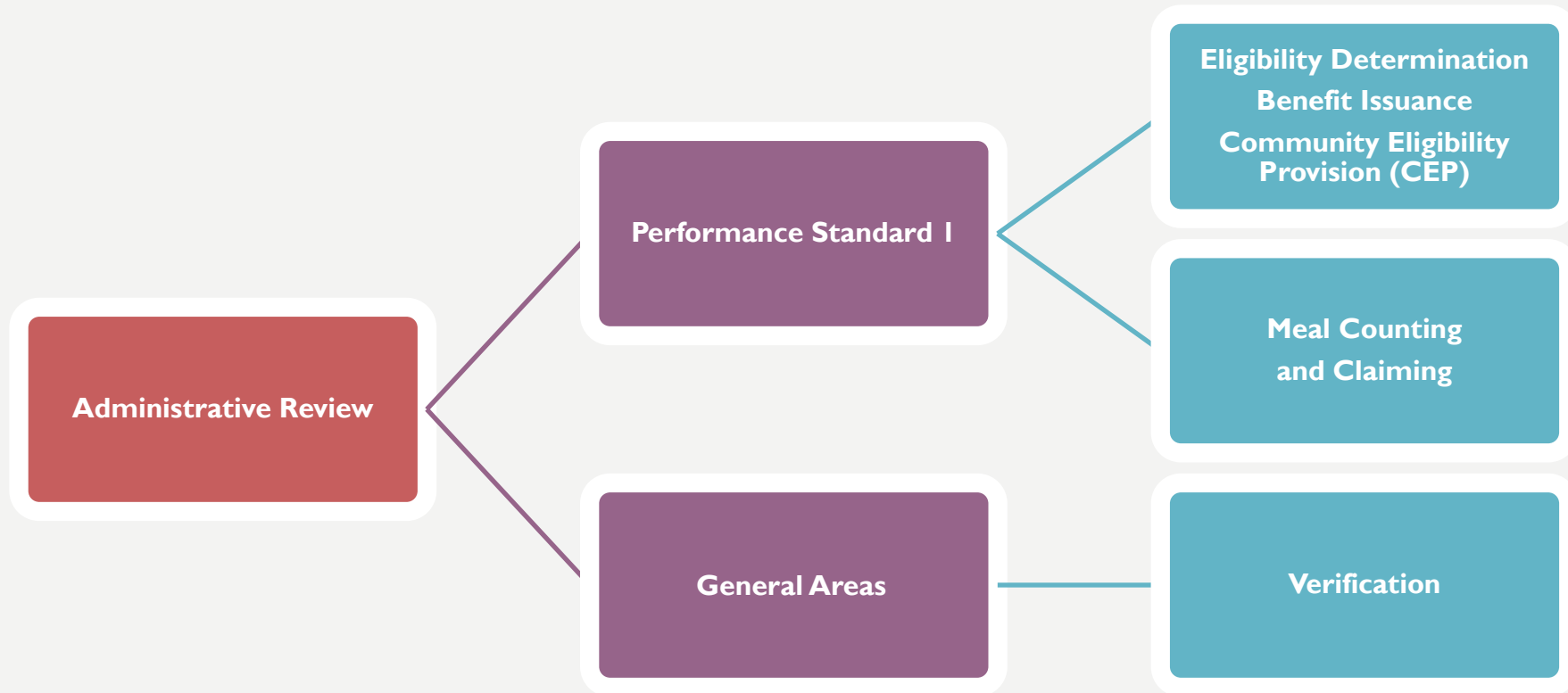
QUESTIONS?

ACCESS AND REIMBURSEMENT

- Eligibility Determination

- Benefit Issuance

- Community Eligibility Provision (CEP)

- Direct Certification

- Verification

- Meal Counting, Claiming and Reimbursement

WHY REVIEW BENEFITS AND ELIGIBILITY?

- Ensure program integrity
- Validate SFA regulatory compliance

ACCESS AND REIMBURSEMENT OVERVIEW

```
Administrative Review
    ├── Performance Standard 1
    │       ├── Eligibility Determination
    │       │   Benefit Issuance
    │       │   Community Eligibility Provision (CEP)
    │       └── Meal Counting and Claiming
    └── General Areas
            └── Verification
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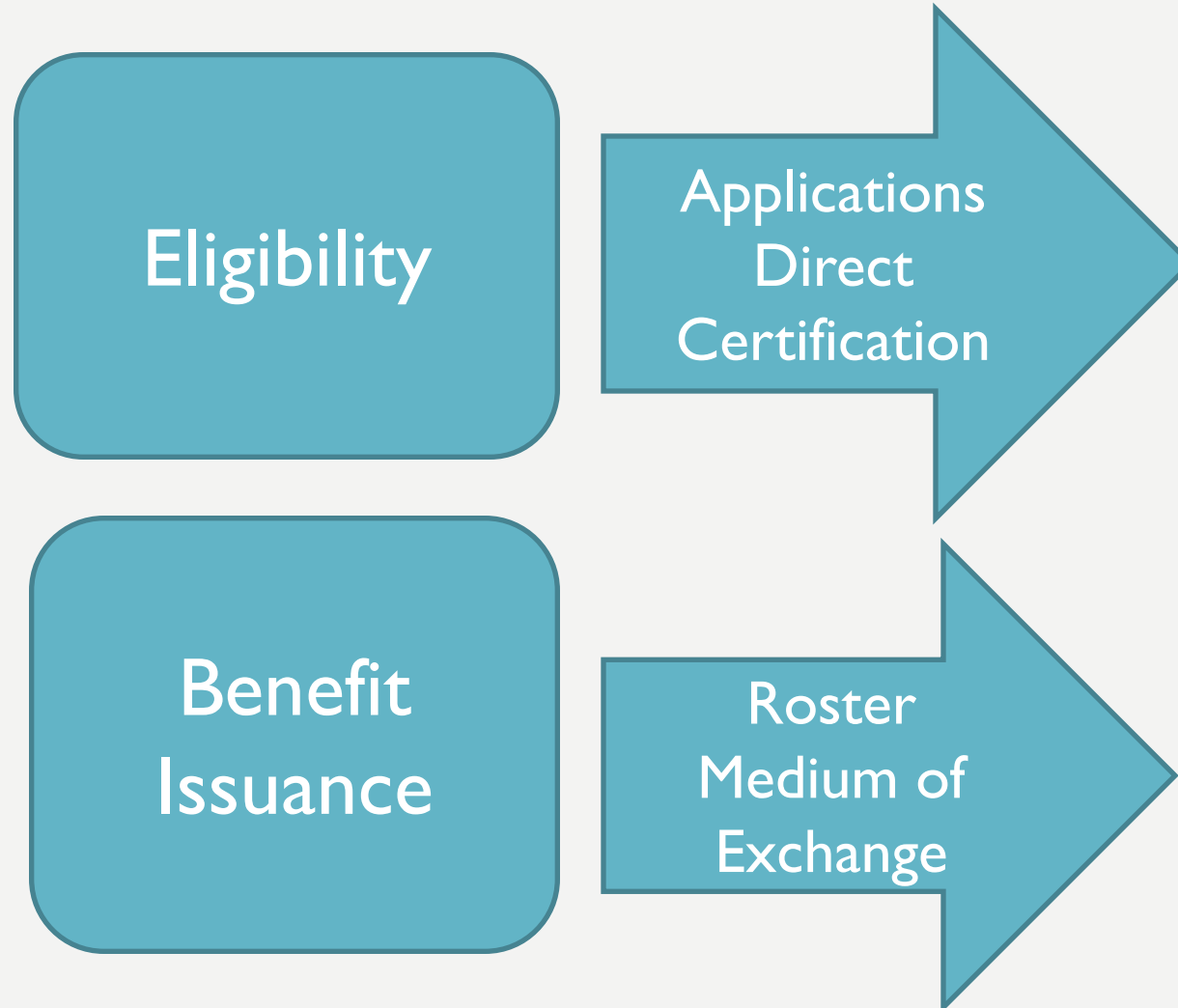
ACCESS AND REIMBURSEMENT

SFA Level

- Certification of Eligibility
- Benefit Issuance
- Eligibility Determination
- Direct Certification
- Community Eligibility Provision (CEP)
- Verification

SFA & Site Level

- Meal Counting and Claiming
  - ➤ Site level (actual)
  - ➤ SFA level (consolidation)

ELIGIBILITY AND BENEFITS ISSUANCE

- Determining official
- Access to applications
- Frequency of updates to the POS

ELIGIBILITY AND BENEFITS ISSUANCE

What Does the State Agency Review:

- Community Eligibility Provision (CEP), if applicable

- Direct Certification

- Free and Reduced-Price Meal Applications

- Combination of CEP and Meal Applications

- Denied Applications

- Back-up system

COMMUNITY ELIGIBILITY PROVISION (CEP)

- The spreadsheet completed with the total number of identified students and enrollment (ADM) entered in the School Nutrition Technology System (SNTS).

