DEPARTMENT OF EDUCATION

School Nutrition Programs
Three Step Administrative Review Action Guide

Welcome to the School Nutrition Programs Administrative Review. This action guide provides detailed information on the three steps School Food Authorities (SFAs) need to take **prior to** the on-site administrative review. The Action Guide is subject to revision.

The reviewer may request additional documentation or expand the scope of the documentation timeframe if warranted. SFAs should be prepared to pull additional documentation on-site if necessary.

If the SFA receives catered or vended meals, they must contact the caterer to obtain some of the required documentation.

Jump to specific sections using these links:

Step One: Upload Documents to SharePoint Prior to the On-site Review

Step Two: Answer Operational Questions in Colyar Prior to the On-Site Review

Step Three: Prepare Items to Have Ready for the On-site Review Day

Appendix:

Administrative Review Process

Accessing SharePoint and Colyar

Resources and Colyar Off-site Questions Answer Guide

Terms and Definitions Used Frequently in School Nutrition Programs

Note: The site(s) of review are determined each fall based on U.S. Department of Agriculture (USDA) criteria. The month of review for meal, claim and student roster documentation is usually the latest claim submitted at the time of the on-site review, but the reviewer will communicate the exact month of review approximately 6-8 weeks prior to the on-site review.

- Meal documentation must be provided for the **first five-day week** of the review month.
- The roster of students eligible for free and reduced-price meals must be provided ahead of time as determined by the reviewer so that a sample of student certifications can be selected for review.

The SharePoint Documents and Colyar Questions are due as determined by the reviewer approximately 2-4 weeks prior to the on-site review. These tasks will take a significant amount of time to complete. You will need to gather data from

multiple sources and should work on the tasks concurrently to ensure you meet the deadlines. Missing deadlines may result in program funds being withheld.

Step One: Upload Documents to SharePoint Prior to the On-Site Review

Each SFA is required to upload several documents to SharePoint prior to the administrative review on-site date and answer a series of questions in Colyar. The reviewer provides specific due dates via email.

The Foodservice Contact in Cyber-Linked Interactive Child Nutrition System (CLiCS) will be been granted access to upload files via SharePoint. Only one individual per SFA can receive access. The individual with access should work with others in the SFA to obtain and upload any applicable documentation. The individual with access should be authorized to view student Free and Reduced-price lunch eligibility information.

Vendors are not authorized to access SharePoint, so SFAs will need to obtain documentation from them to upload. Instructions on how to access SharePoint are included in the Appendix.

Upon logging into SharePoint, several levels of folders, documents and links are available to assist the SFA in uploading documentation. Documentation should be uploaded to the appropriate folder.

Tip: The SFA may print pages two through six of this document to use as a checklist. The information is also available as a checklist within each SharePoint folder to guide the SFA as they upload information.

Site Information

☐ The SFA should complete the following information in the *Review Site Information* form in SharePoint under the *Site Info and Agreements* folder. If the review consists of multiple sites of review, the SFA must complete for each site selected for review.

Sponsor to State Agreement and Free and Reduced-Price Policy Statement

☐ The SFA must provide an electronic digitally signed Sponsor to State Agreement that includes selections for the programs the sponsor intends to participate in. The template and instructions are available in SharePoint under the *Site Info and Agreements* folder.

☐ Submit a [Free and Reduced-Price (FRP) policy statement via survey](link). A link to the survey and a [FRP Policy Statement Reference Guide](link) are also available in SharePoint under the *Site Info and Agreements* folder.

Menu and Food Production Records

☐ Menu for the month of review for:

- All reimbursable meal types (School Breakfast, National School Lunch Program and/or Afterschool Snack Program)
- All menu lines (main line, grab-and-go, salad bar and any field trip/alternate meals) offered at the site(s) of review only.

Note: The week of review is the first five-day week of the review month. The reviewer will discuss this with the SFA.

☐ Food production records for all reimbursable meal types and menu lines for the week of review selected within the month of review.

If the SFA receives catered or vended meals, they must contact the caterer to obtain this documentation.

Recipes and Grain Ingredient Lists

☐ Standardized recipes for all food items with two or more ingredients served during the week of menu review. If a standardized recipe includes a convenience item, the SFA must include the Child Nutrition (CN) label or product formulation statement.

☐ For grain items that the SFA does not have a product formulation statement for, upload the Nutrition Facts panel (including weight per serving and ingredient statement) or product formulation statements for all grain items so that the reviewer can determine whether each grain item is whole grain-rich.

If the SFA receives catered or vended meals, they must contact the caterer to obtain this documentation.

Product Formulation Statements and CN Labels

☐ Official product formulation statements signed on food company letterhead for meat/meat alternate and grain menu items offered during the week of menu review. The USDA Food Buying Guide may be used for crediting in lieu of product formulation statements when applicable.

☐ USDA Child Nutrition labels for all combination meat/meat alternate and grain food items offered during the week of menu review where applicable.

See the [Labels and Menu Documentation Tip sheet for types of acceptable documentation](#).

If the SFA receives catered or vended meals, they must contact the caterer to obtain this documentation.

Free and Reduced-price Student Roster and Applications

If the SFA is operating the Community Eligibility Provision (CEP) at all schools in the district or if they are a Residential Childcare Institution (RCCI) with no day students, they may skip this section.

☐ **Step 1:** The SFA should upload a roster of all actively enrolled students that are approved for free or reduced-price meals from the month of review specified by the reviewer.

- The roster must come **directly** from the point of service system and must be provided in Excel format. If the SFA utilizes a point of service software system, they should download a roster directly from the system in excel format with no manual modifications. If they cannot obtain an excel roster directly from the system, they should contact the software company. They should not manually create a roster if they have a point of service software system.
- The SFA should not include paid eligible students or students not actively enrolled (this may include preschool students if they are not claimed in the School Nutrition Programs).
- The SFA should include all active students in the district, including students at any joint agreement site(s), who have access to meals in the National School Lunch and School Breakfast Program.
- The SFA should include student name, benefit status (free or reduced-price) and eligibility effective date
- The roster can also contain columns for method of certification, grade, date of birth, etc.
- The SFA should not include any duplicate names.

