CONNECTICUT STATE DEPARTMENT OF EDUCATION

The New Administrative Review for School Nutrition Programs

What schools need to know

Fall 2016

Overview of the Administrative Review (AR)

Assigned Reviewers

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A Word About Repeat Findings

USDA requires that state agencies monitor any repeat findings from previous review

- **Check the overview report to ensure that these areas have been addressed, corrected and fully implemented**

Repeat Findings

REPEAT FINDINGS MAY LEAD TO FISCAL ACTION DURING THIS REVIEW!!

Especially in areas of

- **missing meal components**
- **missing vegetable subgroups over the course of a week**
- **insufficient food quantities**
- **not offering whole grain-rich foods**
- **not offering a variety of milk**

Healthy, Hunger-Free Kids Act (HHFKA) of 2010

- **Consolidates Administrative Review (AR) processes**

- **Incorporates school breakfast, new meal pattern and dietary specifications, and 6-cent performance-based reimbursement**

- **Implements 3-year review cycle**

- **Provides for off-site monitoring approaches**

- **Provides training and technical assistance**

Purpose of Administrative Review (AR)

- **Ensure program integrity**

- **Ensure school food authority (SFA) compliance with USDA regulations**

- **Ensure children are fed healthy, nutritious meals in compliance with *Dietary Guidelines for Americans* and Institute of Medicine's recommendations**
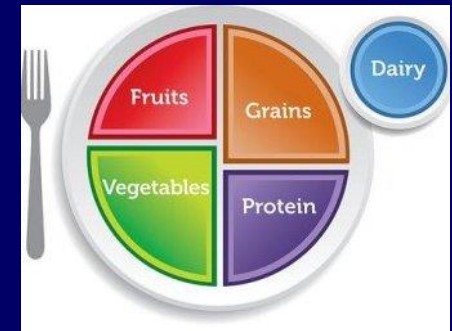
Connecticut AR Process

1. In summer prior to review year, CSDE **IDENTIFIES SFAS** requiring a review

2. In August, CSDE sends letters to business officials informing SFA of **DATE** scheduled for review

3. In advance of on-site review, CSDE issues second letter to food service director with **SPECIFIC INFORMATION**

   - Schools receiving on-site reviews and programs being reviewed

   - Process for completing off-site portion of review

Connecticut AR Process

4. **SFAs submit completed OFF-SITE REVIEW and all REQUESTED DOCUMENTS to lead reviewer by specified due date in the CNP Online Claiming and Application System**

Connecticut AR Process

5. Based on responses provided for off-site review, CSDE sends e-mail to food service director/business official specifying ADDITIONAL DOCUMENTS needed during on-site review

- Some responses from off-site review form may result in a comprehensive review of certain sections of AR

CSDE may provide technical assistance prior to on-site visit so SFA can take corrective measures prior to arrival of CSDE review team

Connecticut AR Process

6. **The CSDE review team (one or more consultants) arrives to CONDUCT ON-SITE PORTION of review (two or more days)**

   - **Upon arrival, team conducts ENTRANCE CONFERENCE with food service director and at least one SFA administrator**

   - **WORKSPACE AND INTERNET ACCESS required for review of documentation**

   - **All DOCUMENTS should be organized and ready for review on first day team arrives**

Connecticut AR Process

7. **In addition to review of documentation, on-site visits of the following programs will occur in selected schools**

   - **National School Lunch Program**
   - **School Breakfast Program**
   - **Fresh Fruit and Vegetable Program**
   - **Seamless Summer Option**

   Documentation Review only
   (unless concerns are identified)

      - **Afterschool Snack Program**
      - **Special Milk Program**

Connecticut AR Process

8. After completing review of all required documentation and on-site visits, team conducts **EXIT CONFERENCE** with food service director and SFA administrator

9. Team provides **OVERVIEW REPORT** of AR, which identifies

    - areas requiring corrective action
    - areas which may result in fiscal action
    - corrective action due date

Connecticut AR Process

10. SFA may need to submit a CORRECTIVE ACTION PLAN to lead reviewer

11. When all corrective action has been received, reviewed and approved in the CNP Online System, CSDE sends LETTER CLOSING THE AR to superintendent, business official and food service director

Posting of the Overview Report

NEW

- **CSDE is responsible for ensuring that information regarding AR is made easily accessible to all members of the public**

- **CSDE must publicly post a summary of AR Report for each SFA on the CSDE's publicly available Web site**

Three Phases to AR Process

1. **Off-site Assessment**

2. **On-site Assessment**

3. **Corrective Action**

Off-site Assessment Tool

- Completed in the CNP online system

- Asks SFA questions about their program and requests information

- CSDE works collaboratively with SFA to gather the information

- Decreases time needed for on-site review

- Allows CSDE time to focus on areas of noncompliance and provide technical assistance

Off-site Assessment Tool

Number Series	Monitoring Area
Section II: Meal Access and Reimbursement (Critical Area – Performance Standard 1)	
100	Certification and Benefit Issuance
200	Verification
300	Meal Counting and Claiming
Section III: Meal Pattern and Nutritional Quality (Critical Area – Performance Standard 2)	
400	Meal Components and Quantities
500	Offer versus Serve
600	Dietary Specifications and Nutrient Analysis
Section IV: Resource Management (General Areas)	
700	Resource Management
Section V: General Program Compliance (General Areas)	
800	Civil Rights
900	SFA On-site Monitoring
1000	Local School Wellness Policy and School Meal Environment
1100	Smart Snacks in School
1200	Professional Standards
1300	Water
1400	Food Safety, Storage, and Buy American
1500	Reporting and Recordkeeping
1600	School Breakfast Program and Summer Food Service Program Outreach
Section IX: Special Provision Options	
2100	Special Provision Options

On-site Assessment Tool

- **Validates information collected on Off-site Assessment Tool through review of documents**

- **Provides opportunity for CSDE to observe operation of school nutrition programs at selected schools**

Corrective Action

- **SFA provides DOCUMENTATION of corrective action for any AR findings identified in the SFA's overview report**

- **CSDE reviews submitted correction action and determines if it is complete and has RESOLVED identified findings**

- **The CSDE APPROVES corrective action and CLOSES review**

How Does CSDE Select Sites?

Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP	Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP
1 to 5 1		41 to 60................................6	
6 to 10.................................2		61 to 80................................8	
11 to 20...............................3		81 to 100.............................10	
21 to 40...............................4		101 or More.........................12*	

* 12 plus 5 percent of the number of schools over 100. Fractions must be rounded to the nearest whole number using standard rounding procedures (i.e. if less than 5 round down, if 5 or more round up).

How Does CSDE Select Sites?

- **Site name**

- **Site type**

- **Number of serving days**

- **Number eligible for free meals**

- **Number of free meals claimed**

- **Whether a school participates in a special provision option, such as**
  - **Provision 2**
  - **Community Eligibility Provision**

AR Organizational Tool (AROT)

AROT

- **Developed to assist SFAs in ORGANIZING DOCUMENTS need for on-site review**

  - **To facilitate review process, SFAs should organize all documents needed for AR as outlined in AROT**

Having all documents ready and in good order prior to arrival of CSDE review team allows for an efficient review of required documents

AROT

- **CSDE will provide to all SFAs receiving a review**

- **Provides cover sheet for each review section**

  - **contains checklist of documents that must be available for CSDE review team**

AROT

- **SFA should collect all documents listed on each cover sheet and place in a pile/folder/binder with cover sheet on top**

> **IMPORTANT**
>
> ▶ **All documents listed on cover sheets are REQUIRED, unless otherwise noted**
>
> ▶ **If you do not know what is being requested, please CONTACT LEAD REVIEWER prior to arrival of review team**

AROT

ADMINISTRATIVE REVIEW ORGANIZATIONAL TOOL | 2016

ADMINISTRATIVE REVIEW ORGANIZATIONAL TOOL (AROT)

for District Name

The documents listed in this tool are REQUIRED for the completion of the Administrative Review (AR).

How is does this tool work? A cover page has been developed for the each of the various sections of the AR. On each cover page you will find a list of documents that are required. The State Agency will need to take a copy of some documents; these are headed by a red "COPY". Other documents must be reviewed by the SA on-site; these are headed by a green "REVIEW".

Place all documents listed with the corresponding cover page in a folder, clipped together, or otherwise organized. Have all documents available for the first day of the review for the Review Team.

If a document is listed, it is REQUIRED. If you do not know what the document is, please check with the Lead Reviewer to clarify *prior to* the start of the on-site portion of the review.

Cover pages:.

1. District Information
2. Section II: Meal Access and Reimbursement *(not applicable to RCCIs without day students)*
3. Section II: Verification
4. Section II: Meal Counting and Claiming
5. Section III: Nutritional Quality and Meal Pattern - Meal Components and Quantities and Dietary Specifications & Nutrition Analysis
6. Section IV: Resource Management - Maintenance of Non-Profit School Food Service Account
7. Section IV: Resource Management - Paid Lunch Equity
8. Section IV: Resource Management - Revenue from Non-Program Food
9. Section IV: Resource Management - Indirect Costs
10. Section V: General Areas - Civil Rights
11. Section V: General Areas - On-site Monitoring
12. Section V: General Areas - Local School Wellness Policy
13. Section V: General Areas - Smart Snacks in School
14. Section V: General Areas – Food Safety
15. Section V: General Areas – School Breakfast and Summer Food Service Programs Outreach
16. Section V: General Areas - Professional Standards
17. Afterschool Snack Program
18. Split-Day Kindergarten Milk Program
19. Fresh Fruit and Vegetable Program

Please note: ALL documents listed are required for completion of the Administrative Review.

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Connecticut State Department of Education ◆ Child Nutrition Programs ◆ August 2016

District Information

Copy →

Have Available →

AROT	2016

District Information

Make a COPY for the State Agency

- ☐ District School Calendar for school year <u>2016-17.</u> *Indicate snow days, delayed openings and early dismissals or any day when meals are not served.*
- ☐ The district charge policy.
- ☐ Procedure for collecting outstanding balances at the end of the school year.
- ☐ Names and titles of staff at the selected school(s).
- ☐ FOR THE SELECTED SCHOOL(S): meals times for the days of the onsite portion of the review. *Include NSLP, SBP, FFVP & ASP.*
    - ○ If the schools being visited for the School Breakfast Program serve breakfast in the classroom, specify the number of locations where meals are counted.
- ☐ Names and phone numbers for key staff *(i.e., food service director, business official, determining official(s), claims preparer).*

<u>Have available for the State Agency to REVIEW</u>

Not applicable.

1

Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Permanent Agreement ED-099

CSDE has agreement with each school food authority (SFA)/local educational agency (LEA)

SFA/LEA	CSDE
■ Follow all laws, rules and regulations for CNPs	■ Administers CNPs for SFA/LEA ■ Publish laws, rules, regulations ■ Pay claims to SFA/LEA if USDA provides money

Permanent Agreement versus Policy Statement

AGREEMENT

- ◼ **SFA/LEA and CSDE agree to follow all federal and state rules and regulations**

POLICY STATEMENT

- ◼ **Methods and procedures district will use to implement free and reduced-price meals**
  - **Determine meal eligibility**
  - **Count and claim meals**
  - **Inform public**
  - **Report to CSDE people responsible for each aspect of program**

Policy Statement (Revised July 2016)

Connecticut School Nutrition Programs

Policy Statement for Free and Reduced-price Meals, Afterschool Snack Programs, and/or Free Milk

The _____ local educational agency (LEA) has entered into an agreement to participate in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP), and/or the Afterschool Snack Program (ASP), or to provide free milk under the Special Milk Program (SMP), and accepts responsibility for providing free and reduced-price meals and/or free milk to eligible children in the schools under its jurisdiction each school day.

The LEA assures the Connecticut State Department of Education (CSDE) that the following policy with respect to determining the eligibility of children for free and reduced-price meals will be uniformly implemented in all NSLP and SBP schools under its jurisdiction, as well as free milk in the SMP.

I. **LEA Responsibilities**
    In fulfilling its responsibilities, the LEA agrees to each of the conditions below.

    A. The LEA will indicate on the online agreement, the name of the determining official or officials designated by the LEA to make eligibility determinations on its behalf for free and reduced-price meals or for free milk.

    B. The LEA will assure that for children who are not categorically eligible for free or reduced-price meal benefits, the LEA will determine eligibility for free or reduced-price meals or free milk in accordance with the current school year's Income Eligibility Guidelines (IEG).

