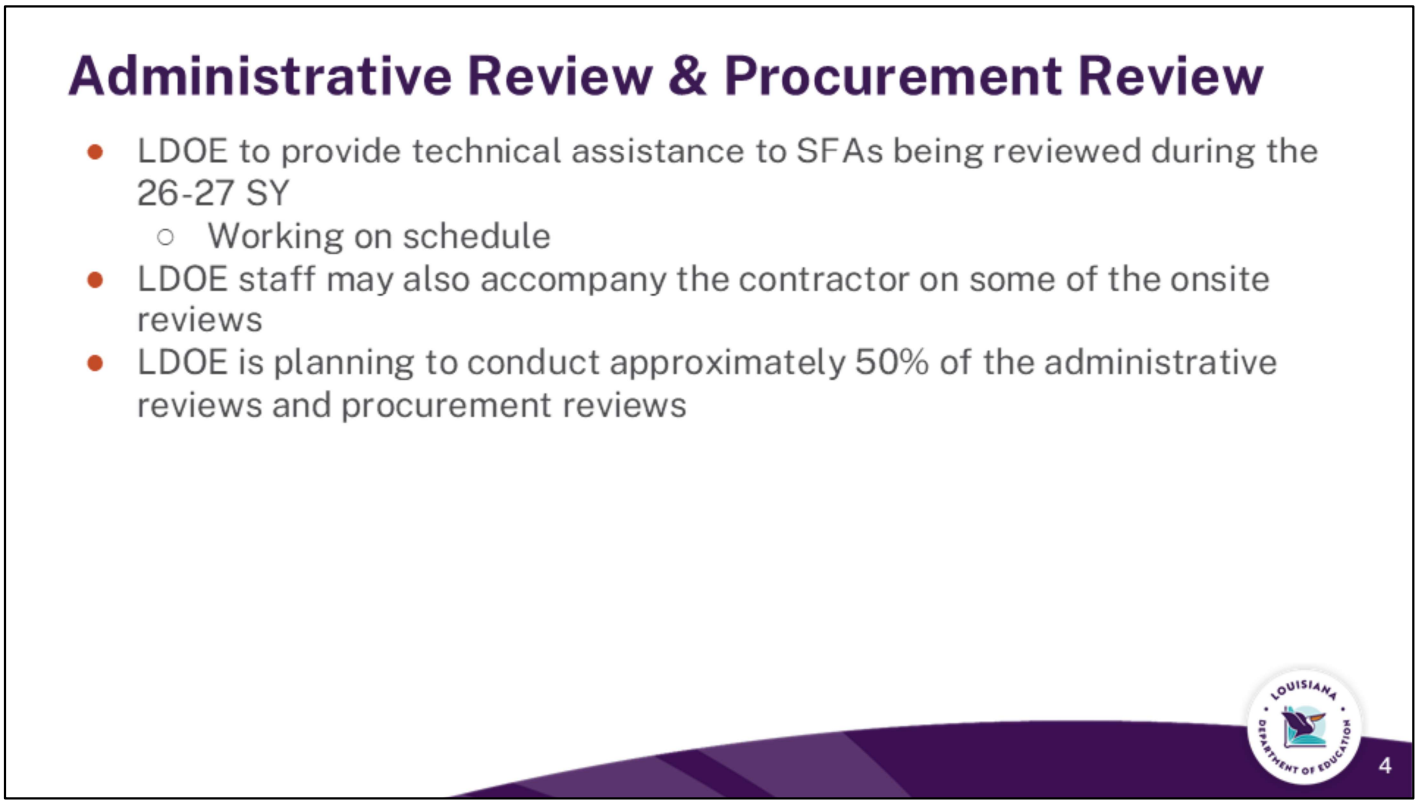
Administrative Review and Procurement Review

April 22, 2026

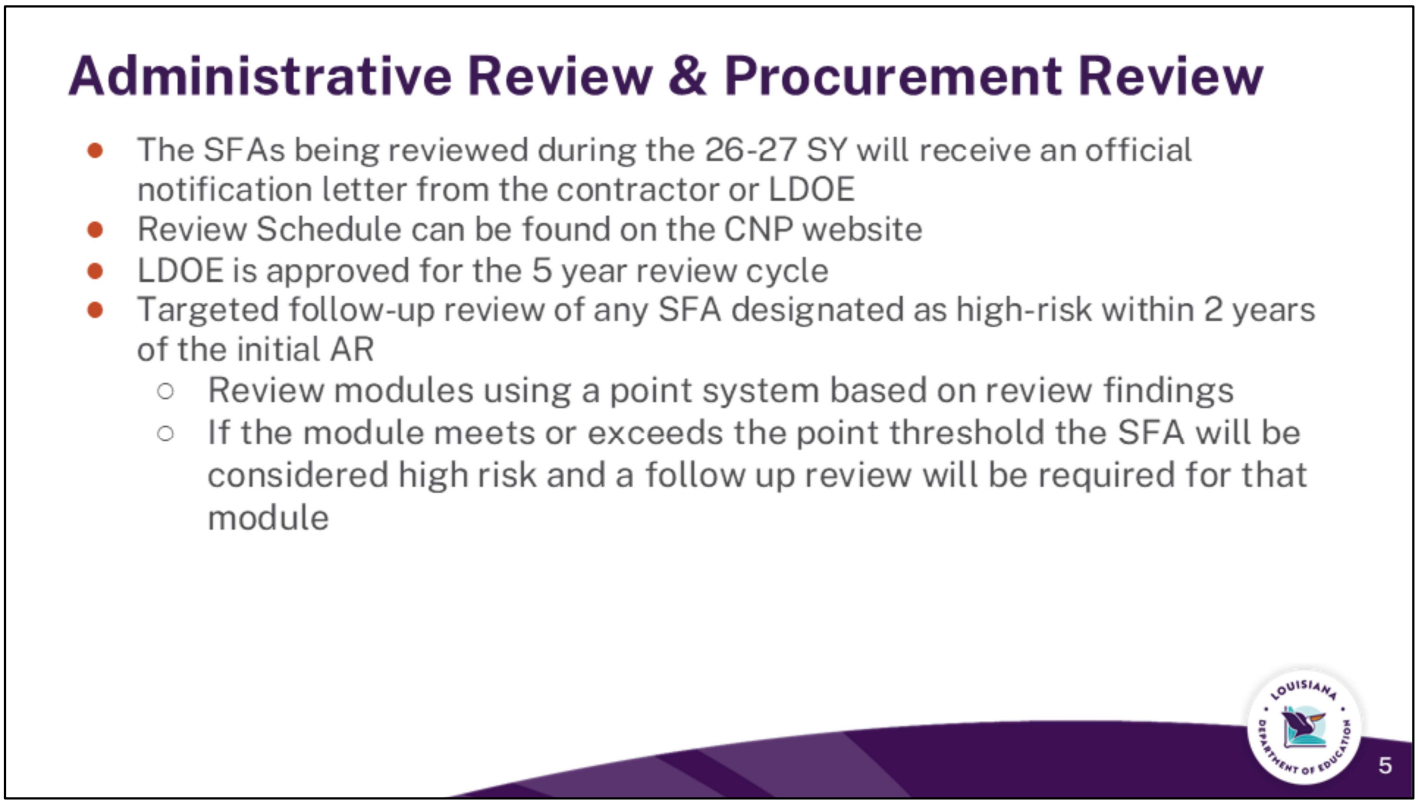
Agenda

- Administrative Review Process
- Administrative Review Off-Site Assessment Tool
- Review Sections, Documents Needed, and How to Prepare
- Review Sections Common Findings
- Review Sections Best Practices (General and related to Common Findings)
- Preparing for the Day of Review
- What to Expect During the Onsite Review
- Procurement Review Process
- Summary of Findings Report and Review Closure
- High Risk and Follow Up Reviews

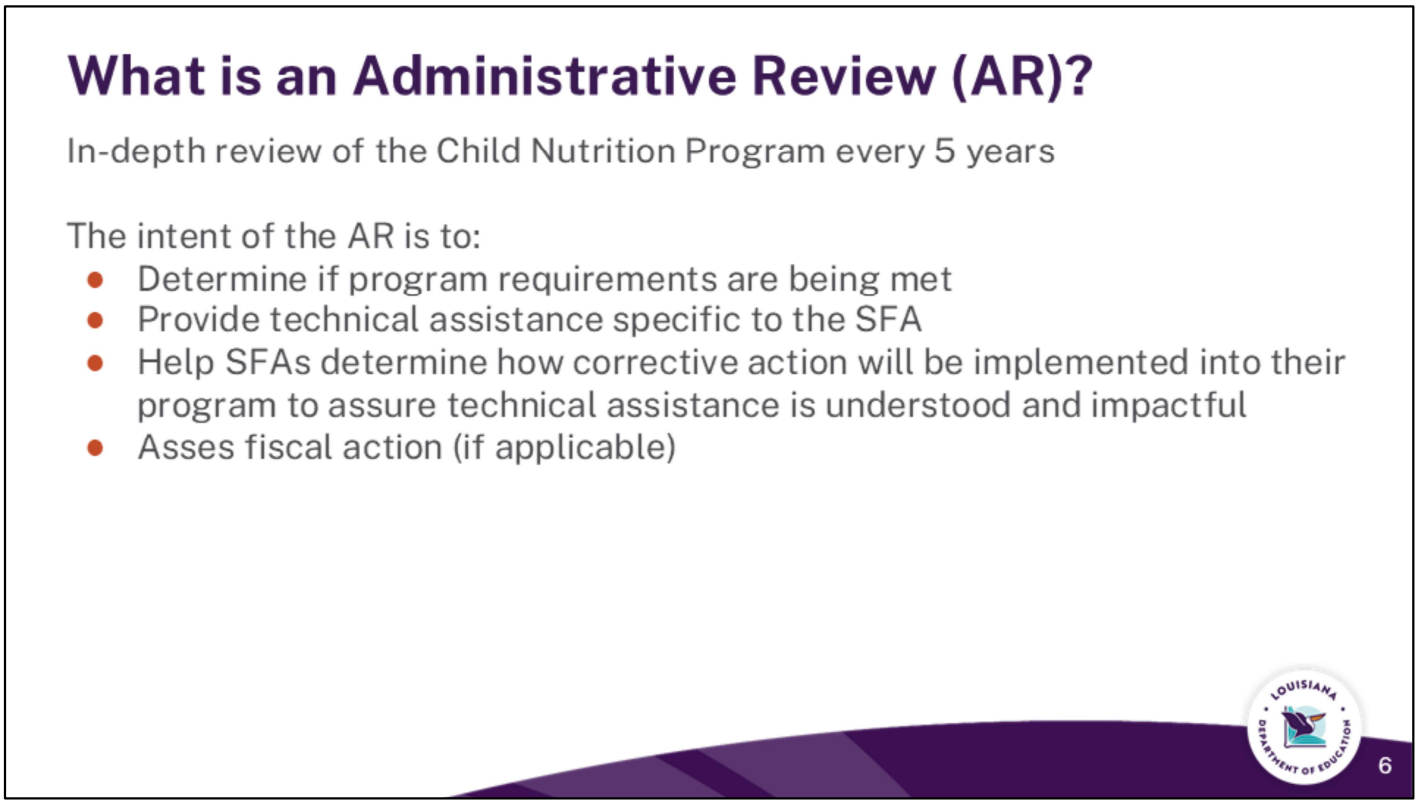
Administrative Review & Procurement Review Process



LDOE is planning provide technical assistance to as many SFAs as possible who are being reviewed during the 26-27 SY. We are in the process of working on the schedule and LDOE staff will be contacting SFAs soon.
LDOE staff is also planning to accompany the contractor on some of the onsite reviews as part of the contact monitoring.
LDOE is also planning to conduct approximately half of the administrative reviews and procurement reviews.



SFAs being reviewed during the 26-27 SY will receive an official notification letter from the contractor or LDOE.
If you are unsure of what year you will be receive an Administrative Review, the Administrative Review Schedule can be found on the CNP website.
LDOE has been approved for the 5 year review cycle.
It is required for State agencies who have been approved for the 5 year cycle to conduct a targeted follow-up review of any SFA designated as high-risk within 2 years of the initial Administrative Review.
LDOE will be using Administrative Review and Procurement Review modules when determining if an SFA is considered High Risk.
Some findings will automatically identify an SFA as High-Risk. These findings will be given the maximum points required to ensure the SFA is identified as High-Risk in the module where the violation occurred.
Each module will have a high-risk point threshold. If a module meets or exceeds the point threshold, the SFA will be considered High-Risk and a follow up of the failed module will be completed by the LDOE within 2 years of the initial Administrative Review.

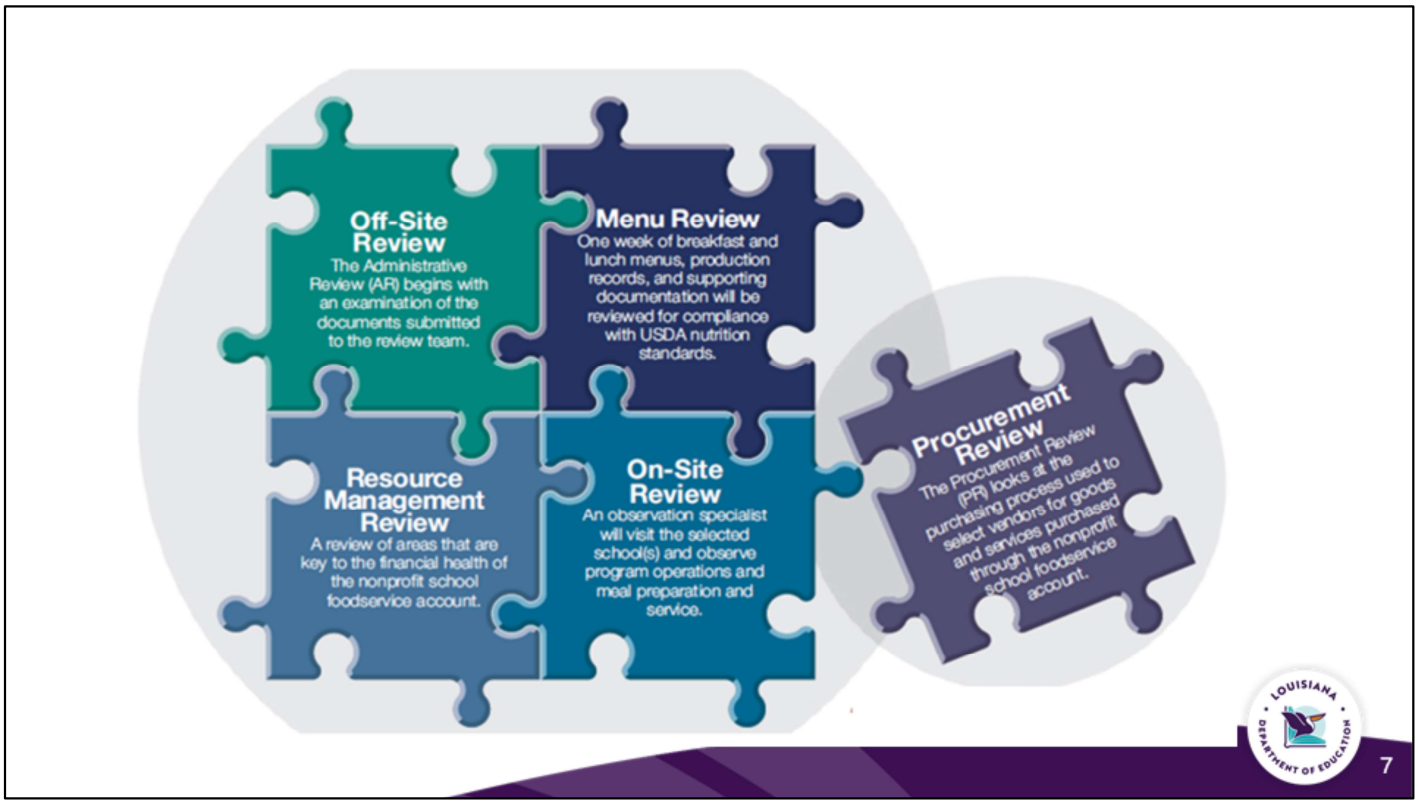


What is an Administrative Review (AR)?

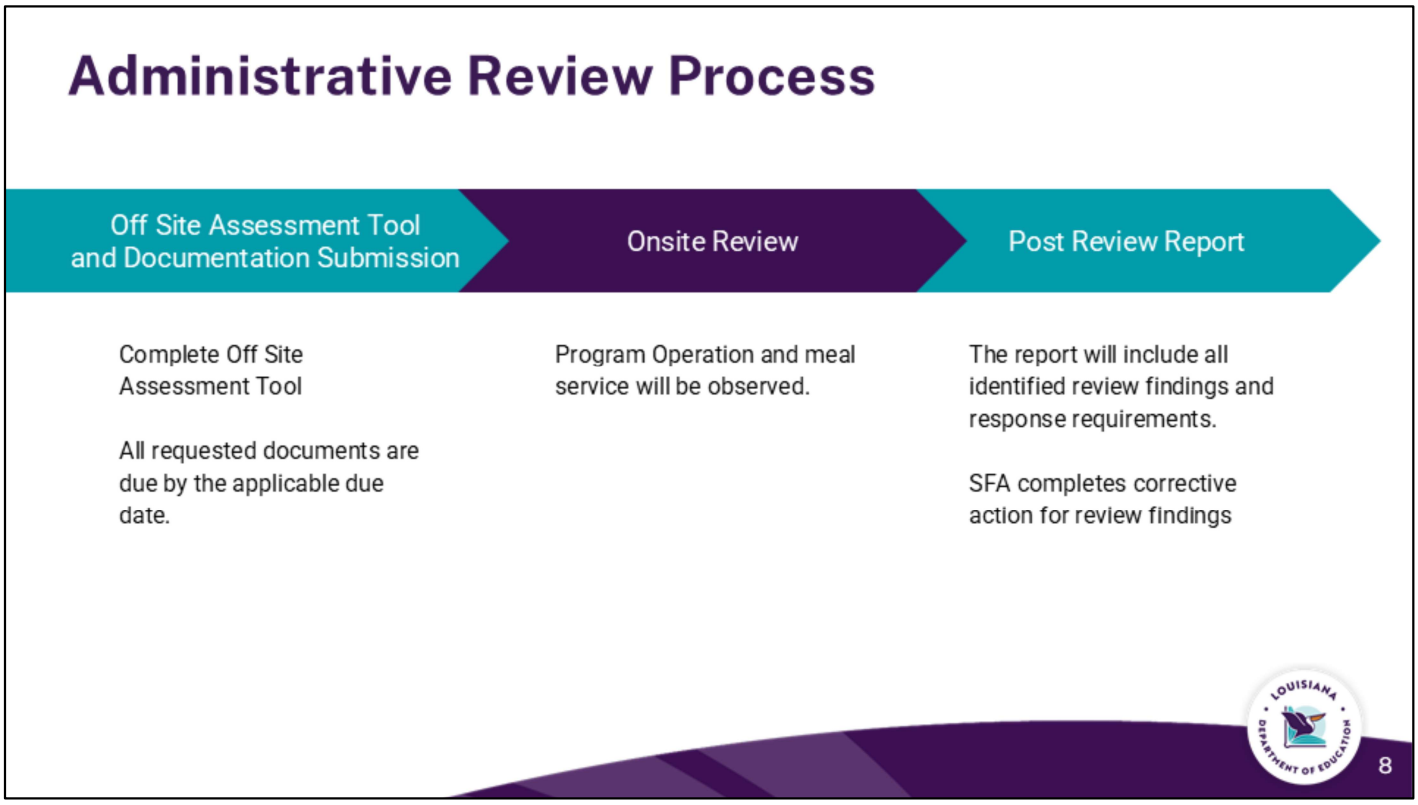
In-depth review of the Child Nutrition Program every 5 years

The intent of the AR is to:

- Determine if program requirements are being met
- Provide technical assistance specific to the SFA
- Help SFAs determine how corrective action will be implemented into their program to assure technical assistance is understood and impactful
- Asses fiscal action (if applicable)



Let's talk about the overall administrative review.
First, the off-site portion of the review the reviewer examines the documents that were submitted.
For the menu review, the reviewer will review one week of breakfast and lunch menus, production records, and supporting documentation for compliance with USDA nutrition standards.
For resource management, the reviewer will review all areas that are key to the financial health of the Nonprofit School Food Service Account..
For the on site portion of the review, the reviewer will observe the program operations, meal preparation and service at the selected school site(s).
In addition to the administrative review, the procurement review will also be conducted at the same time.
For the procurement review, the reviewer will look at the purchasing process used to select vendors for purchase through the Nonprofit School Food Service Account.



We will focus now on the administrative review process. We will talk about the procurement review later in this training.
On this slide is the basics of the administrative review process.
SFAs will complete the off site assessment tools, and submit the requested documentation.
The onsite portion of the review includes observing the program operation and meal service.
SFAs will receive the post review report that will include all identified findings. SFAs will need to completed the corrective action for the review findings.