☐ **Step 2:** The reviewer will run a statistically significant sample from the roster, which will determine the student Applications for Educational Benefits that will need to be reviewed. The reviewer will notify the SFA when the roster sample has been added to SharePoint and will then provide next steps.

- If the number of students eligible for free or reduced-price meals is 100 or less, all students must be reviewed. The SFA should upload documents used to make the status determination for all students on the roster.
- A statistical sample will be run for rosters of more than 100 students. The Reviewer will tell the SFA which students have been selected, and the SFA should upload documentation for only those students. If multiple students are listed on one Application for Educational Benefit, the SFA only needs to upload that document once.

Month of Review Claim Reports and Edit Check Documentation

☐ For the month of review at the site(s) of review, the SFA should upload point of service meal count documentation used to prepare the claim for reimbursement for all meal types offered (School Breakfast Program, National School Lunch Program, Afterschool Snack Program, Minnesota Kindergarten Milk Program and Special Milk Program). The SFA should remember to include documentation from each point of service area, including for any field trips that took place during the month of review.

Documentation should be from the point of service in the original form in which the SFA collected the meal counts at each location in the school, (examples: paper checkoff sheets, electronic reports, etc.).

- The SFA should include any additional consolidated meal count documentation (examples: a daily summary of each meal count location, a weekly summary sheet of meal counts by site, etc.)
- If the SFA uses manual daily point of service checklists and does not consolidate them into a monthly summary, the SFA will need to consolidate the manual daily point of service meal counts in the **Meal Counter** for the month of review.

☐ For the School Breakfast and School Lunch Program, the SFA should upload an edit check report for the month of review. If the SFA has a point of service software system, they should contact the company representative to locate the report if they are not currently using the edit check report. The edit check report meal counts should match the monthly summary report meal counts provided above. See statewide attendance factor on the Minnesota Department of Education (MDE) website.

General Program Areas Documentation

Civil Rights and On-Site Monitoring

As applicable, also see: Religious Exemptions under Title IX of the Education Amendments of 1972.

☐ Documentation (agenda and sign in sheet) showing all staff members involved in the School Nutrition Program completed civil rights training in the current school year. If this information is already provided in the professional standards tracker, there is no need to duplicate the data.

☐ A copy or link to the civil rights training used.

☐ The SFA should upload completed on-site monitoring forms for all sites for the current school year. (If the SFA is a single site sponsor they are not required to complete the on-site monitoring for breakfast and lunch).

Local Wellness Policy

☐ Copy of current school year Local Wellness Policy Committee Agendas

☐ Copy of last Local Wellness Policy Triennial Assessment

Smart Snacks

☐ The SFA should complete the Smart Snacks location list in SharePoint to indicate where Smart Snacks items are sold in all locations throughout all reviewed sites for a la carte, vending machines, school stores and fundraisers. Documentation will be requested during the on-site review to determine compliance with a selection of items sold throughout the school buildings. This may require that the SFA coordinate with departments outside of the School Nutrition Programs to obtain the documentation.

Professional Standards and Training

☐ If the SFA has hired a new food service director since the last administrative review, they should complete the Hiring Standards Form and upload it to SharePoint.

☐ Copy of training tracker for all staff involved in the Child Nutrition Programs for the current school year at all sites in the SFA. If the SFA is not using a tracker, a template for a Training Tracker Tool is available on the MDE website.

Food Safety

☐ The SFA should upload copies of the two most recent food safety inspections for every site. Two inspections are required every year for every site.

SNP Afterschool Snack Program

Complete this section only for National School Lunch Program (NSLP) Afterschool Snack Program. If the SFA is operating the At-Risk Afterschool Snack Program through the Child and Adult Care Food Program (CACFP), they should not upload documents.

☐ Snack menu for the month of review from/for the site(s) of review.

☐ Food production records for snacks served during one full week of the month of review at the site(s) of review. Include product labels for any grains served.

☐ Attendance records for the month of review from the site(s) of review.

☐ Point of service meal counts for the month of review from the site(s) of review and any other documentation support of the claim for reimbursement.

☐ Monitoring forms for the site(s) of review (two monitoring visits are required per year, the first within the first four weeks of operation).

Milk Programs (Minnesota Kindergarten and/or Special Milk Programs)

☐ Original daily milk counting form(s) (classroom calendar, etc.) used to count milk at the point of service for site(s) of review during the month of review.

Fresh Fruit and Vegetable Program (nutrition education program for elementary children, NOT referring to the Department of Defense DoD Fresh program or use of commodity entitlement)

Documentation to support the month of review claim for reimbursement:

☐ Produce and supply invoices

☐ Timesheets

☐ Menu and/or snack counts

Step Two: Answer Operational Questions in Colyar

There are several sections of interview questions that must be answered in Colyar. See the appendix for an answer guide for each question.

Step Three: Prepare Items to Have Ready for the On-Site Review Day

The following items and supporting documentation will be needed for review during the on-site review but do not require specific documentation to be uploaded ahead of time.

Denied Applications for Educational Benefits

If a school is operating the Community Eligibility Provision (CEP) or if the SFA is a Residential Childcare Institution (RCCI) with no day students, the SFA may skip this section.

The SFA should have available the Applications for Educational Benefits that were denied during the current school year. The reviewer will select a portion of them for review.

Verification

If all sites are operating the CEP or if the SFA is a RCCI with no day students, they SFA may skip this section.

The SFA should be prepared to discuss the verification process and make the following documentation available during the on-site review:

- Copies of verification letters sent to households
- Any verification tracking forms used to document the process.
- Applications for Educational Benefits that were verified.
- For applications selected for verification, income or case number supporting documentation provided by the household.
- Point of service software system verification reports, if used.

Civil Rights

As applicable, see: [Religious Exemptions under Title IX of the Education Amendments of 1972](#).

- Special diet forms signed by a licensed medical authority for dietary modifications for any students that are receiving meals that do not meet meal pattern requirements due to disabilities that affect the diet.
- Ensure an And Justice for All poster is available in the meal service area(s).

Food Safety, Storage, and Buy American

- Written food safety plan based on the process approach to Hazard Analysis and Critical Control Point (HACCP) principles
- Food safety logs for the month of review for each site of review:
- Food temperature logs (include receiving logs if applicable)

    o If food temperatures are recorded on the food production record, the SFA does not need to provide additional food temperature logs.

