

Chapter 24: Administrative Reviews

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Background

The Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger-Free Kids Act of 2010 (HHFKA), instructed the U. S. Department of Agriculture (USDA) to develop a unified accountability system designed to ensure that participating school food authorities (SFAs) comply with the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. Reviews conducted by the South Carolina Department of Education (SCDE) are based on USDA regulations (7-CFR-210.18) and updated policy guidance effective July 1, 2013.

Goals of the Administrative Review (AR)

The Administrative Review (AR) is designed to measure **minimum** compliance with federal and state administrative program requirements to determine whether:

- Free and reduced-price meal benefits are properly provided;
- Accurate meal counts are taken at the point of service;
- Complete, reimbursable meals are being offered;
- Food safety plan guidelines are being followed; and
- Wellness policies and state K-5 nutrition standards are being followed.

The Review Process

Selection of Review Sites

ARs are conducted by SCDE in all school districts, residential child care institutions, and private and parochial schools that participate in the National School Lunch Program at least once every three years. The review schedule is available to the public. Approximately 50-60 ARs are conducted by SCDE staff each school year. Generally, ARs are conducted at the same school food authority (SFA) in the same school year. For districts, the number of review sites is based on the number of schools. Specific schools are then selected based on USDA free participation criteria. If no schools meet the USDA criteria, SCDE may use other selection criteria.

Review Period

The review period for the AR and follow-up reviews must cover the most recent month for which a claim for reimbursement was submitted, provided that the claim for reimbursement covers at least 10 operating days.

Pre-Visit Procedures and the Off-Site Assessment

The first step in the Administrative Review Process is to contact the SFA's superintendent and food service director and send a confirmation/introductory letter. The letter must advise the SFA of the upcoming review.

Next, the SFA, with assistance from the SA during and after the Pre Conference, will complete the *Off-Site Assessment Tool* prior to the on-site portion of the Administrative Review. The data collected must be current during the year of the scheduled review and reflective of the current school year.

Entrance Conference

An entrance conference of the AR should be conducted by the SA Reviewer with the SFA staff (e.g., Food Service Director, Business Manager, and Superintendent). The SA Reviewer should discuss the results of the *Off-site Assessment Tool*, explain review areas to be covered, and inform the SFA which schools it will review.

During the On-Site Review

The AR reviewer(s) will check the records at the SFA's office and will also examine paperwork and observe practices at each site to be reviewed. For a list of records they will review, refer to the Resources and Documentation Required section provided in this chapter.

The AR reviewer must complete all modules of the *On-Site Assessment Tool* in order to fully evaluate the SFA's compliance with all program requirements. This includes an examination of:

- The SFA's free and reduced-price certification
- Meal Service – to ensure the school(s) and SFA procedures yield accurate meal counts and claims for reimbursement, and to ensure the school's meal service complies with requirements
- General Areas – to ensure all other program areas comply with program requirements

The Exit Conference

An exit conference must be conducted at the conclusion of the on-site portion of the AR. The purpose of the exit conference is to notify SFA staff of any program findings, extent of the findings, and the establishment of an agreed-upon Corrective Action Plan to correct the findings within a timeframe. An Administrative Review Report will be sent to document compliance, highlight the SFA's strengths, and outline areas in need of improvement. In the spirit of continuous improvement, SCDE may offer recommendations on ways to redesign a particular process and/or enhance the quality of meals to increase overall participation and operational efficiency.

Review Findings and Follow-up Reviews

Financial adjustments will be calculated for errors, omissions, and/or discrepancies in paperwork and/or critical procedures including the following:

- **All meal application approval errors.** In addition, if an application is approved correctly but incorrect benefits are being claimed, fiscal action may be necessary.
- **Meal counting and claiming errors.** This includes meal count consolidation errors and meal claim errors.
- **Menu errors.**

Corrective action may be required for additional findings. In some cases, a corrective action and technical assistance plan may include a follow-up review.

Review of the Reviews

All AR files are subject to a peer review to ensure that all information is accurate and appropriate follow-up action has been accomplished. Performance data from all ARs are then consolidated in an annual statewide data report for submission to USDA. All AR documentation is subject to review during a state-level USDA Management Evaluation.