Scope of Administrative Review

- Meal Access and Reimbursement: (Critical Area-Performance Standard 1)
- Meal Pattern and Nutritional Quality (Critical Area-Performance Standard 2)
- Resource Management (General Area)
- General Program Compliance (General Area)
- Other Federal Pogram Reviews (Critical and General Areas)

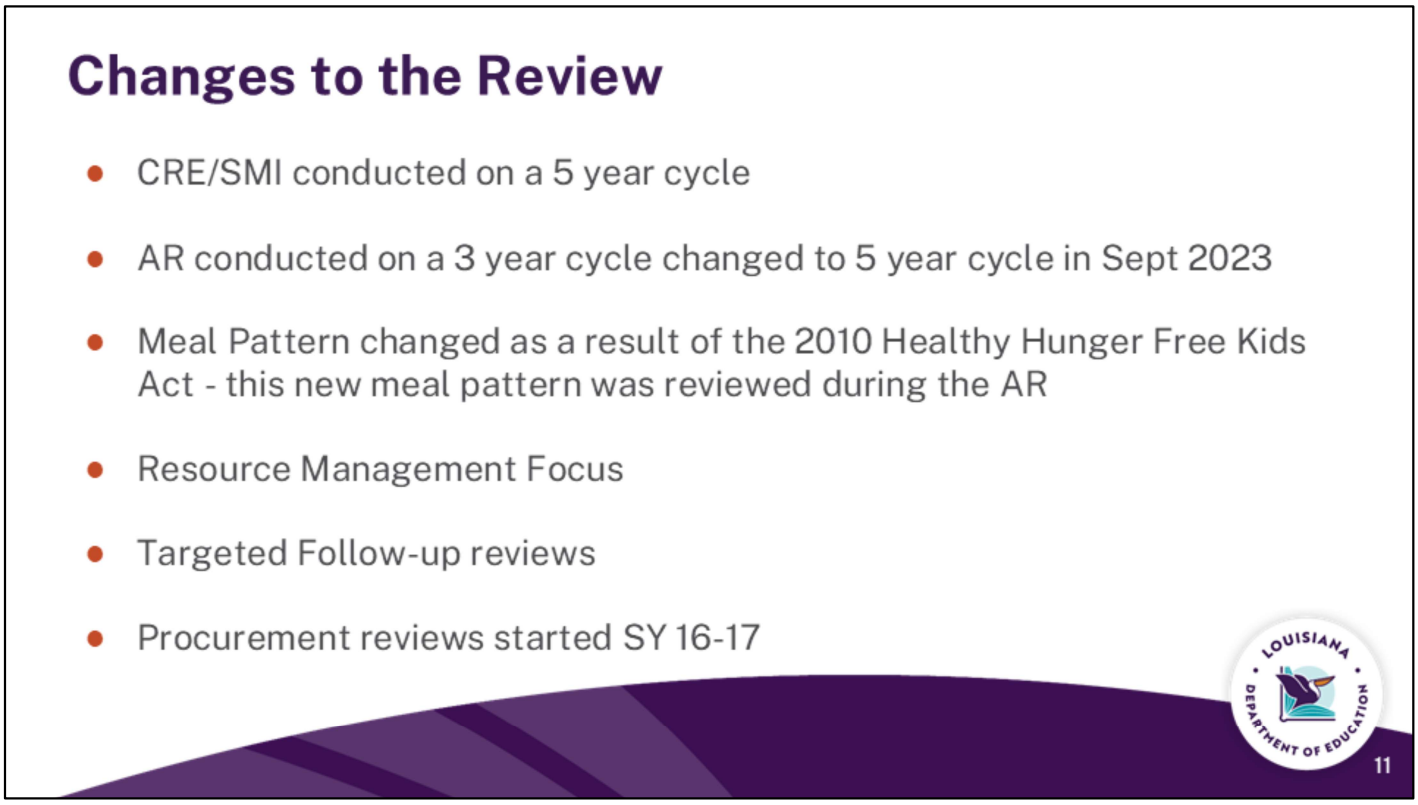
While the regulations use the term “Critical Areas” to describe Performance Standards 1 and 2, compliance standards in the General Areas of Review are equally important.

Here is the scope of the Administrative Review. As you can see there are critical areas and general areas.
While the regulations use the term “Critical Areas” to describe Performance Standards 1 and 2, compliance standards in the General Areas of Review are equally important.
The Meal Access and Reimbursement, Meal Pattern and Nutritional Quality, and a portion of the Other Federal Program Reviews are critical areas.

Scope of Administrative Review

Meal Access & Reimbursement	Meal Pattern & Nutritional Quality	Resource Management	General Program Compliance	Other Federal Program Reviews
Certification & Benefit Issuance	Meal Components & Quantities	Risk Assessment for Resource Management	Civil Rights	Afterschool Snack
Verification	Offer versus Serve	Maintenance of the Nonprofit School Food Service Account	SFA On-site Monitoring	Seamless Summer Option
Meal Counting & Claiming	Dietary Specifications & Nutrient Analysis	Paid Lunch Equity	Local Wellness Policy	Fresh Fruit & Vegetable Progam
		Revenue from Nonprogram Foods	Smart Snacks	Special Milk
		Indirect Costs	Professional Standards Water	
			Food Safety, Storage & Buy American	
			Reporting & Recordkeeping	
			SBP & SFSP Outreach	

Here is another look at the scope of the Administrative Review broken down by sections.



I'm going to take you way back for a minute. Some of you that have been around for many years will remember the term CRE/SMI. The term stands for Coordinated Review Effort and School Meals Initiative. This was the old way a State agency would review an SFA 15 years ago, they did this on a 5 year cycle. A final rule which was brought about by the Healthy Hunger Free kids act of 2010 went into effect on Sept 27th, 2016 and this changed the way State agencies conducted reviews. There was a 26 member team that was made up of people from National office, 7 Regional offices, as well as 7 State Agencies. They worked tirelessly for a whole year to develop a new process which resulted in what you now know as the Administrative Review. The new Administrative Review Process was established as a way to have a unified accountability system which strengthened program integrity through a more robust, effective, and transparent process for monitoring school nutrition program operations. This new process was required to be conducted every 3 years. The regulations changed Sept 18th, 2023 and State agencies were allowed to go back to a 5 year cycle.

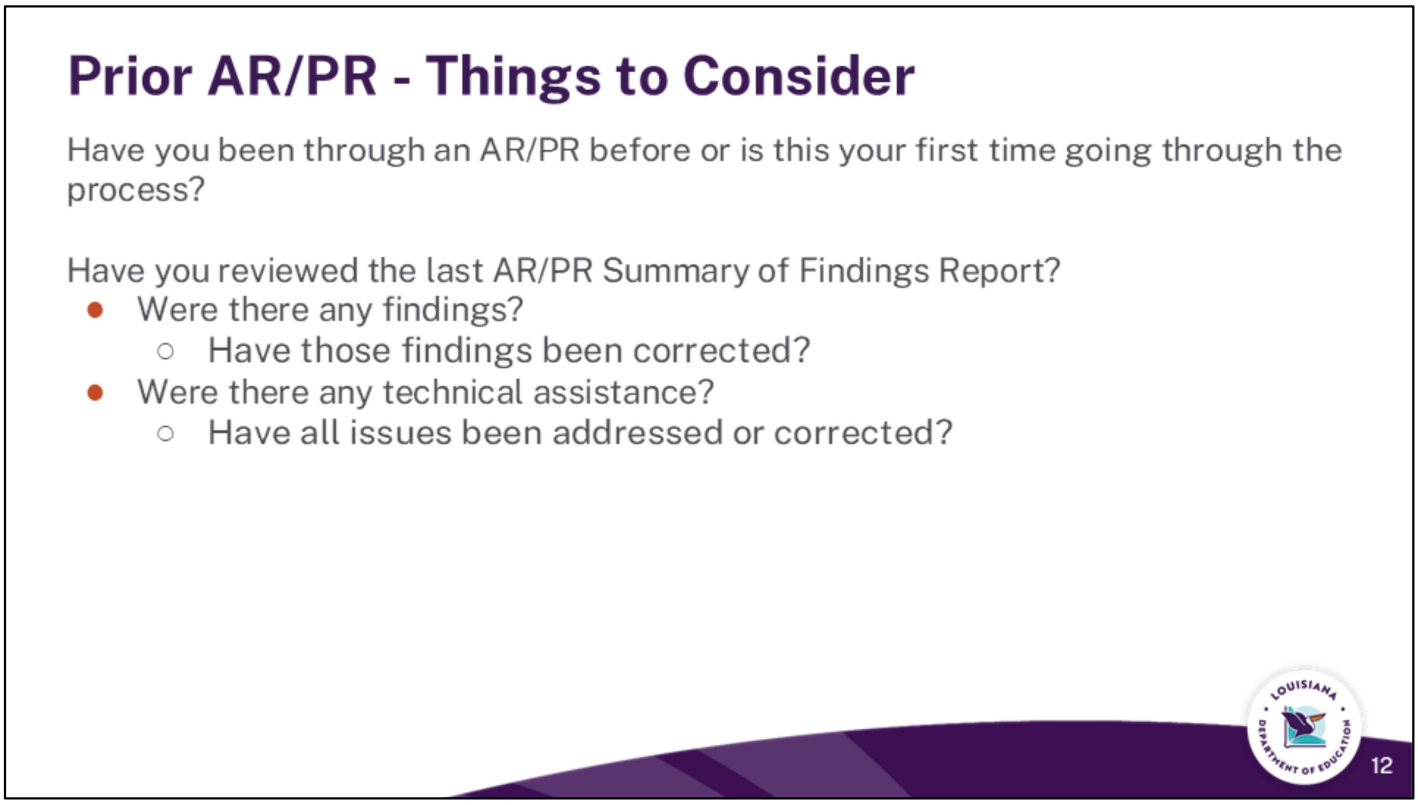
The critical areas that are focused on with the AR are Performance standard 1 (which focuses on benefit issuance and meal counting and claiming), Performance Standard 2 (which focuses on meal components and quantities of the meal pattern and general areas).

With the final rule and the new AR process brought about the review of Resource Management to better assess the financial condition of the Nonprofit School Food Service Account. When we first started the AR process we looked at all for areas such as maintenance of the nonprofit account, PLE, revenue from nonprogram foods, and indirect cost. Now we only have to look at the areas that flag high-risk and a comprehensive review in that area is done to emphasize the importance of the financial health of the SFAs non

profit food service account. This is likely because the Procurement review was introduced which also looked into the nonprofit acct.

Most recently, you have heard of the Targeted Follow up reviews if you flag as high risk, we will cover this more in depth later in the presentation.

Then in SY17 Procurement reviews were introduced into the mix. Like the AR, the Procurement tool was tested by nine State agencies during school year 15-16 and what State agencies use today is the result of all their hard work. The procurement review is a separate review from the AR but a lot of States conduct the two reviews simultaneously. Unlike the AR a Procurement review can be conducted completely off-site by the State agency. However, it is their discretion how they will conduct the Procurement review. A procurement review like the Resource management section assesses the way federal funds are being spent by the SFA. Even though this feels like a new process, Procurement is not new. Schools have always had to conduct procurement in order to buy food and supplies.



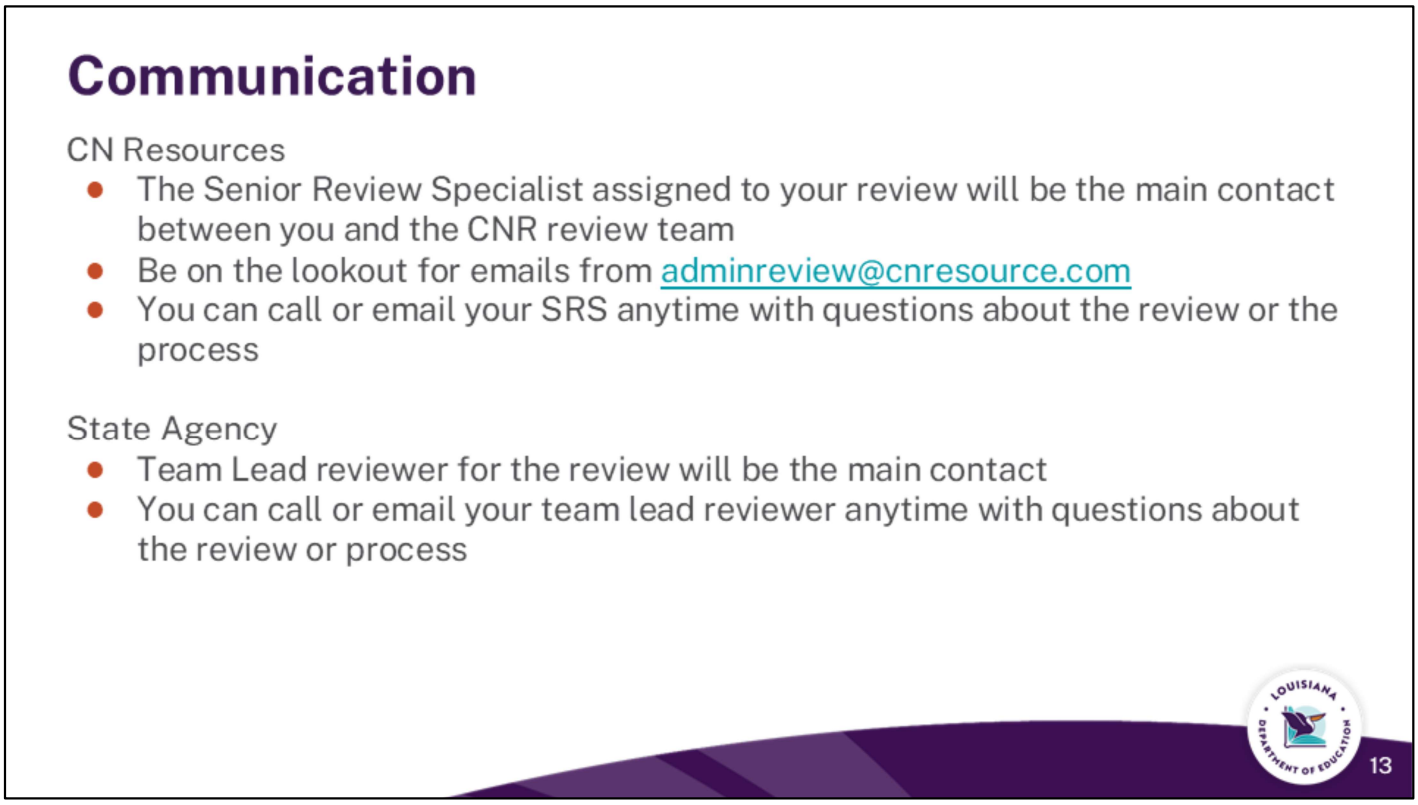
Have you been through an AR/PR before or is this your first time going through the process?

Have you reviewed the last AR/PR Summary of Findings Report?

- Were there any findings?
    - Have those findings been corrected?

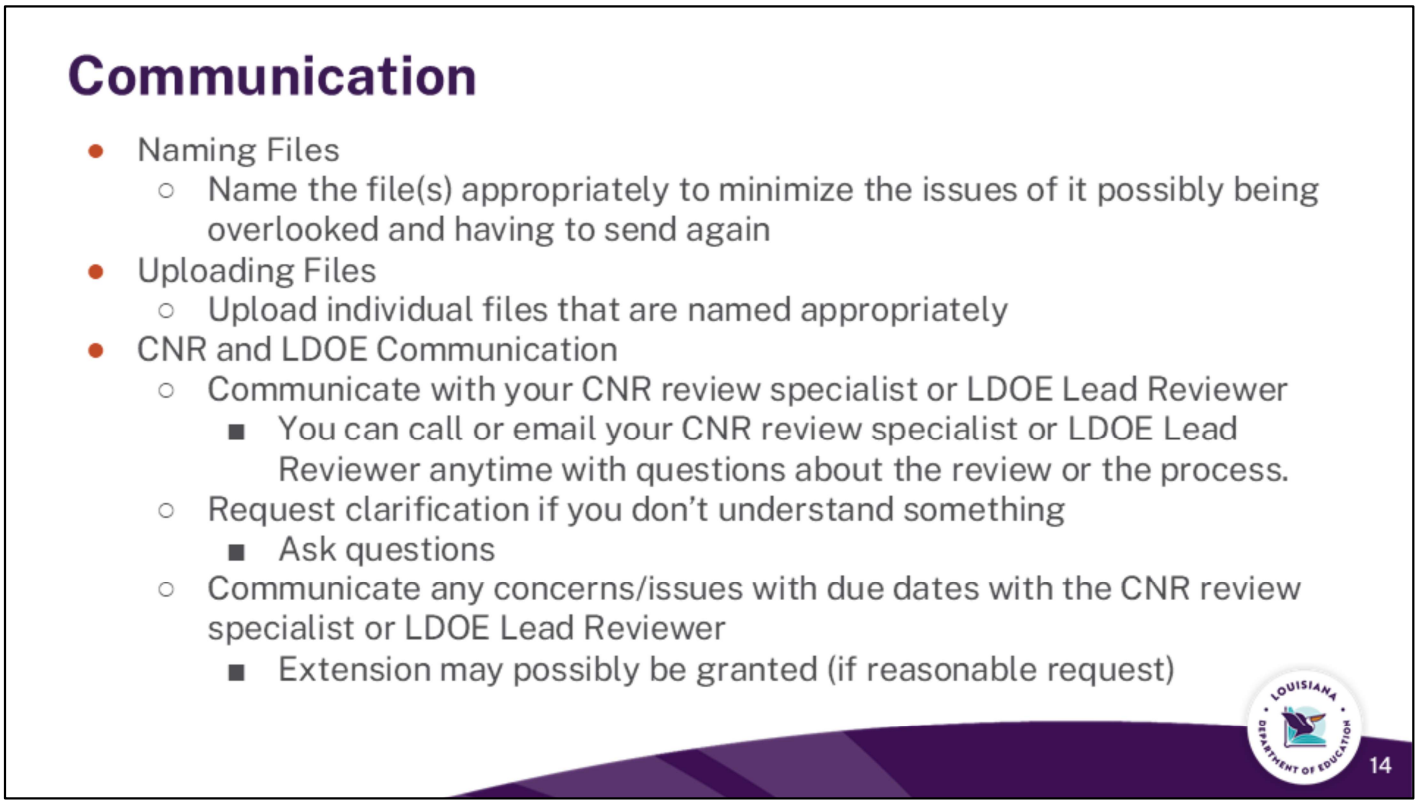
Were there any technical assistance?

- Have all issues been addressed or corrected?



If you are receiving a review conducted by CNR the Senior Review Specialist assigned to your review will be the main contact between your and the CNR review team.
Be on the lookout for emails from adminreview@cnresource.com
You can call or email your SRS anytime with questions about the review or the process

If you are receiving a review conducted by LDOE the team lead reviewer will be the main contact.
You can call or email your team lead reviewer anytime with questions about the review or process.



Let's talk about some general best practices for your review to go as smoothly as possible during the offsite portion.
First, let's talk about the documentation files that need to be submitted. We had a lot of people complain about having to upload files multiple times. We recommend naming the files appropriately to minimize the issue of it possibly being overlooked. If the reviewer does not see the specific item, then they may think it was not originally uploaded and will ask for it to be uploaded.
Next, when uploading the files, make sure to upload individual files that are named appropriately rather than one large files with hundreds of pages. This will again reduce the possibility of something being overlooked. When talking to CNR, this seemed to be most of the issue. A single 100 page document was uploaded with items for multiple areas which required the reviewer to sort through and put in the correct section.
Finally let's talk about communication with CNR and LDOE. For those SFAs being reviewed by CNR, you have a designated review specialist and those SFAs being reviewed by LDOE will have a Lead Reviewer. You can call or email your review specialist or lead reviewer anytime with questions about the review or the process. You can request clarification if you are not sure about something or don't understand something. I encourage everyone to ask questions to make sure you understand rather than receiving a finding.
You also need to communicate any concerns or issues with due dates with your review specialist or lead reviewer. Extension may possibly be granted if the request is reasonable.

How Many Sites Will be Reviewed?

State agencies must review a minimum number of schools depending on the size of the SFA.

The reviewer will use this chart to determine the number of site(s) to review.

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

How many sites will be reviewed?

State agencies must review a minimum number of schools depending on the size of the SFA.
The reviewer will use this chart to determine the number of sites(s) to review.

Site Selection

All schools with a free average daily participation (ADP) of 100 or more and a free participation factor of 100% or more must be reviewed (except RCCI without day students).

Selection of additional schools to meet the minimum number of schools to review must be based on the following criteria:

- Elementary schools with a free ADP of 100 or more and percent free participation of 97% or more
- Combination schools with a free ADP of 100 or more and a percent free participation of 87% or more
- Secondary schools with a free ADP of 100 or more and a percent free participation of 77% or more

When the number of schools selected using the criteria described above does not meet the required number of schools to review or one school from at least each LEA is not selected, the SA must select additional schools using SA criteria.

All schools with a free average daily participation (ADP) of 100 or more and a free participation factor of 100% or more must be reviewed (except RCCI without day students).

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Secondary schools with a free ADP of 100 or more and a percent free participation of 77% or more

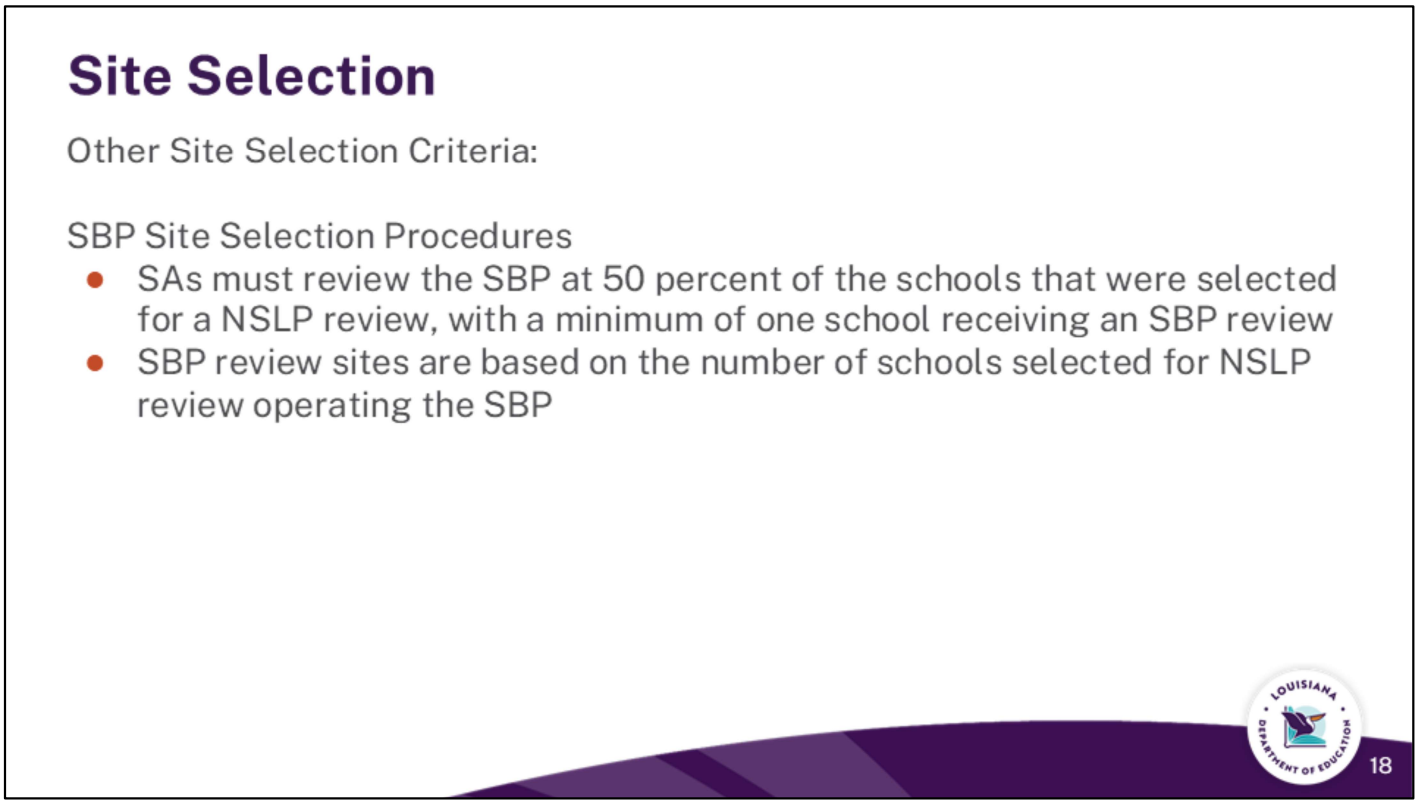
When the number of schools selected using the criteria described above does not meet the required number of schools to review or one school from at least each LEA is not selected, the SA must select additional schools using SA criteria.