- Cooler and freezer temperature logs (walk-ins, standing equipment, milk coolers, etc.)
- Dishwasher temperature logs
- Thermometer accuracy log for all thermometers for the month of review used to temp food. Note: digital thermometers still need to be checked for accuracy.
- Documentation of annual review of food safety plan
- Copy of language included in vendor contracts requiring all foods be Buy American and of domestic origin
- Any follow-up documentation with the vendor for food items that are not domestically produced or manufactured

Smart Snacks

- Have all nutrition facts panel and ingredient statement labels available for all food and beverage items sold including a la carte, vending machines, school stores and fundraisers at the site(s) of review available.
- Inventory of any food-based fundraisers that take place during the school day (midnight before and up to 30 minutes after the end of the school day) at site(s) of review.

Appendix

Administrative Review Process

The administrative review is how a State Agency (SA), which is the MDE, assesses an SFA's administration of the USDA National School Lunch Program, School Breakfast Program and other School Nutrition Programs. The objectives of the Administrative Review are to:

- Determine whether the SFA meets program requirements
- Provide technical assistance
- Secure any needed corrective action and assess fiscal action
- When applicable, recover improperly paid funds

The review scope is set by the USDA for use by all states and territories participating in the School Nutrition Programs.

There are three parts to the administrative review:

Part 1: Off-Site Portion of Review

SFAs will answer questions and provide specific documentation in SharePoint for the off-site section of the review. This will likely require coordination from several staff members in the SFA, such as the food service director/coordinator, business manager and those who approve the Applications for Educational Benefits, complete the verification process, and submit claims for reimbursement into CLiCS. If the SFA utilizes a caterer/vendor or contracts out other aspects of the School Nutrition Programs, information should be gathered from those entities.

Part 2: On-Site Review

The on-site review will occur between October and May. Items included for this part of the review include:

- Collecting documentation for the planned menu
- Observing meal service(s)
- Reviewing food storage and preparation areas
- Following up with food service staff on any items needing clarification or further information

At the end of the on-site review, the SFA will have a comprehensive view of both strengths and areas for improvement in their School Nutrition Program operations.

Part 3: Review Response and Closeout

The reviewer will issue an administrative review report within 30 days of the on-site review. This report will be available in Colyar and requires the SFA to respond with corrective action for findings cited as a result of the review.

Some tips for successfully completing review responses include:

- Respond to every finding in the Colyar system. Site level findings require clicking on the site name toward the bottom of the screen. This will open a new window with additional site level findings.
- Some review findings may have multiple parts that require more than one response. The SFA should ensure that they read the required corrective action carefully so that they are responding to what the reviewer has requested. Thorough answers reduce the chance of the reviewer asking for further information or clarification.

The reviewer may request supplemental information be uploaded to support a corrective action response.

Once all corrective action has been satisfactorily answered and approved and any fiscal action resolved, the SFA will receive a final closeout letter.

Accessing SharePoint and Colyar

Upload a document to a SharePoint library

Video: Adding Documents to a SharePoint library

Add a link in a SharePoint library

SharePoint Libraries Quick Reference Card

Download Colyar Administrative Review Software Access and Off-site Forms Quickstep Card

Resources

Technical assistance is available to assist the SFA in administering the school nutrition program. Resources below are listed by content area.

100: Certification and Benefit Issuance:
MDE Free and Reduced-price Process
MDE Essentials Training: Free and Reduced-price Process
USDA Eligibility Manual for School Meals

200: Verification
MDE Verification
USDA Eligibility Manual for School Meals

300: Meal Counting and Claiming
Minnesota Department of Education Meal Counting
MDE Essentials Training: Counting and Claiming

400: Meal Components and Quantities

MDE Nutritional Quality and Meal Pattern

MDE Essentials Training: Nutritional Quality and Meal Pattern

500: Offer versus Serve

MDE Offer versus Serve

MDE Essentials Training: Nutritional Quality and Meal Pattern

600: Dietary Specifications and Nutrient Analysis

MDE Nutrition and Meal Quality

Menu Planning Software (USDA)

USDA Menu Planner for School Meals

USDA Sodium Reduction Resources

700: Resource Management (completed as a separate review)

800: Civil Rights

Civil Rights Training for School Nutrition Programs

MDE Civil Rights

USDA Civil Rights

MDE Special Dietary Needs

900: SFA On-Site Monitoring

MDE On-site Monitoring

1000: Local Wellness Policy

MDE Local Wellness Policy

USDA Local Wellness Policy

1100: Smart Snacks

MDE Smart Snack

MDE Essentials Training: General Program Areas

USDA Smart Snacks

1200: Professional Standards

MDE Professional Standards

USDA Professional Standards

1300: Water

USDA Water Availability During NSLP Meal Service

1400: Food Safety

MDE Food Safety

USDA Food Safety

Minnesota Department of Health: Certified Food Protection Manager Certification

1600: School Breakfast and SFSP Outreach

[MDE Breakfast Encourages Students to Thrive Promotional Materials](#)

[MDE SFSP Outreach and Promotion](#)

Other Federal Programs

[MDE Other Nutrition Programs for Schools](#)

Colyar Off-Site Questions Answer Guide

Meal Access and Reimbursement

100 Certification and Benefit Issuance

100: Does the SFA meet one of the following criteria: (SFA-wide Special Provision Non-Base Year, RCCI without day students, SFA-wide Community Eligibility Provision).

If the SFA participates in Provision 2 or 3 or the Community Eligibility Provision or is a Residential Child Care Institution without day students, the appropriate box may be checked. If the SFA does not have any of these provisions, check the not applicable (N/A) box.

101: Who is the determining official for certifying household applications?

This is the individual in the SFA who approves the household Applications for Educational Benefits.

102: Does the SFA use an electronic applications approval system or a manual application approval system? Does the SFA use an electronic benefit issuance system or a manual benefit issuance system?

If the SFA only collects paper household Applications for Educational Benefits, select *Manual*. If the SFA collects paper household Applications for Educational Benefits and online applications, select *Combination*. No SFAs will select *Electronic* only.