The Timeline

Point in Process	Description of Action
Beginning of Each School Year	SCDE establishes a tentative review schedule based on a 3-year statewide review cycle.
4-6 Weeks Before Review	SCDE will work with the Child Nutrition Director (CNP) to complete the <i>Off-site Assessment Tool</i> . Access to the Off-site will be granted to the SFA at least ten (10) weeks prior to the On-site review. SCDE will confirm dates with CNP Director. A notification letter is then sent to superintendent with review dates, review month, and number of review sites.
Actual Review	Reviewers hold entrance conference with superintendent (or designee) and CNP director. Reviewers spend approximately one day per review site, including review of district/main office paperwork. An exit conference is held with superintendent (or designee) and CNP director.
Final Report	A final report is issued by SCDE approximately 30-60 days after review.
Appeal Process	SFAs may appeal adverse administrative and/or fiscal action after receipt (via Certified Mail) of the final report within the designated timeframe.

a The actual time may vary based on the number of reviewers, number of sites reviewed, geographical proximity of schools to the district/main office, number and length of lunch periods, and number of applications.

b If adverse findings are identified, confirmation of corrective action, a follow-up review, and/or calculation of fiscal penalties may delay the issuance of a final report.

How to Prepare for an AR

Resources and Documentation Required

In order to accurately determine whether or not requirements are being met, the reviewer must check records both at the SFA's district/main office and at the site(s) being reviewed. The reviewer will need access to a private work area at the district/main office where confidential paperwork can be reviewed. Prior to the review, written driving directions to the district/main office and to the review site(s) will also be needed.

All documentation listed below should be uploaded into SCAPS prior to the Off-site assistance by the SA-

- Operating calendar for the current school year;
- SFA annual onsite monitoring forms for all reviewed schools/sites;
- Benefit issuance document (POS or manual roster) for review month

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- Menus and production records for reviewed schools/sites for the review month, to include breakfast, lunch and afterschool snacks;
- Six Cents Certification Worksheet and/or other nutrient analysis for the review week (if required as a result of findings in the offsite review component);
- Standardized recipes (If Ed. Associate deems it necessary);
- SFA afterschool snack program monitoring forms for all reviewed schools/sites;
- Professional Standard staff training tracking method;
- Paid Lunch Equity Tool;
- Non Program Revenue Calculator;
- Charge Policy;
- Documentation of outreach efforts for breakfast and summer feeding programs;
- Student and parent involvement records for all reviewed schools/sites;
- Updated Direct Certification lists (run match report from Member Center DC software) and all local documentation for other children identified as being in SNAP/TANF households;
- Current year certified list of McKinney-Vento eligible homeless and runaway students;
- Current year certified list of Migrant Education Program (MEP) eligible students;
- Community Eligible Provision (CEP) source documentation to support ISP data;
- Most current FNS-742 Verification Summary, to include all supporting documentation;
- Source documents supporting the SFA's total reimbursement claim for review month;
- Edit check reports for review month at all reviewed schools/sites;
- Source documents for meal counts at reviewed schools during the onsite visitation;
- Discrimination complaint procedures for students and parents;
- Annual training records for child nutrition program staff on civil rights requirements and complaint procedures, to include sign-in sheet and agenda;
- Two most recent DHEC inspections for reviewed schools/sites or letters requesting the inspections;
- Documentation showing that racial/ethnic data is collected (for non-Power School users);
- Current wellness policy with committee roster.

In addition to the above documentation, the following should be ready and available **for each of the review sites**:

- Meal applications (including withdrawn, temporary, and denied);
- Serving times for breakfast, lunch, and snacks (if applicable).

AR Self-Assessment Checklist

The Administrative Review (AR) Self-Assessment Checklist, which is provided on the following pages, may be used by the SFA to evaluate its program at any time but will be particularly helpful when preparing for an AR. For additional information and guidance, contact the Office of Nutrition Programs at (803) 734-8188.