- The documentation from the Direct Certification System used in completing the spreadsheet on file in the SFA for the Data Year. This is your April 1st information.

- Enrollment documentation for April 1st of the Data Year.

- Reviewers will validate your information is accurate for your claiming percentages.

- Please keep all this documentation on file at the SFA. The information must be on file while operating under CEP and for three (3) years after the submission of the final claim for reimbursement for the last fiscal year of CEP.

DIRECT CERTIFICATION (DC)

- Located in the School Nutrition Technology System. If you are unsure of the location, please contact your Zone Consultant.

- Are you conducting a DC upload no less than 3 times a year. HIGHLY recommended to complete this process daily, weekly or monthly to provide the program benefits for which families are entitled.

- Are program benefits being extended to household members.

- Medicaid Benefits – Make sure your system is set up correctly.

DIRECT CERTIFICATION

School Nutrition Programs

North Carolina
Department of
Public Instruction

| Applications | Claims | Compliance | Reports | Security | Search | | Programs | Year | Help | Log Out |

Applications >   School Year: 2024 - 2025

Item	Description
Application Packet	Applications Forms (SFA and Site)
Verification Report	Mandatory Annual Verification Report
Second Review of Applications	FNS-874 report for SFAs selected to conduct a second review of applications.
Food Safety Inspections	Number of Food Safety Inspections by Site
Paid Lunch Equity Tool	Paid Lunch Equity Tool
Financial Report	School Food Annual Revenues and Expenditures Report
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview
FFVP Invitations and Approvals	Fresh Fruit and Vegetable Program Invitations and Approvals
FFVP Application Packet	Fresh Fruit and Vegetable Program Application Forms (SFA and Site)
Capital Expenditure Request	Request for funds to purchase capital items >= $5,000
Site Enrollment	Site Enrollment and Eligibility
Community Eligibility Provision	Enrollment and Eligibility for Community Eligibility Provision
USDA Waivers	USDA Waivers available for participation
Download Forms	Forms Available for Downloading
Document Library	Library containing downloadable documents and urls
Direct Certification	Direct Certification List and Individual Student Lookup

FREE AND REDUCED-PRICE MEAL APPLICATION

The review of Free and Reduced-Price meal applications are an important Performance Standard 1 Review during the Administrative Review.

Accuracy of these applications provide families with the program meal benefits to receive school meals.

Inaccurate determination will require fiscal action during an Administrative Review.

FREE AND REDUCED-PRICE MEAL APPLICATIONS

- Is the current approved State Agency Free and Reduced-Price Meal application utilized by the School Food Authority.

- Application stamped with the date of receipt. All applications must be processed within 10 days of receipt.

- The Review of Applications with all required information.

- Has the family been notified of meal benefits

- Was an independent review of each application conducted

- For online applications – the computer is not part of the Second Party

INDEPENDENT REVIEW OF APPLICATIONS

- Required by HHFKA 2010
- Must conduct annually
- Procedures
- Record keeping

SELECTING APPLICATIONS FOR REVIEW

- Upload consolidated list of eligible students via a secure portal

- Instructions provided prior to review

APPLICATIONS FOR REVIEW

Sample Size Chart					
Total # of students certified for free or reduced price benefits	SAMPLE SIZE		Total # of students certified for free or reduced price benefits	SAMPLE SIZE	
	95%	99%		95%	99%
1-100	All	All	1251-1500	300	450
101-250	60%	75%	1501-1750	310	475
251-500	50%	60%	1751-2000	320	490
501-750	40%	50%	2001-3000	335	525
751-1000	270	380	3001-4000	350	560
1001-1250	290	420	4001-5000	355	580
			5000+	360	590

ELIGIBILITY FILE

E011	000	000	6637874549	013	0N202209074 3552
E012	000	000	8684932478	023	0Y202209294 3768
E013	000	000	3762871302	092	0Y202207274 2042
E014	000	000	1986200	073	0Y202207274 1482
E015	000	000	1781793277	043	0Y202208154 2896
E016	000	000	2558134636	053	0Y202207274 1535
E017	000	000	6643526258	022	0Y202208294 3354
E018	000	000	3299866910	052	0Y202208154 3016
E019	000	000	7648421962	073	0N202209134 3688
E0110	000	000	8949335238	113	0N202209134 3656

ELIGIBILITY REVIEW

Once the file is received, it is sent to the Lead Administrative Review Specialist to review.

The file will be reviewed for errors.

The file will then be uploaded into the Administrative Review.

Once uploaded into the Administrative Review, the AR Lead Specialist will down the file, separating the DC students from the Application Students.

One week before the review, the School Food Authority will receive a listing of applications to have ready on the first day of the review.

REVIEWING DENIED APPLICATIONS

– Minimum of 10 and up to 100%

– Notification of denial

  ➢ Reason

  ➢ Appeal Rights and Instructions

  ➢ Family may reapply

VALIDATING BENEFIT ISSUANCE

Eligibility Status

- The correct eligibility status for each student
- SFA Count of Reviewed Students vs. SA Count of Reviewed Students

Benefit Issuance

- Prevention of Overt Identification
- POS Benefit Issuance Document
- Benefit Issuance Updates
- Wrong categories = Errors

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

FINDING: DATA ENTRY ERROR RESULTS IN INCORRECT ELIGIBILITY STATUS.

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

FINDING: Application processed as an income application but required information is missing.

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

FINDING: Application is processed on checking the box as migrant, runaway or homeless and not verified from district documentation.

Only Foster students can be taken at face value.

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

Finding: Application list an hourly rate and calculated at 40 hours per week.

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

FINDING: Confidential eligibility information is released for unauthorized purposes or without prior consent.

ELIGIBILITY AND BENEFITS ISSUANCE: COMMON FINDINGS

FINDING: Student eligibility status is not updated in Point Of Sale (POS) or roster.