Site Selection - State Agency Criteria

The SA must document the reason(s) for selecting the schools for review. SA criteria may include:

- Low participation schools
- High participation schools
- Schools that have less than 100 free ADP but greater than 100% free participation
- Recommendations from a food service director
- Findings from the on-site visits or the claims review process
- Any school in which the daily meal counts appear questionable
- Identical or very similar claiming patterns
- Large changes in the free meal counts
- Schools with a new manager
- Manager or school never reviewed by SA
- New or unusual accountability system
- Proportional mix of the different counting systems employed by the SFA
- Schools with a significant number of Office of Inspector General Hotline and/or parent complaints
- Schools with alternate points of service
- Schools with a mix of age/grade groups
- Schools participating in FFVP, Afterschool Snacks and SSO

The SA must document the reason(s) for selecting the schools for review. As you can see there are several SA criteria listed.



Here are some other Site Selection Criteria

SBP Site Selection Procedures

- SAs must review the SBP at 50 percent of the schools that were selected for a NSLP review, with a minimum of one school receiving an SBP review
- SBP review sites are based on the number of schools selected for NSLP review operating the SBP

Administrative Review Guidance and Tools

- CNP Website
  - Resources

https://cnp.doe.louisiana.gov/Nutrition/Resources

- USDA Website
  - Administrative Review Guidance and Tools

https://www.fns.usda.gov/nslp/administrative-review-guidance-and-tools

All of the Administrative Review forms can be found on the CNP website under Resources. The administrative review forms have not been updated in quite some time. So if you see SY 18-19, it is the most updated form. USDA has told us the forms are in the process of being updated, but have not been released yet.
Administrative Review Guidance and Tools can also be found on the USDA website.
https://www.fns.usda.gov/nslp/administrative-review-guidance-and-tools

Additional Administrative Review Resources

7 CFR Part 210 National School Lunch Program https://www.ecfr.gov/current/title-7/part-210

7 CFR Part 220 School Breakfast Program https://www.ecfr.gov/current/title-7/part-220

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards https://www.ecfr.gov/current/title-2/part-200

7 CFR Part 245 Determining Eligibility for Free and Reduced Price Meals https://www.ecfr.gov/current/title-7/part-245

USDA Eligibility Manual for Schools https://www.fns.usda.gov/cn/eligibility-manual-school-meals

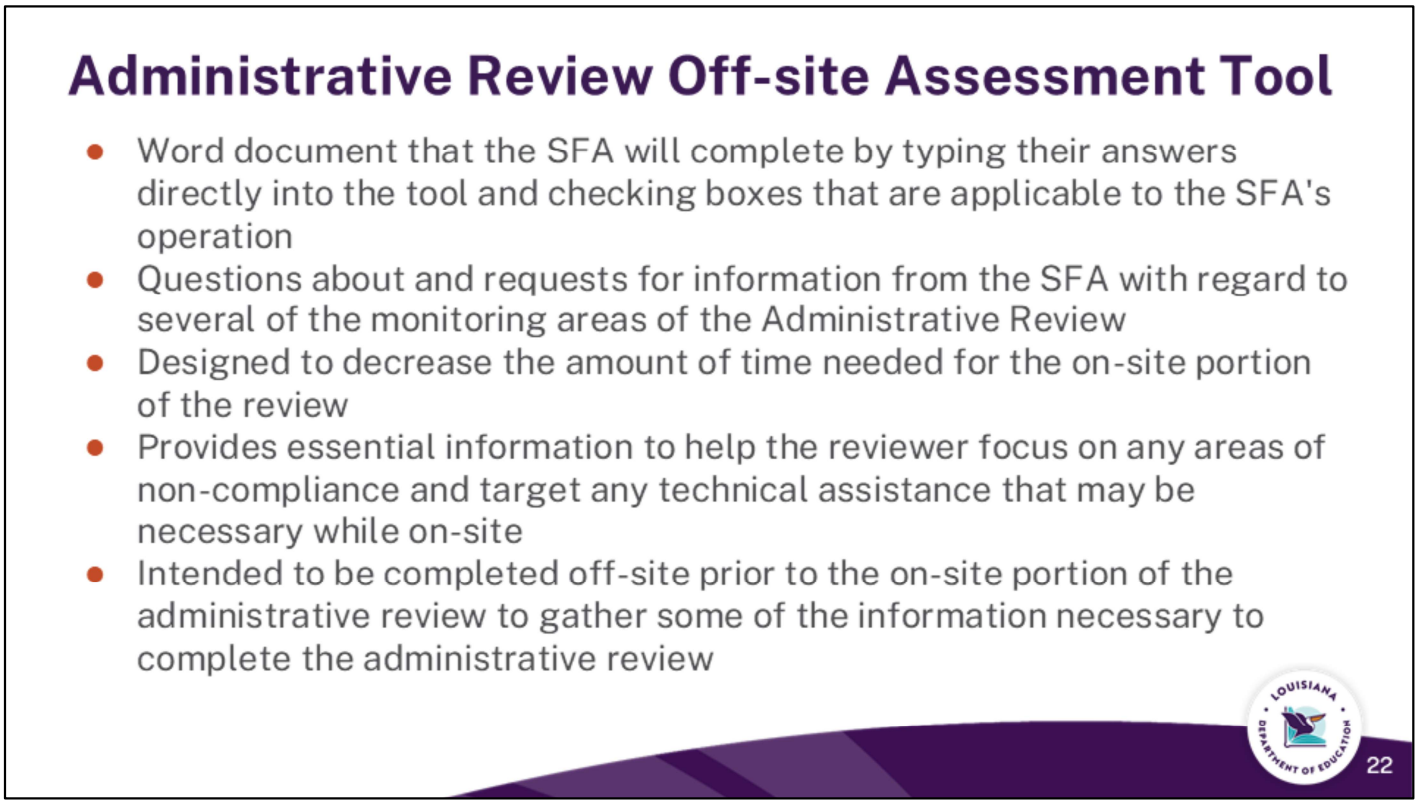
FFVP Manual https://www.fns.usda.gov/ffvp/handbook-schools

OVS Manual https://www.fns.usda.gov/cn/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16

Administrative Review
Off-site Assessment Tool

Slide 21

1 @leah.savoy@la.gov
You will present the Off-Site Assessment Tool slides
Misty Woods, 4/13/2026

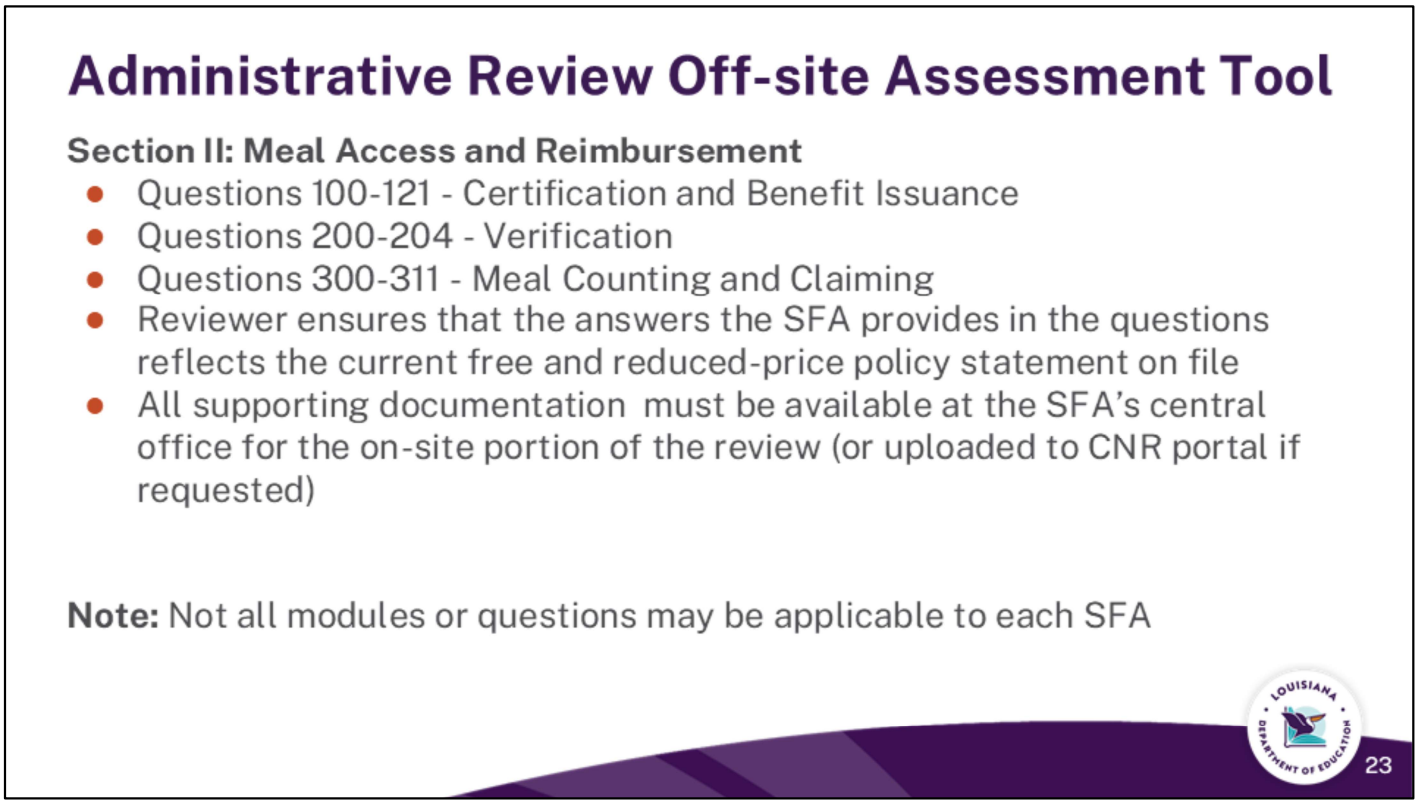


The Off-Site Assessment Tool is a Word document that the SFA will complete by typing their answers directly into the tool and checking boxes that are applicable to the SFA's operation.

The Off-site Assessment Tool encompasses questions about and requests for information from the School Food Authority (SFA) with regard to several of the monitoring areas of the Administrative Review.

It is designed to decrease the amount of time needed for the on-site portion of the review, as well as provide both the State agency (SA) and SFA with essential information to help the reviewer focus on any areas of non-compliance and target any technical assistance that may be necessary while on-site.

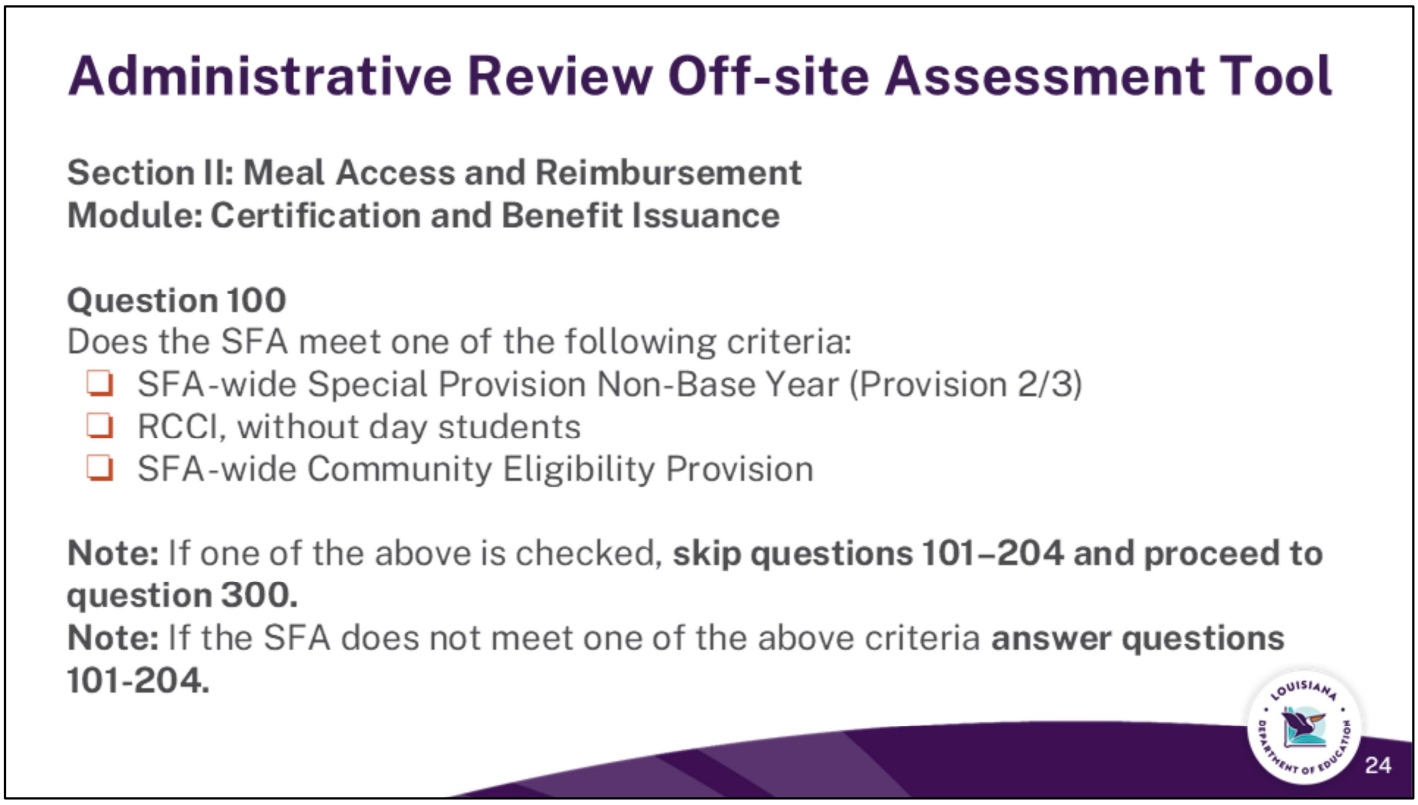
The Off-site Assessment Tool is intended to be completed off-site prior to the on-site portion of the administrative review, and used by the SA as a method to gather some of the information necessary to complete the administrative review.



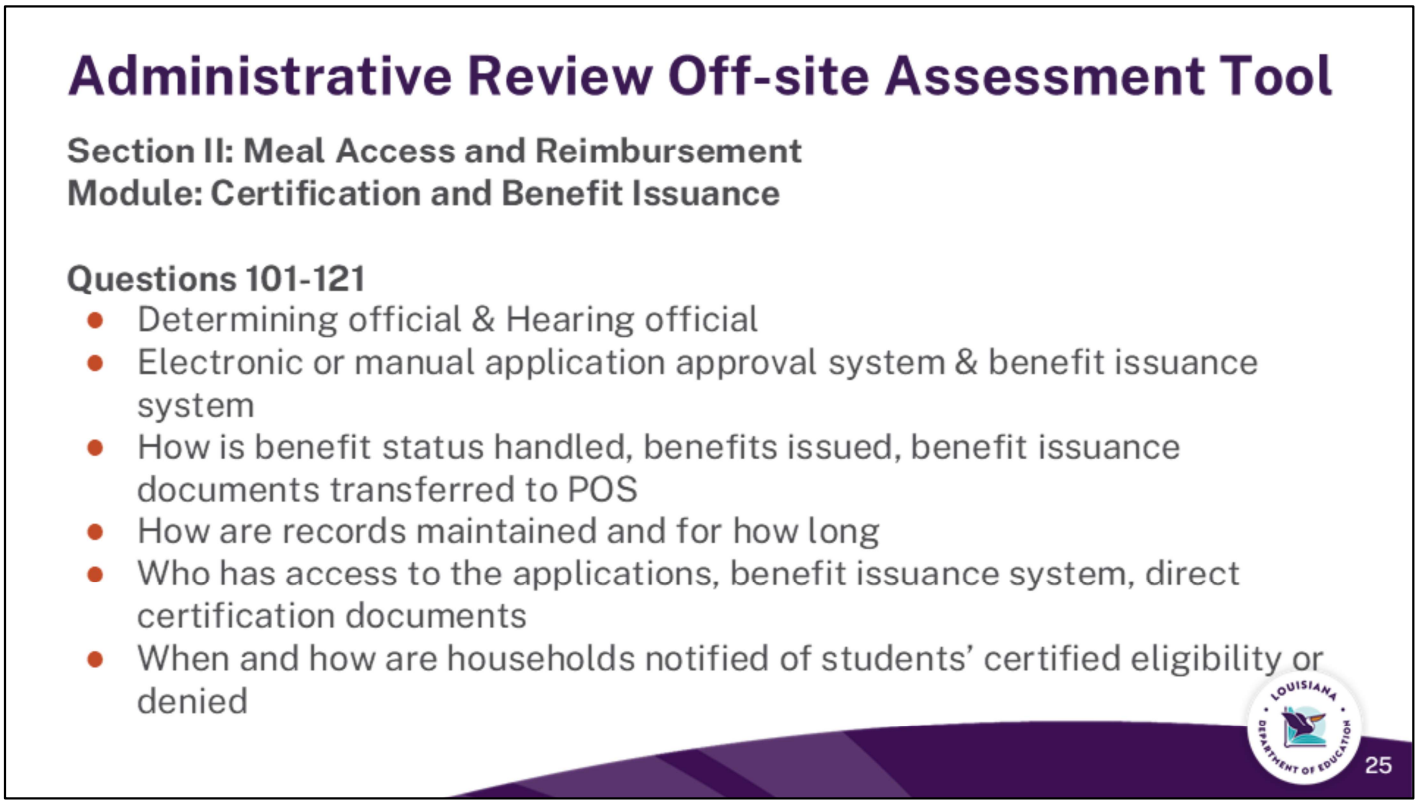
Section II: Meal Access and Reimbursement
Questions 100-121 address the SFA's procedures regarding: eligibility determinations based on household applications, eligibility determinations specific to direct certification, and benefit issuance.
Questions 200-204 explore whether the SFA met all verification requirements, e.g., the SFA's submission of the Verification Collection Report (FNS-742), and/or notification of verification procedures.
Questions 301-311 address standard meal counting and claiming procedures, including internal controls and training.

The reviewer will ensure that the answers the SFA provides in the questions reflects the current free and reduced-price policy statement on file.
All supporting documentation must be available at the SFA's central office for the on-site portion of the review (or uploaded to CNR portal if requested).

Note: Not all modules or questions may be applicable to each SFA.

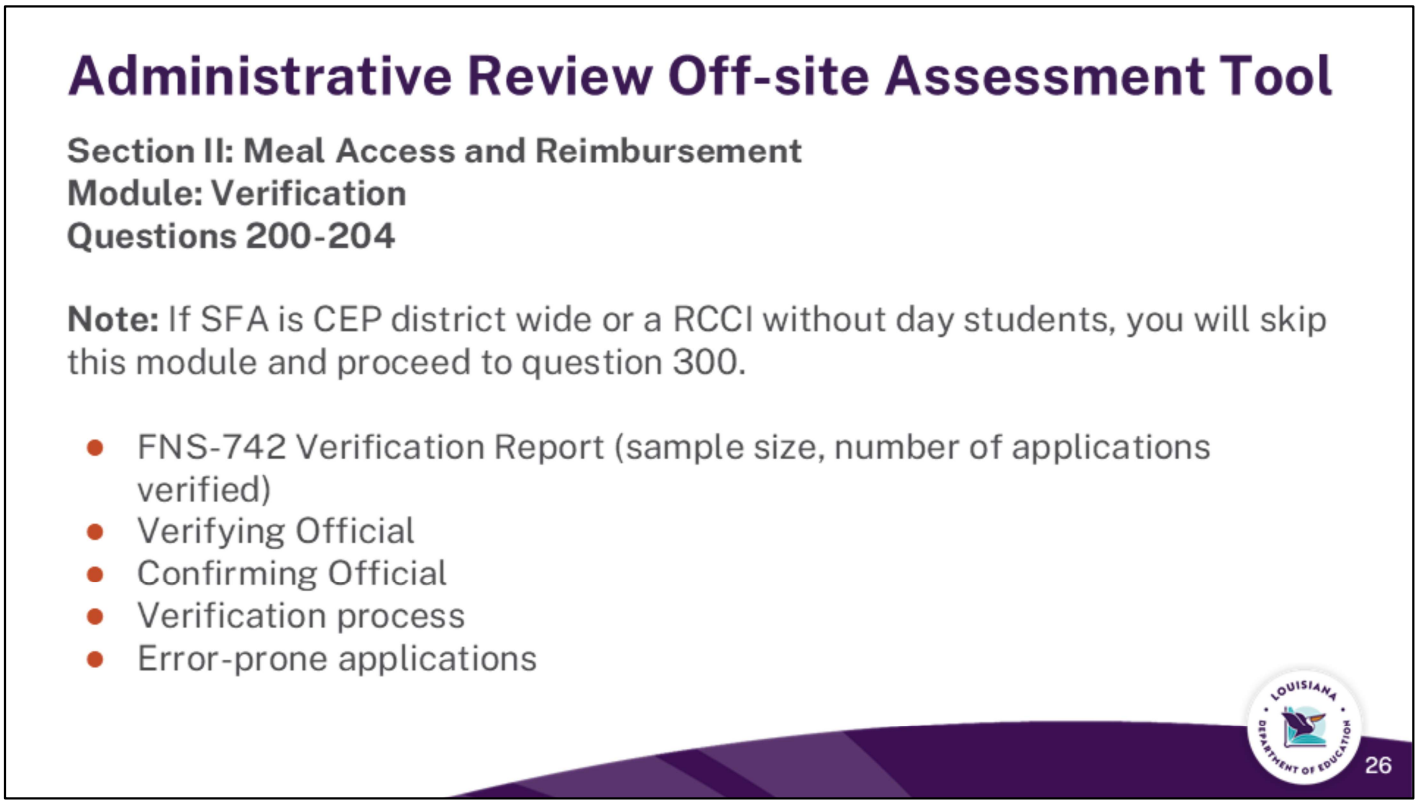


Section II: Meal Access and Reimbursement
Module: Certification and Benefit Issuance
The first, Question #100 will ask if the the SFA meets the criteria of Provision 2 or 3, RCCI without day students, or SFA wide CEP.
If your SFA meets any of the criteria listed, then you will skip the rest of the questions 101-204 and proceed to question 300.
If your SFA does not meet any of the criteria listed, then you will continue to answer the questions in this section.