Administrative Review Self-Assessment Checklist for SFAs

	Item	Action Taken
Access and Reimbursement		
Eligibility and Direct Certification	Were all selected applications correctly approved?	
	Are the correct income eligibility guidelines used to certify applications?	
	Are the correct conversion factors used when processing applications that indicate more than one income frequency?	
	Are households correctly notified of eligibility consistent with FNS requirements?	
	Is household notification of denied benefits consistent with FNS requirements?	
	Does the direct certification list utilized by the SFA... <ul style="list-style-type: none"> a. Contain the correct information for direct certification? b. Come from the proper agency (FNS, TANF, FDPIR, foster, homeless, runaway, migrant, Head Start, Even Start)? 	
	Does the SFA perform Direct Certification matches according to the required timeframes?	
	What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits?	
	For RCCIs with NO day students and no applications on-file, does the SFA have the correct eligibility documentation available for residential students?	

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Eligibility and Direct Certification (Cont'd)	Are free and reduced price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memo SP45-2012?	
	If the SFA is a Residential Child Care Institution (RCCI), are there any day students?	
	If the SFA has an electronic application approval system: <ul style="list-style-type: none"> a. How are records maintained and for how long? b. What are the back-up procedures to the electronic-based approval system? 	
	How long does the applications approval take from the date the SFA receives the application from the household?	
	Within the SFA, who has access to the applications within the system? (Names and/or position titles)	
Benefit Issuance	At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	
	Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	
	Does the benefit issuance system identify how eligibility was determined? (e.g., through application, direct certification, etc.)	
	Did the SFA update the benefit issuance document(s) timely and accurately, including those students that are new, transferred or withdrawn?	

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Benefit Issuance: Manual Systems	For Manual Systems: If number sheets and coded rosters are used, did the SFA/school document changes in student eligibility/enrollment throughout the month?	
	Did the SFA update benefit issuance documents timely and accurately upon receipt of Direct Certification updates?	
	Did the SFA extend benefits to students living in a household that is receiving SNAP, TANF, or FDPIR benefits?	
	If any family declined or requested a lower level of benefits, were benefits changed on the Benefit Issuance document?	
	Who has access to the benefit issuance system and/or documentation? (Names and/or position titles)	
	How are eligibility determinations transferred to the benefit issuance document?	
	How are benefit issuance document(s) transferred to the point of service system?	
	How are eligibility status updates made to the point of service benefit issuance document(s)?	
	How frequently are updates made to the point of service benefit issuance document(s)?	
	Does the benefit Issuance document indicate the date changes were made in the system?	
	How and when are the following changes made to the point of service benefit issuance document: <ul style="list-style-type: none"> • new students • transfer students • withdrawn students 30 day carryover of prior eligibility	
	Is there a back-up system for updating benefit issuance document(s)?	

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Verification	Do the verified applications on file match the number reported on the most recent FNS-742?	
	Did the SFA choose the correct verification sample size?	
	Did the SFA verify the correct number of applications based on their verification sample size?	
	Has the SFA completed the SA's verification training?	
	Does the SFA use an electronic system to identify error-prone applications?	
	<p>If confirmation reviews were required,</p> <ul style="list-style-type: none"> a. Is documentation demonstrating that a confirmation review took place on file at the SFA? b. Did the SFA follow the required procedures if the confirmation review did not validate the original determination? 	
	<p>Based on the review of verified applications:</p> <ul style="list-style-type: none"> a. Were the applications subject to verification properly selected in accordance with the sample size option used (i.e., error prone)? b. If the SFA chose to replace applications selected for verification, was it done correctly and limited to 5% of the applications selected? c. Were all applications selected for review verified correctly? 	
	Did the SFA attempt to directly verify selected applications?	
	Does the SFA's verification notification letter include all required information?	
	Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	

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Verification (Cont'd)	If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	
	<p>If a student's eligibility changed due to verification,</p> <ul style="list-style-type: none"> a. Did the SFA make updates to the eligibility status to benefit issuance list? b. Were benefits increased no later than 3 operating days and decreased no later than 10 operating days from the final decision? 	
	Did the SFA complete verification by November 15? If not, did the SFA get SA approval for an extension until December 15?	
Meal Counting and Claiming	Is the SFA following their approved SFA-SA Agreement/application (including POS)?	
	Does the SFA use an electronic or manual system to count and consolidate reimbursable meals?	
	Does the SFA have a backup system to their primary meal counting and claiming system should the primary system fail/not operate?	
	How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	
	Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	
	Does the school have separate dining areas, meal service times, or serving lines based on a student's eligibility status?	
Meal Counting and Claiming (Cont'd)	Does the school limit choice of reimbursable meals based on a student's eligibility status?	