ELIGIBILITY AND BENEFITS ISSUANCE: CORRECTIVE ACTION

- Required for Findings/Errors

- Must be applied SFA system-wide

- Formal response required from SFA

ELIGIBILITY AND BENEFIT ISSUANCE: FISCAL ACTION

Why?

- Applications missing information
- Incorrect eligibility determinations or status
- Benefit Issuance errors
- Failure to update verified applications

How far back?

- Potentially to original date of eligibility

QUESTIONS?

VERIFICATION

CONFIRMATION OF ELIGIBILITY FOR FREE AND REDUCED-PRICE MEALS

REQUIRED WHEN ELIGIBILITY IS DETERMINED BY APPLICATION

VERIFICATION: WHY REVIEW?

- Ensure program integrity
- Validate SFA regulatory compliance

VERIFICATION: EVALUATION

- Evaluation of Verification Summary Report (FNS 742 Report)
- Sample Size
- Reporting accuracy

VERIFICATION: REVIEWER NEEDS

- Verification position titles

- Description of Verification process

- Continuing education documentation

- Electronic system access

VERIFICATION: DETERMINING COMPLIANCE

- Number of verified applications

- Accurately calculated sample size

- Verified correct number of applications

- Replaced applications accurately

- Confirmation reviews were conducted correctly

VERIFICATION: DETERMINING COMPLIANCE

Reviewer selects all verified applications for additional review.

VERIFICATION: ADDITIONAL EVALUATION

- Notification letters met FNS requirements
- Household follow-up attempts were made
- Notice of adverse action met FNS requirements
- Eligibility status changes were timely
- Verification process completed by November15

VERIFICATION: FOR CAUSE RESPONSES

- Included in the non-response rate

- May impact verification method for upcoming year.

VERIFICATION

Technical Assistance

Corrective Action

Fiscal Action required only if errors in:

- Initial eligibility determination
- Post verification

COMMON FINDINGS

- Verification process did not begin on October 1.
- Verification process did not end by November 15.
- Verification did not take place at all.
- Applications selected for verification were not confirmed as correct before sending letters to the selected households.

COMMON FINDINGS

Application selected for DC student

Incorrect verification method used

Misunderstanding of the sample size

Verification software language inconsistent with USDA resulting in selection of incorrect method

Sample pool number not rounded up; (exact number selected be verified - if the verification selection pool is 25.01 applications, the SFA must select 26 applications to be verified)

Inadequate number of applications verified

COMMON VERIFICATION ERRORS

- Only one attempt made to collect the verification information.

- Documentation was not maintained for the second attempt.

- A student withdraws during the verification process and the process cannot be completed, the SFA must select another "similar" application in its place.

- After the verification process has ended, households that re-apply which were originally found eligible for free or reduced-price meal benefits, did not provide another application with current income or proof of FNS.

- Updated software, which may include verification updates, is not obtained or installed.

QUESTIONS?

MEAL COUNTING AND CLAIMING

WHAT IS REQUIRED FOR THE ADMINISTRATIVE REVIEW?

MEAL COUNTING AND CLAIMING

Meal counts and claims accurate by category

Meals counted, consolidated, and recorded correctly

Meals accurately reported and claimed for reimbursement

MEAL COUNTING AND CLAIMING
OFF-SITE ASSESSMENT

- Electronic vs. Manual System

- Standard Operating Procedures

- Point of Service

- Back-up System

- Continuing Education

- Internal Controls/Edit Checks

- Electronic Meal Counting System

- Alternate Points of Service

- Second Meals/Non-Reimbursable

MEAL COUNTING AND CLAIMING ON-SITE REVIEW

Confirmation during the review for:

– Compliance with the State Agency/SFA Annual Agreement

– Accurate daily count of reimbursable meals at Point of Service

– Count by category

– Without overt identification

– Accurate claim consolidation

MEAL COUNTING AND CLAIMING ON-SITE REVIEW

Forms Reviewed during Site Review:

- Daily and Monthly Participation Reports
- Daily and Monthly Edit Checks
- Daily and Monthly Sales and Receipts
- Void/Override Report

MEAL COUNTING AND CLAIMING

Site level validation:

- No overt Identification

- Accurate meal count by category

- No excessive overrides

- Meal count comparison to review period

- Meal count comparison to approved number by category

- Meal count comparison to attendance adjusted eligible

- Questionable patterns

- School meal counts comparison to SFA reimbursement claim

- Determination of need for fiscal action

COMMON FINDINGS

- Each service line does not provide an accurate count by eligibility category at the POS.

- Meal counts are incorrectly combined and consolidated or not done daily.

- There are patterns in the meal counts for the review period which appear questionable.

- Effective edit checks are not conducted as required.

ERRORS: TWO TYPES

SYSTEMIC

NON-SYSTEMIC

QUESTIONS?

STATE POLICIES

ACCOUNTABILITY

CASH MANAGEMENT PROCEDURES

Written cash management procedures available **at each** site

Money recorded when it is received

Cashier counts their receipts

Receipts verified by another person

Receipts deposited daily

CHARGE POLICY

Written charge policy approved by BOE

Local decision

Notify parents and students

Communication is crucial

COMMON FINDINGS

- Cash receipts not counted and verified by two people
- Receipting method not used when money changes hands
- Cash receipts and participation records not maintained by separate people
- Written cash management policies not available and not used by employees
- Written charge policy not available and not followed
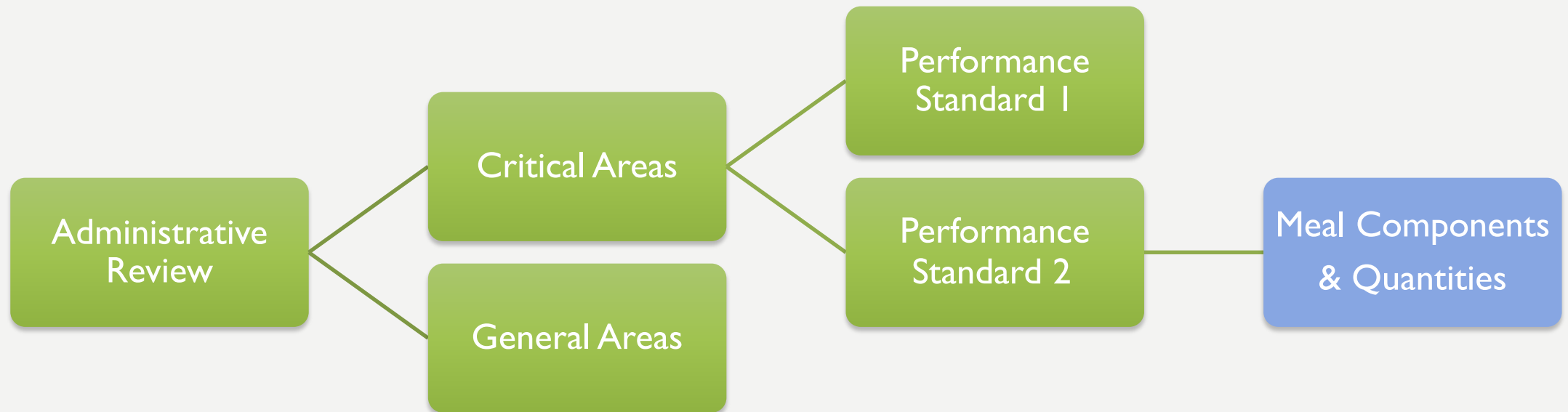
QUESTIONS?