Section II: Meal Access and Reimbursement
Module: Certification and Benefit Issuance
Questions 101-121
The questions is this module have questions relating to following:

- Determining official & Hearing official
- Electronic or manual application approval system & benefit issuance system
- How is benefit status handled, benefits issued, benefit issuance documents transferred to POS
- How are records maintained and for how long
- Who has access to the applications, benefit issuance system, direct certification documents
- When and how are households notified of students' certified eligibility or denied

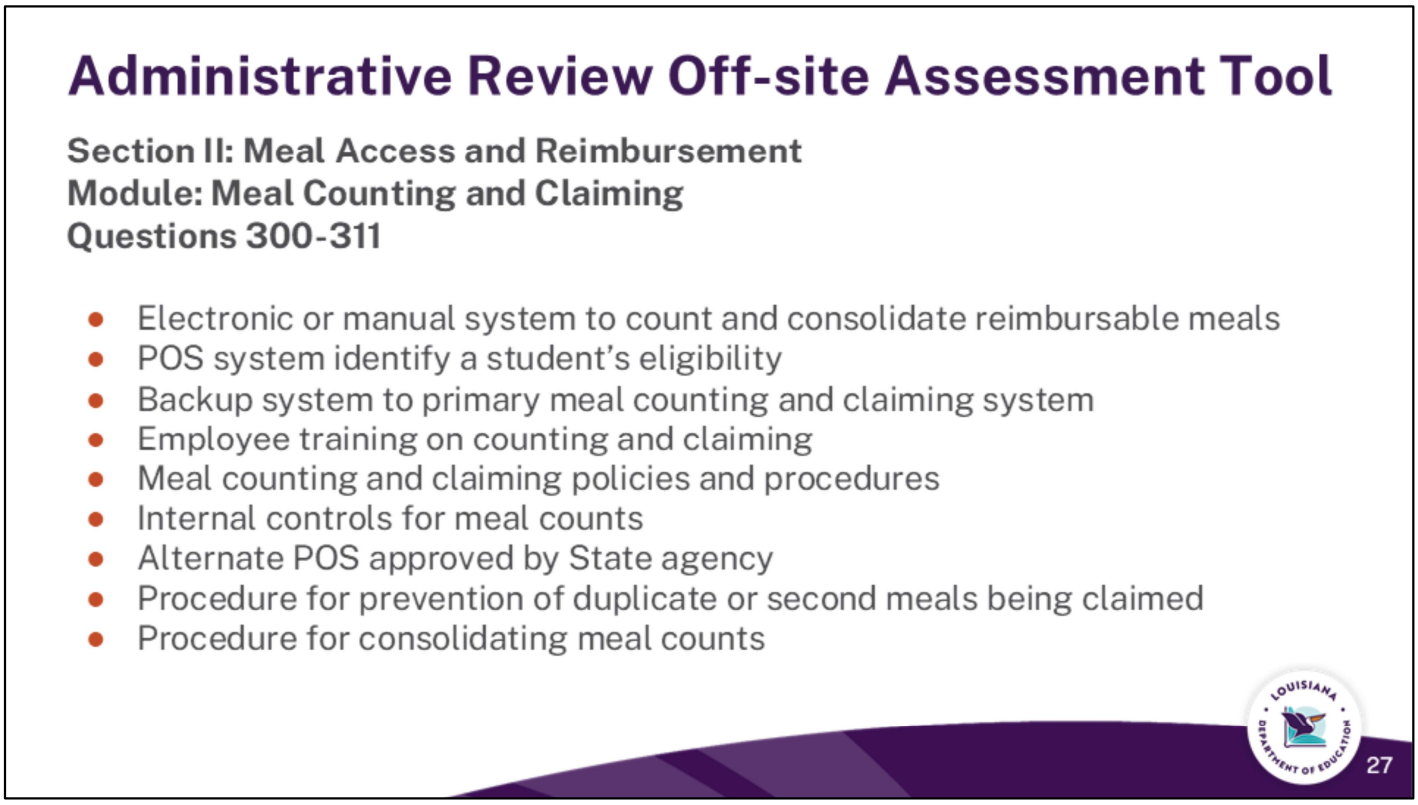


Section II: Meal Access and Reimbursement
Module: Verification
Questions 200-204

As stated previously, if your SFA is CEP district wide or and an RCCI without day students, you will skip this module and proceed to question 300.

The questions is this module have questions relating to following:

- FNS-742 Verification Report (sample size, number of applications verified)
- Verifying Official
- Confirming Official
- Verification process
- Error-prone applications



Section II: Meal Access and Reimbursement
Module: Meal Counting and Claiming
Questions 300-311

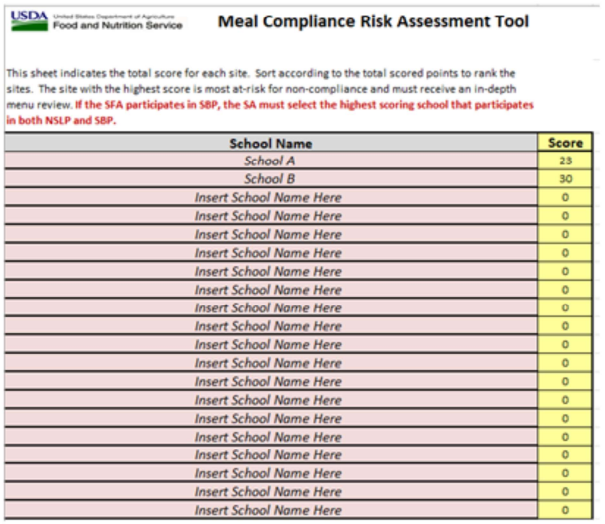
The questions is this module have questions relating to following:

- Electronic or manual system to count and consolidate reimbursable meals
- POS system identify a student's eligibility
- Backup system to primary meal counting and claiming system
- Employee training on counting and claiming
- Meal counting and claiming policies and procedures
- Internal controls for meal counts
- Alternate POS approved by State agency
- Procedure for prevention of duplicate or second meals being claimed
- Procedure for consolidating meal counts

Section III: Meal Pattern and Nutritional Quality
Module: Dietary Specifications and Nutrition Analysis

Questions 600 addresses the results of the Meal Compliance Risk Assessment Tool.
SFA/State agency will complete the Meal Compliance Risk Assessment Tool for each of the sites selected for review.
The results of the Meal Compliance Risk Assessment Tool will determine which site shall receive the targeted menu review.

Meal Compliance Risk Assessment Tool



USDA Food and Nutrition Service

Meal Compliance Risk Assessment Tool

This sheet indicates the total score for each site. Sort according to the total scored points to rank the sites. The site with the highest score is most at-risk for non-compliance and must receive an in-depth menu review. **If the SFA participates in SBP, the SA must select the highest scoring school that participates in both NSLP and SBP.**

School Name	Score
School A	25
School B	30
Insert School Name Here	0
Insert School Name Here	0
Insert School Name Here	0
Insert School Name Here	0
Insert School Name Here	0
Insert School Name Here	0
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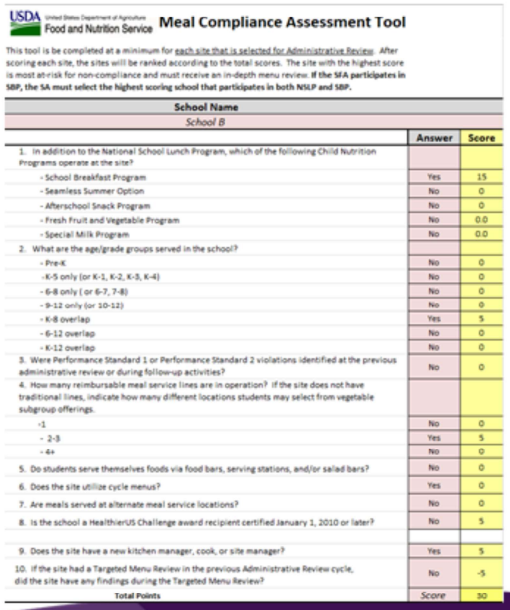


USDA Food and Nutrition Service

Meal Compliance Assessment Tool

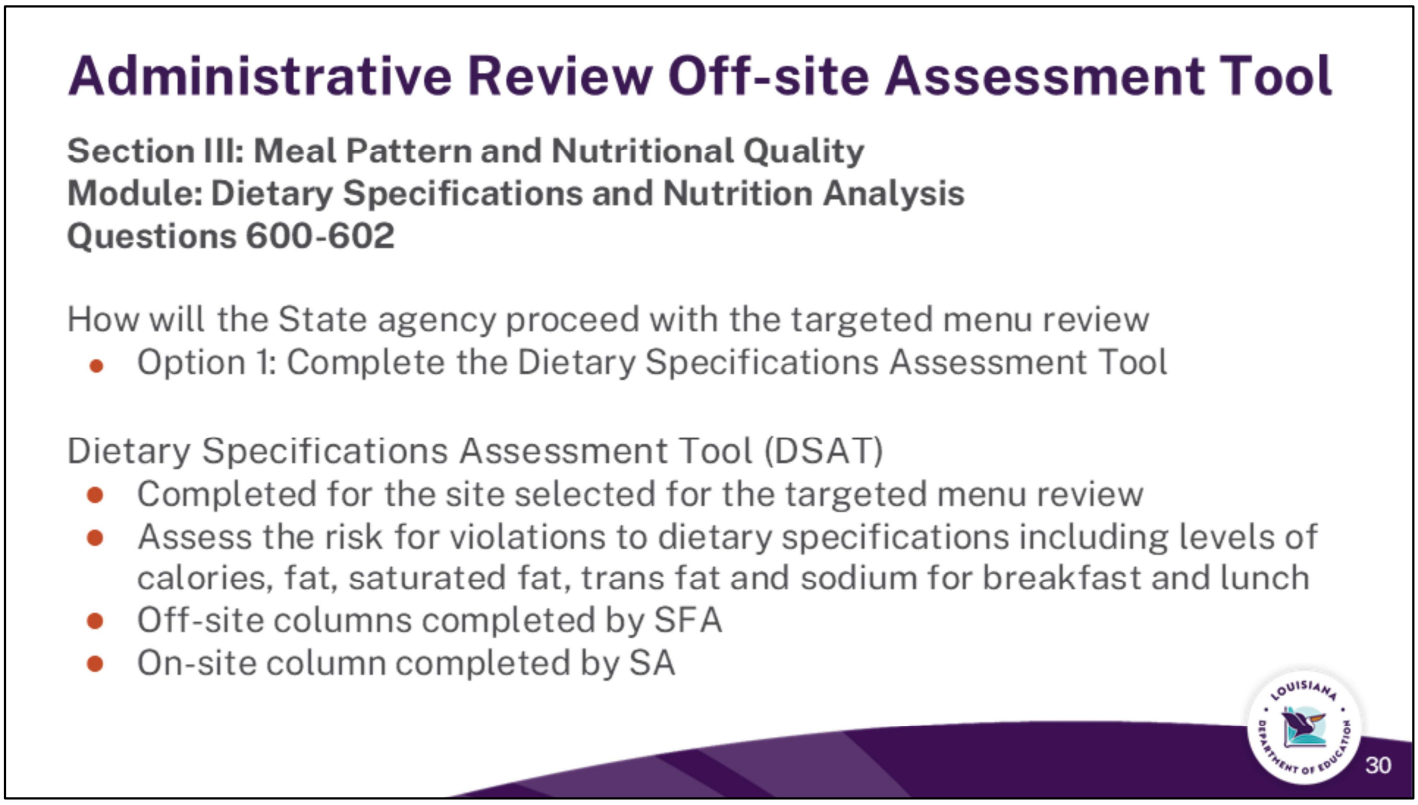
This tool is be completed at a minimum for each site that is selected for Administrative Review. After scoring each site, the sites will be ranked according to the total scores. The site with the highest score is most at-risk for non-compliance and must receive an in-depth menu review. **If the SFA participates in SBP, the SA must select the highest scoring school that participates in both NSLP and SBP.**

School Name

School B

	Answer	Score
1. In addition to the National School Lunch Program, which of the following Child Nutrition Programs operate at the site?		
- School Breakfast Program	Yes	15
- Seamless Summer Option	No	0
- Afterschool Snack Program	No	0
- Fresh Fruit and Vegetable Program	No	0.0
- Special Milk Program	No	0.0
2. What are the age/grade groups served in the school?		
- Pre-K	No	0
- K-5 only (or K-1, K-2, K-3, K-4)	No	0
- 6-8 only (or 6-7, 7-8)	No	0
- 9-12 only (or 10-12)	No	0
- K-8 overlap	Yes	5
- 6-12 overlap	No	0
- K-12 overlap	No	0
3. Were Performance Standard 1 or Performance Standard 2 violations identified at the previous administrative review or during follow-up activities?	No	0
4. How many reimbursable meal service lines are in operation? If the site does not have traditional lines, indicate how many different locations students may select from vegetable subgroup offerings.		
-1	No	0
- 2-3	Yes	5
- 4+	No	0
5. Do students serve themselves foods via food bars, serving stations, and/or salad bars?	No	0
6. Does the site utilize cycle menus?	Yes	0
7. Are meals served at alternate meal service locations?	No	0
8. Is the school a HealthierUS Challenge award recipient certified January 1, 2010 or later?	No	5
9. Does the site have a new kitchen manager, cook, or site manager?	Yes	5
10. If the site had a Targeted Menu Review in the previous Administrative Review cycle, did the site have any findings during the Targeted Menu Review?	No	-5
Total Points	*Score*	30

Here is what the Meal Compliance Risk Assessment Tool looks like.
The Meal Compliance Risk Assessment tool is only completed for each of the sites selected for review, not all sites within the SFA.
The selected site with the highest Meal Compliance Risk Assessment score must undergo a more in-depth meal review called the Targeted Menu Review.



Section III: Meal Pattern and Nutritional Quality
Module: Dietary Specifications and Nutrition Analysis

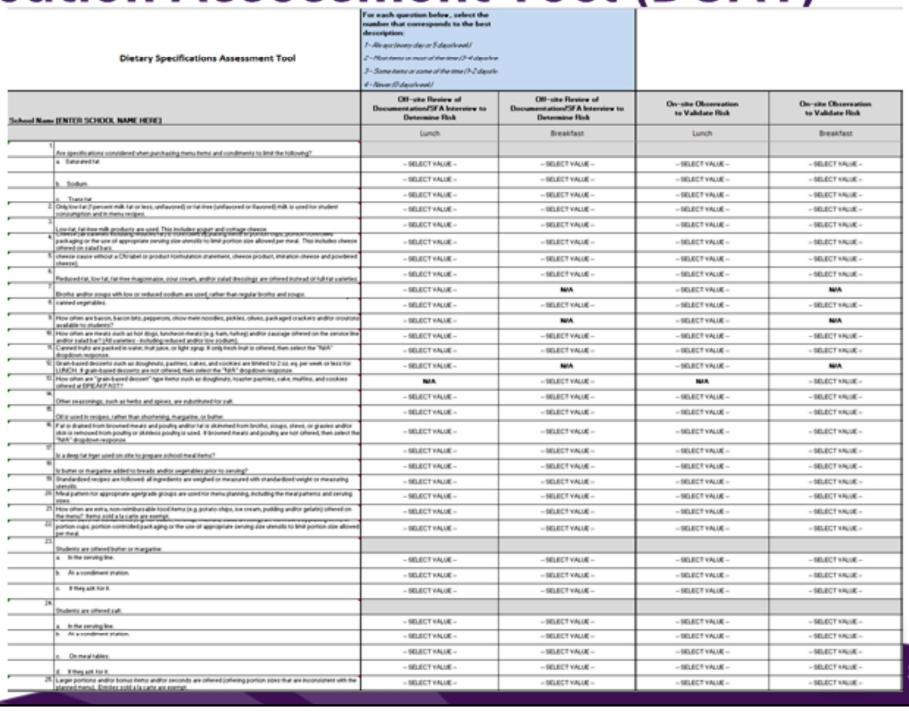
Question 601-602 will ask how the State agency proceed with the target menu review and what is the risk level.
State agency will use Option 1: Complete the Dietary Specification Assessment Tool.
The Dietary Specifications Assessment Tool (DSAT) is utilized to help assess the risk for violations to dietary specifications including levels of calories, fat, saturated fat, trans fat and sodium for breakfast and lunch.
The Dietary Specifications Assessment Toool will be completed only for the site selected for the targeted menu review. The off-site columns are completed by the SFA and the onsite columns will be completed by the State agency.

Dietary Specification Assessment Tool (DSAT)

Once all responses are selected, the tool will determine if the site is at risk for dietary specification violations and places the targeted menu review site in one of two categories: high risk or low risk.

If the site is high risk, a nutrient analysis is required.

If determined low risk, a nutrient analysis may not be required.



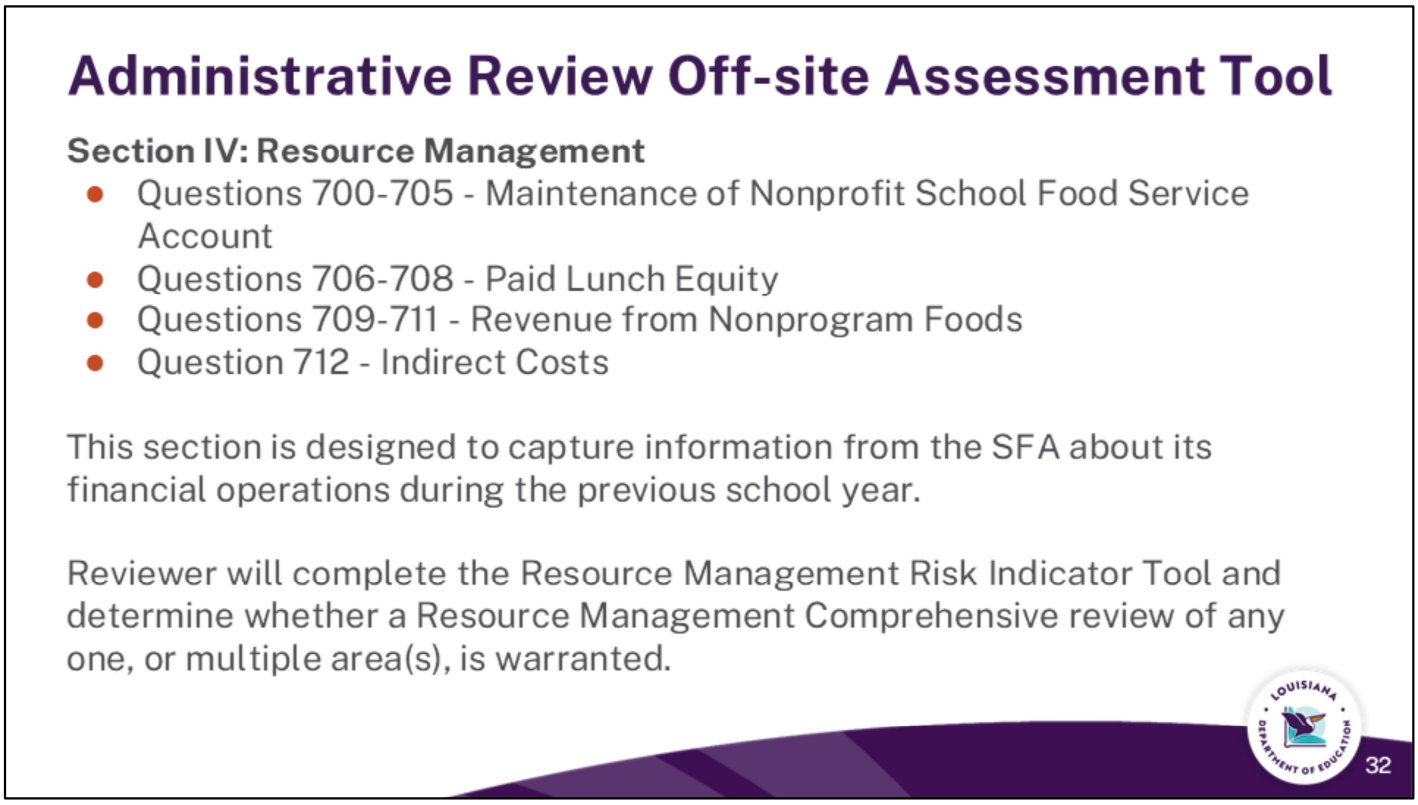
Dietary Specifications Assessment Tool

For each question below, select the number that corresponds to the best description:
1 – All or most (nearly daily or 5 days/week)
2 – Most times or most of the time (3-4 days/w
3 – Some times or some of the time (1-2 days/w
4 – Never (0 days/week)

[School Name: ENTER SCHOOL NAME HERE]	Off-site Review of Documentation/SFA Interview to Determine Risk	Off-site Review of Documentation/SFA Interview to Determine Risk	On-site Observation to Validate Risk	On-site Observation to Validate Risk
	Lunch	Breakfast	Lunch	Breakfast
1) Are specifications considered when purchasing menu items and condiments to limit the following?				
a. Saturated fat	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. Sodium	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. Trans fat	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
2 Only low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored) milk is used for student consumption and in menu recipes	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
3 Low-fat, fat-free milk products are used. This includes yogurt and cottage cheese	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
4 Cheese (or cheese) including cheeses that are commercially shredded, sliced or portion-cups; pre-measured packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
5 cheese sauce without a CN label or product formulation statement, cheese product, imitation cheese and powdered cheese)	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
6 Reduced-fat, low-fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
7 Broths and/or soups with low or reduced sodium are used, rather than regular broths and soups	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
8 canned vegetables	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
9 How often are bacon, bacon bits, pepperoni, chow mein noodles, pickles, olives, packaged crackers and/or croutons available to students?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
10 How often are meats such as hot dogs, luncheon meats (e.g. ham, turkey) and/or sausage offered on the service line and/or salad bar? (All varieties - including reduced and/or low sodium).	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
11 Canned fruits are packed in water, fruit juice, or light syrup. If only fresh fruit is offered, then select the "N/A" dropdown response	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
12 Grain-based desserts such as doughnuts, pastries, cakes, and cookies are limited to 2 oz. eq. per week or less for LUNCH. If grain-based desserts are not offered, then select the "N/A" dropdown response.	N/A	-- SELECT VALUE --	N/A	-- SELECT VALUE --
13 How often are "grain-based dessert" type items such as doughnuts, toaster pastries, cake, muffins, and cookies offered at BREAKFAST?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
14 Other seasonings, such as herbs and spices, are substituted for salt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
15 Oil is used in recipes, rather than shortening, margarine, or butter.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
16 Fat is drained from browned meats and poultry, and/or fat is drained from broths, soups, stews, or gravies and/or skin is removed from poultry or skinless poultry is used. If browned meats and poultry are not offered, then select the "N/A" dropdown response	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
17 Is a deep fat fryer used on site to prepare school meal items?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
18 Is butter or margarine added to breads and/or vegetables prior to serving?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
19 Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
20 Meal pattern for appropriate age/grade groups are used for menu planning, including the meal patterns and serving sizes	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
21 How often are extra, non-reimbursable food items (e.g. potato chips, ice cream, pudding and/or gelatin) offered on the menu? Items sold a la carte are exempt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
22 Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned meal). Entries sold a la carte are exempt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
23)				
Students are offered butter or margarine:				
a. In the serving line.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. At a condiment station.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. If they ask for it.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
24)				
Students are offered salt:				
a. In the serving line.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. At a condiment station.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. On meal tables.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
d. If they ask for it.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
25)	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --

This is what the Dietary Specification Assessment Tool looks like.