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	Does the school use different mediums of exchange based on eligibility status?	
	Does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	
	On the day of review, are excessive overrides used at the POS?	
	At the end of meal service, how does the SFA obtain the daily meal counts by category from each school's point(s) of service?	
	What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	
	Does the SFA consolidate the Claim for Reimbursement?	
	Are meal counts automatically consolidated? a. If YES, does the software program contain edits and internal controls? b. If NO, when and how are edit checks and internal controls completed?	
	Are meal count totals by category combined and recorded correctly?	
	Were the counts from the non-reviewed schools for the review period correctly consolidated and claimed by the SFA?	
	Have alternate points of service been approved by the SA?	
	If a school has more than one meal service line, how does the point of service system prevent duplicate or second meals from being claimed?	
Meal Counting and Claiming (Cont'd)	At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?	

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	Are daily edit checks conducted at the site level?	
	Were there any days when the free, reduced price or paid meal counts exceeded the number of free, reduced price, or paid eligible students?	
	Were there any days when the free, reduced price, or paid <u>lunch</u> counts exceeded the number of attendance adjusted eligible students?	
	Were there patterns in the free, reduced or paid meal counts which appear questionable?	
Nutritional Quality / Meal Pattern		
Meal Components and Quantities	<p>Were all required meal components available on every reimbursable meal service line to all participating students:</p> <ul style="list-style-type: none"> a. Prior to the beginning of meal service? b. During the meal service? 	
	Did all meals observed for the day of review counted for reimbursement contain all of the required meal components?	
	Do portion sizes meet the minimum amounts per meal pattern requirements and planned menu for the day of review?	
	Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? If milk substitutions are made, are they allowable?	
	For NSLP , are the minimum daily requirements of grains/breads, meat/meat alternate, fruits, and vegetables met for the age/grade group being served?	
Meal Components and Quantities (Cont'd)	For SBP , are the minimum daily requirements of grains/breads, fruits met for the age/grade group being served?	

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	If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	
	Has the school complied with the planned menu for the day of review? And, if changes are being made to the planned menu, are the changes acceptable substitutions?	
	Did all observed meals during the review period (production records and other supporting documentation) indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students?	
	Do portion sizes meet the minimum amounts per meal pattern requirements and planned menu for the review period?	
	Did the school comply with the planned menu for the review period? And if changes are being made to the planned menu, are the changes acceptable substitutions?	
Offer versus Serve	Is Offer vs. Serve being implemented properly at the reviewed school sites?	
	Has the cafeteria staff been trained on Offer vs. Serve?	
	Is there signage explaining what constitutes a reimbursable meal to students?	
Dietary Specifications and Nutrient Analysis	Based on the targeted menu review, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	
Dietary Specifications and Nutrient Analysis (Cont'd)	Is the targeted menu review site in compliance with the meal pattern requirements (meal components and quantities)?	