MEAL PATTERN & NUTRITIONAL QUALITY

MEAL COMPONENTS AND QUANTITIES

OFFER VS. SERVE

DIETARY SPECIFICATIONS AND NUTRIENT ANALYSIS

MEAL COMPONENTS AND QUANTITIES: PERFORMANCE STANDARD 2

OFF-SITE

MEAL COMPONENTS AND QUANTITIES

- Purpose is to determine if menus are in compliance with the meal pattern
  - ➤ Daily and weekly minimums per age/grade group
  - ➤ whole grains
  - ➤ vegetable subgroups
  - ➤ fruit (juice)
  - ➤ milk

  - ➤ Scope of the review includes:
  - ➤ Review period (off-site)
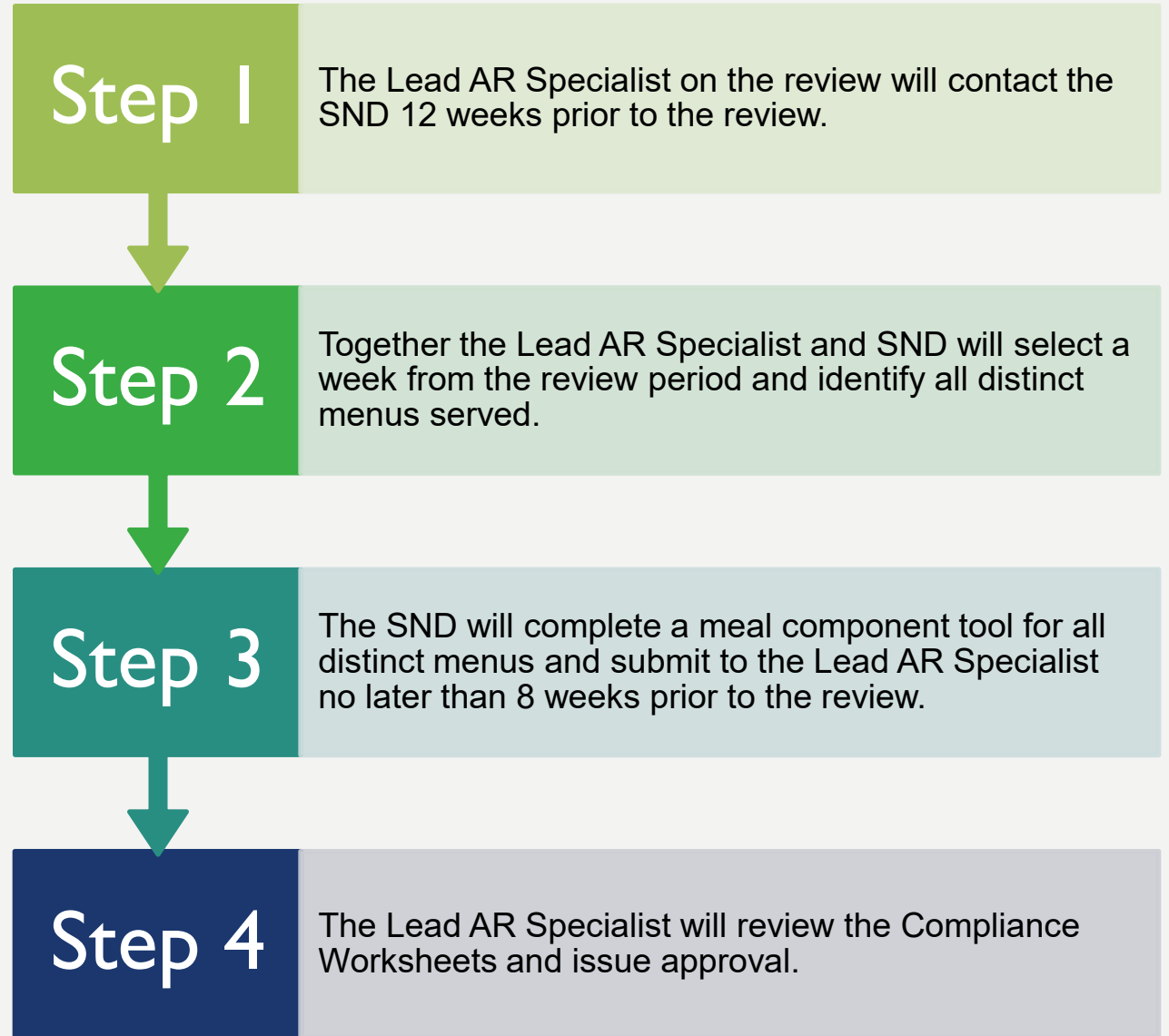 - ➤ Day of Review (on-site)

MEAL COMPONENTS AND QUANTITIES

- Compliance will be verified by:

  - ➢USDA Compliance Worksheets or similar report from your software

  - ➢Visual observation of on-site meal preparation and service

  - ➢Evaluation of production records, recipes, purchase invoices, and other documentation showing proof of reimbursable meal service from the day of review and review period

  - ➢Recipes and Product Formulation Statements : Central Office on the first day of the review. May be required to be sent to the lead reviewer if questions arise.

MEAL COMPONENT AND QUANTITY WORKSHEET

- All sites selected for the AR will receive a meal component and quantity review

- SFA will complete a USDA Compliance Worksheet, or similar report, for <u>each</u> distinct menu

- Reviewer will assess whether each menu:

  - ➤ 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

MEAL COMPONENT REVIEW FOR ALL DISTICNT MENUS

Step 1 — The Lead AR Specialist on the review will contact the SND 12 weeks prior to the review.

Step 2 — Together the Lead AR Specialist and SND will select a week from the review period and identify all distinct menus served.

Step 3 — The SND will complete a meal component tool for all distinct menus and submit to the Lead AR Specialist no later than 8 weeks prior to the review.

Step 4 — The Lead AR Specialist will review the Compliance Worksheets and issue approval.

USDA COMPLIANCE WORKSHEET

	Meal Pattern Reimbursable Lunches Grades 9-12								
	SFA Name: **9-12 Menu #:**								
	Enter each reimbursable lunch offered during the reference week and select or enter the quantity of each component. Each reimbursable meal consists of all required food components: any grain/meat/meat alternates in a main dish and/or side dish, total amount of fruit offered with this meal, total amount of vegetables in a main dish and/or side dish, and amount of milk. The vegetable subgroups and types of milk will be recorded on a different tab.								
Click here to go the Food Buying Guide Calculator			**Click here to go the Instructions**				**Click here to the Weekly Report**		
1	**2**	**3**	**3a**	**3b**	**4**	**4a**	**5**	**5a**	**6**
Meal Name *Enter the name of each reimbursable meal as found on the weekly menu. Select the first blank if the component was not offered with the meal.* *** DO NOT DELETE ROWS***	**Meat/Meat Alternate (oz equivalents)** Enter the total meat/meat alternate ounces offered with this meal	**Grains (oz equivalent)** Enter the total grains ounce equivalents including whole grain rich and desserts offered with this meal	Of the grains offered with this meal, enter the number of ounce equivalents that are whole grain rich	Of the grains offered with this meal enter number of ounce equivalents that are grain based desserts	**Fruit (cups)** **NOTE: Enter the CREDITABLE amount of dried fruit Select the number of cups of fruit including fruit juice offered with this meal	**4a** ONLY select the cups of fruit juice	**Vegetables (cups)** Select the number of cups of vegetables including vegetable juice offered with this meal	**5a** ONLY select the cups of vegetable juice	**Fluid Milk (cups)** Enter the number of cups of fluid milk offered with this meal
Example: Chicken nuggets w/ roll and honey sauce	*2.00*	*2.50*	*2.00*	*0.50*	1	1/2	1		*1*
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									

USDA VERSION OF THE MCQW

The USDA Compliance Worsheet will be uploaded on the Office of School Nutrition Website

Your Administrative Review Specialist will work with you once we know your Distinct Menus. They will forward the documents to you to complete and return.