    C. The LEA will indicate the specific procedures the LEA will use in accepting applications from families for free and reduced-price meals, or for free milk. Additionally, the LEA must include the specific procedures for obtaining documentation for determining children's eligibility through direct certification, in lieu of an application. LEAs shall also provide households that are directly certified with a notice of eligibility, as specified in the Code of Federal Regulations (CFR) 7 CFR 245.6(c)(2), and shall include this notice in their policy statement.

    D. The LEA will provide a description of the method or methods to be used to collect payments from those children paying the full price for meals or milk, or the reduced-price of a meal, which will prevent the overt identification of the children receiving free or reduced-price meals or free milk.

    E. The LEA will provide an assurance that the school will abide by the hearing procedure set forth in 7 CFR 245.7 and the nondiscrimination practices set forth in 7 CFR 245.8.

    F. The LEA will serve meals free to:
        - children from families or households whose income is at or below the free income level in the current IEGs;
        - children from households that provide a confirmed case number on the application; and
        - children who are categorically free as indicated in 7 CFR 245.6 and the IEGs.

    G. The LEA will serve meals at a reduced-price to children from families whose income is at or within the income level in the current IEG for reduced-price meals. The price for meals cannot be more than $.40 for lunch, more than $.30 for breakfast, or more than $.15 for afterschool snack.

    H. The LEA will put procedures in place when selling competitive foods during meal service that prevent overt identification of the children receiving free or reduced-price meals or free milk.

Connecticut State Department of Education • Revised July 2016 • Page 1 of 8
www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320680

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/policystatement.pdf

Charge Policy

- **Schools/districts must have UPDATED POLICY on file that addresses charging of meals and a child's inability to pay**

- **Schools/districts providing meals to nonpaying students should establish a written policy on WHAT FOOD WILL BE PROVIDED to nonpaying full or reduced-price students**

Charge Policy

- Schools/districts must make this written policy **WIDELY AVAILABLE** to parents, guardians and students

- All **CASHIERS/FOODSERVICE STAFF** should be aware of the policies and enforce them at the school

USDA Charge Policy Guidance

- **SP 46-2016:** *Unpaid Meal Charges: Local Meal Charge Policies*, July 8, 2016
  www.fns.usda.gov/unpaid-meal-charges-local-meal-charge-policies

- **SP 47-2016:** *Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments*, July 8, 2016
  www.fns.usda.gov/unpaid-meal-charges-clarification-collection-delinquent-meal-payments

USDA Charge Policy Guidance

- **SP 57-2016:** *Unpaid Meal Charges: Guidance and Q&As , September 16, 2016* **www.fns.usda.gov/unpaid-meal-charges-guidance-and-qas**

- **SP 58-2016: 2016 Edition:** *Overcoming the Unpaid Meal Challenge: Proven Strategies from Our Nation's Schools*, **September 19, 2016 www.fns.usda.gov/2016-edition-overcoming-unpaid-meal-challenge-proven-strategies-our-nation%E2%80%99s-schools**

CSDE Operational Memo No. 4-17
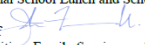
Guidance on Unpaid Meal Charges and Collection of Delinquent Meal Payments

STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION

TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: November 2, 2016

SUBJECT: Operational Memorandum No. 4-17
Guidance on Unpaid Meal Charges and Collection of Delinquent Meal Payments

The U.S. Department of Agriculture (USDA) has issued the following guidance addressing unpaid meal charges:

- SP 46-2016, *Unpaid Meal Charges: Local Meal Charge Policies;*
- SP 47-2016, *Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payment;*
- SP 57-2016, *Unpaid Meal Charges: Guidance and Q and A;* and
- SP 58-2016, 2016 Edition: *Overcoming the Unpaid Meal Challenge: Proven Strategies from Our Nation's Schools.*

This memorandum provides an overview of these USDA memoranda. Please review carefully and share with appropriate staff members.

1. **SP 46-2016,** *Unpaid Meal Charges: Local Meal Charge Policies*

For the past several years, the USDA has examined policies and practices relating to unpaid meals. This was in response to section 143 of the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296; December 13, 2010), entitled "Review of Local Policies on Meal Charges and Provision of Alternate Meals."

SP 46-2016 addresses the need for local educational agencies (LEAs) participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) to have a policy in place for children who are participating at the reduced-price or paid rate, but do not have money in their account or in hand to cover the cost of the meal at the time of service. This policy memo provides details and clarification on what the charging policy should address and the requirements for policy communication.

No later than **July 1, 2017,** LEAs are required to have a written and clearly communicated meal charging policy that ensures a "transparent approach to the issue." This policy must include how the LEA will collect unpaid meal charges. The LEA's policy will be reviewed by the Connecticut State Department of Education (CSDE) during Administrative Reviews.

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www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/opmemos/17/om04-17.pdf

USDA Resource

Overcoming the Unpaid Meal Challenge

Proven Strategies from Our Nation's Schools

USDA-FNS
9/16/2016

USDA United States Department of Agriculture
Food and Nutrition Service

www.fns.usda.gov/sites/default/files/cn/unpaidmealcharges_guide.pdf

Policy for Covering Unpaid Meal Charges

- **Funds from nonprofit school food service account CANNOT be used to cover the cost of charged meals that have not been paid**
  - **includes money received for a la carte sales, catering, etc.**

AROT
MEAL ACCESS AND REIMBURSEMENT

1. Certification and Benefit Issuance

2. Meal Counting and Claiming

AROT
MEAL ACCESS AND REIMBURSEMENT

1 – Certification and Benefit Issuance

Certification and Benefit Issuance

AROT-2

Copy ➡

Have Available ➡

AROT | 2016

Section II: Meal Access and Reimbursement

Certification and Benefit Issuance

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

- ☐ The State-selected Benefit Issuance Document (e.g., Master List).
- ☐ Selected student eligibility applications or documentation of eligibility (e.g. the Direct Certification List). *The applications and documents should be in the same order as the names listed in the sorted Benefit Issuance Document that the Lead Reviewer returns to the Determining Official.*
- ☐ All denied applications.

DRAFT

2

Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Certification and Benefit Issuance

- **Applications for ALL SCHOOLS/SITES (not just schools/sites selected for on-site visits) will be part of review process**
  - **Includes sites that participate through INTERSCHOOL AGREEMENT**

Certification and Benefit Issuance

Number of Students Certified for Free or Reduced-price Meals	Percentage of Student Applications Reviewed
100 or less	100%
More than 100	100% OR a statistical sampling of all free and reduced-price eligible student applications reviewed

Certification and Benefit Issuance

SFA Submits Benefit Issuance Document prior to review

- **District will receive EXCEL spreadsheet to submit benefit issuance information**

- **Include only free and reduced-price eligible students (not denied or paid students)**

- **Include first name, last name, certification method and date, and whether they were verified**

- **Do not include duplicate names**

Certification and Benefit Issuance

Sponsor Name:			Agreement Number:		Date:		
Student Identifer (e.g., the student ID number the district uses OR the POS student ID number) (if applicable)	Student **First Name**	Student **Last Name**	**Eligibility** f=free, r=reduced (Do not include denied)	**School Name**	**Method of Certification** A =application, DC =direct certification, F= foster child, O=Other	**Date Student Certified** as Eligible for Free/Reduce Priced Meals	Was this student selected for **verification**? Put an "X" if the student was selected for verification.

■ **All free and reduced-price eligible children from all sites that are being claimed by the sponsor must be included on this list and are subject to review**

Certification and Benefit Issuance

Sponsor Name:			Agreement Number:		Date:		
Student Identifer (e.g., the student ID number the district uses OR the POS student ID number) (if applicable)	Student **First Name**	Student **Last Name**	**Eligibility** f=free, r=reduced (Do not include denied)	**School Name**	**Method of Certification** A =application, DC =direct certification, F= foster child, O=Other	**Date Student Certified** as Eligible for Free/Reduce Priced Meals	Was this student selected for **verification**? Put an "X" if the student was selected for verification.

- **The benefit issuance documents that generate this list must be those used at the POINT OF SERVICE**

- **The list must be generated from first day of review month**
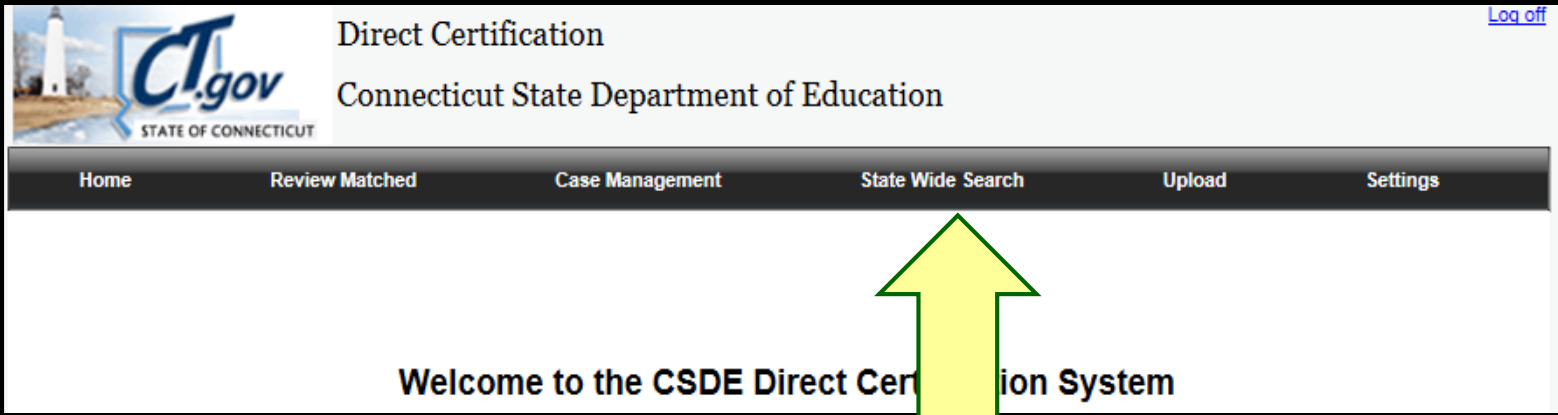
Certification and Benefit Issuance

- **The benefit issuance document will be uploaded as an attachment in the SFA's AR module (CNP online system)**

- **Free and reduced-price student information is confidential**

Do not transmit via email!

Direct Certification

- **Must have proof if you find a student via the State Wide Search Link**
- **Make copy of page or print out as proof of eligibility**

Direct Certification

Case Management

■ **Check at least weekly**
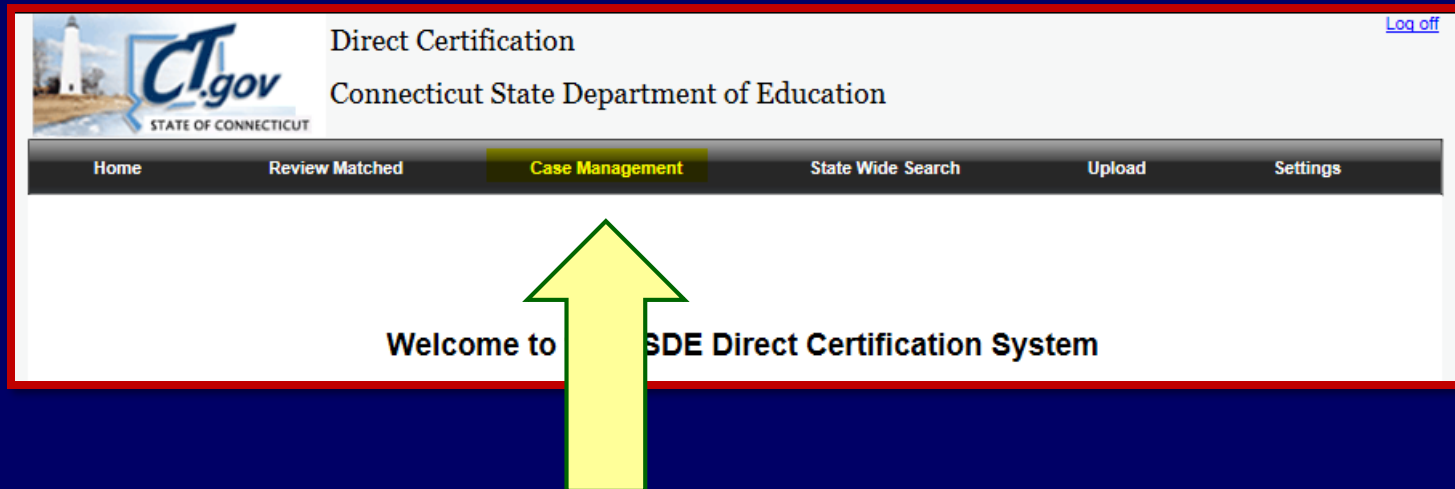
CSDE Direct Certification Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=335442

Certification and Benefit Issuance

WHILE ON SITE

- **Validate SFA's procedures described on Off-site Assessment Tool**
- **Validate student applications and direct certification**
- **Validate Benefit Issuance document**
- **Confirm that Benefit Issuance document is the one used at point of service**
- **Review denied applications**

Common Problems with Benefit Issuance

- **Applications MUST be in the same order as statistical sample sent to you by lead reviewer**

- **Include ALL free, reduced-price and directly certified students on Benefit Issuance Excel spreadsheet**

Sponsor Name:			Agreement Number:		Date:		
Student Identifer (e.g., the student ID number the district uses OR the POS student ID number) (if applicable)	Student **First Name**	Student **Last Name**	**Eligibility** f=free, r=reduced (Do not include denied)	**School Name**	**Method of Certification** A =application, DC =direct certification, F= foster child, O=Other	**Date Student Certified** as Eligible for Free/Reduce Priced Meals	Was this student selected for **verification**? Put an "X" if the student was selected for verification.