<p>Dietary Specifications and Nutrient Analysis (Cont'd)</p>	<p>Did the school/SFA provide the following documentation/materials needed to complete/validate the nutrient analysis? Are the necessary materials available?</p> <ol style="list-style-type: none"> a. Menus <ul style="list-style-type: none"> • The reviewer should conduct a weighted nutrient analysis based on meals offered for each USDA established age/grade group and menu type offered at lunch and breakfast. b. Production records include all required information for each age/grade group and menu type. <ul style="list-style-type: none"> • Production records (including salad bar/theme bar production records) must list all food or menu items offered as part of the reimbursable meal. Additional items such as condiments, gelatin, butter, must also be included. Portion sizes, total food quantity used to prepare each menu item or food item, and leftovers must be recorded. c. Number of a la carte sales, adult, and “other” meals differentiated on production records <ul style="list-style-type: none"> • If the same food items are used for reimbursable meals, a la carte sales and/or “other” meals (e.g., adult meals, meals for special diets), production records differentiate the number of menu items planned for each type of meal, or for a la carte sales. d. Standardized recipes include preparation instructions, portion sizes and yield used in the menus for the period of evaluation. e. Nutrition information is available for commercially prepared foods (e.g., Nutrition Facts Labels or Manufacturer’s Data Submission Forms). f. Food product descriptions/specifications indicate the specific form of the foods used 	
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	<p>(e.g., canned in light syrup, frozen, no added salt, 1 % low-fat milk).</p> <p>g. Crediting Information is available.</p> <ul style="list-style-type: none"> • CN labels are useful because they give information on creditable food items for identifying a food-based reimbursable meal and help to identify specific commercially prepared foods in the CN Database. However, CN labels do not provide nutrient information for data input when conducting a nutrient analysis. 	
	<p>Was the nutrient analysis software:</p> <p>a. USDA approved?</p> <p>b. Using most recent version of CN database?</p>	
	<p>What credentials, qualifications, and/or training, does menu planner have?</p>	
	<p>Were the appropriate Age/Grade groups used?</p>	
	<p>Was a separate analysis completed for breakfast and lunch, each age/grade group, and each menu type?</p>	
	<p>Does the method used for the nutrient analysis yield a correct weighted nutrient analysis?</p>	
	<p>Were all menu and food items, condiments, and foods of minimal nutritional value served as part of a menu item, included in the nutrient analysis?</p>	
	<p>Were recipes entered using the “yield factor method”?</p>	
	<p>Did the SFA/school reanalyze menus based on changes in student selections and participation?</p>	

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Dietary Specifications and Nutrient Analysis (Cont'd)	Are menus being reanalyzed based on changes in purchased products?	
	Did the SFA/school input nutrient data correctly for: a. Local or USDA modified recipes? b. Food items not in the database?	
Resource Management		
Nonprofit School Food Service and Net Cash Resources	Did the SFA have any financial findings related to the child nutrition programs on previous administrative reviews or audits within the past three years?	
	Did the SFA conduct a year-end review of total revenues and expenses to determine the school food service nonprofit status?	
	Did the SFA identify year-end expenses in excess of revenues?	
	Is the SFA compliant with net cash resources requirements in 7 CFR 210?	
	If the SFA had excess revenues at the end of the year, were surplus funds transferred out of the school food service account to support other operations?	
	Do general expenses appear to be reasonable, necessary and allocable?	
	Do the recorded expenditures represent an activity or function that is recognized as reasonable and necessary for the operations of the programs?	
Paid Lunch Equity		
	Did the SFA correctly determine the paid lunch pricing?	
	Did the SFA increase its paid lunch prices if the Paid Lunch Equity tool indicated an increase in the paid lunch price was required?	

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Paid Lunch Equity (Cont'd)	Did the SFA use non-Federal funds to support its paid lunch prices? And if yes, were the sources allowable and appropriately recorded in the nonprofit school food service account?	
	Did the SFA submit its most frequently charged paid lunch prices to the SA?	
Non-Program Foods	Was the SFA's proportion of total revenue from the sale of non-program foods to the total revenue of the school food service account equal to or greater than the proportion of total food costs associated with obtaining non-program foods to the total costs associated with obtaining program and non-program foods from the account?	
	If the SFA does not separate its program food costs from its non-program food expenses, does the SFA have a sufficient process in place to determine if revenue from non-program foods is equal to or exceeds non-program food costs?	
	Did all revenue from non-program foods accrue to the SFA's nonprofit school food service account?	
	Does the SFA keep sufficient records to document its compliance with 7 CFR 210.15(b)(7)?	
Adult Meals	Are breakfasts and lunches served to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) is sufficient to cover the overall cost of the lunch?	
Indirect Costs	Did the SFA obtain approved indirect cost rates from the State Education Agency (SEA)?	