BEST PRACTICE

Use a meal component tool such as the USDA Compliance Worksheet, or similar tool, throughout the year to evaluate menu plans and determine component compliance before menus are served.

HELPFUL HINTS FOR VERIFYING AND MONITORING MEAL COMPONENTS

- Gather, review, and update all specification sheets, recipes and production records prior to beginning work on the component tool

  – Improves accuracy

  – Ensures correct portion size and crediting data are used

  – Eliminates conflicting data when the reviewer compares the component tool with the specification sheets, recipes, and production records

SPECIFICATION SHEETS/RECIPES

- Contact vendors or use the procurement alliance database to obtain updated specification sheets
- Must have CN Labels or a [Product Formulation Statement](#) for Processed Foods
  - ➤ Request missing CN crediting information on a PFS
- Use the updated PFS to update your ingredients and recipe component crediting

PRODUCTION RECORDS

- All sites selected for the AR will receive a production record review for breakfast (50% of sites) and lunch
- The SFA will submit **completed** production records three weeks prior to the review for ***The Targeted Menu School*** selected for review

PRODUCTION RECORDS

- Maintained completely and accurately on-site daily for each meal service

- Documents that all meal components are offered in quantities appropriate for age/grade groups served

- Fiscal Action taken for missing documents

PRODUCTION RECORD RESOURCES

NCDPI Website:

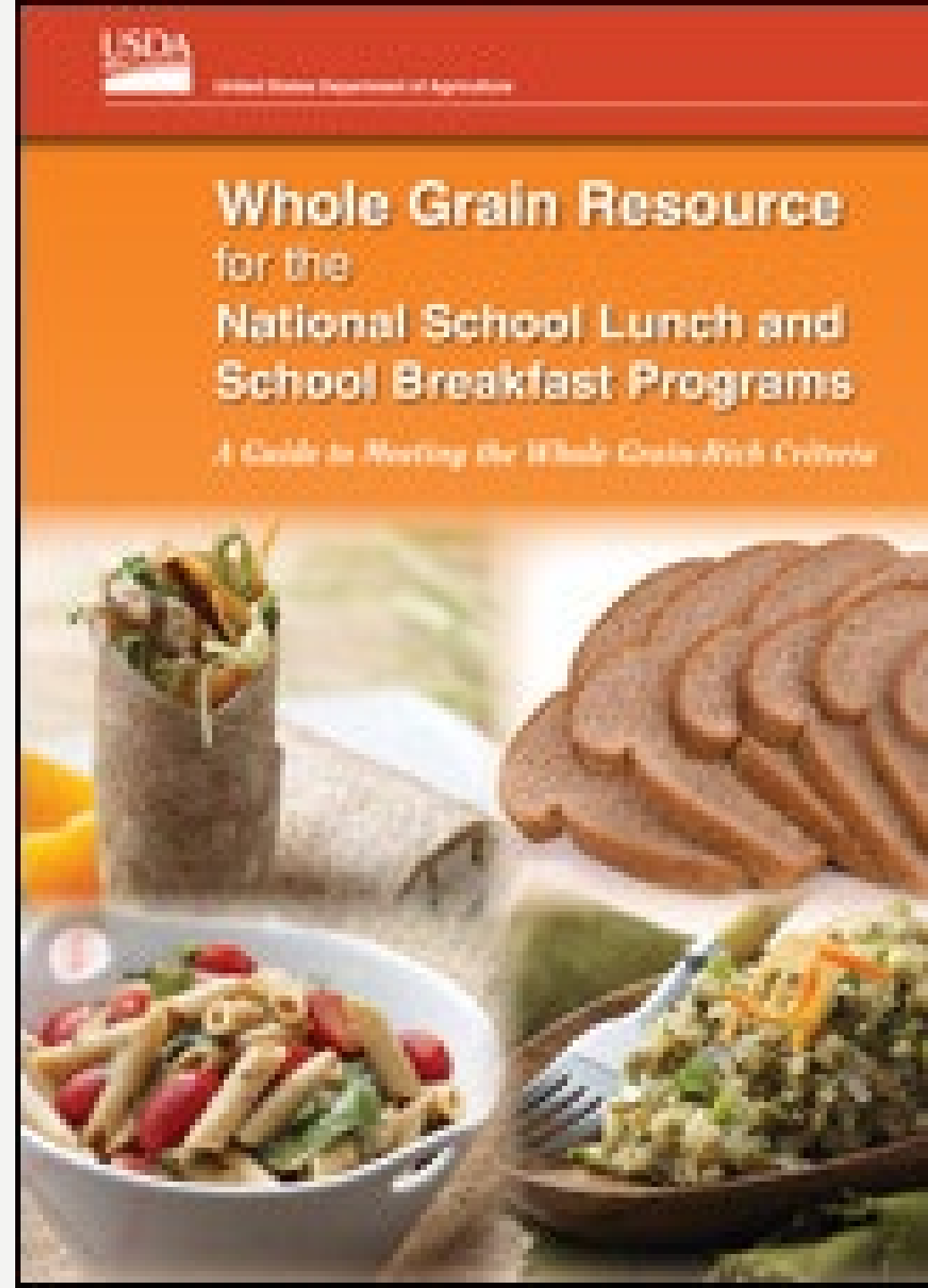- Menu Planning & Production

MEAL PATTERN REQUIREMENTS

- Specific to age/grade group
- Specific requirements for
  - whole grains
  - meat/ MA
  - vegetable subgroups
  - fruit (juice)
  - milk

WHOLE GRAIN-RICH REQUIREMENTS

- 80% of all grains offered in SBP and NSLP must be whole grain-rich

- Breakfast cereals may not have more than 6g sugar per dry ounce.

