

THE ADMINISTRATIVE REVIEW PROCESS DAY 2

QUESTIONS AND ANSWERS FROM DAY 1



GENERAL AREAS

**GENERAL
PROGRAM
COMPLIANCE
RESOURCE
MANAGEMENT
PROCUREMENT
FINANCIAL
MANAGEMENT**





GENERAL PROGRAM COMPLIANCE

CIVIL RIGHTS

ON-SITE REVIEWS

COMPETITIVE FOODS

PROFESSIONAL STANDARDS

LOCAL WELLNESS POLICY

WATER

FOOD SAFETY

SBP AND SFSP OUTREACH

CIVIL RIGHTS

Protected categories for School Nutrition Programs:

- Race
- Color
- National origin
- Age
- Sex
- Disability



United States Department of Agriculture

AND JUSTICE FOR ALL

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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 www.usda.gov/sites/default/files/documents/usda-program-discrimination-complaint-form.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:

mail:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

fax:
(833) 256-1665 or (202) 690-7442;

email:

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discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; o

fax:

CIVIL RIGHTS REVIEW

“And Justice for All” poster placed in visible location. You must have access to read the information on the poster.

Receipt of equal benefits without discrimination at each school during each meal service reviewed

Correct non-discrimination statement on all program materials

CIVIL RIGHTS REVIEW

Annual continuing education provided

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SFA and Site monitoring occurred

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Monitoring and education documentation is maintained

CIVIL RIGHTS: COMPLIANCE WORKSHEET

Required

Central Office

Each school site (includes satellite sites)

Complete by December 15 each year

Kept on file

CIVIL RIGHTS: REVIEW

What are the SFA's complaint procedures?

Have there been allegations of discrimination?

CIVIL RIGHTS: CORRECTIVE ACTION/FISCAL ACTION

Deficiencies
addressed with
corrective action

Funds withheld if
corrective action
plan not submitted
or not implemented

QUESTIONS?



ON-SITE REVIEW OR SELF ASSESSMENT BREAKFAST AND LUNCH

Meal Counting and Claiming Procedures & General Review Areas

LEAs and RCCIs

- Annual On-Site review for every site
- By February 1st

Non-public and Charter schools

- Bi-annual Self Assessments for every site
- By November 1st and April 1st

Corrective Action and Follow-up within 45 days of any finding

ON-SITE REVIEW OR SELF ASSESSMENT

SA will request:

- Copy of On-Site Review or Self Assessments
- Written documentation of follow-up reviews
- Written documentation to verify Corrective Action has occurred for initial review findings

ON-SITE REVIEW OR SELF ASSESSMENT

Evaluated at the site and SFA level

No Fiscal Action unless repeated or egregious

Corrective Action Plan is required for errors



QUESTIONS?

COMPETITIVE FOODS AND SMART SNACKS RULE

All food and beverages sold to students on
the school campus during the school day,
other than reimbursable meals

~Reference: 7 CFR 210 and 220

WHAT IS THE DEFINITION OF A SCHOOL DAY?



COMPETITIVE FOODS AND SMART SNACKS RULE

Healthy, Hunger-Free Kids Act 2010

Provided authority to establish nutrition standards for all foods and beverages sold outside of School Nutrition programs

Specified nutrition standards for all foods sold:

- outside the school meal programs
- on the school campus
- at any time during the school day



SMART SNACKS RULE

Standards must be consistent with most recent Dietary Guidelines for Americans

Standards represent minimum requirements

Local standards may be more restrictive

COMPETITIVE FOODS

Includes:

- *A la Carte* items
- Vending machines
- School Stores
- Fund-raisers
- Student sales
- Other food or beverage sales or activities



COMPETITIVE FOODS DURING MEAL PERIODS

Schools participating in the NSLP and SBP must prohibit:

- The sale of foods and beverages during the school day that are in competition with school meals and
- The sale of foods and beverages that do not meet smart snacks standards



COMPETITIVE FOODS - WHAT HAPPENS AFTER LUNCH?

Schools may:

Extend the existing NC Competitive Foods Rule to 30 minutes after the school day ends.

Allow School Nutrition Program to control all food and beverage sales

Purchase qualifying snacks and beverages from School Nutrition

Control their own sales of foods and beverages after the lunch period

*Combination – must have SA approval

- No food or beverage may be sold to students on campus in competition with the school nutrition program between 12:01 AM and the cafeteria closing.
- All revenues from the sale of foods and/or beverages sold to students *until the established lunch period ends* must accrue to the non-profit School Nutrition Program

COMPETITIVE FOODS: BOTTOM LINE IN NC

COMPETITIVE FOODS AND THE ADMINISTRATIVE REVIEW

Observations to determine: If food and beverage sales occurring during the school day are conducted by the School Nutrition Program.

If all receipts of food and beverage sales are returned to the School Nutrition Program.

If Foods available and sold by the School Nutrition program meet Smart Snacks standards.

COMPETITIVE FOODS: CORRECTIVE ACTION

Competitive food sales will be evaluated at the site level.

Violations require a written Corrective Action **Plan.**

QUESTIONS?