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Indirect Costs (Cont'd)	Did the SFA charge the school food service account for indirect costs?	
	Did the SFA apply the indirect cost rate to the correct direct cost base?	
	Did the LEA charge indirect costs at the State Agency's approved rate?	
	Are school food service accounts charged indirect costs consistently across the SFA?	
	Is the SFAs charged indirect costs that were previously paid from the general fund in previous years?	
	Is the SFAs account not charged directly for expenditures that are included in the indirect cost pool (double dipping)?	
	Does the SFA have documentation to support the indirect cost charged to the school food service account?	
USDA Foods	Does documentation demonstrate the nonprofit school food service has received the full value of USDA Foods (brown box and any processed finished products)?	
	Does the SFA provide for proper storage and use of USDA Foods?	
	Based on the SA review of records, did the SFA receive the full value pass through (rebates, discounts, credits or net off invoice) it was entitled to?	
	Does the School Food Authority receive its USDA Foods from a purchasing agency, cooperative or distributor?	
	Does the School Food Authority or School Food Authority's purchasing agency or cooperative divert USDA Foods for processing?	

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	Does the School Food Authority have a Food Service Management Company contract for food service and purchasing?	
General Program Compliance		
Civil Rights	What is the non-discrimination statement used for appropriate Program materials (please provide exact language)?	
Civil Rights (Cont'd)	What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs?	
	Has the School Food Authority received any written or verbal complaints alleging discrimination in FNS Programs in the current or prior school year?	
	How are students with special dietary needs accommodated?	
	When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e. cafeteria staff, F/R application approval staff) and their supervisors?	
	Who attended these trainings?	
	What topics were covered by the training?	
	How does the SFA collect racial/ethnic data?	
	How often is this information collected?	
	Are denied applications disproportionately composed of minority applications?	
	Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits?	

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	Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination?	
Competitive Food Services	Are any foods of minimal nutritional value available in any food service area during any of the meal periods?	
Competitive Food Services (Cont'd)	<p>Is the school in compliance with applicable competitive food sales policies and regulations?</p> <ul style="list-style-type: none"> a. All food and beverage sales available on school premises during or before the established meal times are operated through the Child Nutrition Program. b. All receipts from food and beverage sales accrue to the Child Nutrition account. c. All income from the food service is used for the school's non-profit lunch and breakfast program. 	
	Are other food and beverage sales on campus compliant with NC General Statute 115C-264?	
Water	Is free potable water available to program participants in each lunch meal service location(s)?	
SFA On-Site Monitoring	How does the SFA ensure that all schools are meeting program requirements?	
	Were the on-site reviews for all selected sites completed prior to February 1 for LEAs and by Nov 1 and April 1 for non-public schools, Charters and RCCIs?	
	Were areas requiring corrective action identified?	
	Does documentation indicate that corrective action as a result of on-site monitoring was successful?	
Local School Wellness Policy	How does the public know about the Local School Wellness Policy?	

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	When and how does the review and update the Local School Wellness Policy occur?	
	Who is involved in reviewing and updating the Local School Wellness Policy?	
	What is their relationship with the SFA?	
Local School Wellness Policy (Cont'd)	How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	
	Has an assessment on the implementation of the Local School Wellness Policy occurred during the school year?	
	How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy?	
Food Safety	Does the written food safety plan contain the required elements?	
	Was a copy of the written food safety plan available at each school?	
	Have two (2) food safety inspections occurred in each site during the current school year?	
	Were two inspections received in the previous school year? If no, does the SFA have documentation to indicate that the SFA requested two (2) inspections in the current school year from the applicable agency?	
	Is the most recent food safety inspection report posted in a publicly visible location?	
	Were Hazard Analysis Critical Control Points (HACCP) principle violations observed?	