Common Problems with Benefit Issuance

- **Do NOT include denied students (although CSDE will review all denied applications on site)**

- **Make sure students are coded as indicated on the document**

Sponsor Name:			Agreement Number:		Date:		
Student Identifer (e.g., the student ID number the district uses OR the POS student ID number) (if applicable)	Student **First Name**	Student **Last Name**	**Eligibility** f=free, r=reduced (Do not include denied)	**School Name**	**Method of Certification** A =application, DC =direct certification, F= foster child, O=Other	**Date Student Certified** as Eligible for Free/Reduce Priced Meals	Was this student selected for **verification**? Put an "X" if the student was selected for verification.

Common Problems with Benefit Issuance

- **Not including students from all schools**

- **Not including students from Interschool Agreement sites**

- **Office benefit issuance document does not match the POS benefit issuance document**

Certification and Benefit Issuance

INDEPENDENT REVIEW OF APPLICATIONS

- HHFKA includes several provisions aimed at helping increase EFFECTIVENESS AND INTEGRITY in Child Nutrition Programs

- Section 304 requires that certain LEAs conduct a SECOND REVIEW of applications for free and reduced-price meal benefits before eligibility determinations are made if, during an AR, the LEA DEMONSTRATES HIGH RISK

Certification and Benefit Issuance

INDEPENDENT REVIEW OF APPLICATIONS

- **To avoid conducting a second review of applications next year (and having to file additional reports) make sure applications and benefit issuance documents are in GOOD ORDER before the AR**

- **LEAs considered to be high risk must conduct a second review of all applications until they can demonstrate to CSDE's satisfaction that no more than 5% of reviewed applications required a change in eligibility determinations**

Verification

AROT-3

Copy

Have Available

AROT | 2016

Section II: Meal Access and Reimbursement

Verification

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

- ☐ A document to show the total number of newly approved applications on file as of October 1, 2016. *This is the list used for the selection of applications for verification.*
- ☐ All verified applications for the current school year
- ☐ The actual verification materials used by the sponsor in conducting verification including:
  - o The completed Verification Selection Worksheet for each household selected for verification
  - o The original household application for all verified households
  - o The verification notification letter to selected households
  - o Documentation of follow-up with unresponsive households
  - o Any notice of adverse action
- ☐ Documentation from the Point-of-Service demonstrating change in student eligibility status as a result of verification, when applicable. *This could be a print out of the Benefit Issuance Document on date change was made or screen shot of change made in electronic POS system.*

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Verification

WHILE ON SITE

- **Validate SFA's procedures as described on Off-site Assessment Tool**

- **Determine compliance with verification requirements, for example**
  - confirmation reviews conducted correctly
  - sample size calculated correctly
  - correct language on notification letters

Verification

WHILE ON SITE

- **Evaluate accuracy of verified applications**

- **Review the most recently submitted Verification Collection Report (FNS-742)**

Verification

Now completed online!

Verification

VERIFICATION REMINDERS

- **Use CSDE sample forms**

- **Make copies of all correspondence and documentation**

- **Organize materials for each application selected**

- **Complete Verification Checklist and include with paperwork**

Document, Document, Document!

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320644

Verification

FOLDER FOR EACH APPLICATION THAT INCLUDES

- **Verification Type Worksheet**
  - **Standard Sample Size Worksheet OR**
  - **Alternate One Sampling Worksheet OR**
  - **Alternate Two Sampling Worksheet**

- **Verification Selection Worksheet**

- **Selected application**

- **Household Notification of Selection form**

- **Other household letters as applicable, e.g., employer letter, etc.**

- **Second Household Notification of Selection form**

- **Notification of adverse action or continuation of benefits**

Sample Verification Selection Worksheet

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/VerSelect.pdf

Common Problems with Verification

- **Poor documentation to support numbers**
- **Confirmation review is not completed**
- **Eligibility changes not made to POS**
- **Accepting improper documentation to confirm eligibility**
- **Incorrect nondiscrimination statement used on verification letters**
- **Not submitting FNS-742 as required**
- **Required language not included on verification letters**

AROT
MEAL ACCESS AND REIMBURSEMENT

2 – Meal Counting and Claiming

Meal Counting and Claiming

Copy →

Have Available →

AROT-4

AROT | 2016

Section II: Meal Access and Reimbursement

Meal Counting and Claiming

Make a COPY for the State Agency

☐ Edit Check Worksheets for all programs and all schools in the district in support of the claim for reimbursement for the review month.
Edit Checks must have the attendance factor applied and include paid students.

Have available for the State Agency to REVIEW

☐ All supporting documentation from the Point-of-Service for the claim submitted for the review month for all child nutrition programs at all schools. *This is the specific documents the claims preparer uses in the placement of the monthly claim for reimbursement.*

☐ Claims submitted for all schools for the review month.

4   Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Meal Counting and Claiming

WHILE ON SITE

- **Validate SFA's procedures described in Off-site Assessment Tool**

- **Validate SFA's meal counting and claiming process**

- **Observe how SFA prevents overt identification, ensures accurate counts by category and addresses overrides**

- **Observe how SFA calculates and uses attendance factor and daily edit checks**

Meal Counting and Claiming

WHILE ON SITE

■ **Review reimbursement claim and supporting documentation for review month at all school CNPs at all schools/sites**

  • **Includes edit check (worksheet or computerized)**

> **Edit checks are a required part of claim consolidation process and are required at each school**

Meal Counting and Claiming

WHILE ON SITE

- **Includes determination and use of attendance factor (AF) which must be applied daily**

  - ▶ **If daily meal counts exceed attendance factor multiplied by free or reduced enrollment more than 50 percent of the time, SFA must investigate why**

  - ▶ **Sites can NEVER claim more than total free or reduced eligible**

Edit Checks

- **Prevent over claims and meal counting problems BEFORE claim submitted to CSDE for payment**

- **Must be performed on daily meal counts BEFORE submitting monthly claim for reimbursement**

  - SFA must update number of free, reduced and paid eligible students as changes occur and apply appropriate attendance factor

Edit Checks

■ **May be done manually or automated through a POS system**

- **Check with your POS company to see if your system has this ability**

- **Confirm that it functions correctly and correct attendance factor is applied as required by USDA regulations**

CSDE Edit Check Worksheets

■ **CSDE "Forms" Web page under "E"**

■ **Use if POS does not have edit check function or if another meal counting system is used**

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320680#e

CSDE Edit Check Worksheets

- **Edits Checks are required for CEP schools**
- **CSDE Program Guidance Web page under "C"**
- **Use if POS does not have edit check function or if another meal counting system is used**

Community Eligibility Provision (CEP) Edit Check Worksheet

Site: _____ B/L: _____ Month/Year: _____

A	B	x	C	=	D	E	F
Date	Enrollment	x	Attendance Factor Percentage	=	Adjusted Eligible Attendance	Number of Meals Claimed	If Column E exceeds Column D on **50% OR MORE** of the monthly serving days, provide an explanation
Example	750	x	.942 %	=	707 (always round up)	712	High participation: Pizza day
1		x		=			
2		x		=			
3		x		=			
4		x		=			
5		x		=			
6		x		=			
7		x		=			
8		x		=			

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=335336

Sample Completed Edit Check Worksheet

Meal Counting and Claiming

WHILE ON SITE

- **Percentage of meal service for breakfast and lunch**

- **Counting and claiming practices**

- **Proper identification of a reimbursable meal**

- **Cashing out procedures**

- **Storage of cash and checks, including daily deposit**

Common Problems with Meal Counting and Claiming

- **Edit checks not being done**

- **Not taking point of service counts**

- **Edit checks do not include paid meals**

- **Site enrollment not updated daily**

- **More meals claimed than eligible students**

- **Staff do not understand importance of edit check**

Edit Check Activity
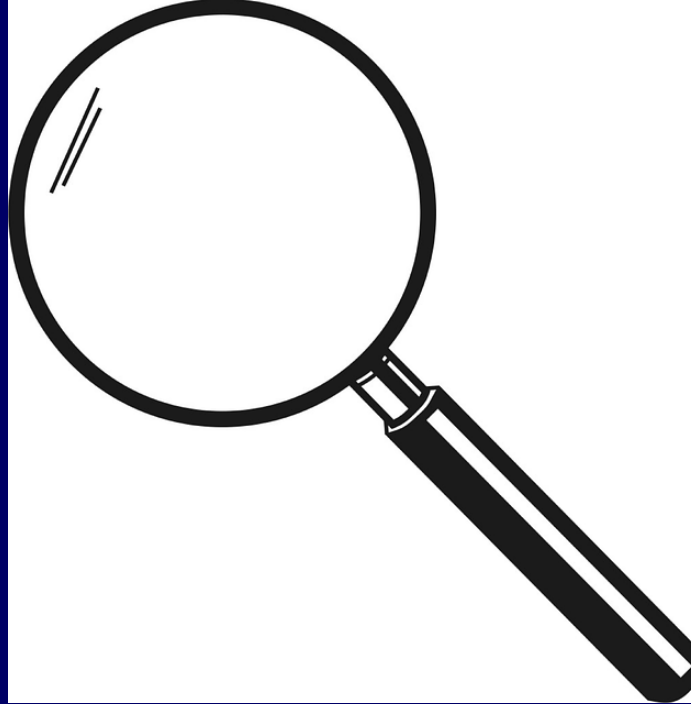
AROT
NUTRITIONAL QUALITY AND MEAL PATTERN

1. Meal Components and Quantities

2. Offer versus Serve (OVS)

3. Dietary Specifications and Nutrient Analysis

Nutritional Quality and Meal Pattern

AROT-5

AROT | **2016**

Section III: Nutritional Quality and Meal Pattern

Meal Components and Quantities

Dietary Specifications and Nutrient Analysis

Make a COPY for the State Agency

☐ Detailed menus for all child nutrition programs for the first week of the review month for the following selected school(s): name of school(s). *This menu must include all choices available to students. Include all milk varieties and vegetable subgroups.*

☐ Menu for the review month for all selected schools.

☐ Menu for the week of the on-site visit for all selected schools.

Have available for the State Agency to REVIEW

☐ Crediting information for the menu items served during the week of the onsite review.

☐ Completed Menu Worksheet portion of a USDA-approved Menu Planning Tool for Certification (Menu Worksheet) for each selected school for the first week of the review month, for both breakfast and lunch for each grade group (e.g. K-5, 6-8, K-8, 9-12) in that school. *Include main menu items and ALL alternate menu choices.* DO NOT PRINT THE MENU WORKSHEETS. HAVE THESE AVAILABLE ON A FLASH DRIVE.

☐ Production Records for breakfast and lunch from each selected school for the first week of the review month. *Production records must be COMPLETE, listing ALL items offered to students including milk varieties and condiments.*

☐ Recipes for foods served at breakfast and lunch from each selected school for the first week of the review month.

☐ Food labels (CN labels, product formulation statements to show crediting information, labels with WGR information) for foods served on the breakfast and lunch menu for the first week of the review month for each selected school.

In some cases, due to findings during the on-site portion of the review, copies of the items listed above may be required by the State Agency.

Attached is the *Menu Documentation Organizational Tool* (MCOT) to assist with the organization of the menu documentation.