PROFESSIONAL STANDARDS

**WHAT IS REQUIRED FOR THE ADMINISTRATIVE
REVIEW?**

FINAL RULE

- Implementation began July 1, 2015
- Establishes minimum:
 - Hiring standards for new SFA directors
 - Annual continuing education standards for all employees
- <https://www.fns.usda.gov/tn/professional-standards>



REQUIRED ANNUAL CONTINUING EDUCATION STANDARDS

SFA Director
12 hours

Manager
10 hours

Full-time Staff
6 hours

Part-time staff (working < 20 hours/week)
4 hours

Jan. 1 or later hire: ½ of required annual
hours

KEY LEARNING TOPICS AND OBJECTIVES

- 1000 Nutrition
- 2000 Operations
- 3000 Administration
- 4000 Communications/Marketing



SOURCES OF CONTINUING EDUCATION

Variety of formats

- Virtual/web-based and in-person
- Credited in 15 minute increments

Variety of sources

- FNS- Team Nutrition
- Institute of Child Nutrition
- Professional Associations and organizations-SNA
- Within the SFA
- State Agency-DPI
- Commercial vendors

employee names by category

employer/school

title of continuing education (CE)

date of CE

topic or objectives

learning code

source of CE

total contact hours

CONTINUING EDUCATION DOCUMENTATION

HIRING STANDARDS FOR DIRECTORS

Based on 3 LEA size categories:

- 2,499 or less student enrollment (Small)
- 2,500-9,999 student enrollment (Mid-Size)
- 10,000 or more student enrollment (Large)

Educational requirements for all size categories reflect the knowledge and expertise required to perform duties successfully

The Final Rule provided hiring flexibilities for Small LEA's effective April 30, 2019

HIRING STANDARDS FOR SMALL LEAS

≤ 2,499 students:

- Bachelor's degree with specific major
- Associate's degree with specific major with 1 year of experience*
- High school diploma with 3 years of experience*


<500 students:

- State Agency has discretion to approve the hiring of a director having a high school diploma and less than 3 years of experience*

***School nutrition or other relevant food service experience including documented volunteer or unpaid work**

HIRING STANDARDS FOR MID-SIZE LEAS

2,500 - 9,999 students:

- Bachelor's degree with specific major
 - Bachelor's degree in any academic major and at least 2 years of Program experience
 - Associate's degree with a specific major and at least 2 years of Program experience
- 

HIRING STANDARDS FOR LARGE LEAS

<10,000 students:

- Bachelor's degree with specific major
- Bachelor's degree in any academic major and at least 5 years of experience in management of school nutrition programs

HIRING STANDARDS FOR ALL CATEGORIES

Food Safety Certification Required

- Achieve food safety certification within 5 years prior to the starting date or within 30 days after the starting date
- Maintaining food safety certification for all current Directors is an expectation



SFA OVERSIGHT

Document compliance with the hiring standards and food safety certification for Director

Document continuing education standards for all

Documentation of compliance must be available for the Administrative Review

QUESTIONS?



LOCAL WELLNESS POLICY (LWP)

Part of the General Program area of Review

HHFKA added new provisions

- Public involvement, notification
- Foods sold outside of school meals
- Foods provided, not sold to students
- Food and beverage marketing

<http://www.fns.usda.gov/tn/local-school-wellness-policy>

LOCAL WELLNESS POLICY

NC Annual Agreement includes LWP Responsibilities

Designate LWP Coordinator for developing, implementing and monitoring

Required for all School Food Authorities (Traditional schools, RCCL, non-public, and charter schools)

LWP ELEMENTS

Measurable Goals for:

- Nutrition education and promotion
- Physical activity
- Other school-based strategies promoting student wellness

Handout: NCDPI Local Wellness Policy Checklist

Resources: <https://www.dpi.nc.gov/districts-schools/district-operations/school-nutrition/information-resources-subject/local-wellness-policy>

OTHER LWP REQUIRED ELEMENTS

Nutrition guidelines for all foods and beverages available to students on school campus during the school day

- **Items sold meet Smart Snacks Nutrition Standards**
- **Items provided have guidelines**

The team who develops and implements the LWP includes broad based group of stakeholders and permit public involvement

Inform and update the public about the content, implementation, and assessment of wellness policies

AR QUESTIONS ASK:

Are the required LWP elements present?

How does public know about LWP?

When, how, and who reviews/updates LWP?

What is their relationship with the LEA?

How are potential stakeholders made aware of their ability be involved?

Has a triennial assessment occurred and how was the public informed of the results?

LWP: TRIENNIAL ASSESSMENT

HHFKA provision requires assessment for:

- Schools' compliance with the LVWP
- How the LVWP compares to a model LVWP
- Schools' progress toward LVWP goals

Tools:

- CDC- School Health Index
- Rudd Center University of Conn-WellSAT
- The Institute of Child Nutrition- Sustaining and Strengthening Local Wellness Policies

LWP CORRECTIVE ACTION AND FISCAL ACTION

Corrective Action

- Missing required elements
- Public notification

Fiscal Action

- May withhold funds for repeated or egregious violations

QUESTIONS?