Benefit issuance is the system used to collect meal counts at the point of service by student eligibility. If the SFA uses a manual checklist, select *Manual*. If the SFA uses an electronic system, plus has procedures in place to collect counts manually in case of computer failure, select *Combination*. No SFAs will select *Electronic* only.

103: 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?

Eligibility status from the previous school year can be carried over for 30 operating days or until a household submits a current Application for Educational Benefits. All students without a carryover or current year application need to be certified for paid meals until documentation is received and approved for free or reduced-price status.

104: If the SFA has an electronic application approval system, answer the below questions. If not, proceed to the next question. How are records maintained and for how long? Describe the backup to the electronic-based approval system. List the method used to obtain household signature.

If the SFA does not have an electronic system that approves Applications for Educational Benefits (either households apply online or the SFA is entering income or case number documentation into a system that determines eligibility), this question may be skipped. Records must be retained and be accessible for three years past the close of the claim for each month. The SFA should have a procedure for secure storage of personal student information. In the case that the electronic application approval system would falter, the SFA should have procedures for backing up the data. Electronic systems also require a method by which the household signature is obtained.

105: How long does the application's approval take from the date the SFA receives the application from the household?

The SFA has 10 operating days to approve household Applications for Educational Benefits from the time they are received. It is recommended that SFAs implement a date received stamp on all applications to ensure timely processing. This also serves as justification for households that may indicate submitting an application earlier than when it actually was, for example, an application that sits in a student locker for several days prior to submission.

106: Within the SFA, who has access to the applications within the system? (Names and/or position titles).

The SFA should only allow access to the Applications for Educational Benefits for those individuals who need to know for the purpose of federal programs. Any additional release of data requires parental consent.

107: When and how are households notified of students' certified eligibility? How are denied households notified?

Households must be notified in writing of the approval or denial of their Application for Education Benefits within 10 operating days of receiving the application.

108: Who is the hearing official?

The hearing official is the individual at the SFA who receives requests from households that object to the determination of their application status. SFAs should have hearing procedures in place that are provided to families who may not agree with the determination of free, reduced-price or paid status. The hearing official must be someone different that the determining official (the individual who approves eligibility statuses).

109: Who at the SFA receives the direct certification documents from the state or local agency and who is responsible for issuing and updating the benefit list?

This is the person at the SFA who receives the direct certification reports from CLiCS and uses it to make or update eligibility determinations for students. The person receiving the information and the person making changes to the free, reduced-price or paid status of students may be different.

SNAP: Supplemental Nutrition Assistance Program (one of the matches on the direct certification report)

TANF: Known as the Minnesota Family Investment Program (MFIP) in Minnesota. It is also one of the matches on the direct certification report.

Medicaid: This is matched on the direct certification report. Students will be matched as Medicaid-Free or Medicaid-Reduced.

FDPIR: Food Distribution Program on Indian Reservations. Often a tribal leader or program director would have information as to what students qualify for FDPIR. It is also one of the matches on the direct certification report.

Homeless: The SFA may have a homeless liaison who makes determinations as to the homelessness status of students. The homeless liaison should provide a list of students with dates of eligibility to the SFA. The liaison should send the information in a way that it is identifiable that they made the determination, for example, through email, signature of forms, etc.

Migrant: The SFA may also have a migrant coordinator who makes determinations as to the migrant status of students. The migrant coordinator should provide a list of students with dates of eligibility to the SFA. The coordinator should send the information in a way that it is identifiable that they made the determination. For example, through email, signature of forms, etc.

Foster children: This is also matched on the direct certification report in CLiCS.

Head Start: The SFA should answer N/A as head start students in most programs should be claimed through the CACFP.

110: Does the SFA use the direct certification notification letter provided by the State agency? If no, does the letter contain all required information and is it approved by the State agency?

The [template direct certification notification letters](#) are available on the MDE website. If an SFA chooses to use their own letter, it must explain that the identified child is eligible for free or reduced-price benefits without further application, clarify eligibility that meal benefits extend to all school-aged children in the household (if based on MFIP, SNAP, Medicaid or FDPIR), and must inform households of how to notify the SFA of any additional school-aged children in the household not listed on the notification. Also, the notification must explain how the household can notify the SFA if the household does not wish to receive meal benefits for directly certified children.

111: 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 (MFIP) or FDPIR benefits?

Eligibility should be extended to all members of the household in which one person receives benefits for those programs. It is best practice to identify these students as direct certification-extension, so as to not confuse them with the students who originally hold the direct certification status. If the SFA has an electronic system that makes eligibility determinations, they should work with their software provider to develop additional benefit category distinctions as necessary. Also, the SFA should ensure that when benefits are automatically extended in an electronic system, such as through uploading direct certification data, the automated process matches correctly. Note: Since these are USDA questions, they cannot be modified. The process for extending Medicaid-Free and Medicaid-Reduced eligibility should also be considered in the response.

112: Does the benefit issuance system identify how eligibility was determined? (e.g., through application, direct certification, etc.)?

The benefit issuance system or document (roster) should identify the method by which students became eligible for benefits. This is helpful for several reasons, including information that must be reported on the annual verification report to MDE.

113: Who has access to the benefit issuance system and/or documentation? What safeguards are in place to ensure that only authorized individuals have access to the benefit issuance system and/or documentation?

The SFA should have procedures so that only individuals needing access to the benefit issuance documentation for the purpose of federal programs has access to it. They should also have a procedure for safeguarding the information.

114: How are benefits issued and distributed to students?

Common examples of benefit issuance include student PINs via software programs, tickets, checklists and scan cards.

115: How are eligibility determinations transferred to the benefit issuance document?

This means the process by which the student is made eligible and then transferred to the list of student's eligibilities. This process may be seamless for SFAs that have a meal eligibility software program.

116: How are benefit issuance document(s) transferred to the point of service system?

For SFAs with electronic software programs, the eligibility determination is usually entered into the system and automatically transfers to the point at which students receive meals. For SFAs using a manual benefit issuance document and manual point of service checklists, it is important that eligibility information of students is not made available in the process. Student eligibility should be coded to the manual checklist at month end, so that overt identification does not take place.

117: How are eligibility status updates made to the point of service and benefit issuance document(s)?

