SCHOOL NUTRITION PROGRAM ADMINISTRATIVE REVIEW

List of Documents and Records Needed

This list is prepared in order to assist School Food Authorities (SFAs) in identifying the documents needed for the Wisconsin Department of Public Instruction (DPI) School Nutrition Programs Administrative Review (AR). Please locate all items and make them available to the Nutrition Program Consultant (NPC) and Public Health Nutritionist (PHN) during the review. Indicate below the person at your agency, or School Food Authority (SFA), who is responsible for completing/maintaining the section listed. As part of the new AR, some documents and records may be requested 4-6 weeks before the onsite portion of the review. Please contact the NPC assigned to your AR with questions related to the documents listed below or questions/concerns related to the on-site review. The School Nutrition Programs website also has a webpage dedicated to [preparing for the AR](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review).Additionally, the webpage for [training](https://dpi.wi.gov/school-nutrition/training/webcasts) offers many webcasts on a variety of topics which can aid in AR preparation and ongoing administration of the programs.

**Nutrition Program Consultant**

Name:

Phone: 608-

Email:

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**Public Health Nutritionist**

Name:

Phone: 608-

Email:

Fax: 608-267-0363

# **DPI School Nutrition Program Contracts**

| **Person Responsible:** |  |
| --- | --- |

* Online Contract – confirm that the contract accurately reflect SFA program participation and staff
* Permanent Agreement/Policy Statement – review (available in the online contract)
* If applicable,
  + Joint Agreement with SFA – most recent is uploaded to the online contract)
  + Vendor/Food Service Management Company contract – most recent is uploaded to the online contract)
  + Alternate Authority Agreement
  + Wisconsin School Day Milk Program (WSDMP) – PI-1464 form
  + Elderly Nutrition (EN) Improvement Program – PI-1451 form

**Miscellaneous Items to Provide:**

* Current school year calendar that shows the days school meals are served
* A work area for the person or team conducting the evaluation
* A list of questions/concerns related to the food service operation
* Internet access
* Instructions to the NPC and PHN for parking and door entry

# **Applications, Direct Certification, and Benefit Issuance**

Please see the DPI [Applications, Direct Certification, and Benefit Issuance](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/free-reduced-applications) webpage for more information.

The following documents are required for all schools in the SFA, not just schools selected for the AR.

If Community Eligibility Provision (CEP), some sections below may not apply.

Review [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf).

| **Person Responsible:** |  |
| --- | --- |

**Email the Nutrition Program Consultant:**

* Sample application packet distributed to households for the current school year including:
  + Application for free and reduced price meals/milk
  + Application instructions (called How to Apply for Free and Reduced Price School Meals)
  + Parent/Guardian letter to Household (called Frequently Asked Questions about the Free and Reduced School Meals)
  + Copy of Sharing Information with Other Programs or fee waiver letter (if applicable) and disclosure agreement used
* Household notification letters (directly certified approval, and notice to households for approval/denial of benefits)
* Copy of Income Eligibility Guidelines used for eligibility determinations (paper or electronic)
* Public release distributed prior to the beginning of the current school year; including name(s) of media outlet(s), community/grassroots organizations and if applicable, unemployment agency and major employers contemplating or experiencing large layoffs, where the public release was submitted
* From review month, benefit issuance documentation (e.g., roster, master list, computer generated list, etc.) and include student name, eligibility status, date of approval, changes in status, dates of transfer/withdrawal (can be organized by school, student ID number, alphabetically, etc., but cannot be organized by eligibility type)

**Keep for On-Site AR:**

* All SFA USDA Free and Reduced Price School Meal applications submitted by households for the current school year (including denied applications)
* Direct Certification match lists for the current school year (original copies, electronic or paper). The match list will include the student names, birthdates, eligibility codes, date of match and school code
* Documentation for homeless, migrant, runaway or Head Start students – from liaison, shelter director, education coordinators, etc.
* Documentation for foster students:
  + Direct Certification match file showing an E code, or
  + Free and Reduced Price Meal applications with box checked to indicate foster status, or
  + Court/agency documentation which proves foster status

# **Verification**

Please see the DPI [Verification](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification) webpage for more information.

Verification is reviewed at the SFA level, not just schools selected for the AR.

If CEP, some sections below may not apply. Review [CEP Calendar of Requirements](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/calendar-of-requirements-cep.pdf).

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Documentation that shows current school year verification efforts were completed by November 15, including:
  + If utilized, completed Verification Tracker Forms (page five of [Verification Forms](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms-packet-1819.docx) resource)
  + Confirm the correct confirming and verifying official is listed on the online contract
  + Sampling method used per DPI notification
  + Documentation to support sample size selection
  + Applications selected for verification, including information used to determine initial eligibility
  + Documentation of confirmation reviews on applications selected for verification
  + Samples of household notification letters (i.e., “We MUST CHECK Your Application” letter, “We HAVE CHECKED Your Application” letter)
  + Documentation from the household selected for verification to support eligibility
  + Documentation of all follow up attempts with households
  + Copy of Verification Collection Report submitted to DPI online (due February 1)

# **Community Eligibility Provision (CEP)**

Please see the DPI [Community Eligibility Provision (CEP)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) webpage for more information.