WATER

- Plain, potable water should be available to all students at no charge (includes cups)
- In the area where lunch is served
- Available at breakfast when served in the dining area
- Must be available without restriction
- Not a part of reimbursable meal



WATER

May be provided in a variety of ways

Reasonable costs to SFA are allowable

Multiple service locations would require water made available for each

Corrective Action required if non-compliant



QUESTIONS?



FOOD SAFETY: GENERAL AREA OF REVIEW

Includes:

1. Written plan (HACCP)
2. Food safety inspections
3. Recordkeeping
4. Storage

Assessment conducted at each site reviewed

Must cover all facilities storing, preparing or serving food for FNS programs

Includes alternate locations such as classrooms, transported meals, buses, warehouses, etc.

FOOD SAFETY: HACCP PLAN

Based on USDA
guidance &
HACCP
principles

Current year
Food Safety plan
available and
accessible

HACCP
templates and
forms in place and
updated

<https://www.dpi.nc.gov/districts-schools/district-operations/school-nutrition/information-resources-subject#haccp--food-safety>

FOOD SAFETY REVIEW

Observations at each review site

- Buy American compliance
 - 10% of food purchases
- Current and complete HACCP Plan with required elements and proper implementation
- Recordkeeping and monitoring
- Compliant storage practices
- Food safety inspection reports
- Central Warehouse HACCP plan if applicable

Required two (2) food safety inspections per school annually

Current grade posted in a publicly visible location

Written documentation required for insufficient number of inspections

FOOD SAFETY INSPECTIONS

FOOD SAFETY: CORRECTIVE ACTION

- Any site food safety concerns identified
- Food safety deficiencies usually do not result in Fiscal Action, however, Corrective Action is required
- Repeat or egregious findings could result in fiscal action

QUESTIONS?





OUTREACH: SCHOOL BREAKFAST PROGRAM AND SUMMER FOOD SERVICE PROGRAM

SFA must inform eligible families of the availability of reimbursable Breakfast in SBP and meals in SFSP programs.

OUTREACH: SCHOOL BREAKFAST PROGRAM

Inform about availability of SBP at beginning
of the SY in F&RP packets



Send reminders about SBP multiple times
throughout the SY



May provide reminders:

through public
address system

by providing printed
or electronic material

By posting menus on
website



OUTREACH: SUMMER FOOD SERVICE PROGRAM

USDA requires
schools to conduct
SFSP outreach before
the end of the school
year

QUESTIONS?



RESOURCE MANAGEMENT

OVERVIEW

MAINTENANCE OF THE NON-PROFIT SCHOOL NUTRITION ACCOUNT

ALLOWABLE COSTS

PAID LUNCH EQUITY

REVENUE FROM NON-PROGRAM FOODS

INDIRECT COSTS

IMPORTANCE OF MONITORING RESOURCE MANAGEMENT

- Ensure SFAs account for all revenues and expenditures of nonprofit School Nutrition account
- Ensure effective and consistent management of program resources



