# School Nutrition Programs Administrative Review Checklist

The School Nutrition Programs (SNP) Administrative Review (AR) includes an evaluation of the National School Lunch Program, School Breakfast Program, Seamless Summer Option, Special Milk Program, Afterschool Snack Program, and/or Fresh Fruit and Vegetable Program. The Illinois State Board of Education reviews program records for compliance with state and federal regulations. This checklist assists in preparing for the administrative review which will include an evaluation of records for the current fiscal year unless otherwise noted.

The <u>SNP Administrative Handbook</u> is a helpful resource when you have questions or concerns regarding items in this checklist.

# **Eligibility Documentation**

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	<b>SY21-22:</b> If operating SSO, Household Eligibility Applications (HEAs) are not required. All SFA's must access Direct Certification reports and maintain on file.
	Official Direct Certification reports will be evaluated.
	Documentation of the extension of benefits will be evaluated. Click here for a sample form: Extension of Benefits form
	The Direct Certification Notification Letter will be reviewed. Click here for a sample letter: Direct Certification Notification Letter
	<ul> <li>Income applications must contain the required information:</li> <li>Names of all household members</li> <li>All household income and how frequently received</li> <li>Signature of an adult household member</li> <li>Last four digits of the social security number of the adult household member who signs the application</li> </ul>
	Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP) applications must contain the required information:  • 9-digit case number  • Signature of an adult household member
	_Adequate eligibility for foster children must be on file. Documentation may include:
	<ul> <li>A copy of the current legal document from DCFS, court, or foster care agency.</li> <li>OR</li> </ul>
	<ul> <li>A current Household Eligibility Application which includes:</li> <li>The name of the foster child.</li> <li>Box checked to apply for the foster child or children. More than one foster chimay be included on a single application.</li> <li>The signature of an adult guardian with whom the foster child(ren) resides.</li> </ul>
	Documentation for categorically eligible children must be on file. Children documented as homeless, migrant, runaway, and Head Start are categorically eligible to receive free meals. Click here for a sample form: Categorical Eligibility Documentation form.

Applications must be correctly approved for free and reduced-price meals based on the current USDA income guidelines. Click here for the current guidelines: Fiscal Year

2022 Income Eligibility Guideline

	ritten notification to parents for the denial of applications must be available for view. Click here for a sample letter: <a href="Denial/Approval Notification Letter">Denial/Approval Notification Letter</a>	
Benefit Issuance		
	ne document used to issue each child's eligibility status (free, reduced, or paid) must e available for review.	
Tł	ne district's meal charge policy must be available for review. Info	

## **Verification of Household Eligibility Applications**

**SY21-22:** Annual Verification Letter All SFA's must complete verification. If SFA collected HEA's between July 1, 2021-October 1, 2021, the SFA must verify a percentage of free/reduced applications on file. If SFA did not collect HEA's, the SFA must still complete an abbreviated verification summary report.

\_Verification of applications must be completed, documented, and available for review.

- Adequate number of applications must be verified, and the verification process completed by November 15.
- Direct verification may be completed on selected applications. Steps for direct verification are found on page I-5 of the handbook here.
- The verification notification letter must include all required information. Click here
  for a sample letter: We Must Verify Your Application. There is a template cover
  letter to parents/guardians to explain that SSO is an option this school year and
  meals served under this federal meal program for SY 2021-2022 will remain free
  regardless of the outcome of the Verification process.
- Acceptable documentation must be received from each selected household.
- Summary of verification must be maintained and include the number of applications on file as of October 1, the selection method used, number verified, and results
- Each household must be notified of the results of verification. The termination/reduction notice to households (if applicable) must contain all required information including notification of appeal rights. Click here for a sample letter: We Have Verified Your Application

## **Claim for Reimbursement**

\_\_\_\_Available claim data, by site, for each month must be available for review and include:

- Daily meal counts by category (free, reduced, or paid). If operating SSO, meal counts by category are not required.
- Enrollment
- Number of children eligible for free and reduced-price meals

\_Claim information is checked to ensure:

- No mathematical errors occurred
- Figures are not transposed or copied incorrectly
- Ineligible meals such as adult meals, second meals, and a la carte meals are not claimed
- An accurate number of days are reported for each claim period.

#### **On-Site Reviews**

**SY21-22:** If operating SSO, SFA's should follow the SNP/NSLP monitoring requirements. COVID-19 Child Nutrition Response #94 – Nationwide Waiver of Onsite Monitoring Requirements in the School Meal Programs - Revised - EXTENSION 3 – Waiver allows flexibility for review to be conducted offsite. SFA should maintain COVID-related documentation.