Once all responses are selected, the tool will determine if the site is at risk for dietary specification violations and places the targeted menu review site in one of two categories: high risk or low risk.
If the site is high risk, a nutrient analysis is required.
If determined low risk, a nutrient analysis may not be required.
In both instances, a on-site visit is required to validate the level of risk and provide the necessary technical assistance.



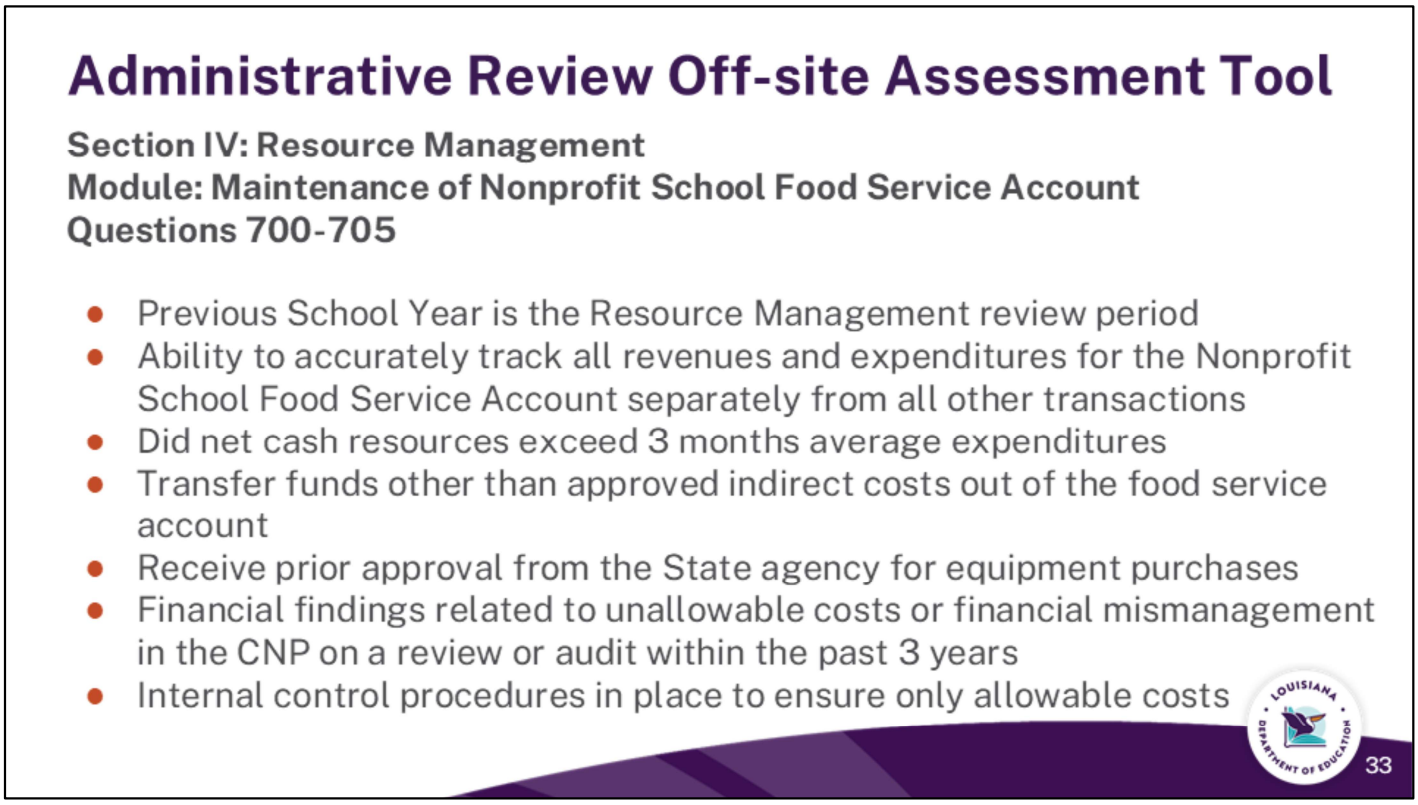
Section IV: Resource Management

Questions 700-712 in the Off-site Assessment Tool focus on the following areas:

- Maintenance of the Nonprofit School Food Service Account (NPSFSA)
- Paid Lunch Equity (PLE)
- Revenue from Nonprogram Foods, and
- Indirect Costs

This section is designed to capture information from the SFA about its financial operations during the previous school year.

Using the SFA's responses to the Off-site Assessment Tool for the Resource Management Review period, the reviewer will complete the Resource Management Risk Indicator Tool and determine whether a Resource Management Comprehensive review of any one, or multiple areas, is warranted.

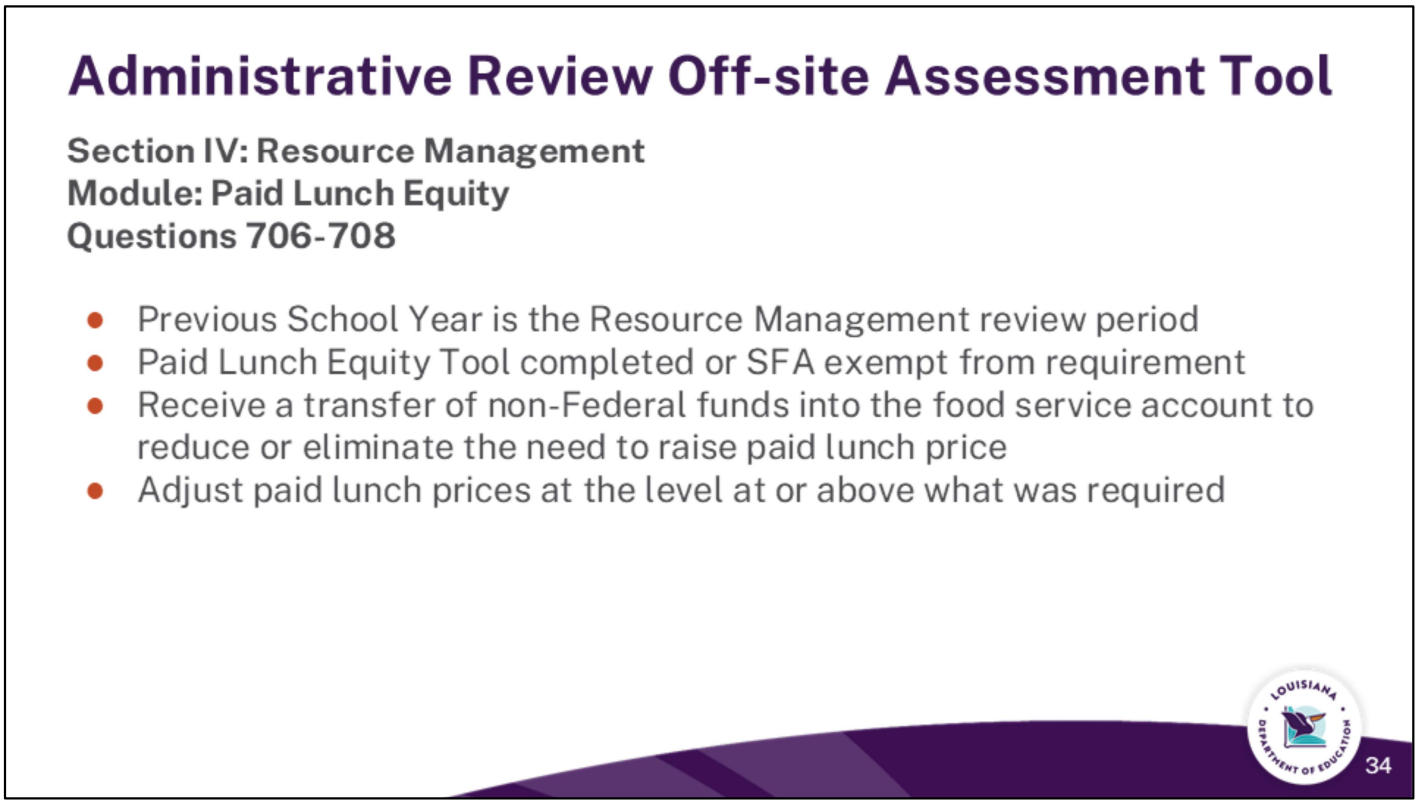


Section IV: Resource Management
Module: Maintenance of Nonprofit School Food Service Account
Questions 700-705

The questions in this module are specific to the Maintance of the Nonprofit School Food Service Account. When answering these questions, the Previous School Year will be the Resource Management review period.

The questions is this module have questions relating to the following:

- Ability to accurately track all revenues and expenditures for the Nonprofit School Food Service Account separately from all other transactions
- Did net cash resources exceed 3 months average expenditures
- Transfer funds other than approved indirect costs out of the food service account
- Receive prior approval from the State agency for equipment purchases
- Financial findings related to unallowable costs or financial mismanagement in the CNP on a review or audit within the past 3 years
- Internal control procedures in place to ensure only allowable costs



Section IV: Resource Management
Module: Paid Lunch Equity
Questions 706-708

The questions in this module are specific to Paid Lunch Equity. When answering these questions, the Previous School Year will be the Resource Management review period.

The questions is this module have questions relating to the following:

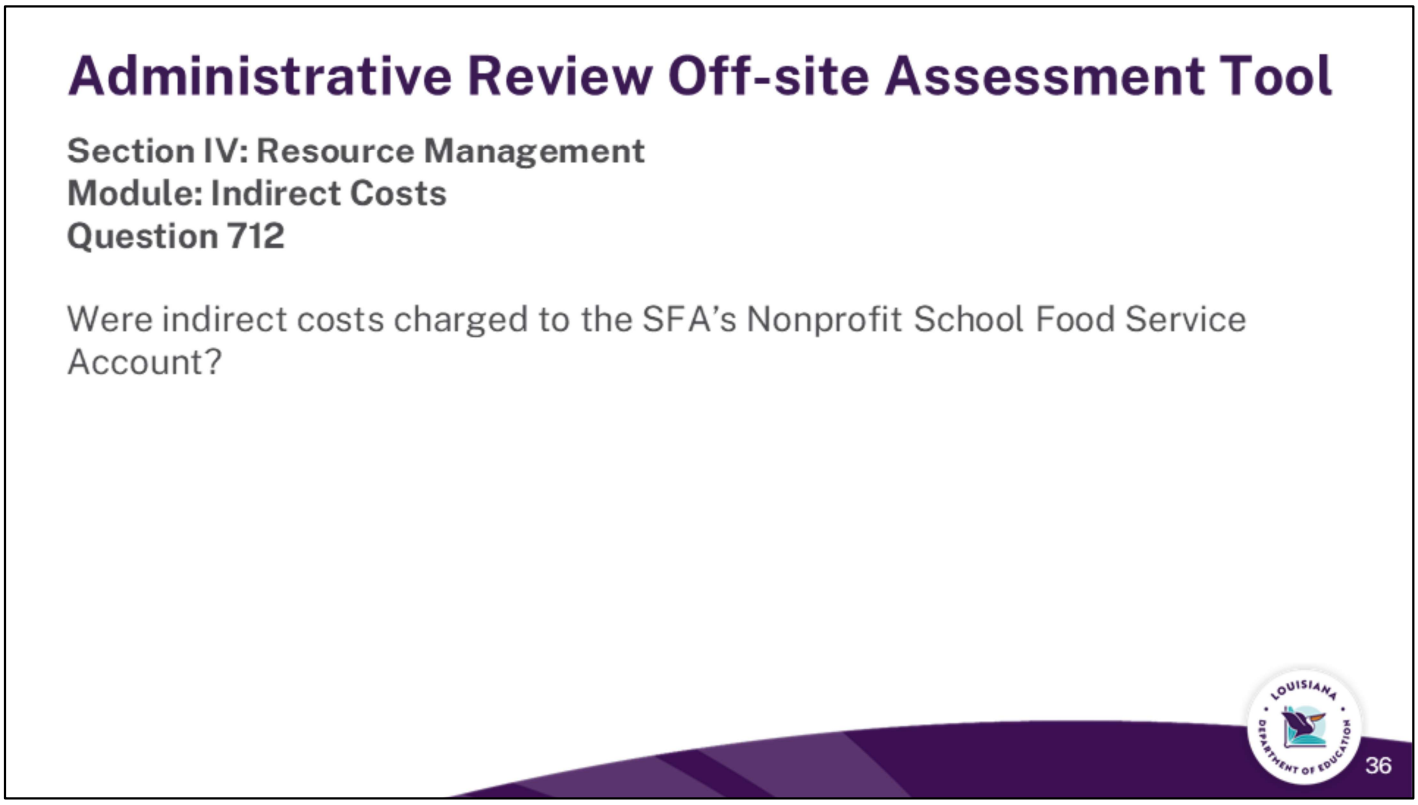
- Paid Lunch Equity Tool completed or SFA exempt from requirement
- Receive a transfer of non-Federal funds into the food service account to reduce or eliminate the need to raise paid lunch price
- Adjust paid lunch prices at the level at or above what was required

Section IV: Resource Management
Module: Revenue from Nonprogram Foods
Questions 709-711

The questions in this module are specific to Revenue from Nonprogram Foods. When answering these questions, the Previous School Year will be the Resource Management review period.

The questions is this module have questions relating to the following:

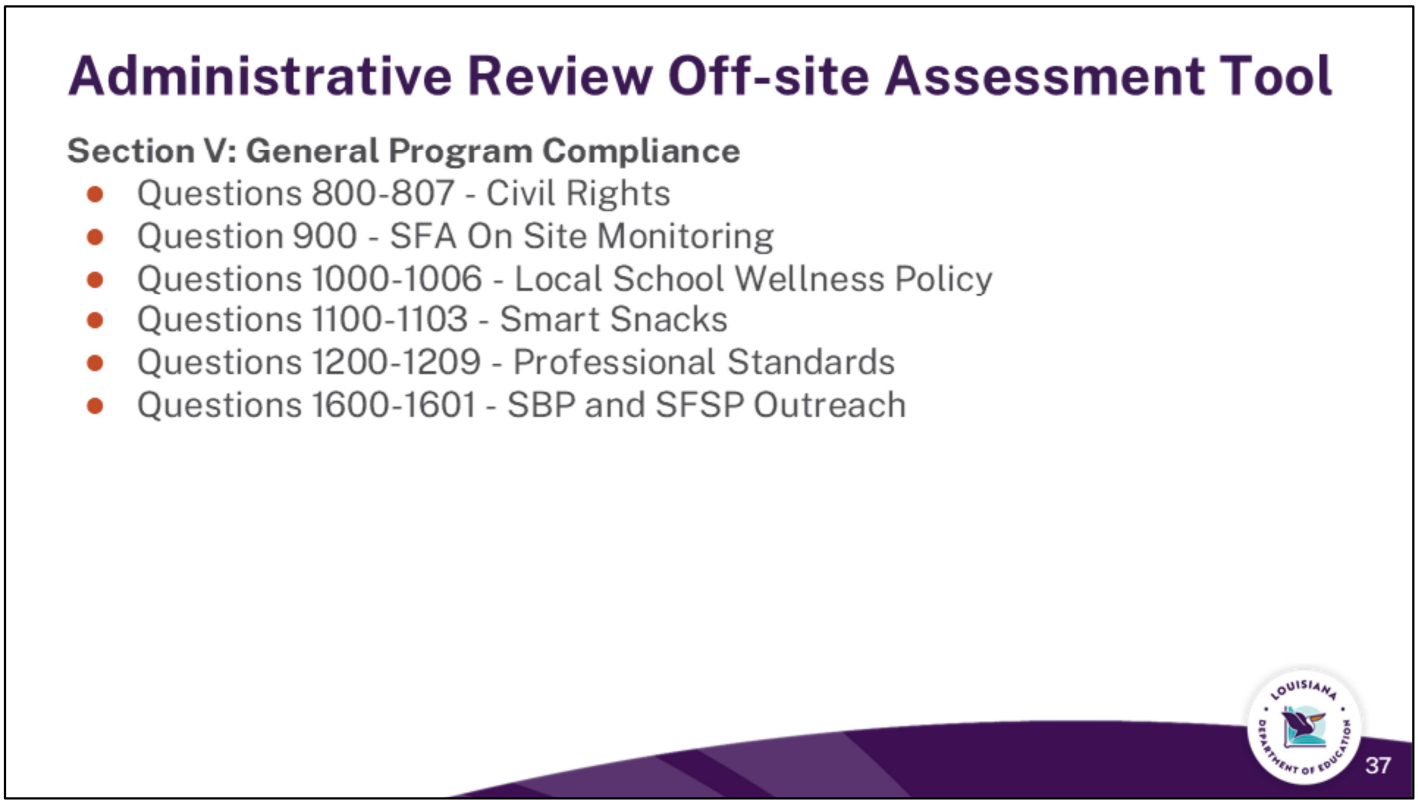
- Sell Smart Snacks, second entrees, and/or catering
- Obtain full payment from adults meals and/or recover the cost of those meals
- Adult meals prices sufficient to cover the overall cost of the meals



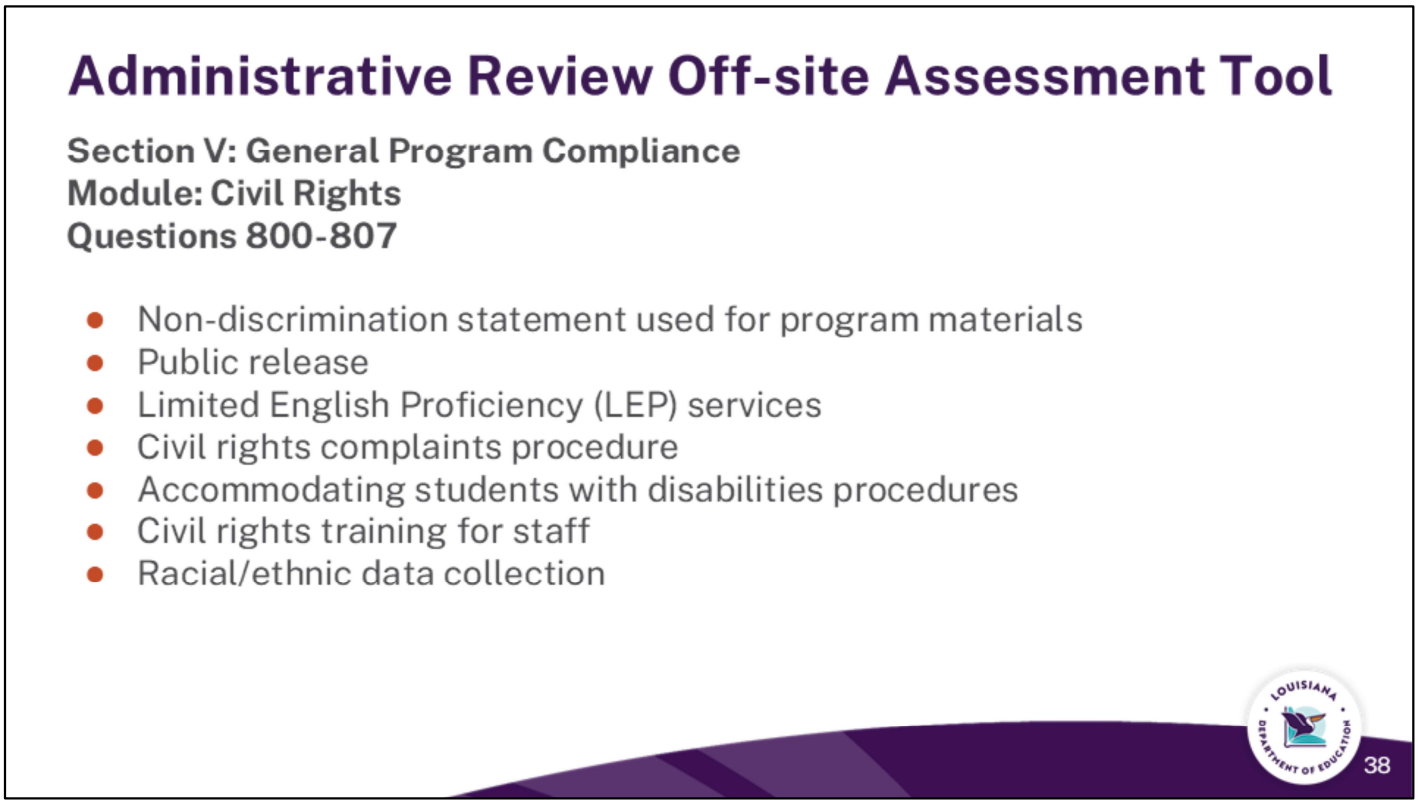
Section IV: Resource Management
Module: Indirect Costs
Question 712

The one question in this module are specific to Indirect Cost. When answering this question, the Previous School Year will be the Resource Management review period.