RESOURCE MANAGEMENT: 5 AREAS

1. Maintenance of
the Non-profit
School Nutrition
Account

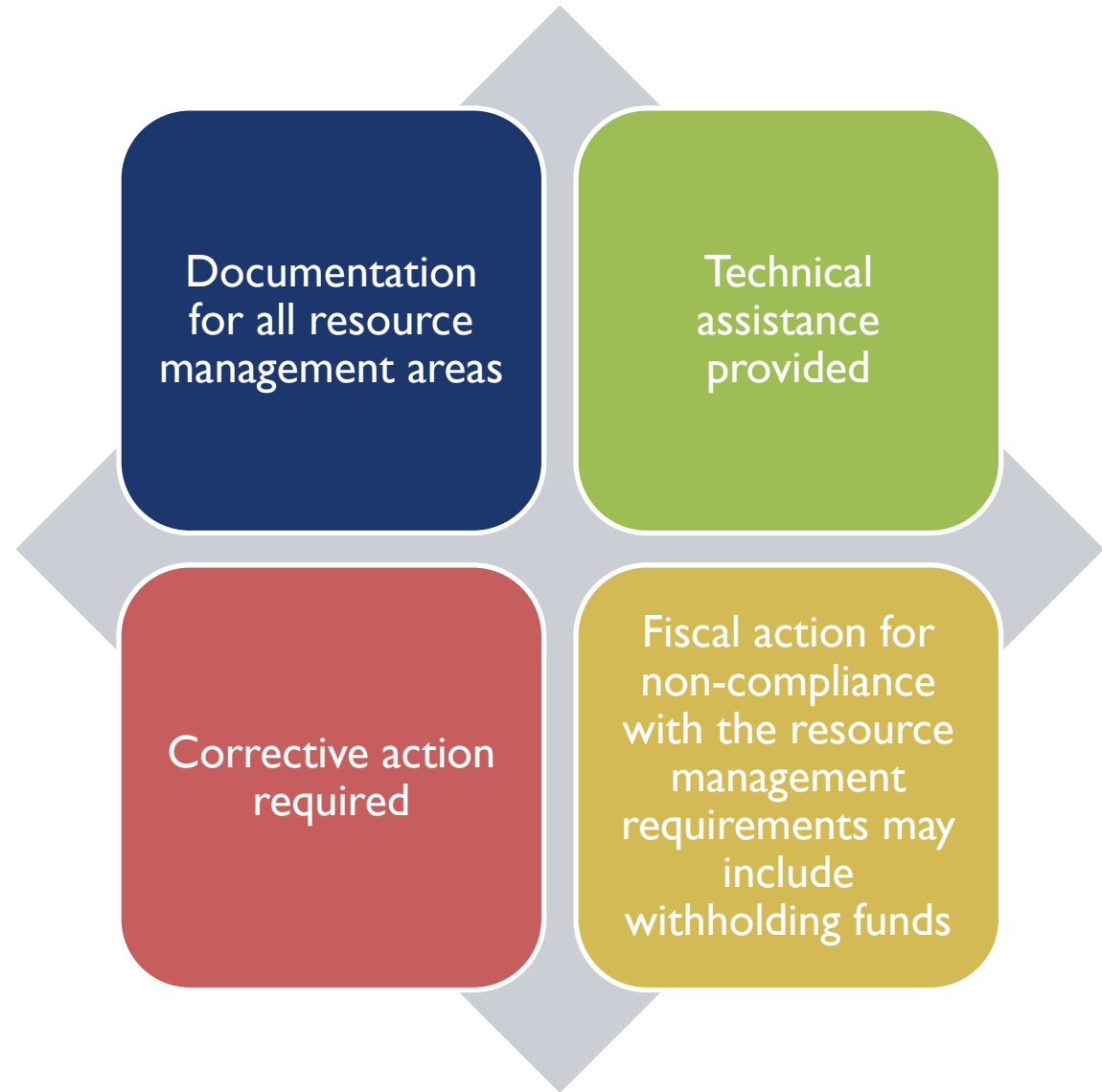
2. Allowable Costs

3. Paid Lunch
Equity

4. Revenue from
Non-program
Foods

5. Indirect Costs

RESOURCE MANAGEMENT REVIEW



NON-PROFIT SCHOOL NUTRITION ACCOUNT

- Break-even or loss not required for non-profit status
- Comply with regulatory limitations on the use of nonprofit School Nutrition revenue
- Identify revenue excess or shortfall

COMPONENTS OF THE NON-PROFIT SCHOOL NUTRITION ACCOUNT

- SFA accounting system
- Net cash resources



ACCOUNTING SYSTEM

– Complies with the system established
by the State Agency



NET CASH RESOURCES

- Cash available beyond three (3) months operating balance



TRADITIONAL PUBLIC SCHOOLS FC1-A FINANCIAL REPORT

- Monitor each quarter in the SNTS.
- View
- Modify
- Summary

Actions	Version	Status	Approved Date
View Modify Summary Admin	Original	Pending Approval	

< Back

Import Financial Form

Term Covered	Due Date
First quarter covers July-September	November 15th
Semi-Annual covers July-December	March 1st
Third Quarter covers July-March	May 16th
Annual covers July-June	October 31st

CHARTER SCHOOLS, RCCI, NONPUBLIC SCHOOLS (FINANCIAL FORM)

Email to:

schoolnutrition@dpi.nc.gov

Term Covered	Due Date
Semi-Annual covers July–December	March 1st
Annual covers July–June	October 1st

North Carolina Department Of Public Instruction	
Child Nutrition Services	
Financial Report for Non-LEAs	
SFA Name and Number:	
Reporting Period:	
REVENUES	
USDA Reimbursement	\$ -
USDA Commodities	\$ -
Student Breakfast and Lunch	\$ -
Adult Breakfast and Lunch	\$ -
Supplemental Sales	\$ -
Other Income	\$ -
TOTAL REVENUES	\$ -
EXPENSES	
Salaries and Benefits	\$ -
Contracted Services	\$ -
Office Supplies and Materials	\$ -
Food and Food Processing Supplies	\$ -
Equipment	\$ -
Other: (Explanation)	\$ -
Other: (Explanation)	\$ -
TOTAL EXPENSES	\$ -
PROFIT/LOSS STATUS	\$0.00
Date Completed:	
Completed by:	

SUMMARY REPORT

- Monitor each quarter in the SNTS.
- Annual FCI-A over 3 months requires an approved Spenddown Plan.

Months Operating Balance

6.4886

Please submit a corrective action plan to reduce the excess funds within the next 30 days. Some acceptable uses of these funds include, but are not limited to: reducing the prices charged to children, improving food quality and food service operations or purchasing food service equipment. Corrective action plans should be in sufficient detail to enable the State Agency to determine:

1. the type, quantity and unit cost of food service equipment to be purchased
2. the value of repairs to existing equipment
3. salary and benefit cost for new food service workers
4. value of the decrease in the student meal prices
5. projected amounts to be spent to otherwise improve the school food service

Please send your Corrective Action Plan to the following address:

Child Nutrition Services, NCDPI
Financial Management Consultant
6324 Mail Service Center
Raleigh, NC 27699-6324