- Must meet minimum amounts required by meal pattern

- Refer to the USDA Whole Grains Resource Manual

USDA
United States Department of Agriculture

Whole Grain Resource
for the
National School Lunch and
School Breakfast Programs

A Guide to Meeting the Whole Grain-Rich Criteria

VEGETABLE SUBGROUP REQUIREMENTS

Offer required quantities weekly

- Dark green
- Red/orange
- Beans/peas
- Starchy
- Other

FRUIT REQUIREMENTS

- 100% fruit juice is allowable

  - ➢Only 50% of the fruit component offerings (over the week) may be 100% fruit juice

  - ➢If ½ cup of juice is offered daily, then ½ cup of fruit must also be offered daily and the student must be allowed to select both items

MILK REQUIREMENTS

At least two varieties of fluid milk

– Fat-free, flavored or unflavored

– Low-fat, flavored or unflavored

– Unflavored milk must be an option
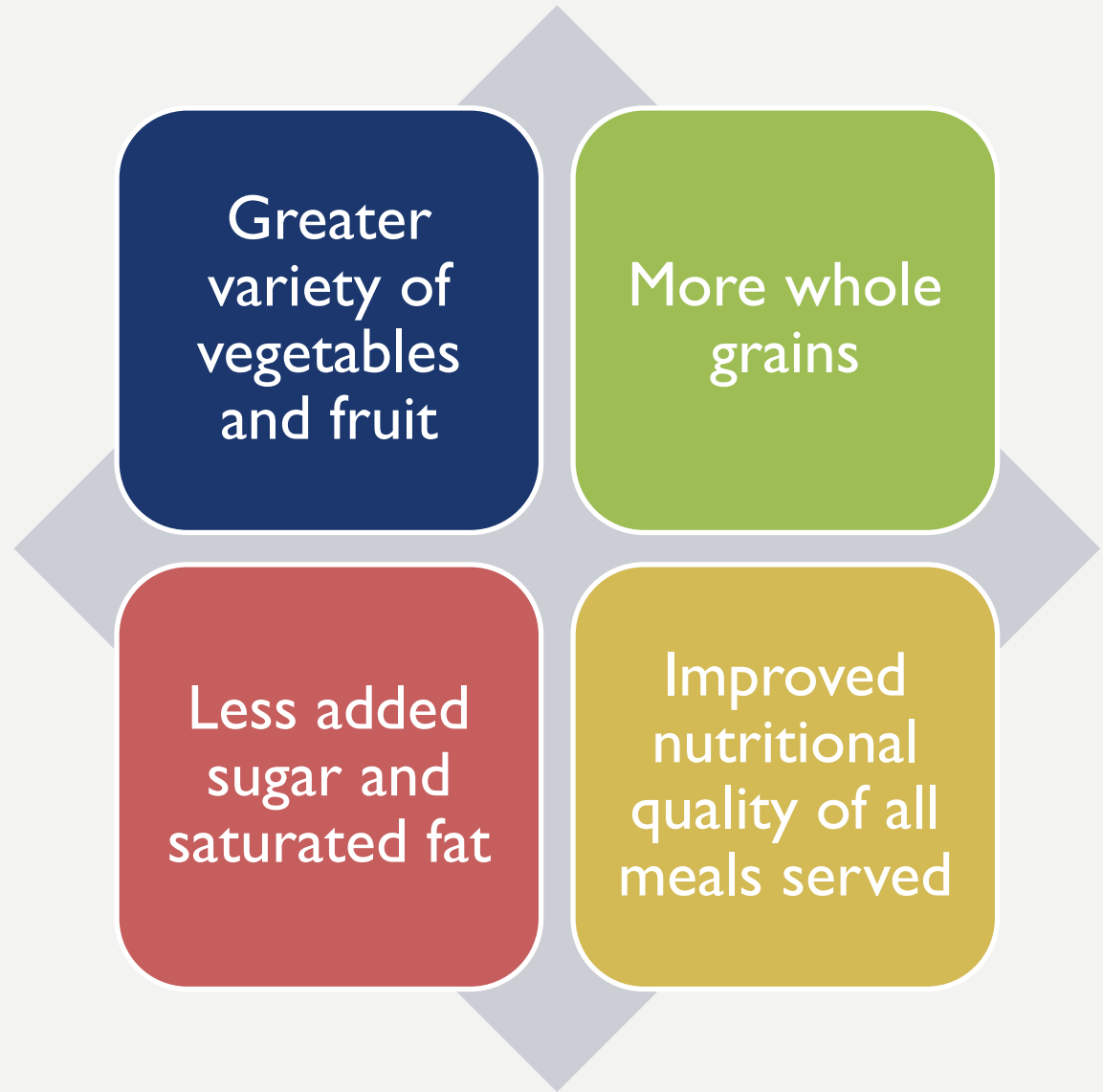
– No more than 10g sugar per 8 fl. oz.

Pre-K requires one variety of unflavored milk

CACFP PRE-K MEAL PATTERNS

PRE-K MEAL PATTERN BASICS

Greater variety of vegetables and fruit

More whole grains

Less added sugar and saturated fat

Improved nutritional quality of all meals served

BREAKFAST FOR AGES 3-5

- Three food components at breakfast

- Milk, Fruit/Vegetable, Grain

  o Fruits and vegetables are combined at breakfast

  o May substitute M/MA for Grain 3 times per week

- No OVS allowed for pre-k

	Ages 1-2		Ages 3-5	
	Previous	Updated	Previous	Updated
Milk	½ cup	½ cup	¾ cup	¾ cup
Vegetables, fruit or both	¼ cup	¼ cup	½ cup	½ cup
Grains	½ serving	½ oz eq	½ serving	½ oz eq

PRE-K BREAKFAST MEAL PATTERN

LUNCH: 5 FOOD COMPONENTS

- Milk

- Meat/Meat Alternates

- Grains

- Vegetable

- Fruit

Minimum serving sizes for a reimbursable meal are included on the charts

	Ages 1-2		Ages 3-5	
	Previous	Updated	Previous	Updated
Milk	½ cup	½ cup	¾ cup	¾ cup
Meat and meat alternates	1 oz	1 oz	1 ½ oz	1 ½ oz
Vegetables	¼ cup	1/8 cup	½ cup	¼ cup
Fruit		1/8 cup		¼ cup
Grains	½ serv	½ oz eq	½ serv	½ oz eq

PRE-K LUNCH MEAL PATTERN

MILK

- Only unflavored milk is allowed for ages 2-5
  - Skim or
  - 1% milk fat

MEAT/MEAT ALTERNATES AT BREAKFAST

- May Substitute for grain at breakfast 3 times per week

- 1 oz eq of M/MA is equivalent to 1 oz eq Grain

FRUIT

- Combined with vegetables at breakfast only
- Separate component at lunch
- Juice
  - May be used at one meal or snack per day
  - Pasteurized
  - Full-strength

VEGETABLES

- Combined with fruit at breakfast only
- Separate component at lunch
- May be used as a fruit substitute- 2 different veggies
- Vegetable Juice
  - May be used at one meal or snack per day
  - Pasteurized
  - Full-strength

MEALS, MENUS AND WHOLE GRAIN-RICH

Each day, at least one meal or snack must include a whole grain-rich food

If only serving one meal, the grain must be whole grain-rich

If serving breakfast, lunch, & snack, choose which meal to serve the whole grain-rich food

Must document whole grain-rich foods on menu

Cereal must contain ≤6 g sugar per dry oz

May not credit grain based desserts (Flexibility/Exemption for sweet crackers)

OTHER WAYS TO SERVE HEALTHY FOODS...

Deep Fat Frying may not be used to prepare meals on-site

May purchase from commercial manufacturer: pan-fried, flash-fried, par-fried (may not deep fry when re-heating)

Meal service types: pre-plated, family-style

Offer water to children throughout the school day

SP 37-2017 FLEXIBILITY FOR CO-MINGLING

Flexibility for Co-Mingled Preschool Meals: Questions and Answers

https://www.fns.usda.gov/cn/flexibility-co-mingled-preschool-meals-questions-and-answers

ON-SITE

MEAL PREPARATION OBSERVATION

Prior to Meal Service

– 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/insufficient components and give opportunity to correct

– Review standardized recipes

MEAL SERVICE OBSERVATION

During the Meal Service

– Observe significant meals at point of service on each line

– Determine if meals contain components & quantities for age/grade group

– Assess cashiers' understanding of a reimbursable meal

– Ensure students have access

to, and know how to select, a

reimbursable meal

ALTERNATE MEAL SERVICE LOCATIONS

- Alternate meal service areas observed day of review or during review period: field trips, classroom, kiosks, buses, etc.