Were indirect costs charged to the SFA's Nonprofit School Food Service Account?



Section V: General Program Compliance
Questions 800-807 of the Off-site Assessment Tool focus on civil rights compliance.
Question 900 assesses the procedures the SFA uses to ensure that all schools are meeting program requirements through SFA On-Site Monitoring.
Questions 1000-1006 assess compliance with local school wellness policy requirements.
Questions 1100-1103 assess compliance with Smart Snacks requirements at all the schools selected for review.
Questions 1200-1209 assess the SFA is meeting professional standards requirements outlined in 7 CFR 210.30.
Questions 1600-1601 assess the SFA's SBP and SFSP outreach activities for the current school year to ensure the SFA' s efforts are consistent with outreach requirements.

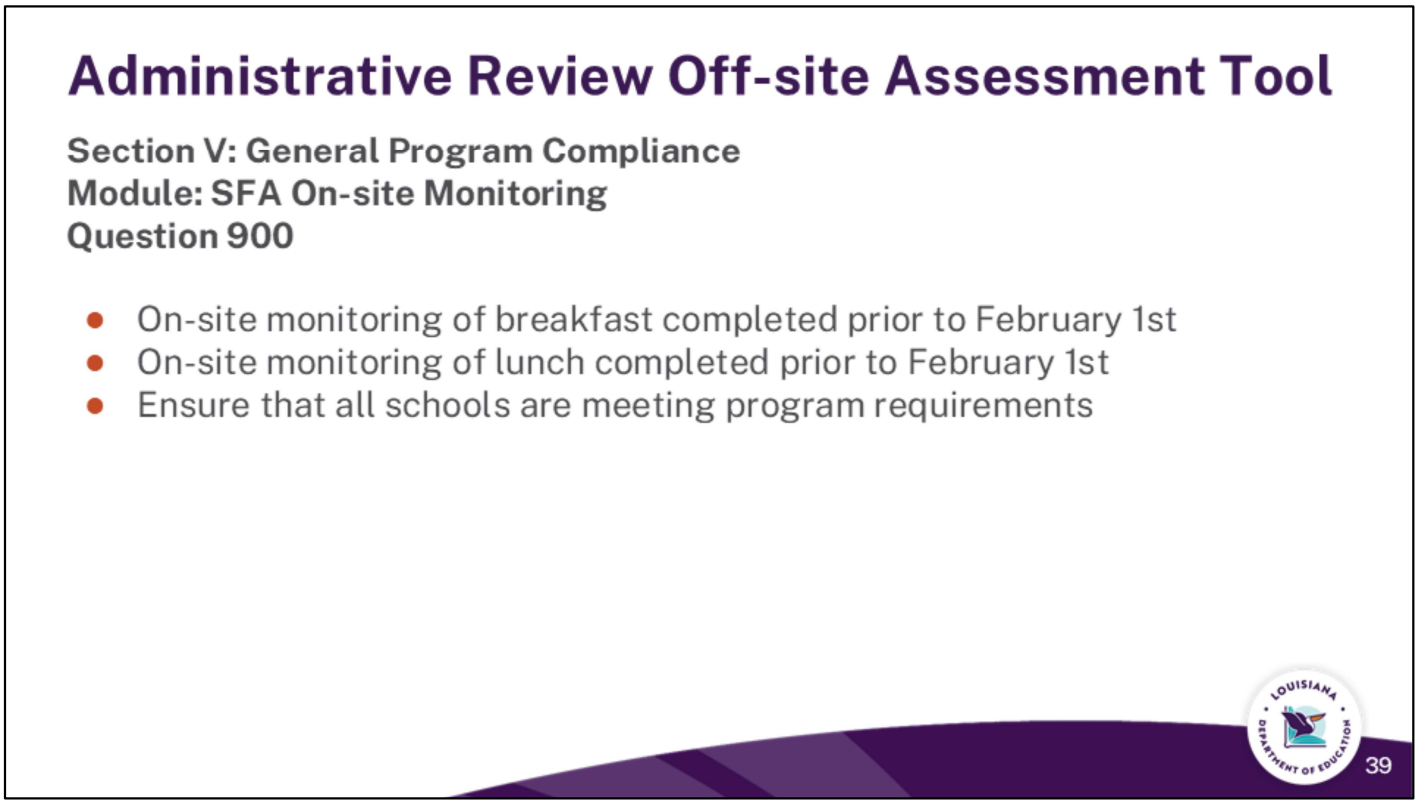


Section V: General Program Compliance
Module: Civil Rights
Questions 800-807

The questions in this module are specific to Civil Rights.

The questions is this module have questions relating to the following:

- Non-discrimination statement used for program materials
- Public release
- Limited English Proficiency (LEP) services
- Civil rights complaints procedure
- Accommodating students with disabilities procedures
- Civil rights training for staff
- Racial/ethnic data collection

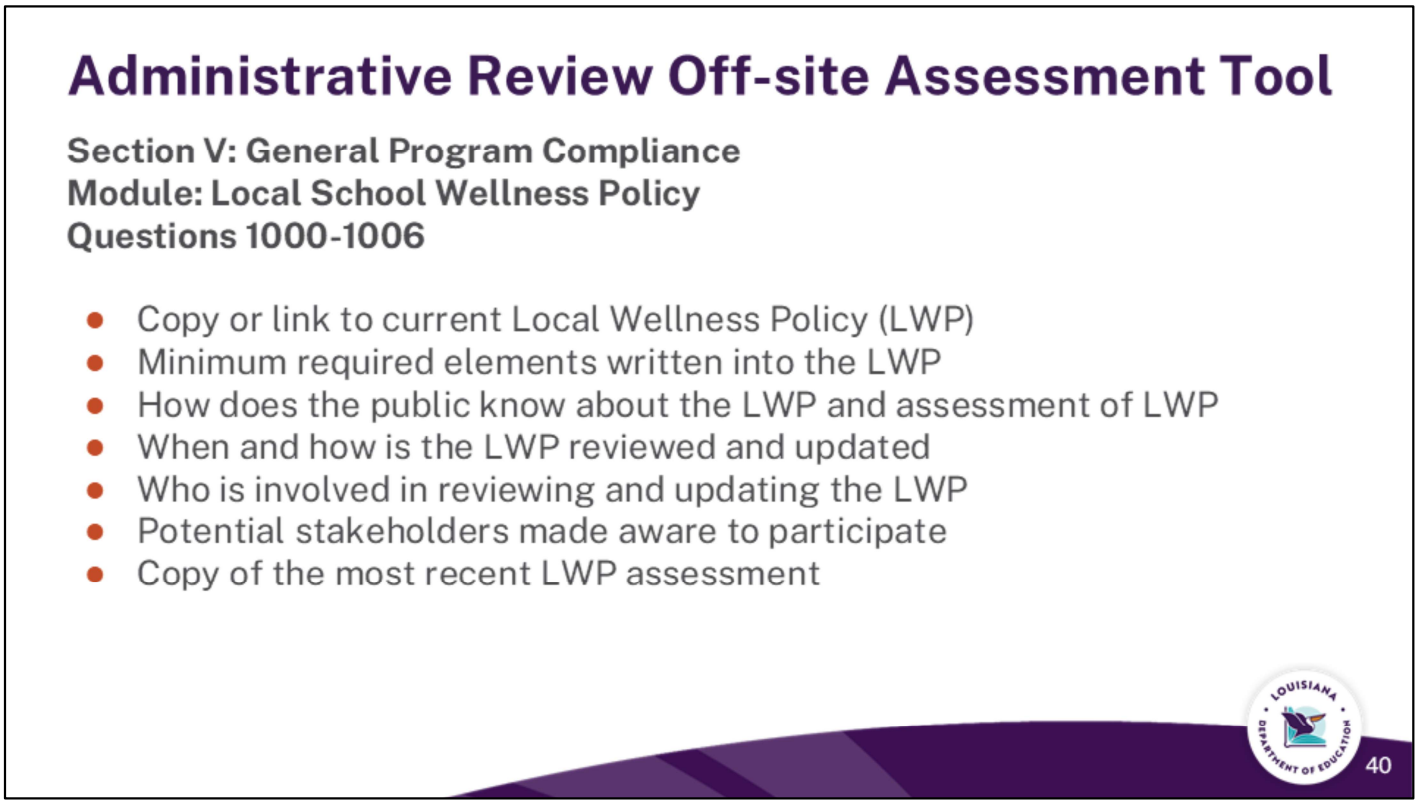


Section V: General Program Compliance
Module: SFA On-site Monitoring
Question 900

The questions in this module are specific to SFA On-Site Monitoring.

The questions is this module have questions relating to the following:

- On-site monitoring of breakfast completed prior to February 1st
- On-site monitoring of lunch completed prior to February 1st
- Ensure that all schools are meeting program requirements

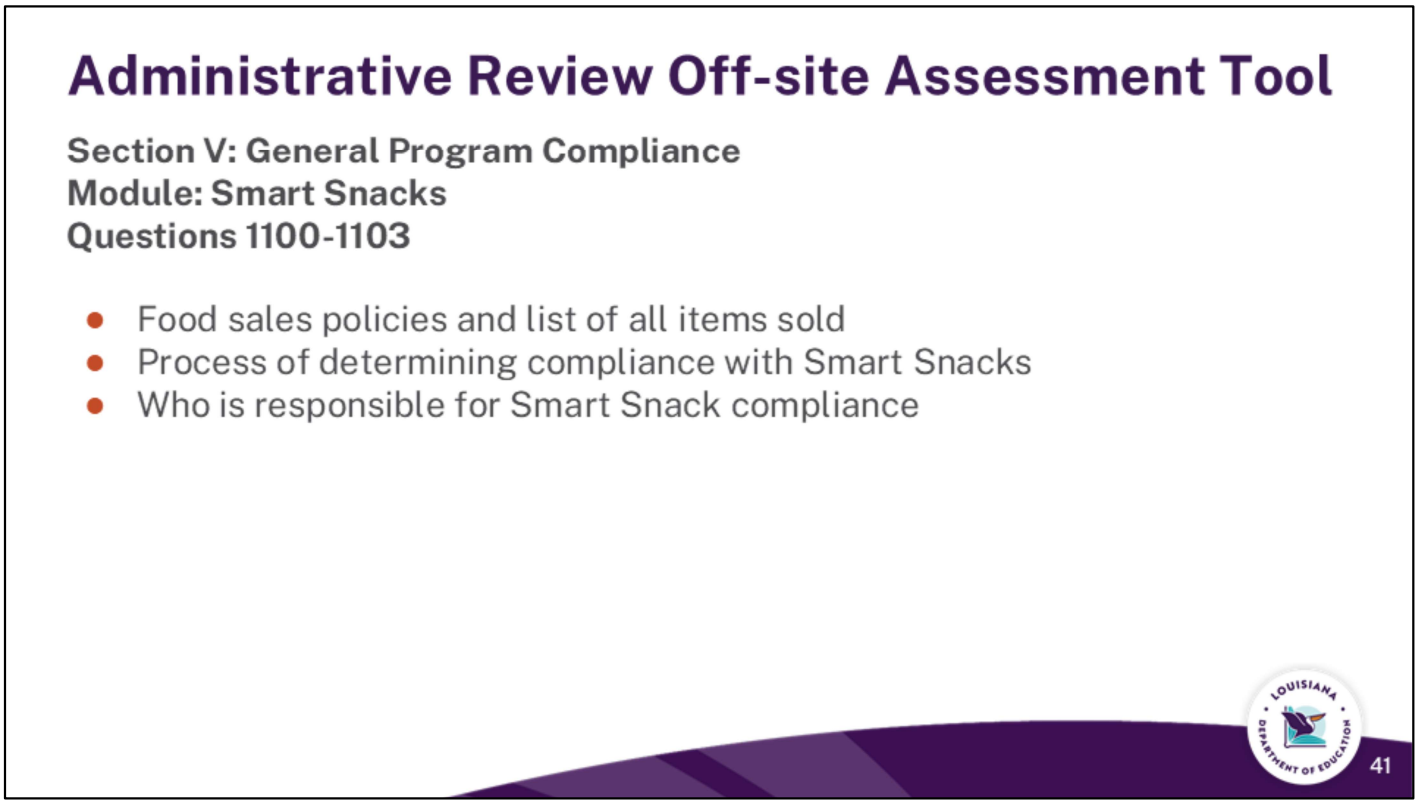


Section V: General Program Compliance
Module: Local School Wellness Policy
Questions 1000-1006

The questions in this module are specific to Local School Wellness Policy.

The questions is this module have questions relating to the following:

- Copy or link to current Local Wellness Policy (LWP)
- Minimum required elements written into the LWP
- How does the public know about the LWP and assessment of LWP
- When and how is the LWP reviewed and updated
- Who is involved in reviewing and updating the LWP
- Potential stakeholders made aware to participate
- Copy of the most recent LWP assessment

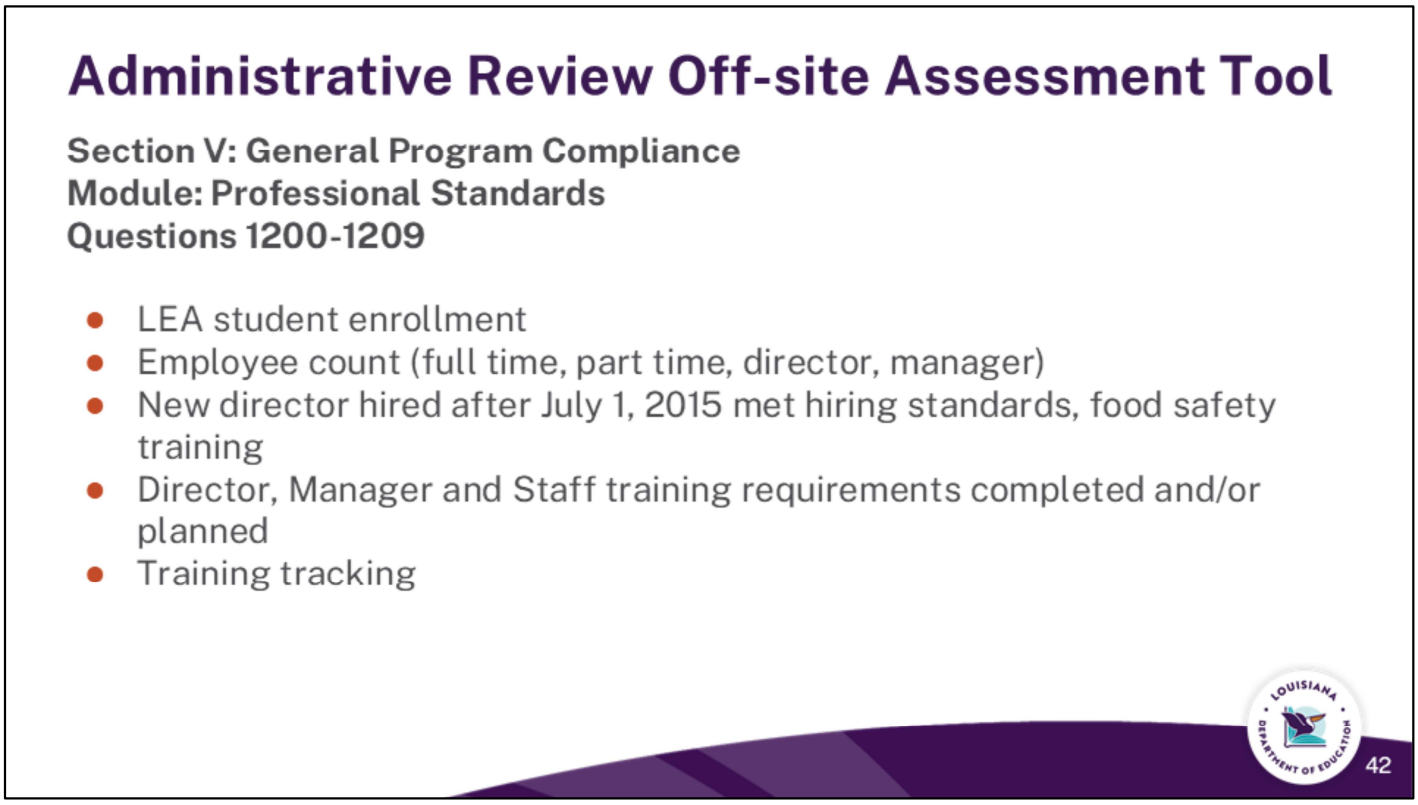


Section V: General Program Compliance
Module: Smart Snacks
Questions 1100-1103

The questions in this module are specific to Smart Snacks.

The questions is this module have questions relating to the following:

- Food sales policies and list of all items sold
- Process of determining compliance with Smart Snacks
- Who is responsible for Smart Snack compliance

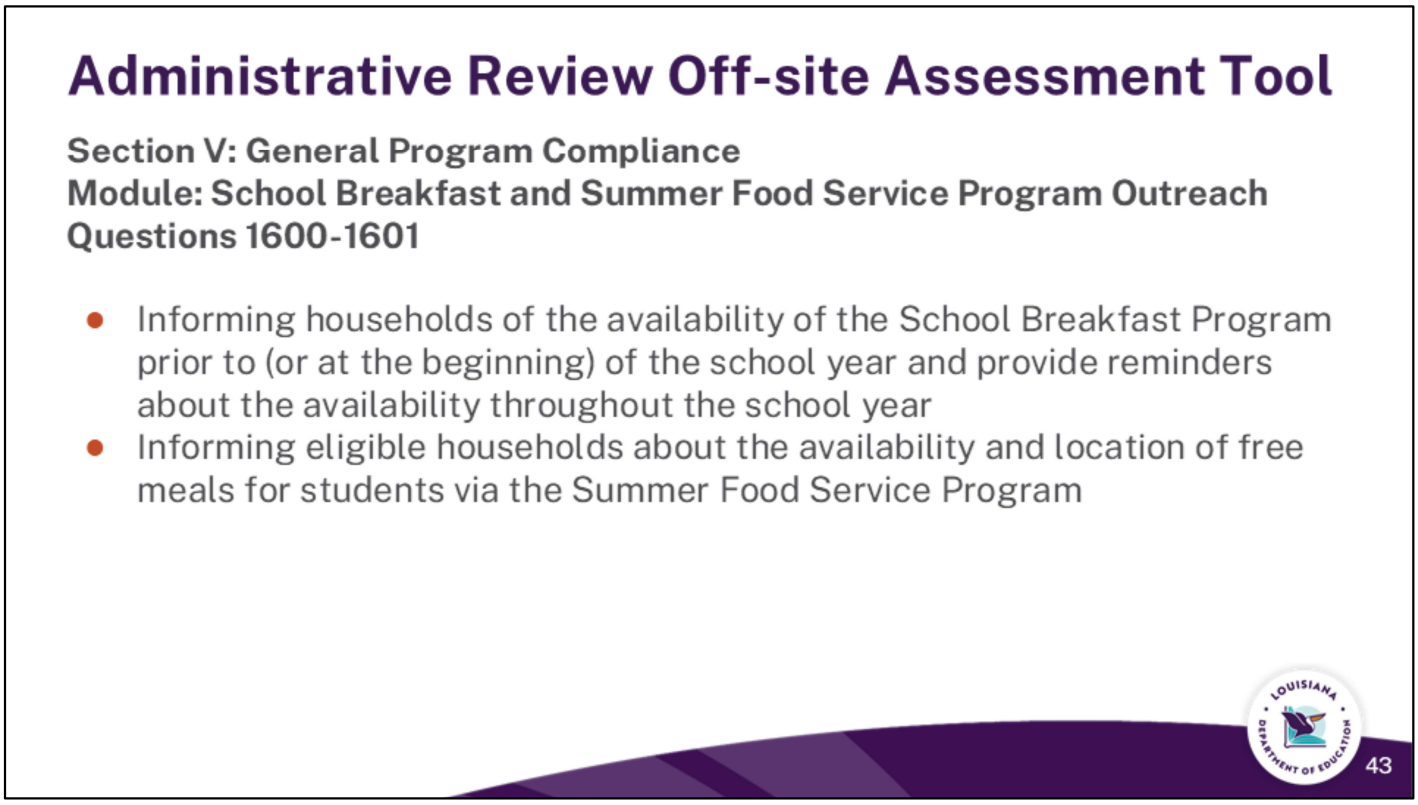


Section V: General Program Compliance
Module: Professional Standards
Questions 1200-1209

The questions in this module are specific to Professional Standards.