REVIEW OF NET CASH RESOURCES

Calculate

by following guidance in the SA's financial management system



Ensure

SFA compliance with approval of net cash resources in excess of three (3) months



Provide

technical assistance to SFAs spend down plan in expeditious and prudent manner

ALLOWABLE COSTS

Must meet the requirements of 2 CFR 200.403 - 409 being reasonable, necessary, and allowable

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Use Federal funds only for the intended program purposes

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Ensure compliance with government-wide and specific rules and regulations

REVIEW OF ALLOWABLE COSTS

Test	actual expenses for compliance with allowable cost requirements
Identify	unallowable costs
Ensure	costs are adequately documented and consistently treated

Allowable	Allowable with prior SA Approval	Unallowable
Salaries/Benefits Travel Continuing Ed Conferences Printing Food Supplies	Capital expenditures (equipment purchases, etc.) Vehicles – Request in Writing to the Office of School Nutrition	Gifts Entertainment Alcoholic Beverages Construction Bad debts Charges

CLASSIFICATION OF COSTS AND EXAMPLES

PAID LUNCH EQUITY

Included in the Healthy, Hunger-Free Kids Act (Section 205)



Ensure SFAs charge paid lunch prices sufficient to cover the costs of paid meals or provide enough local funds to support paid meal costs

NON-PROGRAM FOODS

- Foods and beverages purchased using funds from the nonprofit School Nutrition account
- Sold in a school participating in the federally assisted School Meal Programs
- Includes a la carte items, adult meals, vending machine items, fundraisers, school stores, and for catered and vended meals
- A la carte price listing form to be completed by the School Nutrition Administrator

REVENUE FROM NON- PROGRAM FOODS

- Included in the HHFKA (Section 206)
- Intent: With the exception of reimbursable meals, all food sold in a school and purchased with funds from the nonprofit school food service must generate revenue at least equal to the cost of the food
- North Carolina A La Carte Bid Price versus Selling Price Comparison Template.

INDIRECT COST

Determine	if costs are allowable, allocable and appropriately charged as a direct or indirect cost
Ensure	application of correct indirect cost rate to the allowable expense codes
Confirm	assessment of indirect cost according to SA agreement



QUESTIONS?



FINANCIAL MANAGEMENT

CASH MANAGEMENT PROCEDURES

- SFA must have written cash management procedures
- SFA must abide by approved procedures
- Provide yearly training to School Nutrition Managers and Cashiers



DUAL EMPLOYEES

Salaries and benefit for employees working in multiple departments must be prorated according to the time worked for each



Areas of review include:

Salary	Annual/medical leave	Health Insurance	Other (Longevity, bonus leave and supplements)
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INTEREST

- All interest earned on bank/investment accounts must accrue to the Non-Profit School Nutrition Account.



SALES TAX REFUND

All eligible sales tax paid by School Nutrition should be included in the Sale and Use Tax Refund document prepared by the PSU and submitted to the NC Department of Revenue

The refund of sales tax must be deposited in the Non-Profit School Nutrition Account for current and prior years

WORKER'S COMPENSATION INSURANCE

The amount of premium charged to School Nutrition must reflect the salaries by position type and insurance rate

Discounts and credits must be applied to School Nutrition on a prorated basis

Any refunds from prior years must be prorated accordingly and deposited into the Non-Profit School Nutrition account

ADULT MEAL PRICES

- FNS Instruction 782-5 REV. I
- Include the value of any USDA entitlement and bonus donated foods used to prepare the meal



SINGLE AUDIT

Review the single to determine if there were any financial exceptions noted by the independent auditor in the following areas:

- Cited Question Cost
- Unallowable Use of Funds
- Adult Meal Charges

OUTSTANDING CHARGES/BAD DEBTS

- Review financial reports to determine if there were outstanding charge/bad debt (Students/Adults) or NSF checks
- All outstanding balances should be repaid by June 30th, but no later than September 30th

STATE REVENUE MATCH

- If applicable, review the financial reports to determine if the Local Education Agency (LEA) has met the state revenue match requirement. This does not include Charter Schools



DISPOSITION OF EQUIPMENT

Federal regulations require that disposition/disposal of any equipment purchased with School Nutrition funds with a current value of \$10,000 or more must receive prior approval from the State Agency

Proceeds from the sale of any equipment must be deposited into the Non-Profit School Nutrition account



QUESTIONS?

PROCUREMENT

**PROCUREMENT REVIEWS
2025 – 2026
ADMINISTRATIVE REVIEWS**

VENDOR PAID SUMMARY

- **For School Year 2024-2025**
- **Summary of all vendor payments**
- **Includes Name of Vendor**
- **Vendor Number**
- **Total of yearly expense**

SAMPLE VENDOR PAID SUMMARY LIST

- **Vendor Number** – Assigned by the local Public-School Unit.
- **Name of Vendor**
- **Transaction and/or Total Expenses** – total amount spend in the school year
- Submit a copy to your Lead Administrative Review Specialist

Vendor Number	Vendor Name	Expenditures
1378	Over the Top Food Provider	\$1,457,897.90
8659	Moo Moo Dairy	\$97,678.09
3112	Garden Fresh Produce	\$34,870.68
9368	Main Street Bakery Company	\$46,887.24
5263	Equipment Plus	\$56,997.45
5865	Uniforms R Us	\$5,422.50
4569	Office Supplies 4 U	\$2,488.19
1283	Paper Plus	\$58,934.02
6333	South Equipment Company	\$88,572.56
1652	Corner Grocery	\$345.88



PROCUREMENT REVIEW

2018-2019 New
Format for
Procurement Review

Off-Site Entries –
School Nutrition
Technology System



PROCUREMENT ENTRY

- Located in the School Nutrition Technology System
- Power Point in the Download Forms section, under Applications, then Administrative Reviews
- Contact your Lead Administrative Review Specialist if you need assistance.