5

Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Copy

Have Available

Nutritional Quality and Meal Pattern

- **Support learning and educational achievement**
  - Provide students with well-balanced meals
  - Combat childhood hunger

- **Nutrition education**
  - Teach students components of a well-balanced meal, variety

- **Stewardship of federal dollars**
  - Ensure that meals reimbursed with federal dollars contain required components

Nutritional Quality and Meal Pattern

■ **Assess meal components and quantities**

- **Document review, menus, production records, recipes and labels**

- **Meal observation**

- **Menu Worksheets review**
  - ▶ **All sections except Simplified Nutrient Assessment tab**

Nutritional Quality and Meal Pattern

- **Evaluate OVS policy and implementation**

  - **Staff and students understand what constitutes a reimbursable meal**

  - **Signage**

  - **NSLP and SBP – ½ cup of fruit or vegetable selected with all reimbursable meals**

Nutritional Quality and Meal Pattern

- **Assess compliance with dietary specifications**
- **Menus consistent with federal standards**
  - **calories**
  - **saturated fat**
  - **sodium**
  - **trans fat**

AROT
NUTRITIONAL QUALITY AND MEAL PATTERN

1 – Meal Components and Quantities

Meal Quantities and Components

PRIOR TO ON-SITE REVIEW

- **SFAs must complete USDA Meal Pattern Compliance Worksheet or USDA-approved Menu Planning Tool for Certification for each reviewed school for ONE WEEK from review period for**
  - breakfast and lunch
  - each age/grade group
  - first full week of review period (may have flexibility)

- **Worksheet must include ALL MEALS SERVED DAILY including all daily alternate meals offered**

- **Not required to complete simplified nutrient assessment portion of Compliance Worksheet**

CSDE USDA Certification of Meal Pattern Compliance Web Page

USDA MEAL PATTERN COMPLIANCE WORKSHEETS

The USDA certification tools include menu worksheets and simplified nutrient assessment worksheets. These tools must be used by all Connecticut SFAs for certification of meal pattern compliance.

USDA Worksheet Instructions

- Breakfast Simplified Nutrient Assessment Instructions
- Breakfast Menu Worksheet Instructions
- Lunch Menu Worksheet Instructions
- Lunch Simplified Nutrient Assessment Instructions
- Instructions for Transferring Data from USDA Certification

Breakfast Worksheets	Lunch Worksheets
All breakfast worksheets are available for the following grade groups: - Grades K-5 - Grades K-8 - Grades 6-8 - Grades 9-12 - Grades K-12 - Three-day Breakfast * - Four-day Breakfast * - Five-day Breakfast - Six-day Breakfast * - Seven-day Breakfast *	All lunch worksheets are available for the following grade groups: - Grades K-5 - Grades K-8 - Grades 6-8 - Grades 9-12 - Three-day Lunch * - Four-day Lunch * - Five-day Lunch - Six-day Lunch * - Seven-day Lunch *

* The three-day, four-day, six-day and seven-day week menu worksheets are only for schools that regularly operate for three, four, six or seven days. Schools with occasional decreases in the regular school week due to holidays, snow days or other reasons are not required to adjust the weekly requirements and should continue to use the five-day week worksheets. For more information, see Menu Planning for Shorter and Longer Weeks.

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=334232

USDA Certification Worksheet For Meal Pattern Compliance

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

Helpful Hints for Preparing Menu Week

- **Use cycle menus**

- **Complete worksheets BEFORE you implement the week to ensure all items meet requirements**

- **Compile all supporting documentation (recipes, CN labels, product formulation statements (PFS), production records) BEFORE you implement the week**

Helpful Hints for Preparing Menu Week

■ **Use the same menu the week of the on-site review**

■ **Include all items offered**

- **main menu**

- **alternate menu options**

Menus

- **Must list ALL reimbursable meals**
  - **Meals**
  - **Sides**
  - **Fruits**
  - **Vegetables**
  - **Milk**
  - **Alternate meals**

- **Must include SEPARATE MENUS for each age/grade group**

- **Must list VARIETY OF MILK served**

- **Must list VEGETABLE SUBGROUPS**

Supporting Documentation for Menu Worksheets

- **MENUS that correspond to each completed Meal Pattern Compliance Worksheet**

- **RECIPES for all items served**

- **FOOD LABELS (CN labels, PFS to show crediting information, labels with WGR information)**

- **Completed PRODUCTION RECORDS for breakfast and lunch from each selected school**

Requirements for Production Records

- **List all menu items**
- **Offer all required meal components**
- **Used for proper planning, e.g., evaluate for consumption and leftovers**
- **Document food prepared is creditable for the total number of portions served**
- **Include adult meals and a la carte sales**
- **Document weekly quantity requirements for grains, meat/meat alternates, vegetables, fruit and milk**
- **Identify if seconds are offered**
- **Align with standardized recipes**
- **Include condiments**

Sample Incomplete Production Record

Planning Record   Meal Period: Lunch   Grade Group: K5   Day 11   Report Run: Aug 10, 2012

School: _____   _____   Manager Signature: _____

MEALS SERVED: Student Reimbursable __212__   Adult Paid ____   Employee Free _____   Other 1 _____   Other 2 _____   Total ALL Meals

Recipe Short Name and Number	Portion Size	Utensil	Compon	HACCP Code	Portions Planned (Forecast) Reimb	Other	Total	Portions +/-	Total Portions Prepared	Bulk Quantity Prepared*	Portions Leftover	Portions Served (Actuals) Reimb	Other	Total	Time Temp Prep	Time Temp Mid Point	Time Temp End	Leftover Status**	Notes
Whole Grain Spaghetti (35978.5)	1 cup	tongs										178							
Beef Italian Meat Sauce (35978.2)	1/2 cup	ladle-8oz										178							
Seasoned Broccoli (34555.2)	1/2 cup	scoop # 8										175							
Turkey and Cheese on Whole Wheat	1 each							257				13							
Bagel w/ Yogurt and String Cheese (	1 each																		
Fresh Red Pepper Strips (39236.6)	1/4 cup	tongs																	
Confetti Coleslaw	1/4 cup	scoop # 8							2 cases										
Blueberries with Whipped Topping (4	1/2 cup								1 case										
Watermelon Cubes (38922)	1/2 cup								4 prints / 3		0								
Milk, Skim/Nonfat, 8 floz (3874)	1 each											12							
Milk, Lowfat, 1%, 8 floz (3879)	1 each											25							
Milk, Chocolate, Fat Free, 22 g suga	1 each											200							
Fat Free Italian Dressing (34931)	1 tbsp																		
Fat Free Ranch Dressing (34930)	1 tbsp																		

Production Records

- **Missing production records may result in disallowance of meals and fiscal action**

- **If production records reveal problems with meal components or quantities, CSDE is REQUIRED to expand the review of production records to, at a MINIMUM, the entire review period**

CSDE Production Records Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320672

Menu Documentation Organizational Tool (MDOT)

- **Helps organize documents for review of Meal Components and Quantities**

- **Assists menu planners in completing the USDA Meal Pattern Compliance Worksheets by having all needed documents in order for selected week**

Menu Documentation Organizational Tool (MDOT)

MONDAY

COMPLETED PRODUCTION RECORD

Production records must be complete. Record all food items offered to students including the milk variety, all fruit and vegetable choices and any condiments offered.

MDOT | August 2015

MONDAY

STANDARDIZED RECIPES & PRODUCT LABELS

Standardized Recipes must be used to document that the serving listed provides the appropriate portion size of each meal pattern component.

Product Labels (CN Labels, Product Formulation Statements, Nutrition Facts labels, Ingredient labels) must be available from the manufacturer documenting the amount of each meal pattern component per serving based on either an original CN label from the product carton or a PFS signed by an official of the manufacturer. Documentation must also include the product's nutrition label and ingredients statement.

Include:

- labels for processed ingredients, as needed
- labels for ALL menu choices (unless supplied under daily sheets).

Place **Standardized Recipes** in the same order as the food is listed on the **Production Record**. Place all **Product Labels** in the same order as the food is listed on the **Standardized Recipe**.

MDOT | August 2015

Menu Example

Lunch Menu

Grades 9-12

Deli Turkey and Cheese (2 M/MA) on
   WGR Bread (2 oz eq)

Potato Salad (½ cup Other)

Carrot Sticks (½ cup Red/Orange)

Diced Peaches (1 cup)

Choice of Milk – Fat Free, FF Chocolate, 1% (8 fl oz)

Menu Example

Recipe 120 Deli Turkey and Cheese on WGR Bread

Recipe 120

Deli Turkey and Cheese on WGR Bread

Portion: 1 Sandwich
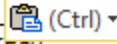
Ingredients	1 Serving
Boar's Head Ovengold Breast of Turkey	2.75 oz
USDA American Cheese 100019	1 slice (.5 oz)
Rockland Bakery Whole Grain Wheat Bread (28g per slice)	2 slices

HACCP Process 1: No Cook
Place 2.75 oz of sliced turkey breast and 1 slice (.5oz) of cheese on top of one slice of bread. Top with second slice of bread. Cut sandwich in half diagonally. Serve immediately or package sandwich and hold for cold service at 45 degrees F or lower. Portion size = 1 sandwich.

Crediting: 1 Sandwich provides

Crediting	1 Sandwich
Boar's Head Ovengold Breast of Turkey	1.61 m/ma
USDA American Cheese 100019	.5 m/ma
Rockland Bakery Whole Grain Wheat Bread	2 oz eq
Total	2 m/ma & 2 oz eq

Menu Example

Boar's Head Ovengold Breast of Turkey

Product Formulation Sheet (PFS)

2.75 oz = 1.61 M/MA

Menu Example

USDA American Cheese 100019

USDA Food Fact Sheet

1 slice = .5 oz m/ma

UNITED STATES DEPARTMENT OF AGRICULTURE
USDA Foods Product Information Sheet
For Child Nutrition Programs

100019—Cheese, American, White, Pasteurized, Sliced

Category: Meat/Meat Alternate

PRODUCT DESCRIPTION

This item is a pasteurized, processed white American cheese. This product is available in cases with six 5-pound loaves containing 160 1/2-ounce slices per loaf.

CREDITING/YIELD

- One case yields 480 1-ounce portions of cheese.
- CN Crediting: 1 ounce cheese credits as 1 oz equivalent meat/meat alternate.

CULINARY TIPS AND RECIPES

- Sliced American cheese can be used as a sandwich component or in recipes that are enhanced by a smooth, creamy melted cheese.
- Processed cheeses should be used in moderation when planning lower sodium menus.
- For more culinary techniques and recipe ideas, visit NFSMI or Team Nutrition.

FOOD SAFETY INFORMATION

- For more information on safe storage and cooking temperatures, and safe handling practices please refer to: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles.

NUTRITION FACTS

Serving size: 1 ounce/ 2 slices (28 g), American cheese

Amount Per Serving

Calories	110
Total Fat	9g
Saturated Fat	5g
Trans Fat	0g
Cholesterol	25mg
Sodium	270mg
Total Carbohydrate	2g
Dietary Fiber	0g
Sugars	1g
Protein	5g

Source: USDA Foods Vendor Labels

Allergen Information: Please refer to allergen statement on the outside of the product package for vendor-specific information. For more information, please contact the product manufacturer.

Nutrient values in this section are from the USDA National Nutrient Database for Standard Reference or are representative values from USDA Foods vendor labels. Please refer to the product's Nutrition Facts label or ingredient list for product-specific information.

June 2014

Visit us at www.fns.usda.gov/fdd

www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets

Menu Example

Rockland Bakery
WG Wheat Bread
WGR Ounce Equivalent Sheet
2 slices = 2 oz eq

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/grainsozeq.pdf

Menu Example

Potato Salad

USDA Recipe E-09

2/3 cup or #6 scoop

= ½ cup Other

Potato Salad

Vegetable | Salads and Salad Dressings | E-09

Ingredients	50 Servings		100 Servings		Directions
	Weight	Measure	Weight	Measure	
Potatoes, as purchased	9 lb 5 oz		18 lb 10 oz		1. Steam potatoes at 5-6 pounds of pressure for 30-45 minutes, or boil for 30-40 minutes. Cool, peel, and dice into ½" cubes.
*Fresh celery, chopped	1 lb 2 oz	1 qt ¼ cup	2 lb 4 oz	2 qt ½ cup	2. Add all other ingredients. Mix lightly until well blended. Spread 5 lb 9 oz (approximately 1 gal ½ cup) into each shallow pan (12" x 20" x 2 ½") to a product depth of 2" or less. For 50 servings, use 2 pans. For 100 servings, use 4 pans.
*Fresh onions, finely chopped	7 ½ oz	1 ¼ cups	15 oz	2 ½ cups	
Sweet pickle relish, undrained	6 oz	⅔ cup	12 oz	1 ⅓ cups	
Fresh large eggs, hard-cooked, chopped (optional)		12 each		24 each	

Potato Salad

Vegetable | Salads and Salad Dressings | E-09

SERVING: ⅔ cup (No. 6 scoop) provides ½ cup of vegetable.