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	Were selected temperature logs available for review?	
	Were on-site (or off-site, if observed) storage violations observed?	
Reporting and Recordkeeping	Are reports submitted to the State Agency as required?	
	Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	
School Breakfast and Summer Food Service Program Outreach	How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning, of the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	
	How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	
Procurement		
<i>Procurement Plan:</i>	<p>Written procurement plan is in place and approved by Board of Education/Governing Board and includes:</p> <ul style="list-style-type: none"> • Specifies authorized purchaser • Procurement method to be used (quotes, IFB, RFP) including procedures for each method • Award method to be used (i.e., line item, bottom line) • Advertisement procedures • How vendor is to be notified of award /non-award • Code of ethics/conflict of interest policy 	
<i>Procurement Procedures:</i>	Procurement activities are in compliance with Federal regulations, State policies and procedures and local policies and procedures	
	Competition was sought for ALL purchases (goods and services) made with Child Nutrition funds	

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	Procurement activities are consistent with the approved Procurement Plan	
	Correct purchasing method was used for purchases at or above the formal bid threshold limit	
<i>Procurement Procedures: (Cont'd)</i>	<p>Letter of invitation is issued and includes:</p> <ul style="list-style-type: none"> • Intent of procurement activity • Contract time period • Bid submission procedures • Pre-bid/proposal meeting • Bid opening date/time/location • Contact information • Civil Rights Statement 	
<i>Invitation for Bid (IFB) and/or Request for Proposal (RFP):</i>	<p>Terms and conditions are included with IFB/RFP and include:</p> <ul style="list-style-type: none"> • Certification regarding disclosure of lobbying (\$100,000+) • Debarment/suspension certification form (\$25,000+) • Non-collusion statement • Assurance of ethical practices • Escalation/de-escalation clause • Price determination statement (fixed, fixed w/ price adj., etc.) • Roll-over clause • Buy American statement • Bid protest procedures • Remedy for non-performance termination of contract • HUB statement to involve minority business where possible • "Equal Employment Opportunity" compliance statement (\$10,000+) • Energy Policy and Conservation Act statement • Clean Air/Water Act statement (\$100,000+) • Civil Rights Act statement • Record retention and record access requirements (are records maintained for 3 years from final payment of contract and/or renewal?) • Method of shipment/delivery requirements 	

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	<ul style="list-style-type: none"> • Method of payment, invoices, statements, etc. • Purchase instrument to be used and how vendor will receive • Bid certification form • Lunsford Act Requirements 	
<i>Bid Specifications:</i>	<p>Bid specifications are in writing and include:</p> <ul style="list-style-type: none"> • Product specifications (approved brand and/or equal) • Quantity • Quality • Packaging • Pricing (unit and extended) • Substitutions and/or deviations 	
<i>Procurement Documentation and Records:</i>	<ul style="list-style-type: none"> • All IFB/RFP/Quote w/ appropriate documentation and signatures maintained (as listed above) • Comparison charts and reason for award documentation • Record of public bid openings • Copies of award/non-award letters • Copies of advertisements • Determination of correct procurement method used • Evaluation of escalation/de-escalation clause implemented correctly • Evaluation/documentation of negotiations/changes to original contract • Do procurement activities agree w/ approved procurement plan • Records retention requirements (3 years + current school year from final payment and/or renewal) • Non-competitive purchases (sole source, emergency, etc.) are appropriately documented and have received approval from State Agency or governing board prior to award, including purchases through means of <i>piggybacking</i> onto another district's IFB • Invoices/payments for items purchased with CN funds 	

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	<ul style="list-style-type: none"> Have there been any contractor claims or breach of contract from vendors 	
Other Federal Program Reviews		
Afterschool Snack Program	Is documentation maintained that the site is located in an area eligible school in which 50% or more of the enrolled students are certified eligible for F/R price meals?	
	Is documentation maintained of F/R price eligibility for each student that receives a free or reduced price snack?	
	Are point-of-service snack counts by student/benefit category maintained?	
	Are snacks being properly counted and claimed?	
	<p>From reviewing production records for a minimum of 5 days from the review period are:</p> <ol style="list-style-type: none"> Production records are completed daily and maintained for a minimum of 3 years? Do production records list each meal component and reflect that the planned portion sizes meet the meal pattern component requirements? Does it appear that each snack claimed for reimbursement met the 2 component per student requirements? 	
	Has the program been monitored within the first 4 weeks of operation each year?	
	Does the snack program conduct acceptable education or enrichment activities before, during or after the snack meal service?	
	Are snacks properly prepared, held, served, and stored within proper food safety practices?	