Item	Description
Review Tracking	Functions for tracking reviews.
Statewide Review Dashboard	Provides statewide statistics regarding 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.

PROCUREMENT ENTRY AREAS

- Micro Purchases
- Small Purchases
- Formal Contracts
- Food Service Management Company Contract
- Processing Contracts
- Emergency Purchase

Type	Vendor Count	# Selected for Review
Micro Purchases	0	0
Small Purchases	0	0
Formal Contracts	0	0
FSMC Contracts	0	0
Processing Contracts	0	0

SOLE SOURCE

All Sole Source Purchase requires State Agency Approval.

Submit request on program letterhead.

Do Not purchase items before you receive State Agency Approval.

PROCUREMENT PLAN

- All School Nutrition Programs in North Carolina MUST have a Board Approved Procurement Plan.
- Fill in the blank document with the Title of person responsible
- Attachment A – Code of Ethics
- Attachment B – Types of Procurement
- Attachment C – Procurement Checklist
- Signed and Dated – Board Chair and Superintendent

NAME OF SCHOOL FOOD AUTHORITY PROCUREMENT PLAN SCHOOL NUTRITION PROGRAM

The procurement plan described on the following pages (pages ___ through ___) was adopted by the _____ Board of Education (BOE) (or Board of Directors for Charter or non-public schools) (BOD) and will be implemented effective (_____ date of adoption) and from that date forward until amended. All procurement processes and activities will be consistent with the principles of free and open competition. The SFA will avoid unreasonable conditions that restrict competition. All reasonable efforts will be made to solicit bids, proposals and/or quotes from as many qualified vendors as possible; all qualified vendors are invited to respond to solicitations.

The procurement of all goods and services using School Nutrition funds will be carefully documented during each phase of the procurement process. The BOE/BOD shall award contracts to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed solicitation. The BOE/BOD will restrict awards, sub-awards and contracts with any party that is debarred, suspended or otherwise excluded from participation in Federal assistance programs or activities. All parties involved in the procurement process involving School Nutrition funds will comply with a written code of ethics/conduct, which includes a [conflict of interest](#) policy. Adherence with the code of ethics/conduct and conflict of interest policies is fundamental to the integrity of the procurement process.

Chair, Board of Education/Directors

Date

Superintendent of Schools

Date

QUESTIONS?



OTHER FEDERAL PROGRAM REVIEWS

**AFTERSCHOOL SNACK PROGRAM
SEAMLESS SUMMER OPTION
FRESH FRUIT & VEGETABLE PROGRAM**



AFTERSCHOOL SNACK PROGRAM (ASSP)

Operated under the NSLP

Sponsored and/or operated by the SFA

Supervised

Organized activities

Educational or enrichment

After the end of the school day

AFTERSCHOOL SNACK PROGRAM MEAL PATTERN

FINAL RULE

- Implementation Date: July 1, 2025
- Must serve 2 out of the 5 components
- No more than half of the weekly fruit and vegetable offerings in NSLP snacks can be juice
- Added sugar requirements for all snacks apply
- Grain-based desserts do NOT count towards the grain requirement
- Milk can be flavored or unflavored, skim or 1%

<u>Meal Components¹</u>	<u>Quantities (K—12)²</u>
Fluid Milk	8 fluid ounces
Meats/meat alternates	1 ounce equivalent
Grains	1 ounce equivalent
Vegetables ³	$\frac{3}{4}$ cup
Fruits ⁴	$\frac{3}{4}$ cup

ASSP: EVALUATING COMPLIANCE

Determine if SFA retains administrative and management responsibility for meeting requirements

Assess compliance in the following areas:

- Eligibility
- Accountability/Meal Counting and Claiming
- Meal Pattern/Production Records
- Monitoring
- General Areas

ASSP: ELIGIBILITY

Qualifying Checklist - completed prior to start

Education or Enrichment Activities

Area Eligible – all meals free

- Free/Reduced-Price 50% or more

Non-Area Eligible

- Documentation of Free/Reduced-Price eligibility required

Expanded Learning Time

- SP 04-2011

Age Eligibility

Snack Pricing

ASSP: ACCOUNTABILITY

Attendance/Sign-in Sheets

Point of Service Roster

Counting/Claiming Procedures

Supporting Documentation

- Snack Orders
- Delivery Records
- Production Records
- Adult Snacks

Record Keeping

ASSP: MEAL PATTERN & PRODUCTION RECORDS

- One snack per child
- Production Records completed daily
- Menu compliant with Meal Pattern
- Counting and Claiming at POS