The SFA should ensure that student status is promptly updated in electronic systems according to requirements. Using a manual point of service checklist may require that the SFA indicate mid-month dates that students change eligibility status

118: How frequently are updates made to the point of service and benefit issuance document(s)?

The SFA should make updates to point of service and benefit issuance documents as soon as they occur to ensure correct claims for reimbursement are filed.

119: Does the benefit issuance document indicate the date the eligibility status changes were made?

This is an important requirement to include on benefit issuance documents for historical reference.

120: How and when are the following changes made to the point of service and benefit issuance document: New Students, Transfer Students, Withdrawn Students, 30 Day Carryover of Prior Eligibility?

Changes in eligibility status should be promptly recorded on the point of service and benefit issuance documents in all situations.

121: Is there a back-up system for updating benefit issuance document(s)? If yes, describe the back-up system for updating benefit issuance document(s).

The SFA should train a second person to handle benefit issuance document updates in case the staff person responsible is not available for a period of time to ensure that students continue to receive timely benefits.

200 Verification

200: Obtain a copy of the SFAs most recently submitted 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? Was the most recent report timely and accurate? If no, is this a recurring problem?

The State Agency reviewer will answer this question. The SFA may leave it blank and may receive an error message when saving this section of the review due to an incomplete answer. The SFA should verify that all other verification questions are answered and leave it as an error.

201: Who serves as the SFAs verifying official?

This is the person at the SFA who receives the verification documentation from households and completes the verification process.

202: Who serves as the confirming official?

In the verification process, there is a requirement that someone at the SFA double check the original determination of the applications selected for verification prior to notifying the households that they have been selected for verification. The individual that completes the double check of these applications for accuracy is known as the confirming official. SFAs that use a computerized system that auto-calculates total household income are automatically granted a waiver from conducting confirmation reviews. This waiver may be removed during an administrative review if significant system issues are identified.

203: Describe the SFA's verification process.

The SFA should describe how many applications are selected for verification, how they go about selecting the applications to be verified, the notification process, how documentation is checked for completeness, following up with households that do not respond and how free, reduced-price or paid status is changed as a result of verification.

204: Does the SFA use an electronic system to identify error-prone applications?

Error prone applications are those applications that fall within $100 of the monthly income guidelines. MDE notifies SFAs each summer whether they need to use the error prone method for conducting verification. It is based on whether the SFA had a greater than 20% nonresponse rate to verification in the last school year. The SFA should refer to the Eligibility Manual for School Meals or the MDE website for additional information.

300 Meal Counting and Claiming

300: Does the SFA use an electronic or manual system to count and consolidate reimbursable meals?

A manual system consists of meal checklists or tickets. An electronic system might use PINs or scan cards. If the SFA has a back-up system for times when the electronic system is not working, they should select Combination. All meals must be counted at the location where the student receives the reimbursable meal. Pre-order catering counts, attendance counts or meal tray counts may not be used as a daily meal count.

301: How does the SFA's point of service system identify a student's eligibility? Include all types of distinct counting methods.

See question 300. If the SFA serves meals in alternate locations, such as breakfast in the classrooms, grab in go, in-school suspension, etc. where meals would be counted differently than in the cafeteria, those should be included in the SFA response.

302: Does the SFA have a backup system to their primary meal counting and claiming system should the primary system fail/not operate?

The SFA should have a method to collect meals in case the electronic system fails or if the individual assigned to take meal counts is unexpectedly not available. It is recommended that SFAs have written procedures on their meal counting system for internal staff.

303: How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?

It is recommended that cashiers and substitute cashiers be trained at least annually on the meal counting and claiming system and what to do in case the primary meal counting system fails.

304: At the end of the meal service, how does the SFA obtain the daily meal counts from each school's point(s) of service?

The SFA should describe any processes that take place to gather meal counts on a daily or monthly basis.

305: What are the SFA's meal counting and claiming policies and procedures for the following situations (as applicable)?

- **Offer vs. Serve:** * Offer vs. Serve (OVS) is a provision that allows students to decline certain food items, with the requirement that they take at least three food components/items, with one being a half cup fruit or vegetable. OVS is required for grades 9-12 and optional for lower grades. It may be implemented in some grades but not others as the SFA decides for grades lower than 9-12. For this question, the SFA should answer what the policy is if a student approaches the point of service without a reimbursable meal.
- **Incomplete/Non-reimbursable Meals:** Are students charged a la carte for incomplete meals? Are students encouraged to take the food items needed to complete a reimbursable meal? Incomplete meals should not be counted as reimbursable.
- **Second Meals:** Second meals may not be claimed for reimbursement and students should be charged at least the minimum adult meal price for a full second meal.
- **Visiting student meals:** Visiting students may be claimed as paid unless the SFA in which they are enrolled sends documentation of their eligibility for free or reduced-price meals.
- **Adult and non-student meals:** Adult meals must not be counted as reimbursable. Adults who spend at least 50% of their time in food service-related activities may receive a meal at no charge. All other adults need to be charged at least the minimum adult meal price set by MDE each year and available on the MDE website. Adult meal portion sizes should be the same as student meals unless they are charged extra for larger portions.
- **Student worker meals:** Student workers may not be compensated in the form of a free meal since all students receive meals at no cost.
- **A la carte:** Individual food items should not be claimed for reimbursement. Under OVS, a student must select at least three food components/items with one being a half cup fruit or vegetable in order to claim the meal. Anything less than this should be categorized as an a la carte sale.

- **Field trips:** All meals claimed for reimbursement on a field trip must include all required food components and be counted at the point the students receive the meal. Some SFAs have students come through the cafeteria, select a bag lunch and enter their PIN prior to leaving for the field trip. Other SFAs send point of service checklists along with the meals. Staff counting meals on field trips need to be trained on how to count and check for reimbursable meals, especially in the case of offer versus serve.
- **Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs and PINs:** The SFA should have a procedure for lost, stolen, misused or forgotten methods of meal count collection.
- **Charged and or pre-billed/prepaid meals:** If the SFA requires pre-payment for meals, what is the process by which this takes place? The SFA should have a written procedure for households depositing money into accounts.
- **Students without funds to pay for meals:** Enter N/A since all students receive meals at no cost.
- **New Students without Approved Certification of Free or Reduced-price Benefits:** New students without documentation for free or reduced-price meals should be claimed as paid.
- **Local Charge Policy and Unpaid Meal Policy Procedures:** Minnesota Statutes 2023, section 124D.111 requires all SFAs operating federal school meal programs to have a written and clearly communicated meal charge policy. This policy is requested as part of the free and reduced-price policy statement process of the review. The SFA should refer to the [Meal Pricing and Non-Program Foods](#) webpage.