The questions is this module have questions relating to the following:

- LEA student enrollment
- Employee count (full time, part time, director, manager)
- New director hired after July 1, 2015 met hiring standards, food safety training
- Director, Manager and Staff training requirements completed and/or planned
- Training tracking

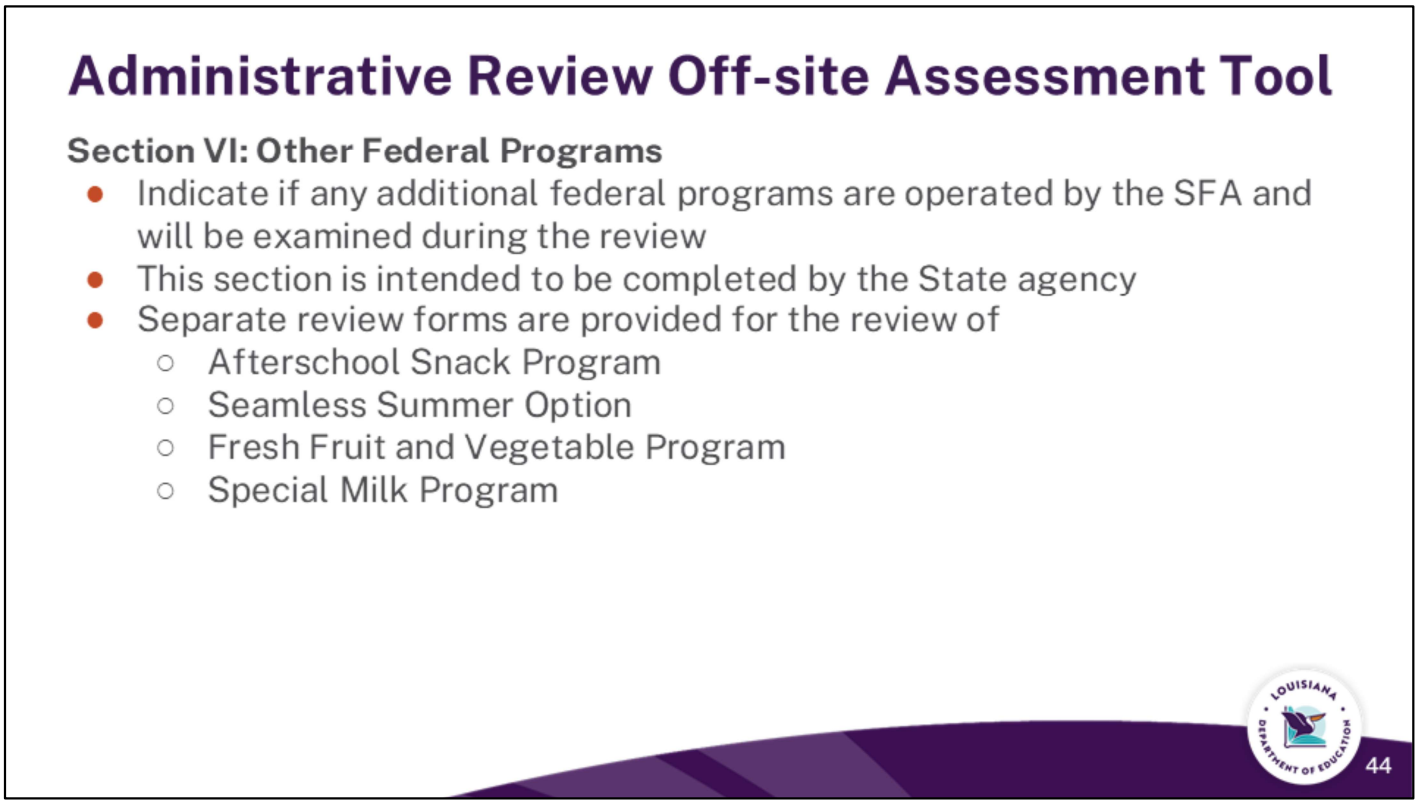


Section V: General Program Compliance
Module: School Breakfast and Summer Food Service Program Outreach
Questions 1600-1601

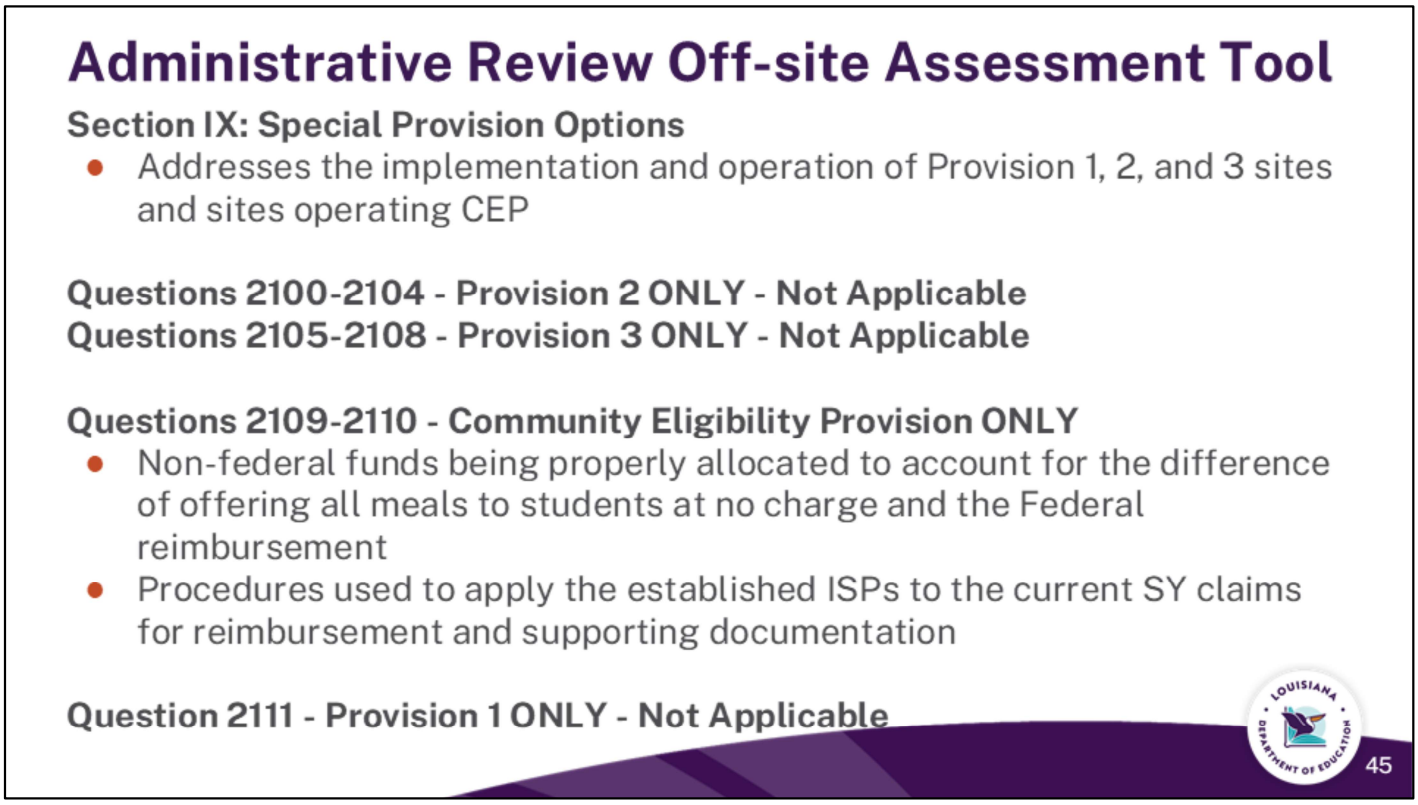
The questions in this module are specific to School Breakfst and Summer Food Service Progam Outreach.

The questions is this module have questions relating to the following:

- Informing households of the availability of the School Breakfast Program prior to (or at the beginning) of the school year and provide reminders about the availability throughout the school year
- Informing eligible households about the availability and location of free meals for students via the Summer Food Service Program



Section VI: Other Federal Programs
Indicate if any additional federal programs are operated by the SFA and will be examined during the review
This section is intended to be completed by the State agency.
Separate review forms have been provided for the review of the Afterschool Snack Program, Seamless Summer Option, Fresh Fruit and Vegetable Program and the Special Milk Program.



Section IX: Special Provision Options
Questions 2100-2111 addresses the implementation and operation of Provision 1, 2, and 3 sites and sites operating CEP.

Questions 2100-2104 - are for Provision 2 ONLY - Not Applicable section
Questions 2105-2108 - are for Provision 3 ONLY - Not Applicable section

Questions 2109-2110 - Community Eligibility Provision ONLY. If no schools in the SFA operate Community Eligibility Provision, this section is not applicable.
The questions is this section have questions relating to the following:

- Non-federal funds being properly allocated to account for the difference of offering all meals to students at no charge and the Federal reimbursement
- Procedures used to apply the established ISPs to the current SY claims for reimbursement and supporting documentation

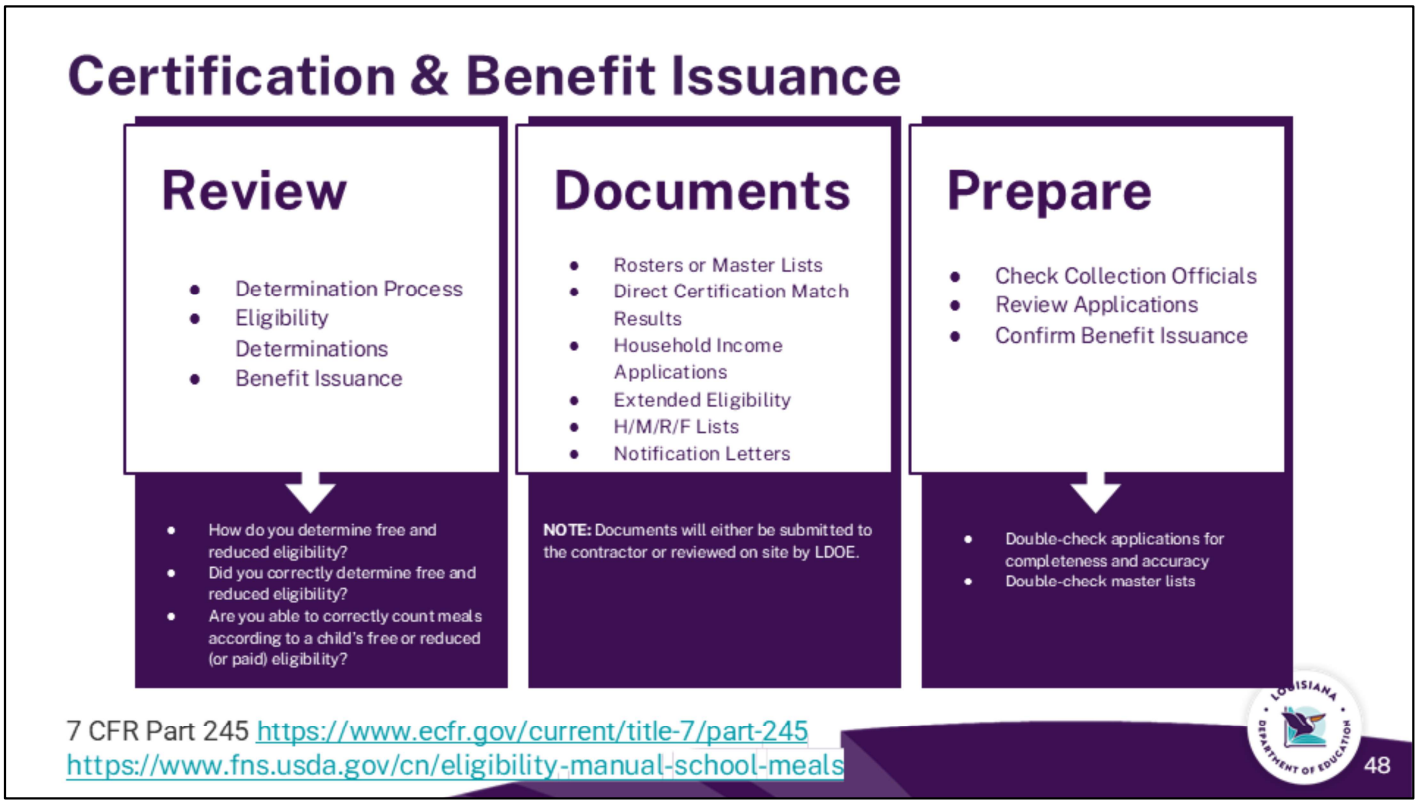
ADMINISTRATIVE REVIEW

Next we will go over each review section of the review describing what is being reviewed for that section, what documents are needed, and how to prepare.

The Meal Access and Reimbursement sections include Certification and Benefit Issuance, Verification and Meal Counting and Claiming.

Slide 47

2 @mary.moses@la.gov
You will present the Meal Access and Reimbursement Sections (Certification and Benefits Issuance, Verification, CEP, Meal Counting and Claiming)
Misty Woods, 4/13/2026



Certification & Benefit Issuance

This will only be applicable for school districts that process household applications. In this section, determination process, eligibility determinations and benefits issuance are being reviewed.

- How do you determine free and reduced eligibility?
- Did you correctly determine free and reduced eligibility?
- Are you able to correctly count meals according to a child's free or reduced (or paid) eligibility?

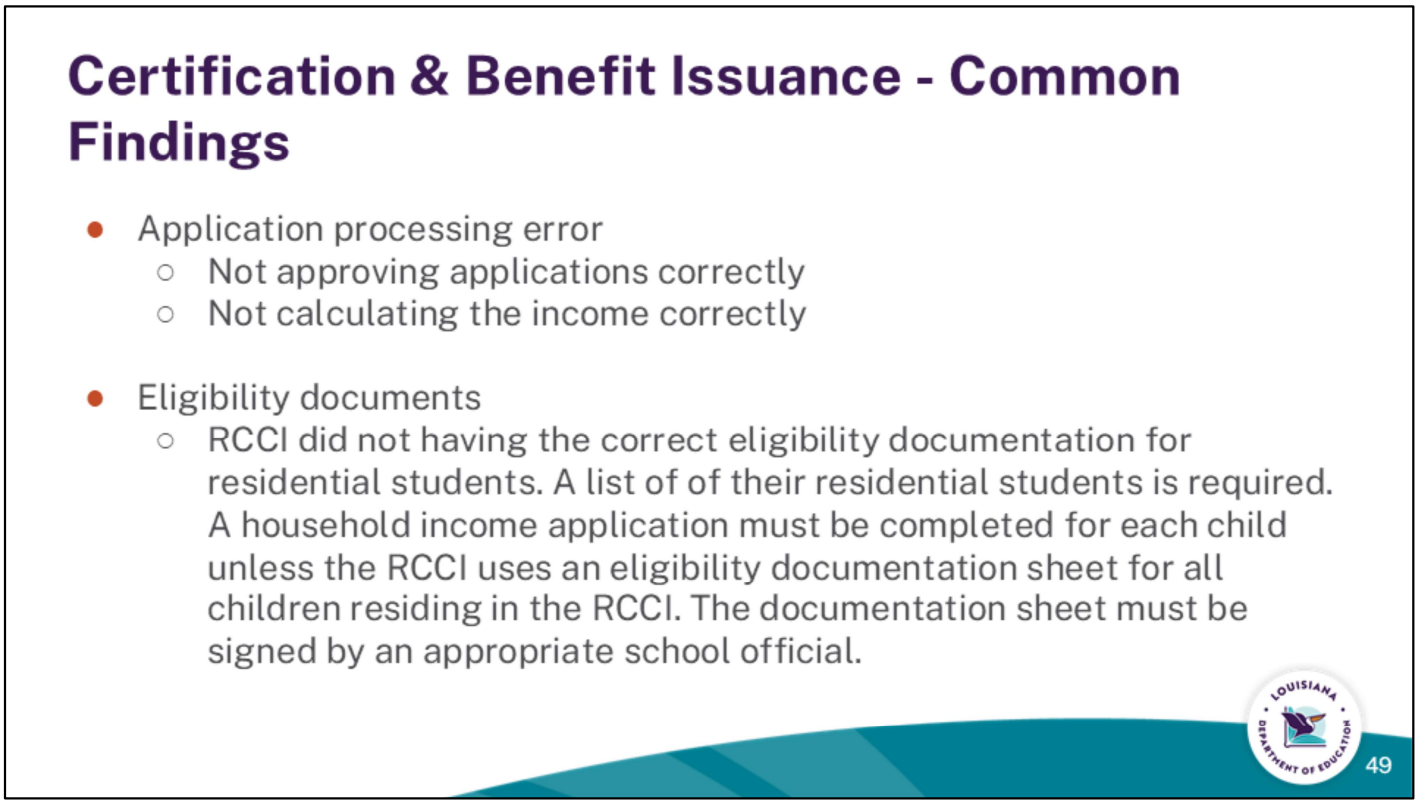
Documents needed:

- Rosters or Master Lists
- Direct Certification Match Results
- Household Income Applications
- Extended Eligibility
- H/M/R/F Lists
- Notification Letters

NOTE: Documents will either be submitted to the contractor or reviewed on site by LDOE. LDOE cannot receive student PPI.

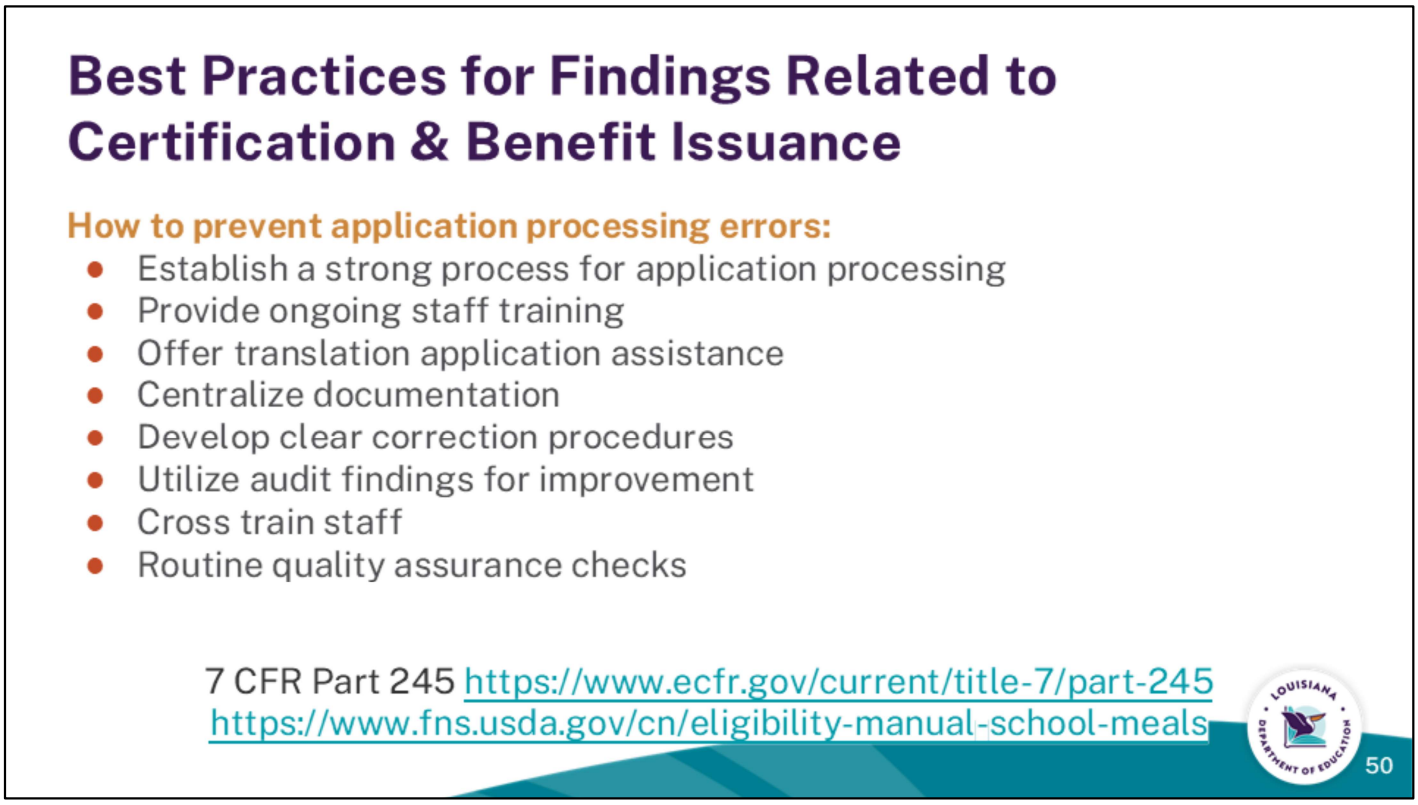
How to prepare:

- Check Collection Officials
- Review Applications - Double-check applications for completeness and accuracy
- Confirm Benefit Issuance - Double-check master lists



Under Certification and Benefit Issuance, the following errors were found on previous reviews:

- Application processing errors occurred as a result of not approving applications correctly. The SFA did not calculate the income correctly.
- Eligibility documents for an RCCI did not having the correct eligibility documentation for residential students. A list of of their residential students is required that includes but not limited to names, start date, any personal income and withdrawn dated. Each child residing in an RCCI is considered a household of one. A household income application must be completed for each child unless the RCCI uses an eligibility documentation sheet for all children residing in the RCCI. The documentation sheet must be signed by an appropriate school official.



For addressing errors within the Certification & Benefit Issuance section of the AR it is best to establish practices centered on clear policies, comprehensive staff training, and rigorous quality control. Implementing specific procedures for each type of error helps prevent them from reoccurring.

For example, application errors, what would be the best way to minimize errors? First you can establish a process where multiple people are checking applications, it is alway best to have a second set of eyes on the application process. Ensure more than one staff member is proficient in processing applications. This provides a backup in case the primary handler is unavailable.

Create explicit procedures for correcting or modifying documents to maintain the integrity of the records. This should include striking through the error, dating and initialing the change, and stating the reason for the correction. Software systems can help you in miscalculating eligibility, they can help identify a correct sampling.

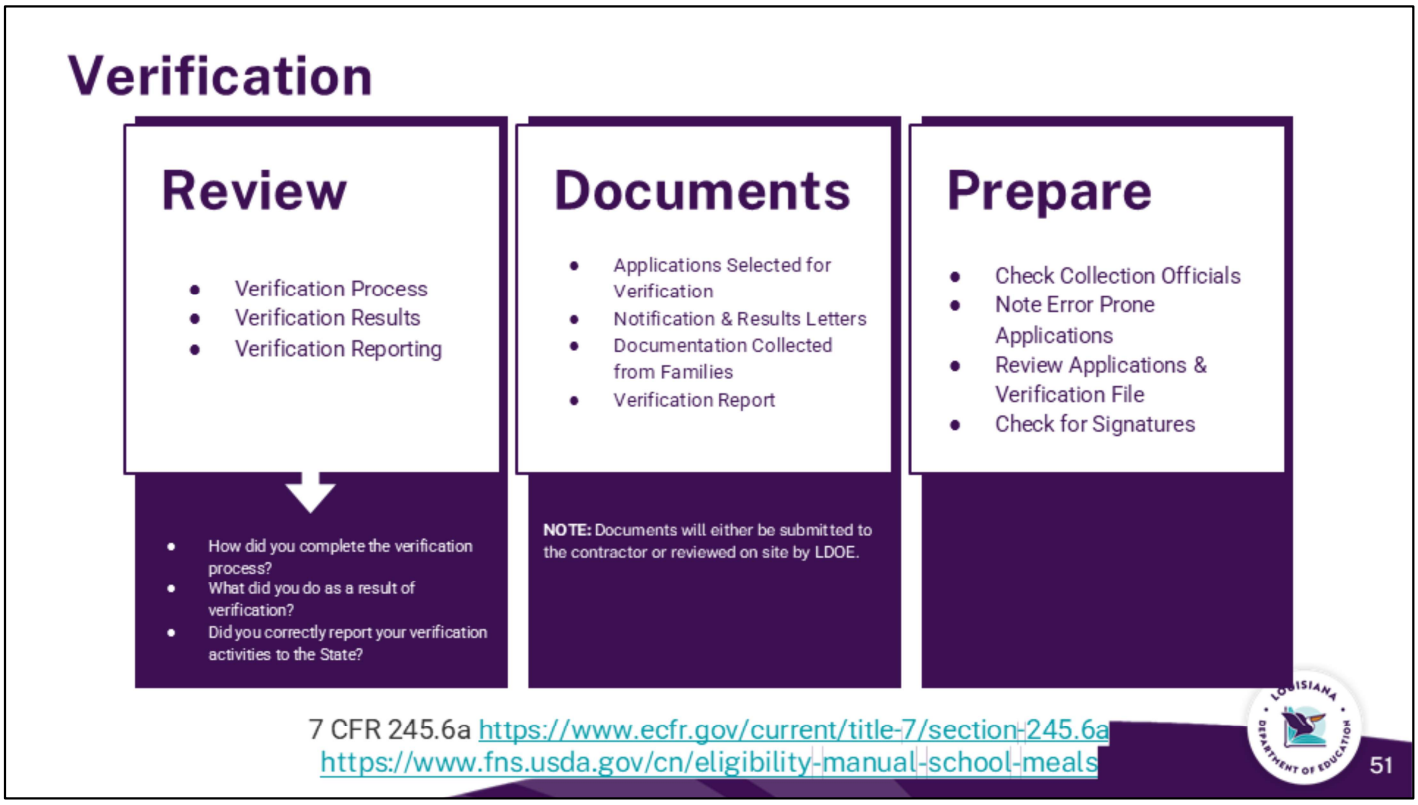
An audit can identify recurring mistakes such as incorrect income calculations or missing signatures. If you have routine quality assurance checks this can alleviate these minor errors.