- If violations observed, all other alternate meal sites checked

- OVS not required in alternate locations, but ≥ 2 milk varieties are required

- OVS may be waived for field trips, but menus must still meet daily and weekly component requirements

MENU SUBSTITUTIONS

- Must be recorded on Production Record
- "Like" substitutions strongly encouraged
- Assess whether daily/weekly requirements are met
- Meals compliant if requirements met
- Maintain documentation for meal pattern non-compliance due to supply chain shortages
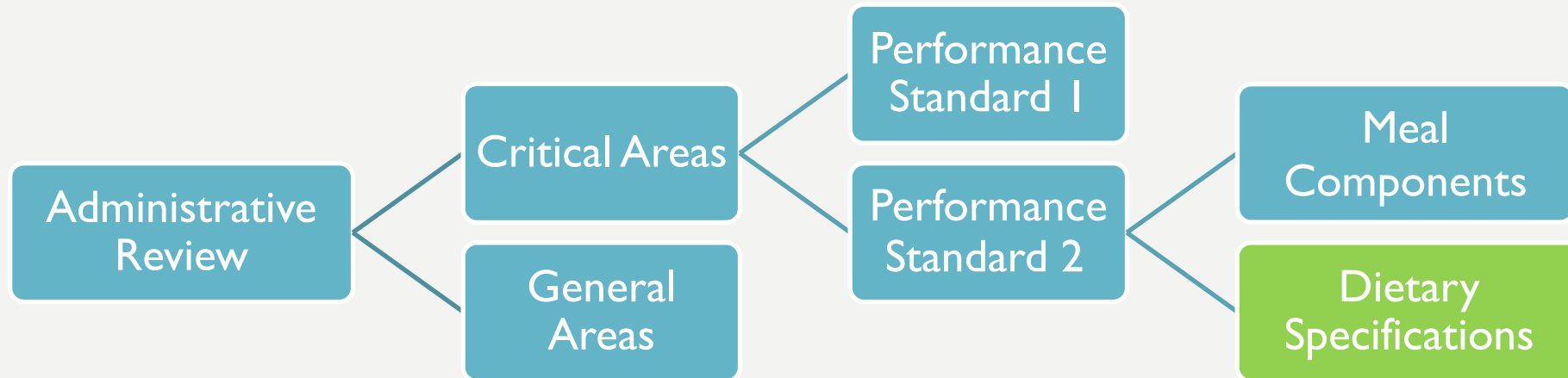
FISCAL ACTION

- Missing Meal Components
- Repeat violations for
  - ➤ Quantities
  - ➤ Whole grain-rich
  - ➤ Vegetable Subgroup
  - ➤ Milk Type

QUESTIONS?

DIETARY SPECIFICATIONS – BREAKFAST & LUNCH: PERFORMANCE STANDARD 2

Administrative Review → Critical Areas → Performance Standard 1

Critical Areas → Performance Standard 2 → Meal Components

Performance Standard 2 → Dietary Specifications

Administrative Review → General Areas

DIETARY SPECIFICATIONS & NUTRIENT ANALYSIS

- Calories (weekly average range)

- Saturated Fat (weekly maximum)

- Sodium (weekly maximum)

- *Trans* Fat (daily restriction)

CALORIE RANGES: MINIMUM AND MAXIMUM

GRADES	LUNCH (kcal)	BREAKFAST (kcal)
Grades K-5	550-650	350-500
Grades 6-8	600-700	400-550
Grades 9-12	750-850	450-600

SATURATED FAT

- Limited to <10% of total calories at breakfast and lunch
- Weekly average
- Same as previous regulatory standard
- No total fat standard

TRANS-FATS

- Nutrition labels or manufacturer's specs must specify zero grams of *trans* fat per serving (less than 0.5 gram per serving)

- Naturally-occurring *trans* fat excluded

  e.g., beef, lamb, dairy products

SODIUM: TRANSITIONAL STANDARDS

Target 1

GRADES	LUNCH (mg)	BREAKFAST (mg)
Grades K-5	$\leq 1{,}110$	≤ 540
Grades 6-8	$\leq 1{,}225$	≤ 600
Grades 9-12	$\leq 1{,}280$	≤ 640

Daily Amount Based on the Average for a 5-Day Week
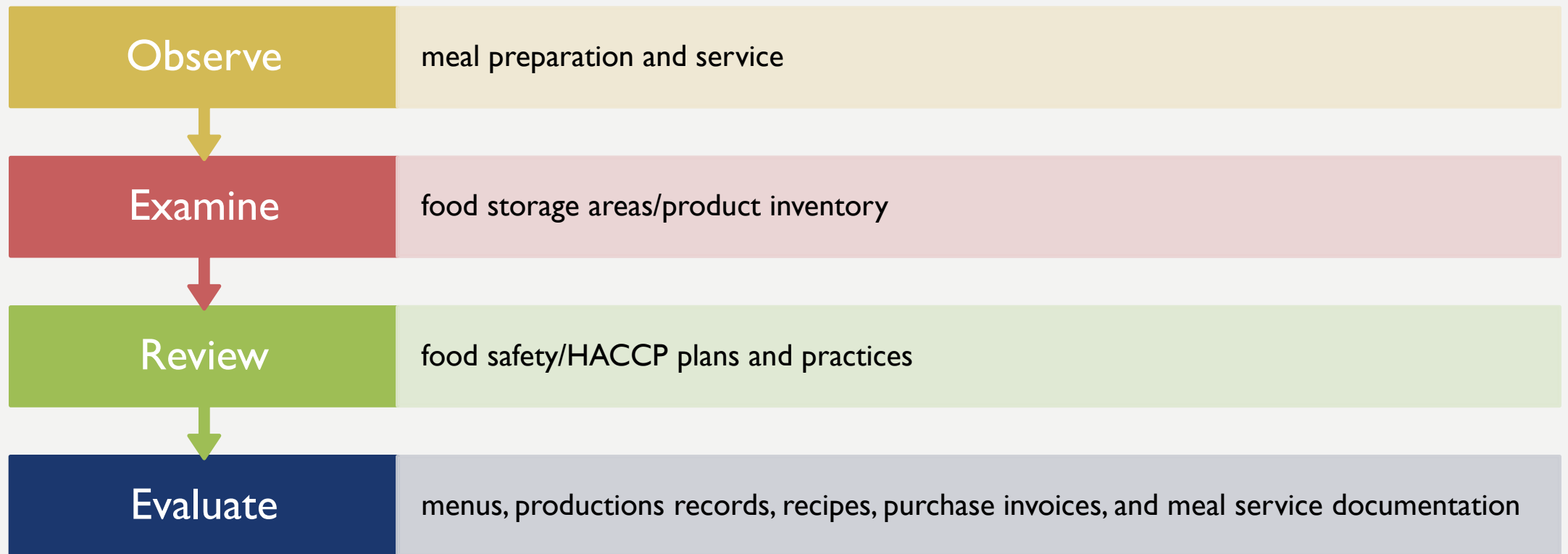
DIETARY SPECIFICATIONS ASSESSMENT

Completed for Breakfast and Lunch for the Nutrition Review School

Contains 26 questions

Results will be validated on-site

Will determine if SA will perform or validate full Nutritional Analysis

ON-SITE REVIEW PROCEDURES: VALIDATE RISK ASSESSMENT

Observe	meal preparation and service
Examine	food storage areas/product inventory
Review	food safety/HACCP plans and practices
Evaluate	menus, productions records, recipes, purchase invoices, and meal service documentation

VALIDATING ANALYSIS IF REQUIRED

Weighted analysis of distinct breakfast and lunch for each age/grade group

- Site specific – aggregated analyses not acceptable
- Minimum 3 consecutive days

USDA approved Nutrient Analysis Software

USDA Nutrient Analysis Protocols
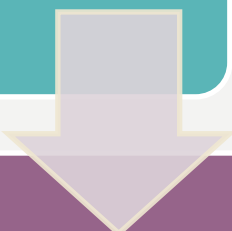
Prepare Data Collection Notebook for review

Analysis results meets Dietary Specifications

FISCAL ACTION: DIETARY SPECIFICATIONS

Limited to the violation at review site