306: What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?

The SFA is required to conduct an edit check at the end of each month, prior to submitting claims for reimbursement to MDE, to ensure that daily and monthly meal counts don't exceed the enrollment and attendance adjusted enrollment by category, free, reduced-price and paid. The SFA should refer to the MDE website for [sample edit check forms](#). For SFAs that use an electronic system, the edit check report should be available in the system. The SFA should contact the software provider if they are unable to locate it.

307: Are meal counts automatically consolidated? If Yes, does the software program contained edits and internal controls? If No, when and how are edit checks and internal controls completed?

MDE uses site-based claiming, so SFAs would not be combining claims from multiple sites to submit for reimbursement. The SFA should answer this question in terms of the electronic or manual system adding up each day's worth of meal counts by category for a monthly total. How does the SFA ensure that the monthly totals are accurate? For manual checklists, the SFA should consolidate the daily counts in a consistent verifiable manner.

308: Have alternate points of service been approved by the SA?

Alternate points of service including front of the line counts and alternate meal service locations do not need to be approved by the State Agency, or MDE. SFAs must ensure that alternate point of service procedures meet regulatory requirements. Front of the line counts must have a staff person designated at the end of the line to check for reimbursable meals. The SFA should select N/A and describe any alternate points of service in the comments.

309: 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?

If an electronic system is used, the SFA should describe how the system prevents second meals from being claimed. If a manual system is used, what process is used to ensure only one meal is counted per student per day?

310: At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?

What is the SFAs process for gathering meal counts from each site?

311: Describe the SFA's procedures for consolidating daily meal counts by category for each site to process the claim for reimbursement, if applicable.

What process does the SFA use to take daily meal counts and consolidate into one monthly meal count for the claim for reimbursement?

Meal Pattern and Nutritional Quality

600 Series Site Level Forms

Click on the site level forms located at the bottom of the list. A few more forms will populate for each site that will be reviewed.

Meal Compliance Risk Assessment Tool

SFAs with only one site of review do not need to complete this form. For SFAs that will have more than one site reviewed, the reviewer will complete this tool with the SFA.

Dietary Specifications Assessment Tool

For single site reviews: the Dietary Specifications Assessment Tool (DSAT) is completed for both breakfast and lunch at the site indicated to be at the highest risk in question 600. The DSAT is completed in lieu of conducting a nutrient analysis and asks about menu purchasing and preparation practices. If the DSAT risk level is low, the SFA will not need to submit documentation for the reviewer to complete a nutrient analysis. The reviewer will let the SFA know the results of the DSAT after the SFA has completed the DSAT for the site at highest risk for breakfast and lunch, as applicable.

For SFAs that will have more than one site reviewed: The reviewer will give the SFA more instructions on which site needs to complete this tool.

General Program Areas

Civil Rights

Due to the ongoing USDA litigation, the civil rights training and materials do not need to incorporate the most recent May 2022 updates as of 8/26/22. The reviewer will inform the SFA of any updates closer to the review and time will be given to incorporate any updates. As applicable, also see: [Religious Exemptions under Title IX of the Education Amendments of 1972](#).

800: What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?

The SFA should refer to the MDE website for the most recent version of the USDA non-discrimination statement. The statement should be included on all program materials that reference Child Nutrition Programs, including the SFA's website if a designated nutrition program section is available.

801: Does the SFA have a public release?

SFAs may answer yes to this question. MDE does a public release on behalf of all SFAs each year.

802: What services does the SFA provide to Limited English Proficient households?

The SFA should make reasonable efforts to provide materials in other languages where the need exists.

803: What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS (Food and Nutrition Services, also known as federal meal programs) School Meal Programs? If procedures are written, provide a copy.

It is recommended that the SFA develop procedures for receiving and processing complaints within the programs so staff are aware of how to handle such requests. A Civil Rights Complaint Procedure is available on the MDE School Nutrition Programs website.

804: Has the SFA received any written or verbal complaints alleging discrimination in FNS programs in the current or prior school year?

If yes, the SFA should describe the date, nature of complaint and agency it was reported to.

805: How are students with special dietary needs accommodated?

The SFA should refer to MDE's website for additional information about special dietary needs. Students with documented disabilities are required to be accommodated when a special diet statement is signed by a licensed physician, physician assistant or certified nurse practitioner.

806: When was the SFAs most recent civil rights training for staff who interact with program applicants or participants and their supervisors? Who attended these trainings? What topics were covered?

The SFA must conduct civil rights training annually for all staff involved in the School Nutrition Programs. It may be held as a group session or reviewed individually. The SFA should retain the date(s) that training was received and the individuals who received it, along with an agenda of topics or material that were covered.

807: How does the SFA collect racial/ethnic data? How often is this information collected?

For public SFAs that conduct Minnesota Automated Reporting Student System (MARSS) reporting, this requirement is met through enrollment forms. Non-public SFAs may collect this information upon enrollment or utilize a collection form available on the MDE website.

On-Site Monitoring

900: Was the on-site monitoring of breakfast/lunch completed prior to February 1? How does the SFA ensure that all schools are meeting program requirements?

> *If the SFA is a single site sponsor they are not required to complete on-site monitoring for breakfast and lunch.* MDE has a monitoring form available on the [School Nutrition Monitoring website](#). All sites must be reviewed for lunch prior to February 1 of each year. Breakfast at each site must be reviewed every 2 years. If the SFA operates the afterschool snack program, it must be monitored twice within the year, with the first visit occurring within the first four weeks of operation.

Local Wellness Policy

1000: Provide a copy or appropriate web address of the current local school wellness policy. Are the minimum required elements written into the Local Wellness Policy?

> It is required that SFAs post their wellness policies to the website. A [local wellness policy checklist](#) is available on the MDE website to help ensure all required elements are covered in the policy.