May not apply to all SFAs. For mixed districts with CEP schools and non-CEP schools, this section only applies to the CEP schools.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Certification documentation used to determine the Identified Student Percentage (ISP) for the initial approval year and all documentation from updates made in following years (if applicable), including:
  + Approval documentation from DPI
  + Direct certification lists
  + Documentation for extension of eligibility for Direct Certification
  + Lists from homeless/migrant liaison
  + Student rosters used in determining the ISP

# **Meal Counting and Claiming**

Claim data is reviewed at the SFA level and also at each site selected for review.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* Daily meal count records supporting monthly claims for reimbursement for the current school year for the following programs (if applicable):
  + National School Lunch Program (NSLP)
  + School Breakfast Program (SBP)
  + Afterschool Snack Program
  + Special Milk Program (SMP)
* Documentation that edit checks have been conducted on daily meal counts for each school prior to submission of monthly claims for reimbursement
* Copy of the SFA’s local meal charge policy (how unpaid meal charges are handled). Documentation to show it was communicated to all households at the beginning of the school year, when students transfer into the school, and to all school or SFA-level staff responsible for policy enforcement.

**Keep for On-Site AR:**

* Documentation to support annual reimbursement claims for the following state programs:
  + Wisconsin School Day Milk Program, if applicable
  + Elderly Nutrition Improvement Program, if applicable
* For sites claiming Severe Need Breakfast Reimbursement: Documentation supporting the number of free and reduced price lunches served in the second preceding year (2016-2017) at each qualifying school as reported on the current online school nutrition contract

**Meal Components and Quantities**Please see the DPI [Meal Components and Quantities](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning)webpage for more information.Expect an email from the PHN closer to date of AR clarifying the information in this section.

| **Person Responsible:** |  |
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**Email to the Public Health Nutritionist:**

* Select a week of meals during the month of review and the day of the on-site review
  + Copy of the meal component compliance documentation must be collected for each menu type and age/grade group in each reviewed school
  + Weekly or monthly menu
  + Production records
  + Standardized recipes for all items prepared in-house with two or more ingredients
  + Child Nutrition (CN) Labels or Product Formulation Statements (PFS) for all items that cannot be credited using the Food Buying Guide (FBG)
  + Nutrition fact labels for all items
  + USDA Foods fact sheets for any USDA Foods products used

**Keep for On-Site AR:**

* [Signage](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/signage) must be at the beginning of each breakfast and lunch serving line to assist students in selecting a reimbursable meal

# **Smart Snacks in School (All Foods and Beverages Sold in School)**

Please see the DPI [Smart Snacks in School (All Foods and Beverages Sold in School)](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks)webpage for more information.

The following documentation is only required for schools in the SFA selected to be reviewed for the AR.

| **Person Responsible:** |  |
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**Email to the Public Health Nutritionist:**

* Documentation that identifies all foods and beverages sold on school campus to students (excluding reimbursable meals), during the school day. This includes a la carte items, vending machines, schools stores, etc.
* One week of menu documentation from the review period to ensure a la carte foods and beverages are compliant (this could be the same week selected for Meal Components/Quantities review)
* Documentation to support the Smart Snacks requirements for all items sold on campus during the school day are met and can include: Alliance for a Healthier Generation Smart Snacks Calculator print outs, recipes, product specifications, purchase orders, receipts or other documentation
* Documentation for the year that identifies all fundraisers in the reviewed schools that occur during the school day
* Documentation to support the state limit on exempt fundraisers is met. This should include the group organizing the fundraiser, the item(s) being sold, documentation to support whether or not the item(s) met the Smart Snack standards and the dates the fundraiser(s) occurred

# **Local School Wellness Policy**

Please see the [Local School Wellness Policy information](http://dpi.wi.gov/school-nutrition/wellness-policy) page on the DPI website.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* Copy of current Local School Wellness Policy

**Keep for On-Site AR:**

* Documentation to support that the SFA has taken the required steps regarding implementation, transparency, public input, and availability of the Local Wellness Policy
* Documentation of efforts to review and update the policy (including who is involved, how stakeholders are informed of their ability to participate, and public posting of those updates)
* A copy of the most recent assessment on the implementation of the Local School Wellness Policy, if completed; and how the public was notified of the assessment results. A triennial assessment must be completed within three years of the policy being updated or no later than June 30, 2020.