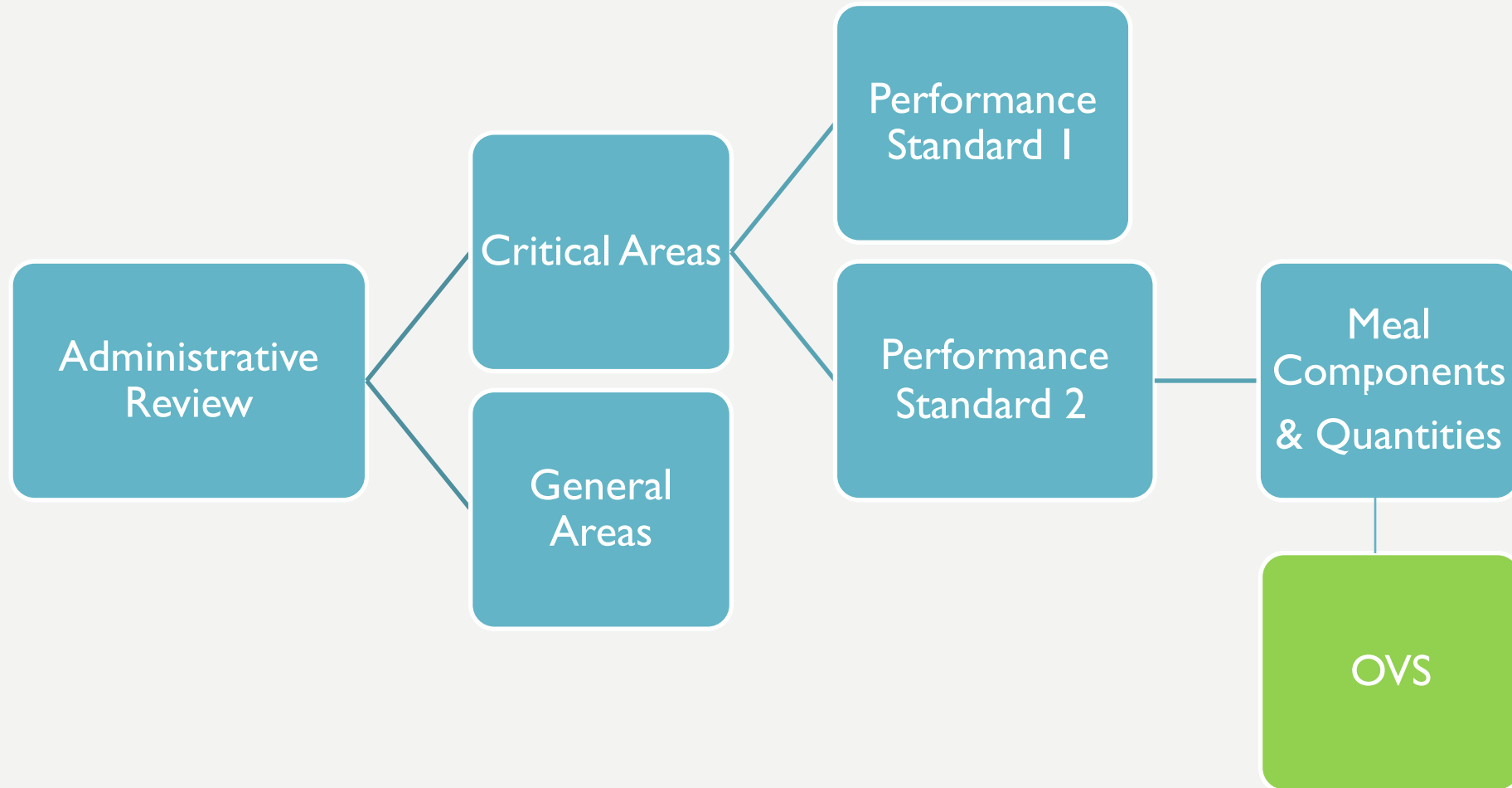May expand to the entire review week, review month, or to beginning of school year

Corrective Action Plan required

QUESTIONS?

OFFER VS. SERVE: PERFORMANCE STANDARD 2

OFFER VS. SERVE (OVS)

- All components sufficiently offered

- Students select adequate components for reimbursable meal

- Training conducted with School Nutrition Staff each school year

OFFER VS. SERVE: QUESTIONS TO ASK...

Is clear, easy to understand signage posted?

Is the school offering enough food on all reimbursable meal service lines?

Are students selecting components/items to make a reimbursable meal?

MEAL SIGNS

- Signage posted **at or near the beginning** of serving line
- Identifies the **minimum** that must be taken to constitute a reimbursable meal
- Identifies the **maximum** that may be taken as part of reimbursable meal
- Indicates the **required ½ cup fruit/vegetable component requirement**

MEAL SERVICE OBSERVATION

Reviewer will determine:

- if meals selected by students contain minimum of **3** food *components* (NSLP) or *food items* (SBP)

- if each reimbursable breakfast or lunch contains at least ½ cup fruit or vegetable

- if SN staff understand OVS and can accurately judge quantities on the tray

- if students understand OVS and are aware of all options

FOOD COMPONENT OR FOOD ITEM?

Food Component

- One of five food groups for reimbursable meals
  - Fruits
  - Grains
  - Milk
  - Vegetables
  - Meat/Meat Alternates

Food Item

- A specific food offered within the food components
  - Banana or Fruit Juice
  - Waffle or Muffin
  - Skim Chocolate Milk
  - Carrots or Corn
  - Beef Patty or Chicken Breast

OVS AT LUNCH: OFFER 5 COMPONENTS

1. Milk
2. Meats/Meat Alternates
3. Grain
4. Fruit
5. Vegetable

OVS AT LUNCH

- Students are allowed to decline 2 of the 5 required food components
- Students must select at least ½ cup of either a fruit or vegetable
- Other selections must be of minimum amounts required by the meal pattern

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 full components required by the meal pattern for the grade group at lunch or 2 additional items as designated by the menu planner at breakfast?

OVS AT BREAKFAST

OVS is optional at breakfast

4-5 food items for OVS from the 3 components (Grain, Fruit, Milk)

Students may decline 1 item at breakfast (under OVS only)

Students must select ½ cup fruit component

OVS AT ALTERNATE LOCATIONS

- Alternate Meal Service Locations
  - ➢ May waive OVS at lunch
  - ➢ Must meet meal pattern
  - ➢ Milk choices must be offered

OVS FISCAL ACTION

- Missing Meal Components on tray at POS (including no fruit/vegetable at lunch)
  - ➤ Fiscal action required
- Insufficient fruit/vegetable quantity on tray at lunch is considered incomplete meal
  - ➤ Fiscal action may occur for repeat violations
- Corrective Action required

ADDITIONAL RESOURCES

https://www.fns.usda.gov/tn/nslp/offer-versus-serve-posters

QUESTIONS?