ASSP: SELF ASSESSMENT

Self-Reviews completed on site for each ASSP

- 1st – during first 4 weeks of operation
- 2nd – prior to end of SY

Records kept for 3 years

ASSP: GENERAL AREAS

- Civil Rights
- Health Inspection Records
- Food Safety
 - ✓ HACCP
 - ✓ Temperature Logs



ASSP: REVIEW

Snack contains required components and adequate portions

One snack per child claimed

The offer versus serve (OVS) provision is not allowed

Snacks are served at the appropriate time

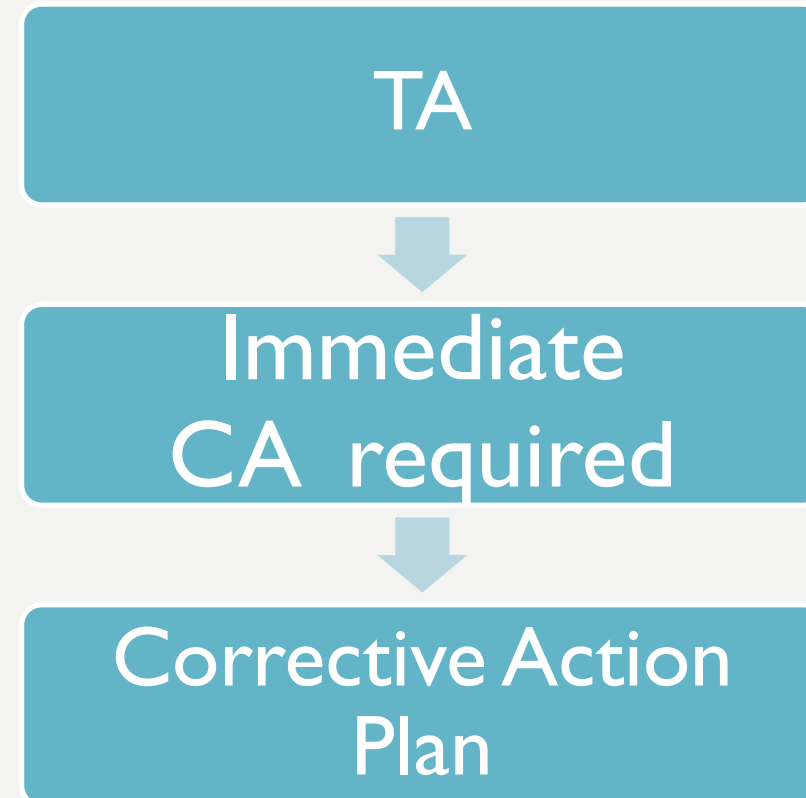
Counting and claiming is accurate

ASSP: CORRECTIVE ACTION/FISCAL ACTION

EXAMPLES

- Site Eligibility Concerns
- Counting/Claiming Violations
- Inappropriate Food Components
- Insufficient Quantities
- Missing Components

REVIEW PROCESS



ASSP: COMMON FINDINGS

ASSP checklist not completed prior to startup of snack service and/or not available

Two After School Snack Program On-Site Reviews not conducted, one within the first 4 weeks of operation.

ASSP Production Record indicating inadequate portion sizes for meal components

ASSP Production Records are incomplete

Meal Counts not taken at the point of service

Inadequate 6 oz Fruit components (pay special attention to juice and dried fruit serving sizes!)



SEAMLESS SUMMER OPTION (SSO)

REVIEW AT LEAST ONE SSO SITE
SITE ELIGIBILITY

SSO - NON-CONGREGATE MEALS

**Please notify your Service Area Consultant
if you are operating SSO and/or a Non-
Congregate site.**

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SSO: COMPLIANCE



SSO: ADVERTISEMENT & ON-SITE REVIEW

- Advertisement
 - SFA makes reasonable effort to advertise to community
 - Advertisements have non-discrimination statement
- SFA On-Site Review
 - SFA reviews all sites by the 4th week of operation or before site close

FREE Summer Meals and Snacks for Kids

The Summer Meals Program feeds kids and teens 18 years and under. Sites are located at places such as schools, parks and community centers.



Call the Family Food Hotline
1-888-4-FOOD-WA
(1-888-436-6392)
or visit
www.ParentHelp123.org
or text
FoodWA to 877-877
to find Summer Meal sites near you



programs of
WithinReach

This institution is an equal opportunity provider.