# **Resource Management**

Please see the [Financial Management](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial)page on the DPI website.

If the SFA triggers for a comprehensive resource management review in any of the four possible categories based on the Resource Management Risk Indicator Tool completed by DPI, the following documents will be reviewed in the respective categories. Please note that even if the SFA does not trigger for a comprehensive resource management review, these documents should be available upon request.

1. Maintenance of the Nonprofit School Food Service Account:

| **Person Responsible:** |  |
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* Year-end statement of revenues and expenses
* General ledgers
* Other documentation showing revenues and expenditures to/from nonprofit food service account (e.g., balance sheets, invoices, receipts) for the prior school year
* One month of detailed ledger revenues/expenditures

1. Paid Lunch Equity (not applicable if non-pricing):

| **Person Responsible:** |  |
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* Copy of the current year’s completed “*Paid Lunch Equity Tool*” (Only required if the nonprofit school food service account had a negative balance as of January 31, 2018, or was voluntarily completed)
* If non-federal funds were transferred over to Food Service in addition to, or in lieu of, raising lunch prices, provide supporting documentation that the funds were transferred at the beginning of the school year (i.e. copy of General Ledger)

1. Revenue from Non-Program Foods

| **Person Responsible:** |  |
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* Documentation demonstrating food costs of non-program foods
* Documentation demonstrating revenue from non-program foods
* Completed [USDA Non-Program Food Revenue Tool](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls) or [DPI Non-program Food Revenue Tool/Price Calculator](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx) (recommend using DPI’s version which feeds into USDA’s tool)
* Recommend using the DPI Non-Program Foods Price Calculator to ensure non-program foods are priced to cover all costs and that the non-program foods ratio is met
* Price charged for adult meals ([Wisconsin Adult Meal Pricing Guide](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc))
* Invoices for products or services provided by school food service to internal and external organizations, e.g.: catering, vending machines, school store, vended meals, staff meetings, etc.

1. Indirect Costs

| **Person Responsible:** |  |
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* DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Food Service account in WUFAR). For both public and private schools in Wisconsin, any costs assessed to food service must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc. The NPC will confirm that indirect costs are not being charged to the nonprofit food service account.

# **Civil Rights**

Please see the [Civil Rights information](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights) page on the DPI website.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* [School Food Authority-Civil Rights Compliance Self Evaluation Form-National School Lunch Program (PI-1441](http://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc)) form must be completed by October 31 annually.
* Documentation, including attendance roster, date of training/review and topics, to support that the annual Civil Rights [PowerPoint presentation](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) was conducted for all staff involved in school food service operations
* Examples of the [updated USDA Nondiscrimination Statement](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/snt-mail-120415.docx) on program materials including website and printed materials
* Description of procedures for receiving and handling school food service civil rights complaints
* Information on the number and description of complaints alleging discrimination in the current and prior school year
* Types of services provided to Limited English Proficient households

**Keep for On-Site AR:**

* USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits
* Procedures and supporting documentation for accommodating students with special dietary needs, as applicable

# **Professional Standards**

Please see the [Professional Standards information](http://dpi.wi.gov/school-nutrition/professional-standards) page on the DPI website.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* Completed [DPI’s template Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) or other tracking tool that includes:
  + list of all current staff members with ties to the school nutrition programs (directors, managers, cooks, servers, claim preparer and application processor, etc.) and each staff member’s name, title/position, duties, date of hire, and general number of hours worked per week
  + documentation showing that continuing education/training hours are tracked annually for each employee including the employee’s name, training title, training subject, date and length of training

**Keep for On-Site AR**

* If agency hired a new Food Service Director since July 1, 2015, please have the documentation (resume, college transcripts, education information) available to show highest level of education achieved, years of school nutrition experience, and food safety training (8 hours completed within 5 years prior to or within 30 days after start date)
* On the day of review, please be prepared to provide an up-to-date list of all employees in the SFA with ties to the school nutrition programs currently employed as of the date of the on-site review

# **Food Safety**

Please see the [Food Safety information](http://dpi.wi.gov/school-nutrition/food-safety) page on the DPI website.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Food safety inspection reports (two per school year) per site
  + Note: If two inspections have not been received for the current school year, please have food safety inspection reports for the previous school year.
  + The most recent food safety inspection report should be posted in a publicly visible location.
* Food safety plan specific to each site (including site description and standard operating procedures) and records to show the plan is operational (e.g., temperature logs, documentation of staff training, etc.)
  + Food safety plan should be kept in a location accessible to all employees at each site
* Temperature logs for previous 6 months
* Documentation to show the Food Safety Plan has been reviewed annually and updated
* Approval from a sanitarian to use Time as a Public Health Control for TCS items held without temperature control, if applicable

# **On-Site Monitoring**

For SFAs with more than one participating school.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* SFA On-site monitoring form(s) completed for each participating site by February 1 for [National School Lunch Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc)site(s) monitored each year
* [SFA On-site monitoring form(s) completed for each participating site by February 1 for School Breakfast Program](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc) site(s) monitored at least once every two years, with 50% reviewed each year

# [**Procurement**](http://dpi.wi.gov/school-nutrition/procurement)

Please see the [Procurement](https://dpi.wi.gov/school-nutrition/procurement)page on the DPI website.