YIELD:
50 Servings: about 11 lb 1 ½ oz
100 Servings: about 22 lb 3 oz

VOLUME:
50 Servings: about 2 gallons 1 cup 2 pans
100 Servings: about 4 gallons 2 cups 4 pans

Edited 2004

Nutrients Per Serving					
Calories	102	Saturated Fat	0.48 g	Iron	0.38 mg
Protein	1.45 g	Cholesterol	6 mg	Calcium	10 mg
Carbohydrate	17.90 g	Vitamin A	26 IU	Sodium	309 mg
Total Fat	2.90 g	Vitamin C	9.2 mg	Dietary Fiber	1.6 g

www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cElEPTEwMiZpc01ncj10cnVl

Menu Example

Carrot Sticks

Food Buying Guide or

Start w/ Half a Cup Guide

2.2 oz or 6 sticks = ½ cup red/orange

www.swhacct.org/#!portion-guides/cknz

Menu Example

USDA Diced Peaches 110234

USDA Food Fact Sheets

½ cup drained diced peaches = ½ cup fruit *

*For grades 9-12, students must be offered 1 cup of fruit, but only have to take a ½ cup for OVS

www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets

Menu Example

Milk Varieties

Menu Example

Condiments

Nutrition Facts
Serving Size 1 tsp (5.6g)
Servings Per Container 1

Amount Per Serving

Calories 0	Calories from Fat 0

% Daily Value*

Total Fat 0g	**0%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 70mg	**3%**
Total Carbohydrate 0g	**0%**
Dietary Fiber 0g	**0%**
Sugars 0g	
Protein 0g	

Vitamin A 0%	Vitamin C 0%
Calcium 0%	Iron 0%

*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:
Fat 9 • Carbohydrate 4 • Protein 4

Variety N
530500

Package
Packet

Pack
500

Size
5.5 g
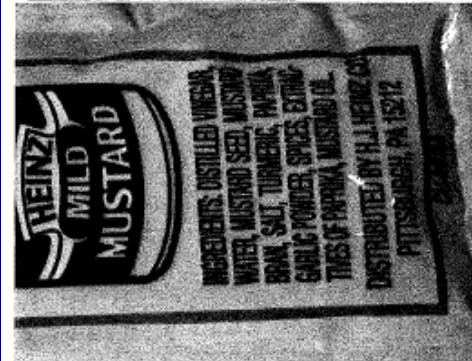
Menu Example

Production Record

Menu Production Record 3 • Grades 9-12

Site: ABC School

Date: 9-10-15

☐ Breakfast   ☒ Lunch

Today's Menu
Deli Turkey & Cheese (2 m/ma) on WGR Bread (2 ozeq)
Potato Salad (1/2 cup Other)
Carrot Sticks (1/2 cup Red/Orange)
Diced Peaches
Choice of Milk

Number of Meals Served

Grades 9-12: 40

Adults: 5

Total: 45

Menu Item	Recipe Number or Product Name and Code	Portion Size and Amount Prepared				Meal Component Contribution									Temperatures (Take corrective action if not at target temperature)			Total Quantity of Food Used (e.g., number of servings, pounds, cans)	Amount Leftover	Total Amount Served
		Grades 9-12		Adults and A La Carte		Meat/ Meat Alternate oz eq	Grains oz eq	Vegetables cups					Fruits cups	Milk fl oz	Time: 9:30	Time: 10:15	Time:			
		Portion Size	Number of Portions	Portion Size	Number of Portions			Dark Green	Red/ Orange	Legumes	Starchy	Other								
Deli Turkey & Cheese Sandwich	Recipe #120	1 Sand wich	50	1 Sand wich	5	2 m/ma	2 oz eq								42	40		55	10	45
Potato Salad	USDA Recipe E-09	2/3 cup	50	2/3 cup	5							½ cup			40	41		55	5	50
Carrot Sticks (1/2 cup)		6 sticks	30	6 sticks	5				½ cup						43	43		35	15	20
Diced Peaches	USDA 110234	½ cup	75	½ cup	5								1/2 cup		43	43		80	20	60
Chocolate Milk	Garelick Farms	1 milk	40											8 oz	38	40		40	5	35
1% Milk	Garelick Farms	1 milk	10											8 oz	38	40		10	5	5
Fat Free Milk	GArelick Farms	1 milk	10											8 oz	38	40		10	5	5
Mustard	Heinz	1 packet	50															50	40	10

On-site Meal Service Observation

PRIOR TO MEAL SERVICE

- **Ensure all reimbursable meal lines offer all required components**

- **Observe meal preparation**

- **Ensure signage is posted and students are instructed how to select a reimbursable meal**

On-site Meal Service Observation

DURING MEAL SERVICE

- **Observe percentage of meal service for each line**

- **Determine if meal contains components and quantities for age/grade group**

- **Ensure students have access to and know how to select a reimbursable meal**

AROT
NUTRITIONAL QUALITY AND MEAL PATTERN

2 – OVS

OVS

- **Reduces food waste in school meals while permitting students to decline foods they do not intend to eat**

- **Optional for lower grade levels in NSLP**

- **Optional for SBP**

OVS

- **At senior high school level, OVS is required at lunch unless school or SFA demonstrates to CSDE that their system does not accommodate OVS**

- **OVS not required (even at senior high level) for**
  - **pre-packaged Meals (Bagged or "Grab and Go" Meals) offered as part of breakfast in the classroom or field trips**
  - **students leaving the campus for work study**

On-site OVS Observation

PRIOR TO MEAL SERVICE

- **Ensure school is offering enough food on all reimbursable meal service lines**

- **Ensure signage for breakfast and lunch is posted on service line**

On-site OVS Observation

DURING MEAL SERVICE

- **Ensure students are selecting enough components/items for a reimbursable meal**

- **Ensure food service staff are accurately judging quantities on self-serve bars**

- **Ensure food service staff at POS are trained and can recognize reimbursable meals**

- **Ensure staff can properly distinguish reimbursable meals from a la carte purchases**

USDA OVS Manual

EFFECTIVE BEGINNING SCHOOL YEAR 2015-2016

OFFER VERSUS SERVE
GUIDANCE FOR THE NATIONAL SCHOOL LUNCH PROGRAM
AND THE SCHOOL BREAKFAST PROGRAM

FOOD AND NUTRITION SERVICE   U.S.
DEPARTMENT OF AGRICULTURE

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/ovsmanual.pdf

CSDE Menu Planning Guide
Section 4 – Meal Service

AROT
NUTRITIONAL QUALITY AND MEAL PATTERN

3 – Dietary Specifications and Nutrient Analysis

Dietary Specifications and Nutrient Analysis

- **Determine if SFA is serving reimbursable meals according to Dietary Specifications at one targeted school**
  - **Calories**
  - **Saturated Fat**
  - **Sodium**
  - **Trans Fat**

- **Nutrient Analysis ONLY REQUIRED if you are notified by CSDE**

SFAs with More than One School being Reviewed

MEAL COMPLIANCE RISK ASSESSMENT TOOL (MCRAT)

- **Completed in the CNP online system for each reviewed school as part of Off-site Assessment Tool**

- **Used to assess schools most at risk for error-prone areas such as**
    - multiple meal service lines
    - multiple age groups
    - alternate meal service locations

- **School with highest score identified for TARGETED MENU REVIEW**

Dietary Specifications Questionnaire

- **Completed for school chosen for TARGETED MENU REVIEW**
  - **Analyzes SFA's food service practices for breakfast and lunch**
  - **Determines whether meals are at risk for not meeting required dietary specifications**
- **SFA should exercise best judgment and select most appropriate response**

Dietary Specifications Questionnaire

- **Must be completed by SFA prior to review**
  - Completed in the CNP online system

- **Will be verified by reviewer on site**

- **Depending on results and on-site confirmation**
  - Technical assistance may be provided
  - Nutrient analysis may be required

> **Nutrient analysis may also be conducted at CSDE's discretion**

Nutrient Analysis
Sponsors Determined High Risk

- **One week weighted nutrient analysis of breakfast and lunch required for each menu type offered for TARGETED SITE**

OR

- **Validate existing nutrient analysis of breakfast and lunch for each menu type offered if SFA is using USDA-approved nutrient analysis software for TARGETED SITE**

CSDE Menu Planning Guide
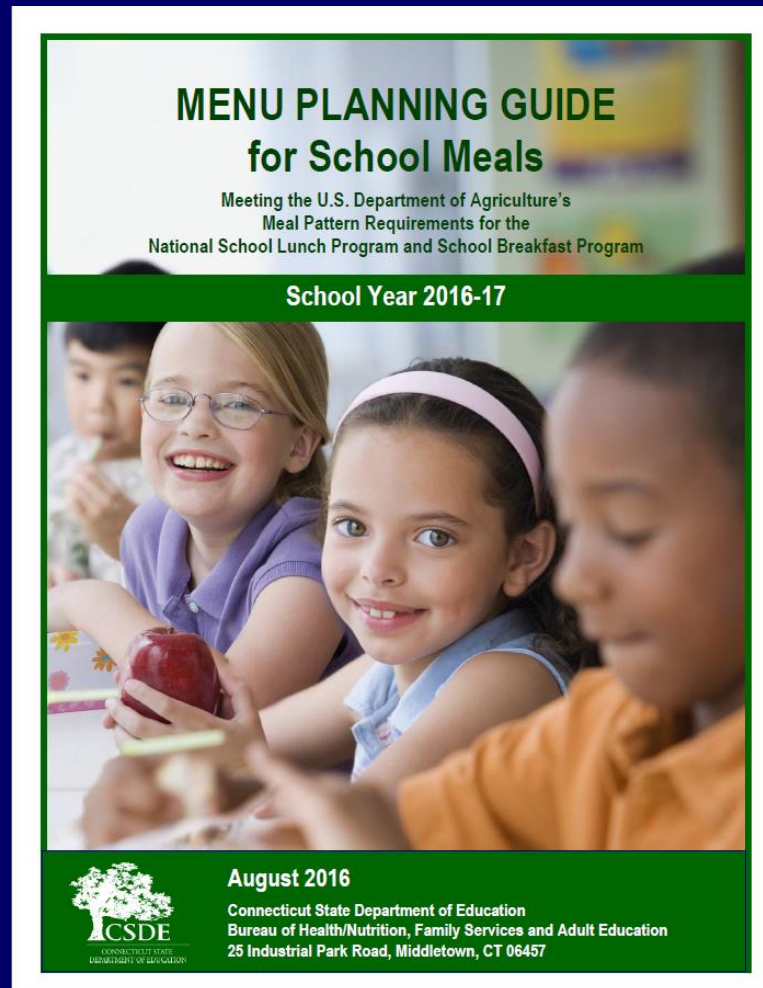
www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=334320

Common Problems with Nutritional Quality and Meal Pattern

- **Menus do not include all available items**
- **Sufficient documentation not provided to support crediting**
- **Supporting documentation poorly organized**
- **Alternate meals not included on menu compliance worksheets**
- **Incorrect crediting of deli meats (may not credit ounce-per-ounce)**

Common Problems with Nutritional Quality and Meal Pattern

- **Portion sizes listed on recipes not consistent with what is listed on production record**

- **Productions records not complete**

- **Kitchen staff not following standardized recipes**

- **Serving utensils used do not match what is listed on recipes**

- **Staff make menu changes (substitutions) without consulting menu planner**

AROT
RESOURCE MANAGEMENT

1. Maintenance of Nonprofit School Food Service Account
2. Paid Lunch Equity (PLE)
3. Revenue from Nonprogram Foods
4. Indirect Costs

AROT
RESOURCE MANAGEMENT

1. Maintenance of Nonprofit School Food Service Account
2. Paid Lunch Equity (PLE)
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If a sponsor flags in a particular area, then a Comprehensive Resource Management Review will be conducted in that area.