1001: How does the public know about the Local Wellness Policy? Provide documentation to support the response (or appropriate web addresses).

> The SFA must post the policy on the website and make information related to ongoing evaluation and assessment available to the public. Use SharePoint to upload any documentation.

1002: When and how does the review and update of the Local School Wellness Policy occur? Provide documentation to support the response (or appropriate web addresses).

> The local wellness policy should be reviewed and updated on a regular basis with documentation noted to support the ongoing updates. The SFA should use SharePoint to upload any documentation.

1003: Who is involved in reviewing and updating the Local School Wellness Policy? What is their relationship with the SFA?

> A local wellness policy committee and school board should be involved with the regular review and update of the policies.

1004: How are potential stakeholders made aware of their ability to participate in the development, review, update and implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web addresses).

> Stakeholders should be invited to participate in the review, update and implementation of the local school wellness policy. The SFA should use SharePoint to upload any documentation.

1005: Obtain a copy of the most recent assessment on the implementation of the Local School Wellness Policy.

> The SFA should use SharePoint to upload any documentation.

1006: How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy? Provide documentation to support the response (or appropriate web addresses).

> The SFA should provide documentation to show that the school community has been informed about the results of the most recent assessment on the implementation of the Local School Wellness Policy.

Smart Snacks

1100: What are the SFA's food sale policies? List all types of food/beverage sales to include the selling of non-food items in combination with food items.

> The SFA should list all general areas food is sold during the school day, from midnight until 30 minutes after the end of the school day.

1101: What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label).

> The SFA should refer to the MDE website for additional resources on calculating smart snack compliance for recipes.

1102: How does the SFA account for accompaniments when determining whether food items meet Smart Snack standards?

> All condiments and accompaniments must be included in the smart snack calculations. The MDE website has smart snack recipe resources to assist the SFA.

1103: Who is responsible for tracking Smart Snacks compliance at the SFA level, school level and for foodservice?

> The SFA should list all the individuals in the district who determine what food items may be sold during the school day and who checks for smart snack compliance.

Professional Standards

1200: What is the Local Educational Agency (LEA) student enrollment?

> The SFA's enrollment should be entered for all sites.

1201: List the employee count for each of the following: Directors, Managers, Other Full-Time Nutrition Staff, Part-Time Nutrition Staff, Staff hired after January 1, Non-school nutrition staff that have responsibilities that include dates related to the program.

> The term director refers to foodservice director. All SFAs must designate a director. The SFA should enter all staff numbers into the fields. Manager refers to a cook manager at each site. If the foodservice director and cook manager are the same person at a site, the SFA should enter 1 for director and 0 for manager.

1202: Has the SFA hired any new directors on or after July 1, 2015? If no, proceed to Question 1204. If a new School Nutrition Program Director has been hired, did they meet the hiring standard requirements?

> The SFA should refer to the MDE website for the hiring standard requirements for new directors if a new director has been hired since July 1, 2015.

1203: If a new School Nutrition Program Director has been hired, did they complete food safety training within 30 days of being hired? If yes, proceed to question 1204. If no, was a previous food safety certification obtained in the last five years? If yes, list the date of certification in comments.

New directors must have eight hours of food safety training within the last five years prior to being hired or within the first 30 days of being hired. All directors must maintain eight hours of food safety training every five years. MDE will count the four hours of Minnesota Department of Health approved food safety continuing education every three years (eight hours in six years) as meeting the requirement.

1204: Did the School Nutrition Program Directors meet the training requirement? If no, after review of the scheduled/planned trainings for the remainder of the school year is the School Nutrition Director expected to meet annual training requirements? List completed training hours and expected/planned training hours in the comments.

School Nutrition Directors must document 12 hours of training per year. Every SFA must have a School Nutrition Director designated. The SFA should use SharePoint to upload any documentation.

1205: Did the School Nutrition Program Managers meet the training requirement? If no, after review of the scheduled/planned trainings for the remainder of the school year is the School Nutrition Director expected to meet annual training requirements? List completed training hours and expected/planned training hours in the comments.

School Nutrition Program Managers must document 10 hours of training per year. Every SFA must designate a director, but not all SFAs will designate a manager if the director performs the same duties. For example, in a small SFA. The SFA should use SharePoint to upload any documentation.

1206: Did full-time school nutrition staff meet the training requirements? If not, after review of scheduled/planned trainings for the remainder of the school year are School Nutrition staff expected to meet the annual training requirements?

Full-time school nutrition staff must document 6 hours of training per year. The SFA should use SharePoint to upload any documentation.

1207: Has the State Agency allowed the SFA flexibility to complete annual training requirements over a 2-year period? If yes, list in the comments section, the first school year to which the flexibility was applied.

The SFA should mark *Yes* for allowing completion over 2 years. If the SFA has utilized this flexibility, indicate so in the comments.

1208: Is the SFA tracking training hours on an annual basis? If not, please describe how training hours are being tracked

The SFA must track training hours for all employees utilizing the USDA training tracker tool or a method of their own.

1209: Are there any employees that were hired on or after January 1 of the current school year? If no, proceed to 1210. If yes, did the employees meet at least half of the annual training requirements? If no, after review of scheduled/planned trainings for the remainder of the school year, are they expected to meet the annual training requirements?

The SFA should use the comments section to explain the training plan for any employees hired after January 1 of the current school year, if applicable. If it does not apply, the SFA should mark *No*.

1210: Did the employees that work outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program receive training applicable to their duties related to the program?

These individuals must complete 4 hours of training per year.

1211: Did part-time staff meet the training requirements?

Part-time staff (less than 20 hours per week) must document four hours of training per year.

School Breakfast and Summer Food Service Program Outreach

1600: How did the SFA inform families of the availability of the School Breakfast Program (SBP) prior to, or at the beginning of, the school year and provide reminders about the availability of the SBP throughout the school year?

SFAs must inform eligible families of the availability of reimbursable breakfasts served under the SBP. In addition, schools must send reminders regarding the availability of the SBP multiple times throughout the school year. Sending the monthly breakfast menu to households would count as outreach.

1601: How did the SFA inform the eligible families about the availability and location of free meals for students via the Summer Food Service Program (SFSP)?

If the SFA operates the SFSP or if it is available in the local community, the SFA must inform families about the availability.