Beginning in SY 2016-17, the USDA has implemented a new procurement review process. SFAs selected for an AR will also receive a review of their procurement practices during the same year, but this is conducted at a separate time and completed by different reviewers. You will receive additional guidance on this process at a later date. If you have any questions on the procurement review, please contact Alex Zitske at [alex.zitske@dpi.wi.gov](mailto:alex.zitske@dpi.wi.gov) or 608-267-9288.

# **Buy American**

Please see the [Buy American Provision](https://dpi.wi.gov/school-nutrition/procurement/buy-american)page on the DPI website.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Solicitation and contract language including the requirement for the purchase of foods produced and processed in the United States
* Implemented process for examining product packaging for identification of the country of origin
* Completed copy of the [Buy American - Noncompliant Product List](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx) for any non- domestic food products

# **Summer Food Service Program Outreach (SFSP)**

Please see the [SFSP information](http://dpi.wi.gov/community-nutrition/sfsp) page on the DPI website.

Required for all SFAs, even if not participating in the SFSP.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Documentation that SFSP outreach occurred before the end of the school year to ensure eligible families are informed of the availability and location of SFSP meals in the community

# **School Breakfast Program Outreach (SBP)**

Please see the [SBP information](http://dpi.wi.gov/school-nutrition/school-breakfast-program) page on the DPI website.

May not apply to all schools. Complete if program offered.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* Documentation to show that families were informed of the availability of reimbursable meals served under the SBP periodically throughout the year

# **Afterschool Snacks**

Please see the [Afterschool Snacks information](http://dpi.wi.gov/school-nutrition/after-school) page on the DPI website.

May not apply to all schools. Complete if program offered.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* Documentation to show afterschool enrichment activities are available to students
* Documentation that supports the number of snacks served daily and claimed (such as enrollment and attendance records, snack orders, delivery records, and production records)
* Documentation to support that annual Civil Rights [PowerPoint Presentation](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx) was presented to these staff, including attendance roster and topics

**Keep for On-Site AR:**

* Completed on-site monitoring forms to show review of afterschool snack operation occurred twice per year with the first review occurring in the first four weeks of the school year
* Documentation to verify that the school(s) is area eligible **(May not apply)**
* Eligibility documentation (Benefit Issuance List) for each student that receives a free or reduced price snack if not area eligible **(May not apply)**
* Point of Service documents
* Daily menus and production records

# **Special Milk Program**

Please see the [Special Milk Program](http://dpi.wi.gov/school-nutrition/milk-programs/special-milk)page on the DPI website.

May not apply to all schools. Complete if program offered.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Milk Pricing Policy - non-pricing plan (all students receive free milk), pricing plan (all students pay), or pricing plan with free milk option (free milk to qualifying students)
* Documentation to support the number of milks served daily and claimed for reimbursement (e.g., milk orders, deliver records, point of service documentation)
* For those participating in the pricing plan with free milk option, documentation to support the correct eligibility status is being applied to each participating student (e.g., benefit issuance list, direct certification runs, applications)
* Documentation showing milk counts

# **Wisconsin School Day Milk Program (WSDMP)**

Please see the [Wisconsin School Day Milk Program (WSDMP)](http://dpi.wi.gov/school-nutrition/milk-programs/wisconsin-school-day-milk)page on the DPI website

May not apply to all schools**.** Complete if program offered.

| **Person Responsible:** |  |
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**Keep for On-Site AR:**

* Documentation to support the number of milks served daily and claimed annually for reimbursement (e.g., milk orders, delivery records, point of service documentation, milk pricing)
* Documentation to support the correct eligibility status is being applied to each participating student (e.g., benefit issuance list, direct certification runs, applications)
* Documentation to support the cost per ½ pint of milk submitted as part of the annual claim for reimbursement

# **Fresh Fruit and Vegetable Program (FFVP)**

Please see the [Fresh Fruit and Vegetable Program (FFVP)](http://dpi.wi.gov/school-nutrition/ffvp)page on the DPI website.

May not apply to all schools. Complete if program offered.

| **Person Responsible:** |  |
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**Email to the Nutrition Program Consultant:**

* These documents will be requested prior to the onsite portion of the AR. The month of review will be determined by the FFVP coordinator assigned to your school district.
  + One month of program invoices to support purchases
  + One month of payroll data to support labor costs

Updated October 2018