Resource Management

- **CSDE conducts risk assessment based on completed Resource Management section of Off-site Assessment Tool**

  - completed in the CNP Online System

  - must be completed at least four weeks prior to the on-site review

Resource Management

1 or more risk indicators in <u>1 of the 4 areas</u> ➡ Comprehensive Review of the identified area is required
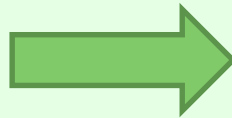
1 or more risk indicators in <u>more than 1 area</u> ➡ Comprehensive Review of each identified area is required
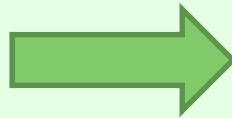
1 or more risk indicators <u>in each</u> <u>of the 4 areas</u> ➡ Comprehensive Review of all four areas is required
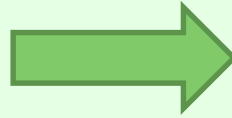
Resource Management

- **Results of Resource Management Risk Indicator Tool determines if a Comprehensive Review is required**

- **CSDE lead reviewer will notify SFA if this part of the review is being conducted**

Resource Management

- **At reviewer's discretion, may need some or all documents to review a risk indicator**
    - Know what these documents are and how to access them during review, just in case

AROT
RESOURCE MANAGEMENT

1 – Maintenance of Nonprofit School Food Service Account

Maintenance of Nonprofit School Food Service Account

Copy →

Have Available →

AROT-6

Section IV: Resource Management

Maintenance of Non-Profit School Food Service Account

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ Year-end statement of revenues and expenses for school year 2015-2016 (i.e., the *Financial Report*, which is submitted in the online Colyar system by November 1)

☐ General Ledgers for school year 2015-2016.

☐ Other documentation showing revenues and expenditures to/from nonprofit food service account (e.g., balance sheets, invoices, and receipts).

☐ Documentation of unpaid student balances at end of school year 2015-2016.

☐ Copy of the internal control procedures used to ensure that only allowable costs are charged to the non-profit school food service account.

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Maintenance of Nonprofit School Food Service Account

■ **SFAs must maintain nonprofit school food service account**

- **Maximize program benefits to enrolled students**

- **Federal funds must be used only for operation and improvement of school food service**

- **SFA compliance with regulations (7 CFR 210.14(a))**

Maintenance of Nonprofit School Food Service Account

THREE COMPONENTS

1. **Nonprofit School Food Service Revenue**

2. **Net Cash Resources**

3. **Allowable Costs**

Maintenance of Nonprofit School Food Service Account

ALLOWABLE COSTS

- Ensure costs are reasonable and necessary for specific program functions

- Use Appendixes A and B of 2 CFR 225 as guidance to determine if cost is allowable

- Review actual invoices and receipts as necessary to verify compliance

- Identify unallowable costs

Annual Revenue and Cost Expenditure Report

REVENUES AND EXPENDITURES

1. Revenue for Reporting Period
   a. Cash From Daily Sales — $
   b. Other Local Revenue — $
   c. BOE Subsidies to Food Services Dept. — $
   d. Total Revenue — $0.00
2. Expenditure for Reporting Period
   a. Purchased Food Used — $
   b. Direct Labor — $
   c. Employee Benefits — $
   d. Purchased Services — $
   e. Equipment Purchase — $
   f. Supplies / Miscellaneous — $
   g. BOE Subsidies — $
   h. Total Costs — $0.00
3. Computed Operating Position
   a. Ending Cash Balance — $
   b. Accounts Receivable — $
   c. Value of Inventories on Hand — $
   d. Total 3A + 3B + 3C — $0.00
   e. Minus Accounts Payable — $
   f. Computed Operating Position (3D-3E) — $0.00
   g. Number of Operating Months
   h. Three Month Average Operating Cost (2H/3G)*3 — $0.00
   i. Excess Balance (3F-3H) — $0.00

☐ I certify that the information supplied above is correct to the best of my knowledge, that records are available to support this report. I understand that this information is being given in connection with the receipt of federal funds and that deliberate misrepresentation may subject the applicant to prosecution under applicable state and federal statues.

Now completed online!

Maintenance of Nonprofit School Food Service Account

- **Bad debts, including losses (whether actual or estimated) arising from uncollectible accounts and other claims, related collection costs, and related legal costs are unallowable**

- **Funds from nonprofit school food service account (including dollars received for a la carte sales, catering, etc.) CANNOT be used to cover cost of charged meals that have not been paid**

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/opmemos/09/om_18-09.pdf

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/opmemos/10/om_19-10.pdf

AROT
RESOURCE MANAGEMENT

2 – Paid Lunch Equity (PLE)

Not applicable UNLESS you charge students for their meals

Paid Lunch Equity

Copy →

Have Available →

AROT | 2016

Section IV: Resource Management

Paid Lunch Equity

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ Food and Nutrition Service's (FNS) *"Paid Lunch Equity Tool"* or the equivalent.

☐ Previous school year weighted average price for paid lunches (if FNS Paid Lunch Equity Tool is not utilized).

☐ All paid lunch prices for October 2015.

☐ Number of paid lunches served associated with each paid lunch price in October 2015.

7

Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Paid Lunch Equity

CSDE must ensure that SFAs comply with the requirements for pricing paid lunches (7 CFR 210.14 (e))

Paid Lunch Equity

- **USDA developed PAID LUNCH EQUITY TOOL for SFAs to use in determining compliance with this provision**
  - See USDA Memo SP 09-2016 for school year 2016-17

www.fns.usda.gov/sites/default/files/cn/SP09-2016os.pdf

Paid Lunch Equity

SCHOOL YEAR 2016-17

- **SFAs that on a weighted average, charged LESS THAN $2.78 FOR PAID LUNCHES in school year 2015-16 are required to adjust their weighted average lunch price or add nonfederal funds to the nonprofit food service account**

AROT
RESOURCE MANAGEMENT

3 – Revenue from Nonprogram Foods

Not applicable UNLESS you charge students for buying foods/beverages a la carte

Revenue from Nonprogram Foods

Copy

Have Available

AROT-8

AROT | 2016

Section IV: Resource Management

Revenue from Non-Program Food

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ Method to assess compliance with Nonprogram foods requirements

☐ Copy of the most recent "*USDA Nonprogram Food Revenue Tool*" or 5-Day Reference Period as described in FNS policy memo SP 20-2016: Nonprofit School Food Service Account Nonprogram Food Revenue Requirements (December 23, 2015).

☐ Supporting documentation that was used in support of the above tool, to determine revenue from nonprogram foods for the first full week of the review month.

☐ Price charged for adult meals.
   FNS Instruction 782-5 Rev. 1 Pricing if Adult Meals in the National School Lunch and School Breakfast Programs

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Connecticut State Department of Education ◆ Child Nutrition Programs ◆September 2016

Revenue from Nonprogram Foods

■ **Except for reimbursable meals, all foods sold in schools that are purchased with funds from the nonprofit school food service MUST GENERATE REVENUE AT LEAST EQUAL TO THE COST OF SUCH FOODS**

- HHFKA Section 206

Revenue from Nonprogram Foods

USDA defines **NONPROGRAM FOODS** as those foods and beverages sold in a participating school other than reimbursable meals and ASP supplements (snacks)

- A la carte items and adult meals

- Items purchased with nonprofit school food service account funds for vending machines, fundraisers, school stores, and catered and vended meals

Revenue from Nonprogram Foods

- **Regulations at 7 CFR 210.14(f) require SFAs to ensure the revenue ratio is greater than or equal to the food cost ratio, as follows:**

$$\frac{\textit{Nonprogram food revenue}}{\textit{Total program and nonprogram revenue}} \geq \frac{\textit{Total nonprogram food costs}}{\textit{Total program and nonprogram food costs}}$$

Revenue from Nonprogram Foods

- The reference period may be a school week, a month, or year

- The reference period must include at least 5 consecutive operating days (or 4 consecutive days for schools operating a 4 day week)

- The selected days must represent typical food service operations

www.fns.usda.gov/sites/default/files/cn/SP20-2016os.pdf

Revenue from Nonprogram Foods

- Assessments cannot include data from summer school, holidays, or vacations or special circumstances that might distort the program and nonprogram foods data

- The percentage of nonprogram revenue generated must be at least as great as the percentage of nonprogram food costs incurred during the reference period to be in compliance with federal Requirements

www.fns.usda.gov/sites/default/files/cn/SP20-2016os.pdf

Nonprogram Food Revenue Tool

USDA FOOD AND NUTRITION SERVICE

Nonprogram Revenue Calculator		
Enter the cost for reimbursable meal, cost of nonprogram food and total revenue		
Cost for Reimbursable Meal Food		
Cost of Nonprogram Food		
Total Food Costs	$ -	
Total Nonprogram Food Revenue		
Total Revenue		
Minimum portion of revenue from nonprogram funds	0%	
Minimum Revenue Required from the Sale of Nonprogram Foods	$ -	
Additional Revenue Needed to Comply	$ -	

www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods

CSDE Pricing Worksheet for Adult Meals and A la Carte Sales

PRICING OF ADULT MEALS

Breakfast:

School:	School Name or District Wide	
**Price of student breakfast		
Value of paid student reimbursement (SY 2016-2017)		$0.29
Subtotal		$0.29
Add 10 cents to this price IF your schools are defined as Severe-need for Breakfast by the State of Connecticut		
Total minimum adult price*		**$0.29**
	Actual Price Charged to Adults:	

Lunch:

School:	School Name or District Wide	
*Price of student lunch		
Value of commodity foods (SY 2016-2017)		$0.32
Value of paid student reimbursement (SY 2016-2017)		$0.32
Approximate Value of State Matching Funds (SY 2016-2017)		$0.05
Subtotal		$0.69
Add 10 cents to this price IF your district is CT Healthy Food Certifie		
Add 6 cents to this price IF your district certified for the additional 6		
Total minimum adult price* *		**$0.69**
	Actual Price Charged to Adults:	

www.sde.ct.gov/sde/lib/sde/excel/deps/nutrition/np_pricing.pdf

CSDE Pricing Worksheet for Adult Meals and A la Carte Sales

ALA CARTE PRICING WORKSHEET

School District Name	
Schools Using These Prices	
Desired Food Cost Percentage:	42.5%

Item	Total Cost	Approx Price	Actual Price
Milk	$0.23	$0.54	$0.55
12 oz. Orange Juice	$0.72	$1.69	$2.00
Pretzels, 1.2 oz.	$0.32	$0.75	$0.75
		$0.00	
		$0.00	
		$0.00	
		$0.00	
		$0.00	
		$0.00	
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		$0.00	
		$0.00	
		$0.00	

www.sde.ct.gov/sde/lib/sde/excel/deps/nutrition/np_pricing.pdf

AROT
RESOURCE MANAGEMENT

4 – Indirect Costs

Indirect Costs

AROT		2016

Section IV: Resource Management

Indirect Costs

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

- ☐ Indirect Cost Rate Agreement, if applicable.
- ☐ School year 2015-16's retroactive billing, if applicable.
- ☐ List of classification of costs (direct/indirect).
- ☐ Support documentation for indirect cost billing.