Terms and Definitions Used in the School Nutrition Programs

Administrative Review: The comprehensive off-site and on-site evaluation of all School Food Authorities (SFAs) participating in the program. It reflects a review of both critical and general areas and includes other areas of program operations determined by the state agency to be important to program performance.

Alternate Meal Service Location: Anywhere outside the typical food service area/cafeteria. Alternate meal locations include places such as classrooms, in-school suspension areas and grab and go stations.

Benefit Issuance: The link in the accountability system between the eligibility determination and the benefit delivery.

Certification/Benefit Issuance: The process used to determine a student's eligibility for free or reduced-price meal benefits and the method used to apply the correct meal benefit level for the student at the point of service. The review of certification documents may include a review of a household's application for meal benefits, direct certification information or other source documentation. The review of the benefit issuance documents may include a review of a roster or medium of exchange (any type of ticket, token, ID, name or number) used in the process of providing meal benefits.

Child Nutrition Programs: Includes the National School Lunch Program, the School Breakfast Program, the Fresh Fruit and Vegetable Program, Seamless Summer Option, Afterschool Snack Program, Special Milk Program, Minnesota Kindergarten Milk Program, Food Distribution Program and At-risk Afterschool Snack/Supper program.

Claim for Reimbursement: The claim submitted to the State Agency on a monthly basis by an SFA for reimbursement for meals served under the Child Nutrition Programs.

Corrective Action: Actions required to correct any violation identified under the Administrative Review and must be applied to all schools in the SFA, as appropriate, to ensure that previously deficient practices and procedures are revised system-wide. Corrective action may include correction of incorrect practices and training.

Colyar: The administrative review system used to complete review related forms.

Critical Areas: Performance Standard 1 and Performance Standard 2, measures of performance under the Administrative Review. *See Performance Standard 1 and Performance Standard 2.*

Day of Review: The day(s) on which the on-site review of the individual sites selected for review occurs.

Documented Corrective Action: Written documentation provided by the SFA to the SA describing the actions taken to correct violations and the dates of completion. Documented corrective action may be provided at the time of the review or may be submitted to the State Agency within specified timeframes.

Edit Checks: The procedure used by the SFA to compare each school's daily counts of free, reduced-price and paid lunches against the product of the number of children in that school currently eligible for free, reduced-price and paid lunches, respectively, times an attendance factor.

Finding: Identification of non-compliance with program regulations, FNS Instructions and/or policy memoranda. Each finding is associated with a required corrective action.

Fiscal Action: Includes, but is not limited to, the recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid claims for reimbursement, submission of a revised claim for reimbursement and correction of records to ensure that unfiled claims for reimbursement are corrected when filed. It also includes disallowance of funds for failure to take corrective action to meet the meal pattern requirements.

Free and Reduced-price Policy Statement: Outlines the procedures to be followed and identifies individuals who will complete duties related to issuing student meal benefits. This document will walk you through all of the considerations and decisions that need to be made when developing and executing the procedure.

Food Production Record: The documentation of what was prepared and served. This documentation is necessary to support the claim for reimbursable meals and to identify information needed for the nutrient analysis.

General Areas: The areas of review as specified in 7 CFR 210.18(h).

Incomplete Meal: Any meal that does not meet the meal pattern and nutritional specification requirements set forth in 7 CFR 210 and 220 as applicable.

Local Educational Agency (LEA): A public board of education or other public or private nonprofit authority legally constituted within a state having administrative control of schools.

Local Wellness Policy: Is an official document that guides an LEA's efforts to establish a school environment that promotes healthy behaviors among students and staff. The development of the wellness policy is left to each school district so their unique needs can be considered, though the policy must address all requirements outlined in the Healthy, Hunger-Free Kids Act of 2010.

Meal Component/food component: One of the required food groups that comprise a reimbursable meal: meats/meat alternates, grains, vegetables, fruits and milk.

Offer Versus Serve (OVS): A provision that allows students to decline a specific number of food components/food items depending on the menu planning approach used.

Overclaim: The portion of a SFA's Claim for Reimbursement that exceeds the Federal and/or state financial assistance that is properly payable.

Performance Standard 1: The standard requiring that all free, reduced-price and paid meals claimed for reimbursement are served only to children eligible for free, reduced-price and paid meals respectively; and counted, recorded, consolidated and reported through a system which consistently yields correct claims.

Performance Standard 2: The standard requiring that reimbursable lunches must meet the meal requirements in 7 CFR 210.10 as applicable to the age/grade group reviewed. Reimbursable breakfasts must meet the meal requirements in 7 CFR 220.8 and 220.23, as applicable to the age/grade group reviewed.

Point of Service: The point in the food service operation where a determination can accurately be made that a reimbursable free, reduced-price or paid meal has been served to an eligible child.

Professional Standards: School Nutrition Program food service directors must meet hiring standards. Additionally, all staff involved in operation of the Child Nutrition Programs must complete annual training hours according to their job responsibilities.

Reimbursable Meal: A meal meeting the USDA meal pattern requirements, served to an eligible student and priced as an entire meal rather than based on individual items. Such a meal qualifies for reimbursement with Federal funds.

Review Period: Is the most recent month for which a claim for reimbursement was submitted during the on-site portion of review provided that it covers at least 10 operating days.

Reviewed School: The school(s) selected for review using the school selection procedures.

School Food Authority (SFA): The governing body that is responsible for the administration of one or more schools and has the legal authority to operate the Program therein or be otherwise approved by FNS to operate the Program.

SharePoint: The secure document transfer system used for collection of review documentation.

Smart Snacks: Smart Snacks supports the health goals of the School Nutrition Programs by providing healthy food alternatives on the school campus throughout the school day. The reviewer will assess the SFA's methods for ensuring compliance across the SFA, including food-based fundraisers.

Sponsor to State Agreement: Is a legally binding document that details program responsibilities. This document should be signed by an individual at your SFA with signature authority.

Technical Assistance: Help or advice provided to the SFA or school, by the State Agency, to improve program operations.

Verification: Confirmation of eligibility for free or reduced-price benefits under the NSLP or SBP. Verification includes confirmation of income eligibility and, at state discretion, may also include confirmation of any other information required in the application.