WB0000512

SSO: MEAL COUNTING & CLAIMING

Count complete meals at POS

Compare POS meal counts to

- **Meal counts from last full week from review period**
- **Benefits issuance roster**

Camps – Ensure only meals served to F/RP eligible children are claimed for reimbursement

SSO: MENU PLANNING & MEAL SERVICE

- Review menus, USDA Compliance Worksheets , and production records
- Assess how site provides meals to varying age/grade groups, if applicable
- Ensure children eat meals on-site during approved meal service times



SSO: MENU PLANNING & MEAL SERVICE

- Ensure eligible children get one meal before seconds are served
- Verify food safety measures
- Validate alternate arrangements for inclement weather



SSO: CORRECTIVE ACTION

Missing meal components for day of review

- Immediate corrective action required before any meals claimed
- Include on Corrective Action Plan

Documentation Review

- Give opportunity to provide documentation to show component was actually offered
- Evaluate erroneous meals to assess fiscal action
- Require Corrective Action Plan

SSO: CORRECTIVE ACTION

Findings for
Vegetable Subgroups,
Milk Types, Whole
Grain-rich foods,
Quantities

- Provide technical assistance
- Include on Corrective Action Plan

Production Records
Missing/Incomplete

- Provide technical assistance
- Ensure site manager understands how to complete production records to prevent future problems



QUESTIONS?



FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)

FFVP REVIEW: 3 COMPONENTS

1) NCDPI determines which FFVP school(s) will be reviewed

2) On site (school) review of FFVP *operation*

3) SN Admin Office review of FFVP *financial* records & documents

FFVP REVIEW SCHOOL SELECTION

Number of Schools Selected for AR that 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 plus 5% of the number of schools over 100 rounded to the nearest whole number

FFVP SCHOOL REVIEWED ON SITE FOR PROGRAM OPERATION

- FFVP menu/weekly operation
- Advertise/Marketing
- Storage of produce/supplies
- Preparation/Distribution of snacks
- FFVP snack service
- Unused FFVP snacks
- Nutrition education efforts
- Partnerships



SN ADMIN OFFICE: FFVP FINANCIAL RECORDS & DOCUMENTS

Addendum/School Proposal

Advertising efforts

Budget implementation/status

Procurement plan/practices

Claim for review month (and other months?)

- Paid FFVP invoices for food/non-food expenses
- Time & Activity Report to justify FFVP labor claimed
- Status of FFVP 10% Administrative funds/expenses
- Confirm NC E-Pay Remittance for FFVP claim (direct deposit notification)

FFVP ANNUAL BUDGET

Plan! Plan! Plan!

Requirement to
complete/submit to NCDPI

Wisely utilize FFVP funding
monthly

Exhaust FFVP school's grant
allocation by completion of
school year



CORRECTIVE AND FISCAL ACTIONS

Corrective Action will address all FFVP non-compliance

Fiscal Action will be used to recover any payments inconsistent with FFVP requirement

IF YOU DON'T KNOW...CONTACT JACQUELYN!

Jacquelyn.mcgowan@dpi.nc.gov

NCDPI: 984-236-2909

Cell: 919-757-6685



QUESTIONS?



POST REVIEW

PROCEDURES AFTER THE ADMINISTRATIVE REVIEW

- Administrative review exit conference
- Preliminary findings signed by SFA and reviewer
- Second party review
- Exit letter and review results
- Corrective action submitted and approved

POST REVIEW

POST REVIEW: EXIT CONFERENCE PURPOSE

Report of Preliminary Findings

Required Corrective Action

Preliminary Fiscal Action

- Compilation of all review areas

- Review Findings
- Required Corrective Action
- Timeframes
- Fiscal Action
- Appeals Process

POST REVIEW: EXIT LETTER AND REVIEW RESULTS



POST REVIEW: CORRECTIVE ACTION

Submit written
Corrective Action
Plan

Remedy non-
compliance

Must be sustainable

Adhere to
timeframes

CORRECTIVE ACTION – WHAT NOW?

Review the report upon receipt, including the Report of Findings.

Contact the Administrative Review Specialists with questions about the required corrective action

Develop a plan to address areas of corrective action

Begin immediately on Corrective Actions

CORRECTIVE ACTION – REPORT OF FINDINGS

Continuing Education – Read the requirements of the required continuing education....Written procedures, Agenda, Sign in Rosters, etc.

Written Assurances – On district letterhead, dated, and signed

Financial Repayments – Copies of a check or journal entry.

Procurement – Approved Board Procurement Plan or addendum to Invitation for Bid (IFB).

Production Records – Does it say submit one week of breakfast or lunch production records.

Recipes – Copies of Recipes

CORRECTIVE ACTION – SUBMITTING TO ADMINISTRATIVE REVIEW SPECIALIST

- Submit Corrective Action by email (zip file) or traceable mail.
- Organize the information – If in an email, submit documentation for each identified area in a file. If by mail, use a cover sheet or folders to separate information.
- The Administrative Review Specialist will acknowledge receipt
- You will be notified if additional information is needed

POST REVIEW: CLOSURE

- Corrective Action Plans meets program compliance
- Closure letter issued



OFF SITE DATA ENTRY



OFFSITE DATA ENTRY IN SCHOOL NUTRITION TECHNOLOGY SYSTEM

- You will receive a detailed email containing attachments to walk you through the process of completing the offsite questions. The email will contain the date the offsite is open for you to complete the information.
- The person completing the information must have Application Rights.
- Information **MUST** be completed at least 3 weeks prior to the start of your review.
- Please enter comments into the comment boxes, just don't answer questions as "Yes" or "No".

Let's walk through the process now with step by step instructions.

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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/ad-3027.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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