\_\_\_\_\_If the school food authority has more than one feeding site, an on-site review must be conducted and documented at lunch for all sites and at breakfast for 50% of the feeding sites by February 1. The on-site review forms must be available for review. Click here for a sample form: On-site Review form

## **Local Wellness Policy**

A locally developed wellness policy must be in place, contain the required elements,
announced to the public, and re-evaluated periodically. The approved local wellness
policy must be available for review. Click here for guidance on developing the policy:
<u>Local Wellness Policy</u>

\_\_\_\_The local policy must include procedures for reviewing and approving or denying requests for exempted fundraising days.

A Triennial Assessment must be completed at least once every three years to assess compliance with the local wellness policy. Assessment results must be made available to the public.

SY21-22: COVID-19 Child Nutrition Response #98 - Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the NSLP & SBP extends the deadline for sponsors to complete their first triennial assessment by June 30, 2022. A list of SFA's who elected to use this waiver → Triennial Assessment Extension List 2

#### Menus

SY21-22: COVID-19: Child Nutrition Response #90 Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022 SFA's should maintain adequate documentation to support supply chain issues related to COVID-19.

Menus must contain all components/menu items and must meet the daily and weekly requirements. Click here for guidance: Meal Patterns

Production records must contain all components/menu items and must meet the daily and weekly requirements. Click for <a href="Production Records">Production Records</a>. (Select USDA Meal Pattern and Nutrition Standards and scroll under ISBE Resources for Standard Production Record or Production Record with Vegetable Subgroups.)

\_Child Nutrition (CN) labels, school meal equivalents, nutrition fact labels, standardized recipes and/or other crediting documentation must be available to support the nutritional contribution of the food to the meal. Click here for guidance: <a href="TIP Sheet for Processed Product Documentation">TIP Sheet for Processed Product Documentation</a>

If the required meal pattern requirements are not followed, children with life-threatening disabilities require a Physician's Statement for Meal Accommodations. Click here for a sample form: Medical Authority Modified Meal Request
<ul> <li>A request for a milk substitute must be on file for children without a disability.</li> <li>The milk substitution must provide the same key nutrients found in regular cow's milk. Click on the following link and scroll down and click on, "For a child without a disability who is requesting JUST a fluid milk substitution from the meal pattern requirement": <a href="Nutrients Required for Milk Substitutions">Nutrients Required for Milk Substitutions</a></li> </ul>
Meal Service
Adequate food quantities must be prepared and correct portion sizes served.
Each site must offer two fat-free or low-fat (1%) fluid milk choices daily.
Drinking water must be made available to all children.
Meal Count Procedures
Free, reduced-price, and paid meals must be counted, by category, at the point of service. If operating SSO, meal counts are not required by category.
Meals counted for reimbursement must contain the required components or food items
Anonymity of children receiving free and reduced-price meals must be protected.
Offer versus Serve
Signage must be posted.
At lunch, a minimum of three components must be taken. One of the three components must be a minimum of ½ cup fruit or vegetable.
At breakfast, a minimum of four food items must be offered.
At breakfast, a minimum of three food items must be taken. One of the three items must be a minimum of ½ cup fruit or vegetable.
Point of service staff must be trained. Click here for training guidance: Offer versus Serve for K-8; Offer versus Serve 9-12
Food and Beverage Requirements
Foods and beverages sold outside of or in addition to the reimbursable meal must meet Smart Snack standards. These standards apply during the school day anywhere on the school campus/grounds. Click here for <u>A Guide to Smart Snacks in Schools</u> .
Nutrition documentation, such as the Smart Snacks calculator results, Nutrition Facts labels, and product specifications must be on file.
Documentation of exempted fundraiser days for each site must be available for
<ul> <li>review.</li> <li>Grades 8 and below are not allowed exempted fundraiser days.</li> <li>Grades 9-12 are limited to no more than nine exempted fundraiser days per school year.</li> </ul>
All revenue from the sale of any food or beverage to students in the food service areas during the meal periods must accrue to the nonprofit school food service account.