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	Is the USDA/FNS approved non-discrimination poster prominently displayed and visible to program participants?	
Seamless Summer Option	Is the SFA operating any sites that were not approved?	
	Have there been any changes in the dates of operation from those approved?	
	Does the SFA have an adequate system for documenting the number of meals served under the SSO separately from those served at non-SSO sites during the same claim period?	
	Has the SFA reviewed all SSO sites at least once during each site's operation?	
	Did the SFA advertise the availability and location of free meals at all of its area eligible sites to the community? And, did all advertising materials used contain the required non-discrimination statement? Meal Service Times?	
	Does the site have an academic summer school? If yes, does the academic summer school participate under the SSO? If yes, was the community made aware of the availability of meals under the SSO?	
	Was proper documentation for area eligibility determined correctly and kept on file?	
	Were all meals served and claimed for reimbursement served only to eligible participants?	
	Were all required meal components available on every reimbursable meal service line to all participating students? a. Prior to the beginning of meal service? b. During the meal service?	

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	Did all observed meals claimed for reimbursement contain the required number of components at the point of service?	
Seamless Summer Option (Cont'd)	Do portion sizes appear to meet the minimum quantity requirements as defined by the menu planner?	
	Are the minimum daily and weekly requirements of grains/breads, meat/meat alternate, fruits, and vegetables met for the age/grade group being served?	
	Was a variety of fluid milk throughout the serving period on all serving lines?	
	Is Offer versus Serve properly implemented?	
	Does the meal counting system produce an accurate count of reimbursable meals?	
	Did the site provide a media release and/or promotional material to serviced areas?	
	Does the system as implemented prevent overt identification of children receiving free meal benefits?	
	Do production records, nutrient analysis and/or other supporting meal documentation for the five operating days prior to the meal observation indicate that required meal components were available?	
	Was an on-site review conducted by the SFA at least once during the site's operation?	
	Is a USDA/FNS approved poster displayed in a prominent place and visible to recipients?	
	Are bilingual services (translators and materials) available for the Limited English Proficiency (LEP) population?	

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	Are Program benefits made available and provided to all children without discrimination on the basis of their race, color, national origin, age, disability, sex, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program?	
Seamless Summer Option (Cont'd)	Is a food safety program in place?	
	Is free potable water provided to program participants in each lunch meal service location(s)?	
Fresh Fruit and Vegetable Program	Is the school on track to spend no more than 10% of its total grant on administrative costs?	
	Did the cost documentation provided support the school's FFVP claim for reimbursement?	
	Is the cost documentation for allowable FFVP costs?	
	Is the FFVP offered during the school day, but outside the meal service times of the NSLP and/or SBP?	
	Is the FFVP widely publicized within the school?	
	Were any of the following unallowable products offered during the FFVP meal service: frozen, canned, and other types of processed fruits/vegetables; fruit/vegetable juice, nuts, cottage cheese, trail mix, fruit/vegetable pizza, smoothies, fruit strips, fruit drops, fruit leather, jellied fruit, or carbonated fruit?	
	Did the school choose to offer dip with the day's offering? If YES, was it fat-free or low-fat, no greater than 2 Tablespoons, and provided for vegetables only?	
	Is a cooked vegetable offered on day of review? If yes, is it included as part of a nutrition education lesson?	

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	Is this the only offering of a cooked vegetable this week?	
Fresh Fruit and Vegetable Program (Cont'd)	Are the only adults provided with fresh fruits and vegetables teachers who are in the classroom with students during the FFVP meal service?	
	Did the FFVP meal service follow HAACP principles and applicable sanitation and health standards?	
Special Milk Program	If the SFA is operating a pricing program, does the purchase price of milk on the most recent claim for reimbursement match the purchase price reflected on invoices? Are reimbursements being used to reduce students' payments?	
	Do the daily milk count records support the most recent claim for reimbursement?	
	Do the milk service counting procedures yield accurate milk counts?	
	Does the school count milk at the point-of-service?	

(Important Note: This checklist is intended to support compliance with Federal and State Regulations consistently throughout the operation of the Child Nutrition Program. It is not intended to prepare a SFA for an Administrative Review. This checklist is not an all-inclusive list of items to be addressed during a review.)