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Copy

Have Available

Indirect Costs

- **SFAs can only charge indirect costs if they receive an indirect cost rate provided by the CSDE**

Prior Years Retroactive Billing

- **Cannot bill school food service account for any costs unless an agreement exists to show that the SFA was "loaned" the nonprofit school food service account funds to cover the costs in one or more prior years WITH the expectation of repayment**

- **Accounting records must support implementation of the loan agreement**

Indirect Costs

- **Operational Memorandum 33-11: Child Nutrition Reauthorization 2010 – Indirect Cost Guidance**

- **USDA Indirect Costs Manual**

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/opmemos/11/om_33-11.pdf

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/Indirect_Cost_Guidance.pdf

Common Problems with Resource Management

- **Adult meals not being tracked or accounted for**

- **If program is being charged for any allowable costs, those costs must be supported by documentation to show how the charge was calculated**

CSDE Program Guidance Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320674

AROT
GENERAL AREAS

1. **Civil Rights**

2. **On-site Monitoring**

3. **School Wellness Policy**

4. **Smart Snacks**

5. **Food Safety/Storage/Buy American**

6. **School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach**

7. **Professional Standards**

AROT
GENERAL AREAS

1 – Civil Rights

General Areas
Civil Rights

AROT	2016

Section V: General Areas

Civil Rights

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

- ☐ Documentation of most recent Civil Rights training pertaining to the USDA Child Nutrition Programs for ALL staff to include food service workers, determining officials, verifying officials, etc. (date, agenda, sign-in sheets).
- ☐ Information on number and description of any complaints alleging discrimination in the USDA Child Nutrition Programs operating in your district/institution in the current and prior school year. *All Civil Rights Complaints pertaining to the USDA Child Nutrition Programs must be reported to USDA Office of Civil Rights or the CSDE at the time they occur.*
- ☐ Written procedures for handling Child Nutrition Civil Rights complaints. *The district must have a written, formal procedure for receiving and processing complaints alleging discrimination within the Child Nutrition programs.*
- ☐ List of services that your district/institution provides to Limited English Proficient (LEP) households. *Local educational agencies, schools and other entities that receive Federal financial assistance, including reimbursements for meals from United States Department of Agriculture, must take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency.*

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ September 2016

Copy

Have Available

Civil Rights

■ **Reviewed to ensure that SFAs are administering program services and benefits in accordance with all laws, regulations, instructions, policies and guidance related to nondiscrimination in program delivery**

CSDE Civil Rights PowerPoint Presentation

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333768

Civil Rights

- **SFA's procedures for receiving and processing complaints alleging civil rights discrimination within USDA CNPs must**
  - indicate whether allegation is made verbally or in person
  - transcribe the complaint
  - Identify the outside agency to which complaints are forwarded

- **Procedures CANNOT indicate that attempts to resolve the complaint can be made at the local level**

Civil Rights Nondiscrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
     Office of the Assistant Secretary for Civil Rights
     1400 Independence Avenue, SW
     Washington, D.C. 20250-9410;
(2) fax: (202) 690-7442;
(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Civil Rights

WHILE ON SITE

- ■ **Confirm that USDA's "And Justice for All" posters are prominently displayed**

- ■ **Observe during meal service that program benefits were made available to all children without discrimination**
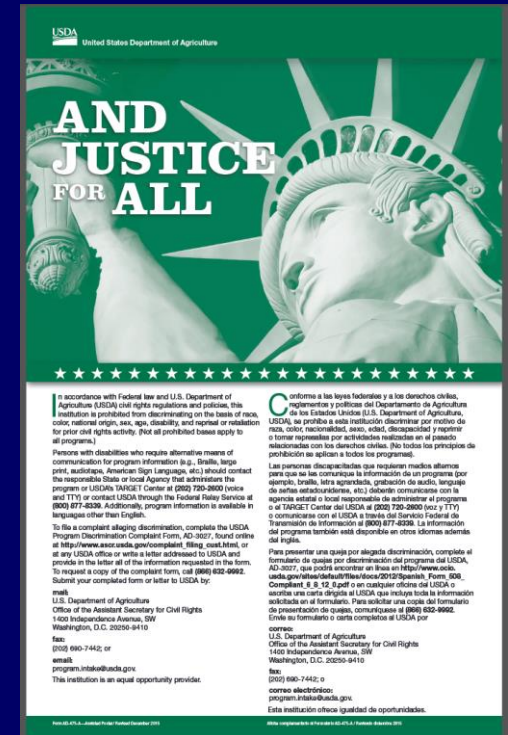
Common Problems with Civil Rights

- **Not all staff members associated with CNPs have received training**

- **Nondiscrimination "And Justice for All" posters not displayed in serving line**

- **CNP civil rights complaints are about human resources issues not about CNPs**

- **CNP civil rights complaints not reported to CSDE or USDA and are handled internally**

AROT
GENERAL AREAS

2 – On-site Monitoring

Copy

Have Available

AROT | 2016

Section V: General Areas

On-site Monitoring

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ The completed On-site Monitoring Forms for all schools in the SFA. *If the Administrative Review is early in the school year and the on-site monitoring has not yet occurred for all schools, have the completed forms from the 2015-16 school year available for review.* *On-site monitoring must occur in all schools for the NSLP, and for 50% of all SBP schools, prior to February 1 each school year.*

☐ Documentation of follow-up and corrective action taken for any deficiencies noted.

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ September 2016

On-site Monitoring

- **SFAs with MORE THAN ONE SCHOOL must perform AT LEAST ONE on-site review of the lunch counting and claiming system used in each school under its jurisdiction by FEBRUARY 1 of each year**

On-site Monitoring

NEW

■ **On-site monitoring must occur in 50% of all SBP schools, prior to February 1 each school year**

On-site Monitoring Checklist

NSLP

SBP

NEW

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/monitorbreakfast.pdf

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/monitorlunch.pdf

Common Problems with On-site Monitoring

- **Form not being utilized effectively**

- **Form not completed at all sites**

  - **interschool agreement site**

- **Forms all completed on same day**

- **Did not watch the full service**

- **Incomplete forms**

- **No follow-up documented, if required**

Common Problems with On-site Monitoring

■ **Person conducting review has limited knowledge of what they are observing**

■ **FSMC conducts on-site monitoring**

- **Responsibility of LEA not FSMC**

AROT
GENERAL AREAS

3 – School Wellness Policy

General Areas
Local School Wellness Policy

AROT-12
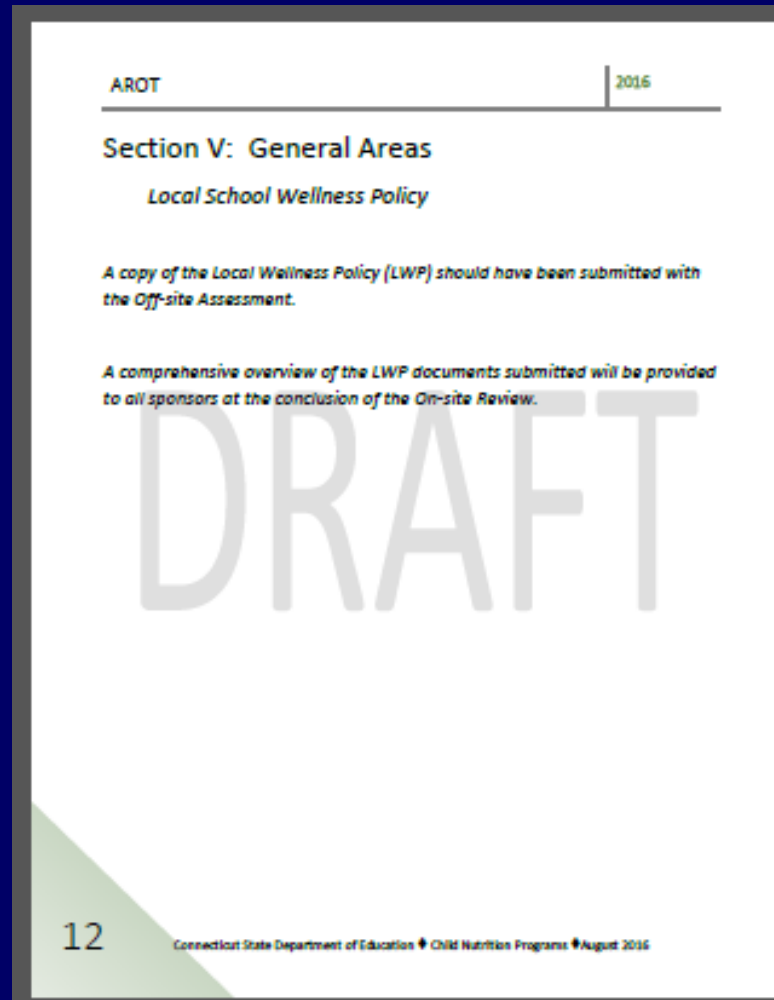
Local School Wellness Policy (SWP)

- **HHFKA Section 204 strengthens wellness policies by emphasizing ongoing implementation, assessment and communication**

- **Intended to foster broad-based community support for the development and implementation of effective SWPs**

Local School Wellness Policy (SWP)

- **All Wellness Policies were reviewed as part of the 2013-2014 AR (Cycle 1-Year 1)**

- **SA assessed whether the SMP contained all the required elements**

- **SA assessed whether required steps have been taken regarding implementation, transparency, public input, and availability**

Be sure to review the last assessment of the Local School Wellness Policy

Local School Wellness Policy (SWP)

- Since SWP is a requirement of NSLP participants, **NEW SPONSORS** must develop and implement a SWP as soon as possible

CSD School Wellness Policies Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2678&q=322438

AROT
GENERAL AREAS

4 – Smart Snacks

General Areas
Smart Snacks in School

AROT-13

Copy

Have Available

AROT   2016

Section V: General Areas

Smart Snacks in School

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

NOT CT Healthy Food Certified

☐ Documentation for the first week of the review month of all foods and beverages sold a la carte at the selected schools. Acceptable documentation may be menus, production records, and related materials.

☐ Nutrition documentation for food items sold by the food service department to students in ALL schools in the district.

☐ Nutrition documentation for food items sold by entities outside of the school food service, such as school stores, PTAs, fundraisers.

> *Any documentation that contains the necessary information is acceptable including Alliance for a Healthier Generation Smart Snacks Calculator print outs, recipes, product specifications, highlighted items on the* Connecticut State Department of Education's (CSDE) List of Acceptable Foods and Beverages, *or other documentation.*

CT Healthy Food Certified

Have available all documentation submitted to the CSDE as part of the annual HFC documentation requirement. *Note: this documentation was due on November 1, 2016.*

13   Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Not Healthy Food Certified

- **Documentation for first week of review month of ALL FOODS AND BEVERAGES SOLD A LA CARTE at the selected schools**

- **Nutrition documentation for food items sold by FOOD SERVICE DEPARTMENT to students in ALL schools in the district**

Not Healthy Food Certified

■ **Nutrition documentation for food items sold by ENTITIES OUTSIDE of school food service, such as school stores, PTAs, fundraisers**

> ### ACCEPTABLE DOCUMENTATION
> ▶ **Alliance for a Healthier Generation Smart Snacks Calculator printouts**
> ▶ **Recipes**
> ▶ **Product specifications**
> ▶ **Highlighted items on CSDE's *List of Acceptable Foods and Beverages***
> ▶ **Other documentation**

CSDE Competitive Foods Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333772

Connecticut Beverage Statute

- **All Connecticut public school districts MUST COMPLY with state beverage requirements even if district does NOT choose healthy food option of Healthy Food Certification**

- **The only beverages that can be sold to students in Connecticut public schools are those belonging to the FIVE CATEGORIES specified in Section 10-221q of the Connecticut General Statutes**

Connecticut Beverage Statute

FIVE ALLOWABLE BEVERAGE CATEGORIES

1. **Milk**

2. **Nondairy beverages such as soy or rice milk**

3. **100 percent juice (fruit, vegetable or combination)**

4. **Beverages that contain only water and fruit or vegetable juice**

5. **Water**

AROT
GENERAL AREAS

5 – Food Safety/Storage/Buy American

General Areas
Food Safety/Storage/Buy American

AROT-14

AROT | 2016

Section V: General Areas

Food Safety/Storage/Buy American

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ Written food safety plan based on the Process Approach to HACCP Principals.
☐ Documentation of annual review of the food safety plan.
☐ Copies of two most recent food safety inspections for each school reviewed. *If one or no inspections were completed in the current school year, provide copies of the two inspections conducted during the 14-15 school year. In absence of two inspections, provide documentation of the request made to the local health department for two inspections.*
☐ The address(es) of any off-site storage facilities.
☐ If non-domestic products are used, provide documentation to support exception to the Buy American requirements as allowed under FNS Policy Memo SP 24-2016.