Sanitation		
Two food safety inspections must be conducted each school year. If two inspections have not been conducted, a letter to the local health department requesting the inspection(s) must be on file. Click for a sample letter to request food safety inspections. Scroll down to Food Safety Inspections Requirement. Click on the arrow.		
A copy of the most current review must be posted in a prominent place. Citations must be corrected.		
Each site must have a food safety plan for the preparation and serving of meals based on Hazard Analysis and Critical Control Point (HACCP). Click here for guidance (particularly focus on Food Safety Standard Operating Procedures (SOPs) and Food Safety SOP Resources).		
Food safety plans must apply to any facility or part of a facility where food is prepared, stored, or served for any federally funded child nutrition programs.		
Temperature logs for all cold/hot food items and food storage areas must be available for review. For sample logs, click here, scroll to Food Safety Logs.		
A review of a sample of purchased food items will be evaluated to ensure the Buy American requirements are met.		
Civil Rights		
Denied free and reduced-price applications should not be disproportionately composed of minority groups.		
<ul> <li>Data regarding the target population and beneficiaries of the program, by racial/ethnic category, must be on file.</li> <li>The racial/ethnic data of students receiving free and reduced-price benefits must be compared to the racial/ethnic categories of the total student population to ensure there are no potential participation barriers for any racial/ethnic group.</li> </ul>		
<ul> <li>The following public notification requirements must be fulfilled:</li> <li>USDA-approved poster must be displayed. To request additional posters, contact our office at <a href="mailto:cnp@isbe.net">cnp@isbe.net</a></li> <li>Informational materials must be made available in the appropriate translation, as needed.</li> </ul>		
<ul> <li>Program material must include the nondiscrimination statement and the procedure for filing a complaint.</li> </ul> Decumentation of civil rights training to frontling staff and supervisors must be		
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Program Outreach
Reminders of the availability of the School Breakfast Program must be available for review. These notices may include newsletter articles, emails to families, open house display, etc.
Notification to families of the availability of the Summer Food Service Program must occur. Click here for a sample: Summer Meals Outreach.
For Food Service Directors hired after July 1, 2015, including directors through interna promotions, provide hiring documentation that supports education/experience requirements. Documentation may include college transcripts or resumes.
From last school year, training documentation will be reviewed to determine if all school nutrition directors, managers (head cooks), and staff met the minimum annual training requirements. Click here for guidance: <a href="Guide to Professional Standards in School Nutrition Programs">Guide to Professional Standards in School Nutrition Programs</a>
SY21-22: If operating SSO, SFA's are not required to complete Professional Standards training hours for SY 21-22. Any training hours completed in SY21-22 may be applied to SY 22-23.
Procurement/Purchasing
<ul> <li>If you have not already completed/submitted the following requested in your announcement letter, please complete/submit ASAP. If recently submitted, then have available for the review. For assistance, visit the General Procurement webpage.</li> <li>Code of Conduct</li> <li>District policies and procedures on purchasing (procurement).</li> <li>Vendor Paid List (or General Ledger). A report of vendors paid using the non-profit food service account including total dollar value expenditures.</li> <li>USDA Procurement Tool (Excel spreadsheet)</li> </ul>
Food vendor (those on the vendor paid list) documentation such as solicitations, final contracts and amendments, bids, evaluation and scoring, notification letters, receipts, invoices.
Resource Management
Complete the Resource Management risk assessment tool accessed by the link provided in your announcement letter. This tool determines which areas of RM are evaluated during the review. Resource Management Fact Sheet
The areas of RM include the Nonprofit Food Service Account, the Paid Lunch Equity (PLE) tool, Revenues from Nonprogram Foods and Indirect costs. Click the following links for a fact sheet on each area – Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity (PLE), Revenue from Nonprogram Foods, Indirect Cost
Fresh Fruit and Vegetable Program
Expenditure documentation for any reported cost on the Claim for Reimbursement will be reviewed.

## **Special Milk Program**

\_\_\_The information reported on the Claim for Reimbursement must be supported by adequate documentation.

- Accurately approved Household Eligibility Applications, Direct Certification documentation, extension of benefits documentation, or categorical documentation must be on file for children receiving free milk.
- Monthly milk counts must validate the number of half pints of milk served to eligible children and claimed for reimbursement.
- Dairy receipts must ensure an adequate amount of milk is purchased to support the monthly milk counts.
- The dairy cost reported on the claim must match the purchase price on invoices.

## **Afterschool Snack Program**

SY21-22: COVID-19 Child Nutrition Response #93 – Nationwide Waiver of Area Eligibility in the Afterschool Programs and for Family Daycare Home Providers in the SY 2021-2022 – allows SFA's to claim all NSLP Afterschool Program and CACFP At-Risk Afterschool Snack Program meals and snacks at the free rate.

 _Sites must offer educational or enrichment activities.
 _Area eligible sites must take an accurate daily count of the total number of snacks served.
 _Monthly counts must validate the number of snacks served to eligible children and claimed for reimbursement.
_Menus and production records must be available for review and contain all components.
_Anonymity of children receiving free and reduced-price snacks must be protected.
 On-site reviews must be conducted twice annually for each site participating in the afterschool snack program and documentation must be available for review. Click here for a sample form: <a href="https://example.com/After-School Care Snack Review form">After-School Care Snack Review form</a> .

SY21-22: COVID-19 Child Nutrition Response #94 – Nationwide Waiver of Onsite Monitoring Requirements in the School Meal Programs - Revised - EXTENSION 3 – Waiver allows flexibility for review to be conducted offsite. SFA should maintain COVID-related documentation.

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