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Copy

Have Available

CSDE Food Safety Web Page

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333772

Food Safety

- **New sponsors must have food safety plans in place**

- **Food safety plan should be reviewed AT LEAST ANNUALLY and updated as needed throughout school year**

- **Annual review should be DOCUMENTED**

- **Plan should be INDIVIDUALIZED to your program**

HACCP-based Standard Operating Procedures: http://sop.nfsmi.org/HACCPBasedSOPs.php

Food Safety

WHILE ON SITE

- **Observe meal preparation and service at selected schools**

- **View most recent food safety inspection posted in publicly visible location for all participants of school meal program to review**

Common Problems with Food Safety

- **Temperature logs not completed for both food and equipment and are not maintained for a period of 6 months**

- **Kitchen staff do not know where or what the HACCP Plan is**

- **HACCP Plans not reviewed and updated annually**

- **Food Safety Inspection Reports not posted for public view**

Storage

WHILE ON SITE

- **Observe conditions of ON-SITE STORAGE FACILITIES and OFF-SITE FOOD STORAGE FACILTIES AS APPLICABLE to ensure proper storage practices**
  - freezers
  - refrigerators
  - dry good storage rooms
  - other areas to ensure proper storage practices

Buy American

New

- **SFAS are required to purchase domestic agricultural commodities or products that are produced and processed in the US**

- **While limited exceptions exist when products are prohibitively costly or not available in required quantities, SFAs must consider alternative domestic foods prior to automatically approving an exception**

Buy American

New

WHILE ON SITE

- **Review a variety of products per food category**
    - **2-3 items in each food category**

- **Check labels on foods in on and off-site storage facilities**

- **May review the SFAs solicitation and contract documents for the Buy American provisions or language**

AROT
GENERAL AREAS

6 – School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

General Areas
SBP and SFSP Outreach

Copy →

Have Available →

AROT-15

AROT | 2016

Section V: General Areas

School Breakfast Program & Summer Food Service Program Outreach

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ Documentation of household notification of availability of the School Breakfast Program prior to or at beginning of school year.
☐ Documentation of reminders provided throughout school year of availability of School Breakfast Program.
☐ Documentation of household notification of availability of and location of free summer meals via Summer Food Service Program. *This is required even if your district does not offer summer meals!*

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

SBP and SFSP Outreach

- **SFAs must inform families of the availability of breakfasts offered under the SBP**

  - Beginning of school year

  - Multiple times throughout the school year

- **SFAs must conduct SFSP outreach before the end of each school year and meals offered through the Summer Food Service Program (SFSP)**

SBP and SFSP Outreach

- **SFAs must inform families of the availability of breakfasts offered under the SBP**
  - Beginning of school year
  - Multiple times throughout the school year
- **SFAs must conduct SFSP outreach before the end of each school year and meals offered through the Summer Food Service Program (SFSP)**

SBP and Summer Outreach

- **If SFSP is administered by different SFA or sponsor, they must work cooperatively to inform eligible families of availability and location of SFSP meals**

- **All SFAs must conduct summer outreach regardless of whether they sponsor a program**

AROT
GENERAL AREAS

7 – Professional Standards

AROT-16

Section V: General Areas

Professional Standards

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ The spreadsheet currently being used to track the training of all school nutrition staff members according to USDA Professional Standards.

☐ Nutrition program employee lists that include:
   (List must be current as of the start of the on-site review)
   - ✓ Name
   - ✓ Date hired
   - ✓ Title/Position
   - ✓ Employee status (Full Time, Part Time, Acting, Substitute, include average hours per week for each employee)
   - ✓ USDA Professional Standards Employee Category/Position (Nutrition Program Director, Manager or Staff)

☐ Current (school year 2016-17) training sign-in sheets, attendance rosters and agenda.

☐ Certificates of completion for any off-site trainings being tracked.

☐ Planned/scheduled trainings for the remainder of this school year.
****

☐ For School Nutrition Program Directors hired on or after July 1, 2015:
   - ✓ Highest level of education achieved
   - ✓ Education achievement certificates (i.e. diplomas)
   - ✓ Years of school nutrition program experience
   - ✓ Prior food safety training record

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

Copy

Have Available

DRAFT

General Areas
Professional Standards

7 CFR 210.30

- Established **HIRING STANDARDS** for new school nutrition program directors at the SFA level

- Established **ANNUAL TRAINING STANDARDS** for all school nutrition program directors, managers and staff

> Required annual training hours vary according to the employee's role in the management and operation of the school nutrition program

General Area
Professional Standards

WHILE ON SITE

- **Review SFA records documenting that applicable hiring actions for new program directors completed on or after July 1, 2015 are consistent with hiring standards**

- **Review SFA records documenting completion of annual training standards by all personnel (program directors, managers and staff)**

USDA Professional Standards Web Page

www.fns.usda.gov/school-meals/professional-standards

WATER REQUIREMENT

Potable Water

- **Children must have ACCESS to water during lunch and breakfast meal service**

- **Can provide in a variety of ways**
  - water pitchers and cups on a table
  - a water fountain
  - a faucet that allows students to fill their own bottles or cups

Potable Water

- **CSDE will assess whether a school makes free water available to students in any location where lunches are served (during meal service) and when breakfast is served in the cafeteria**

- **Any school that does not make free water available or restricts access during the meal periods is noncompliant**

REQUIREMENT FOR REPORTING AND RECORDKEEPING

Reporting and Recordkeeping

- **To determine if reports are submitted as required by CSDE, and maintained with other program records for a period of THREE YEARS after submission of the final claim for reimbursement for the fiscal year**

- **If audit findings have not been resolved, the three-year period is EXTENDED as long as required for resolution of audit issues**

On-site Monitoring Activity
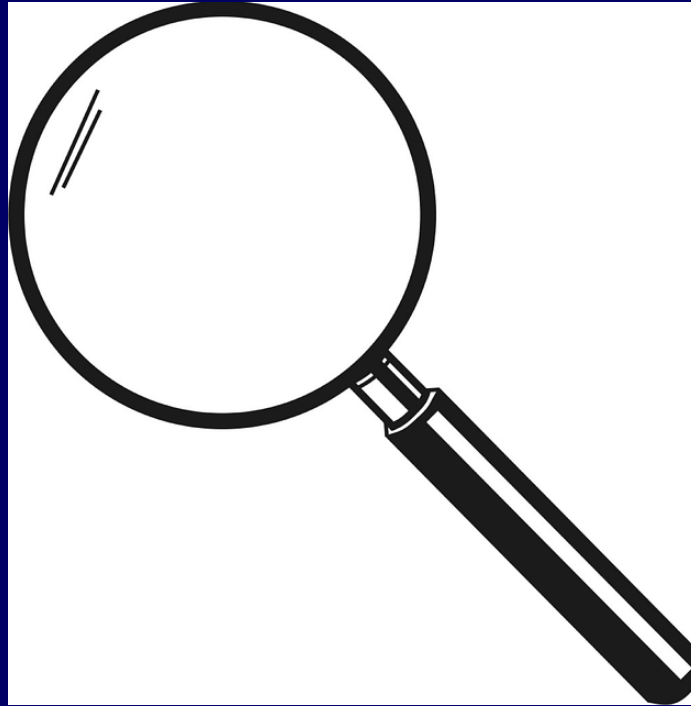
SUPPLEMENTAL REVIEW AREAS

1. Afterschool Snack Program (ASP)

2. Special Milk Program (SMP)
   (Split-day Kindergarten Milk Program)

3. Fresh Fruit and Vegetable Program (FFVP)

4. Seamless Summer Option (SSO)

SUPPLEMENTAL REVIEW AREAS

1 – ASP

ASP

Copy →

Have Available →

AROT-17

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Afterschool Snack Program

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

The following items are required for the selected school:

- ☐ Documentation indicating that the approved after school care program offers educational or enrichment activities.
- ☐ Documentation indicating the time of snack service.
- ☐ Snack menu for the review month.
- ☐ Production records for snacks served during the first week of the review month.
- ☐ Description of the procedure used to ensure accurate counting and claiming of snacks.
- ☐ The most recent submitted claim for reimbursement.
- ☐ All documentation available in support of the claim.
- ☐ *For programs that are NOT Area Eligible*, the roster of students receiving snacks for the first week of the review month.
- ☐ On-site monitoring forms for the two required visits at the selected site.

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ASP

- **Document review conducted on site in schools selected for AR that also operate ASP**

- **If none of selected schools operate ASP, no review will be conducted**

- **On site observation of ASP service will be at CSDE's discretion**

ASP

- **Verify school eligibility**

- **Ensure accurate counting and claiming**

- **Verify snacks meet snack service and nutritional requirements**

- **Confirm SFA conducts self-monitoring activities twice per year**

- **Certify food safety and civil rights requirements** are met

SUPPLEMENTAL REVIEW AREAS

2 – SMP

Special Milk Program
(Split-Day Kindergarten Milk Program)

Copy

Have Available

AROT-18

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Split-Day Kindergarten Milk Program

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Not applicable.

Have available for the State Agency to REVIEW

- ☐ Claim for reimbursement for the review month.
- ☐ All supporting documentation for the selected claim.
- ☐ Copies of invoices reflecting milk pricing and delivery amounts from the first week of the review month.
- ☐ Copy of the roster used for point-of-service milk counts for the first week of the review month.

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Special Milk Program (SMP)
(Split-Day Kindergarten Milk Program)

Students who have access to breakfast and lunch cannot participate in the SMP

SMP (Split-Day Kindergarten Milk Program)

- **CSDE examines SMP documentation for each school selected for AR that operates SMP**

- **On-site SMP observation only required if**
  - issues discovered during documentation review
  - issues with meal counting/claiming of NSLP/SBP

- **If school selected for AR does not operate SMP, CSDE does not select another site**

SMP (Split-Day Kindergarten Milk Program)

WHILE ON SITE

- **Review pricing policy**

- **Confirm SFA is operating its approved SMP option**

- **Make sure counting and claiming procedures yield accurate claims**

- **Determine records are properly retained**

SUPPLEMENTAL REVIEW AREAS

3 – FFVP

FFVP

Copy →

Have Available →

 AROT-19

AROT | 2016

Fresh Fruit and Vegetable Program

Make a COPY for the State Agency

Not applicable.

Have available for the State Agency to REVIEW

☐ FFVP claim submitted for the review month.
☐ All supporting documentation for the above claim.
- Invoices (anything claimed on your monthly report)
  - Fresh fruits/vegetables
  - Dips, paper, small equipment
  - Large equipment purchases (must have been approved prior to purchase)
- Payroll records
  - Frontline staff
  - Administrative staff

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Connecticut State Department of Education ♦ Child Nutrition Programs ♦ August 2016

FFVP

- **At least one FFVP school must be reviewed during AR**

- **Selection of schools for FFVP review occurs AFTER selection of sites for NSLP review**

FFVP

WHILE ON SITE

- **Available to all students**

- **Free of charge**

- **Offered within school day outside of meal service**

- **Publicized**

- **Not serving frozen, canned, dried fruit**

- **Not serving juice, nuts, trail mix**

- **Served only to students (teachers within classroom may participate as role models)**

- **Following Food Safety Plan**

FFVP

REMINDERS

- **Dip can only be used for vegetables**
  - **Must be less than 2 tablespoons**
  - **Must be low-fat or fat-free**

- **If cooked vegetables are served**
  - **must be only once per week**
  - **must be accompanied by nutrition education lesson**

Validate FFVP Claim for Review Month

Supporting cost documentation must indicate

- School uses majority of funds to purchase **FRESH PRODUCE**

- School carefully reviews and prorates **EQUIPMENT PURCHASES**

Validate FFVP Claim for Review Month

Supporting cost documentation must indicate

■ **Labor costs (prep/serve and administrative) and all other nonfood costs are minimal**

- administrative costs ≤ 10%

■ **Must be supported with proper documentation, such as**

- payroll reports
- time sheets
- documentation of time allocated to FFVP

SUPPLEMENTAL REVIEW AREAS

4 – SSO

SSO

- **Review occurs in summer 2017 for school year 2016-17 AR sponsors**

- **CSDE determines SSO compliance in same manner as NSLP and SBP**
  - **CSDE will conduct on-site and off-site review components**
  - **SFA will submit off-site review materials to CSDE prior to on-site review**

SSO

- ■ **CSDE must review at least one SSO site**
  - **Site selected for SSO review may be any SSO site**
  - **Does not have to be a site selected for regular AR**

SSO

WHILE ON SITE

- Verify meal counting and claiming

- Assess how site differentiates between age/grade groups

- Ensure children eat meals on-site

- Ensure one meal served prior to offering seconds

- Verify proper food safety measures are in place

- Verify meal service times are same as approved by CSDE

SSO

OTHER REVIEW COMPONENTS

- **Confirmation of site eligibility**

- **CSDE must ensure SFA makes reasonable effort to advertise the availability of free meals to children in community**

- **CSDE must examine SFA's self monitoring forms**

CSDE may use information obtained during the AR

SSO

■ **To ensure meals are compliant and reimbursable, CSDE will review ONE WEEK of meals using the Menu Worksheets**

SSO

■ **Materials needed to complete worksheets**

- **One week of menus**
- **Portion sizes for all reimbursable items**
- **Contribution Information for each menu item (CN Label, USDA Food Fact Sheet, Product Formulation Statement)**
- **Production Records**
- **Standardized Recipes**

SSO

- **Complete separate Menu Worksheet for each GRADE GROUP**

- **Complete separate Menu Worksheets for each MEAL SERVICE**
  - **Breakfast**
  - **Lunch**
  - **Snack**
  - **Supper**

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