Use the results of audits to improve processes and inform future training. If the same error keeps occurring, the training or process may need to be updated.

Two resources to use are:

Federal regulations at 7 CFR Part 245 Determining Eligibility for Free and Reduced Price Meals https://www.ecfr.gov/current/title-7/part-245

USDA Eligibility Manual for Schools https://www.fns.usda.gov/cn/eligibility-manual-school-meals



Verification
This will only be applicable for school districts that process household applications.
In this section, the verification process, results and reporting are reviewed.

- How did you complete the verification process?
- What did you do as a result of verification?
- Did you correctly report your verification activities to the State?

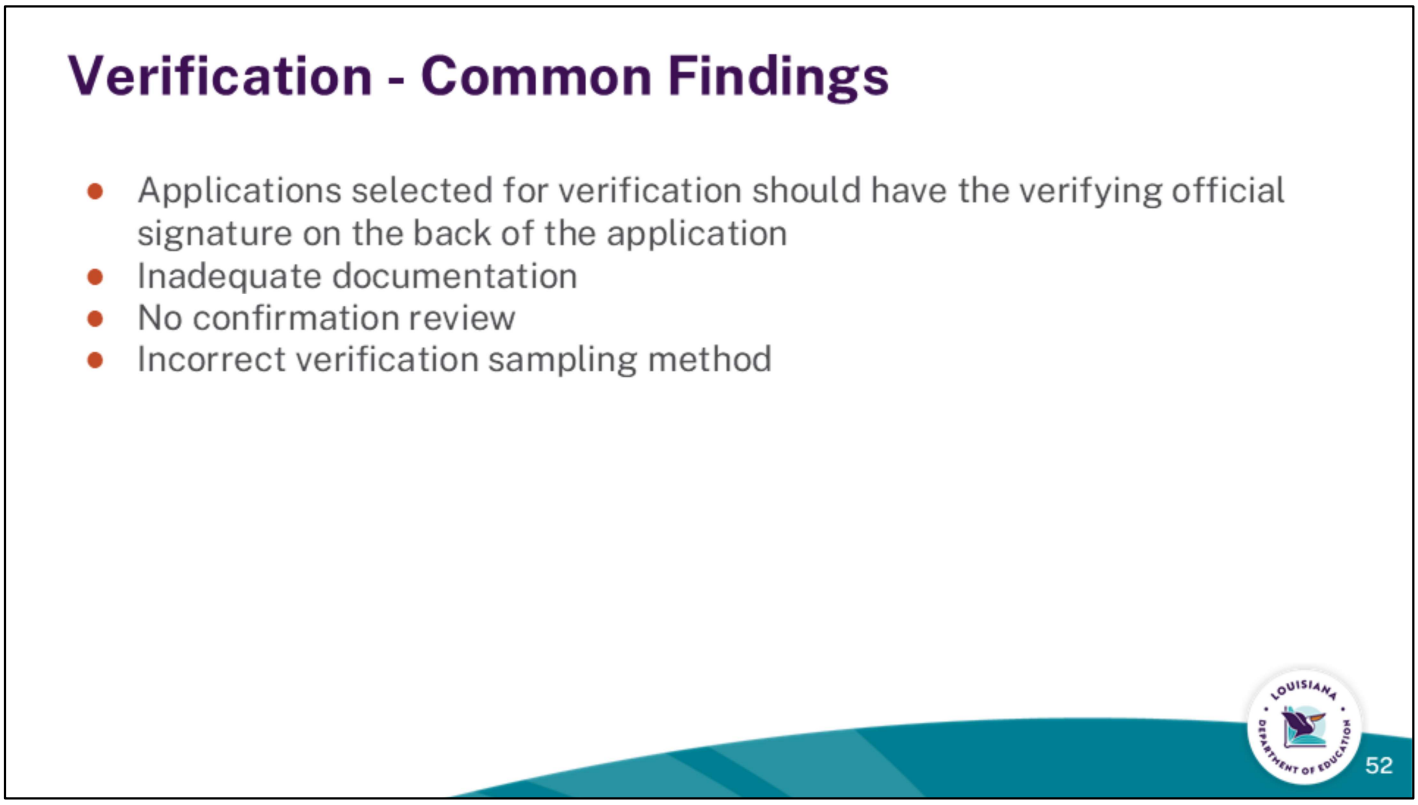
Documents Needed:

- Applications Selected for Verification
- Notification & Results Letters
- Documentation Collected from Families
- Verification Report

NOTE: Documents will either be submitted to the contractor or reviewed on site by LDOE. LDOE cannot receive student PPI.

How to Prepare:

- Check Collection Officials
- Note Error Prone Applications
- Review Applications & Verification File
- Check for Signatures

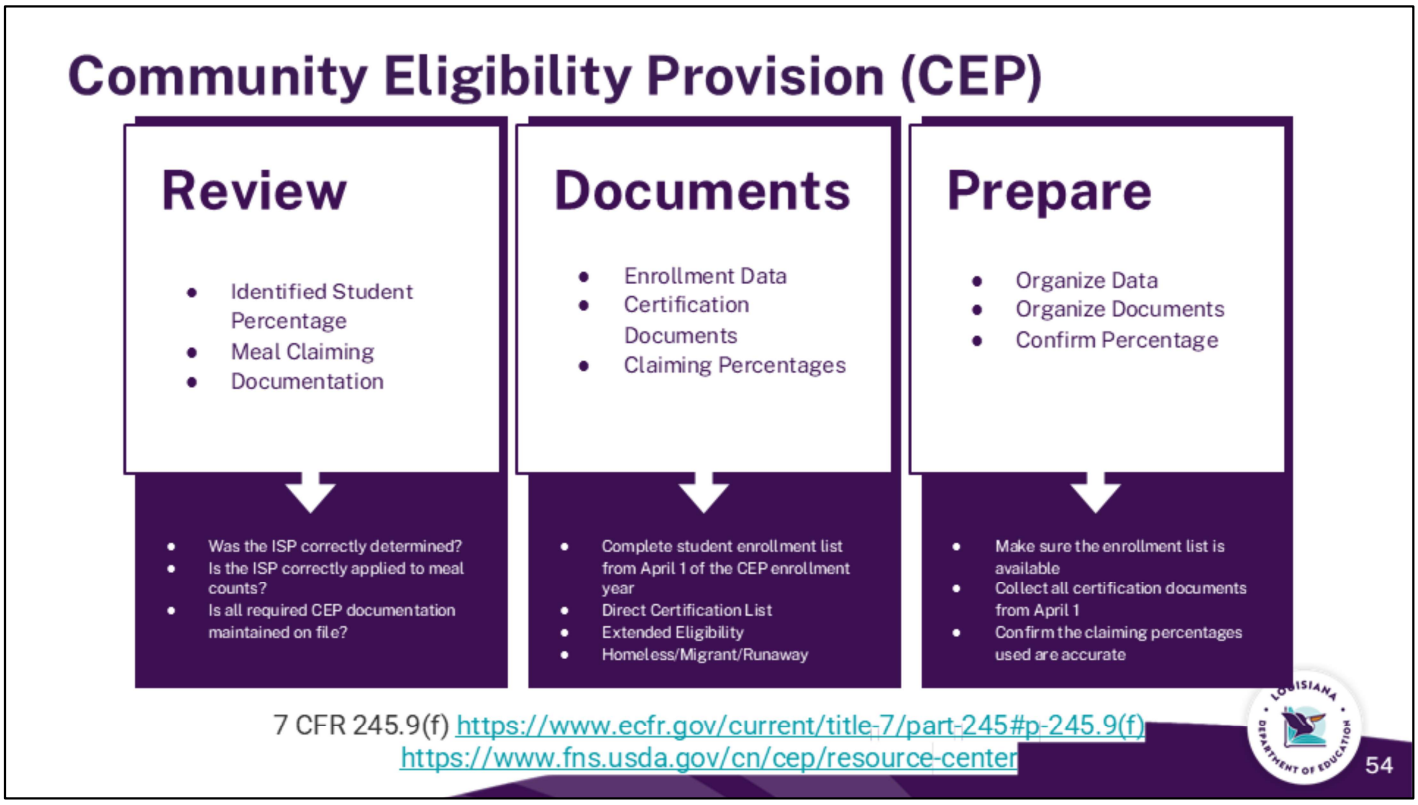


Under Verification, the following errors were found on previous reviews:

- Each selected application must have a verifying official signature
- Inadequate documentation
- No confirmation review
- Incorrect verification sampling method

For addressing errors within the Verification section of the AR:
If an application is selected for verification, conduct confirmation reviews to ensure eligibility criteria has been checked and correctly documented.
Keep in mind the confirming official cannot be the same person as the verifying official.
Provide training to all staff involved.
Cross train employees.
Use software wisely to help you automate and track verification/identify error prone applications and eliminate timing errors.

Two resources to use are:
Federal regulation at 7 CFR 245.6a Verification Requirements
https://www.ecfr.gov/current/title-7/section-245.6a
USDA's Eligibility Manual for Schools https://www.fns.usda.gov/cn/eligibility-manual-school-meals



Community Eligibility Provision (CEP)
This will only be applicable for school districts that partcipate in CEP.
In this section, Identified Student Percentage, Meal Claiming and Documentation is reviewed.

- Was the ISP correctly determined?
- Is the ISP correctly applied to meal counts?
- Is all required CEP documentation maintained on file?

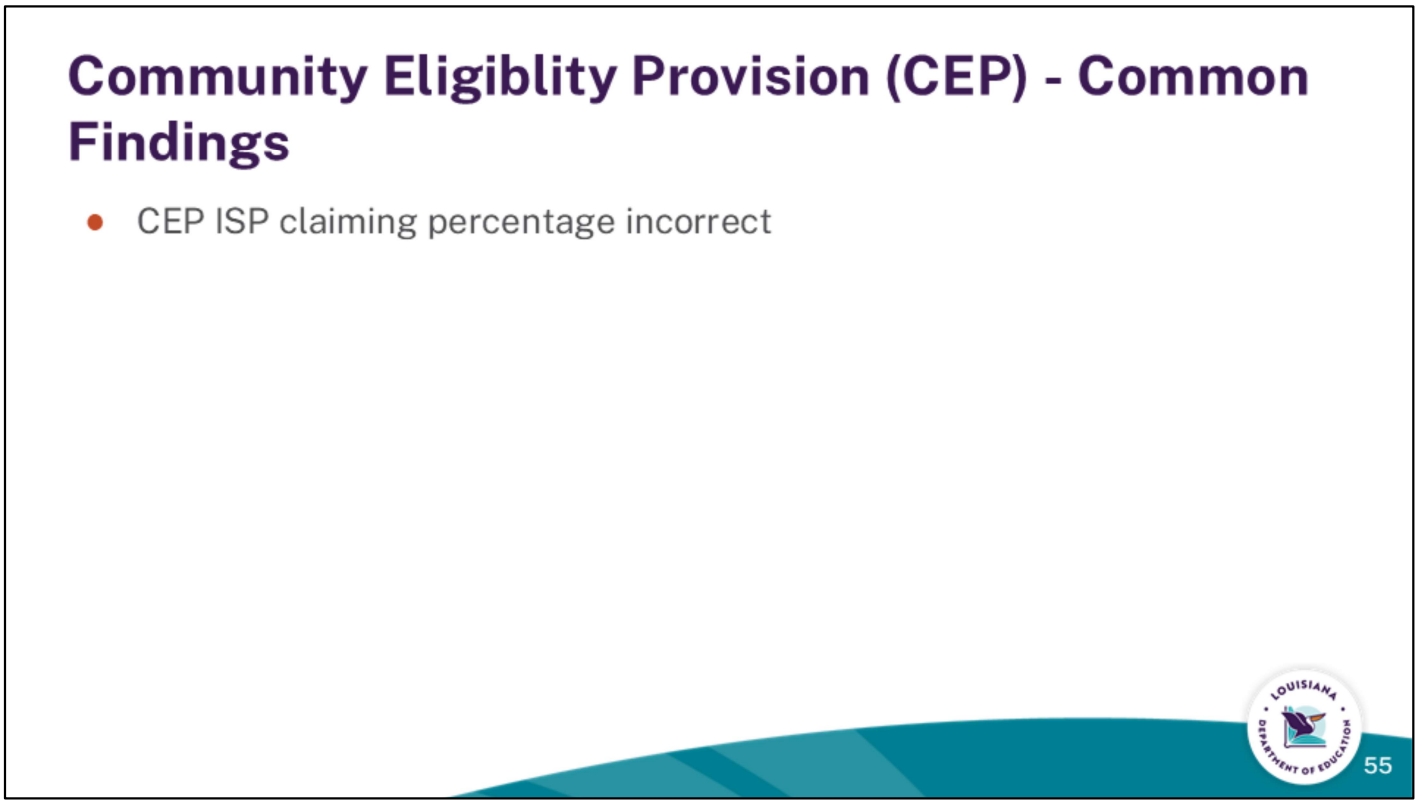
Documents Needed:

- Enrollment Data -
- Direct Certification Documents - from April 1st
- Extended Eligibility Documents
- Claiming Percentages

NOTE: Documents will either be submitted to the contractor or reviewed on site by LDOE. LDOE cannot receive student PPI.

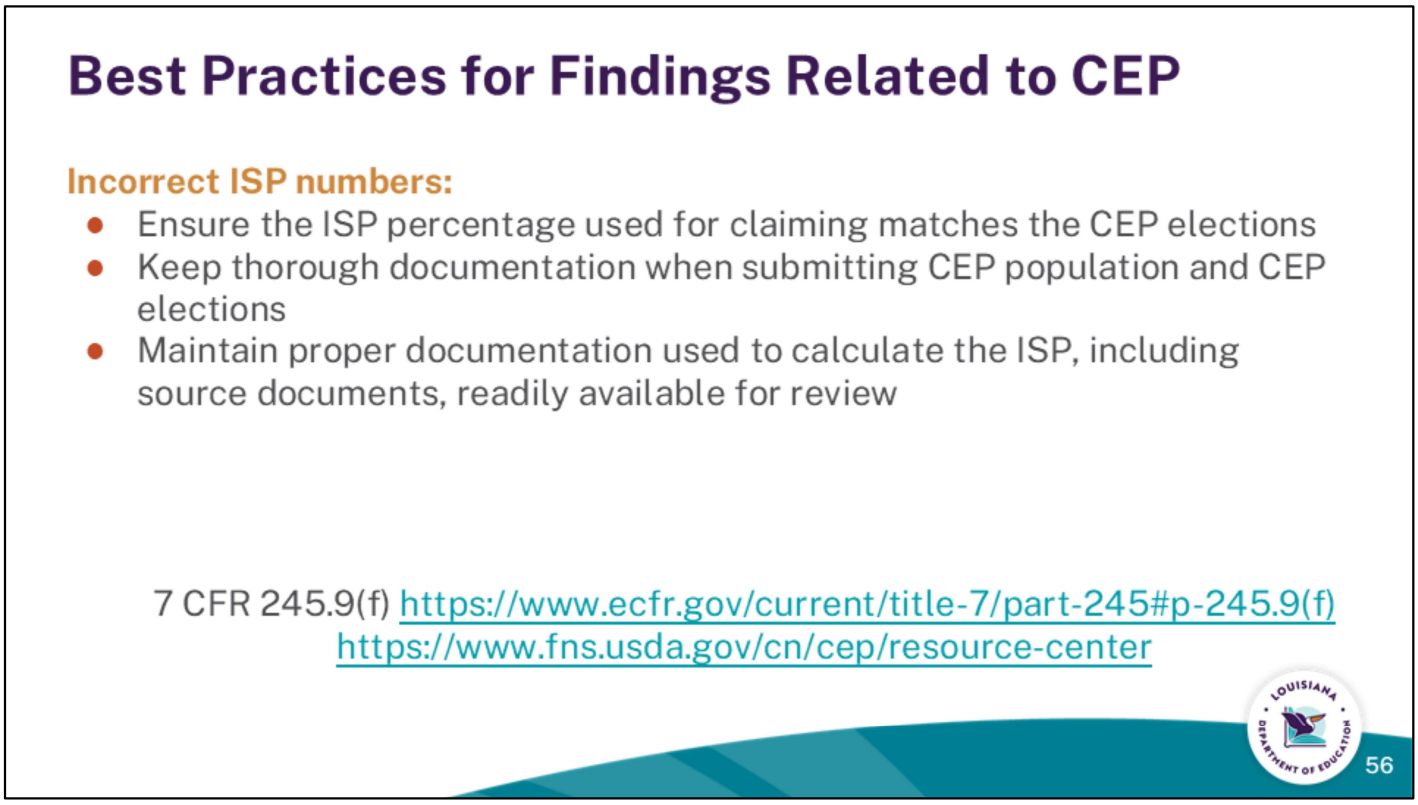
How to Prepare:

- Make sure the enrollment list is available
- Organize Data
- Organize Documents
- Confirm Percentage used are accurate



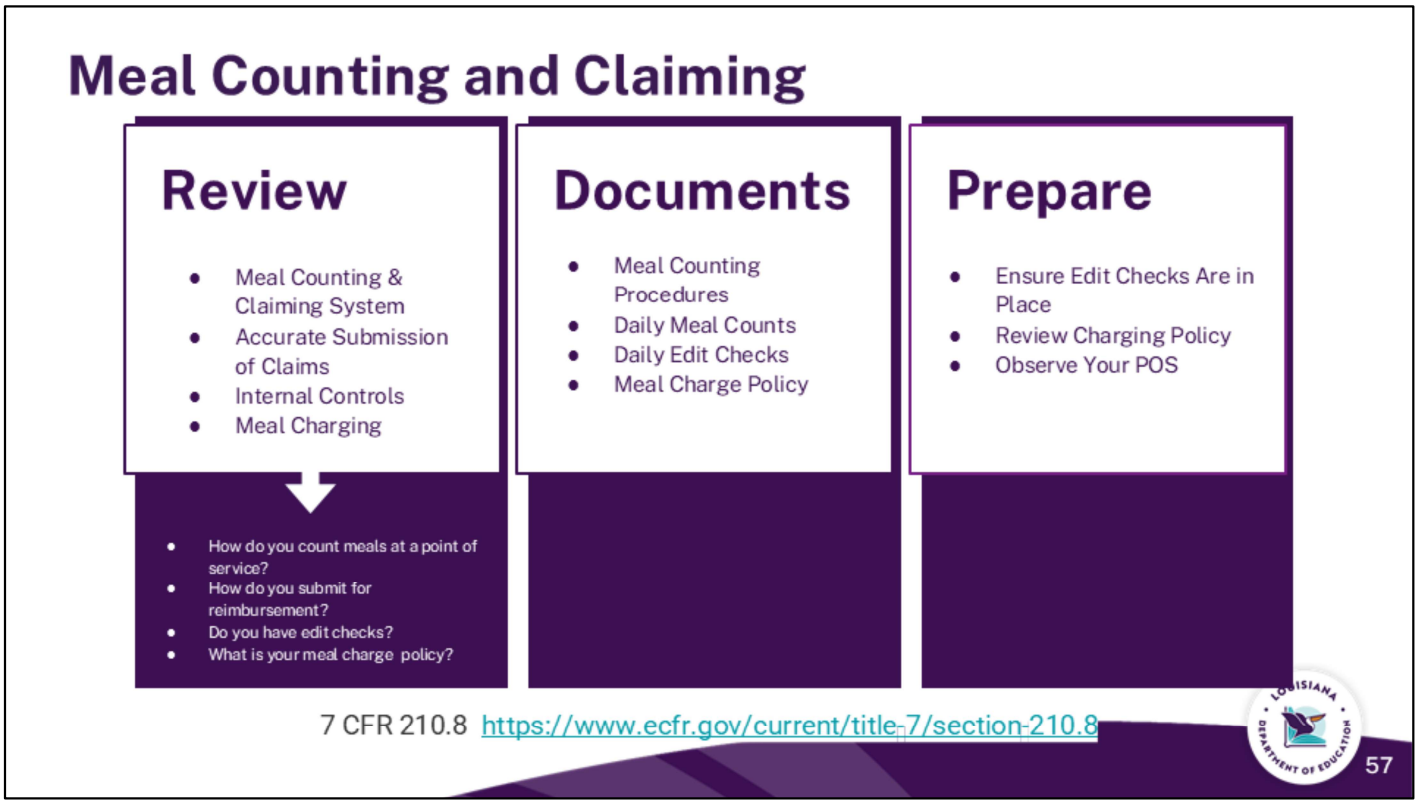
Under CEP, the following errors were found on previous reviews:

- CEP ISP claiming percentage incorrect



Some best practices for addressing errors within the CEP section of the AR it is best to establish practices centered on clear policies, comprehensive staff training, and rigorous quality control.
Ensure the ISP percentage used for claiming matches the CEP elections.
Keep thorough documentation when submitting population and election data.

Two resources to use are:
Federal regulation at 7 CFR 245.9(f) https://www.ecfr.gov/current/title-7/part-245#p-245.9(f)
USDA's Community Eligibility Provision Resource Center
https://www.fns.usda.gov/cn/cep/resource-center



Meal Counting and Claiming

In this section, the Meal Counting & Claiming System, Accurate Submission of Claims, Internal Controls, and Meal Charging is reviewed.

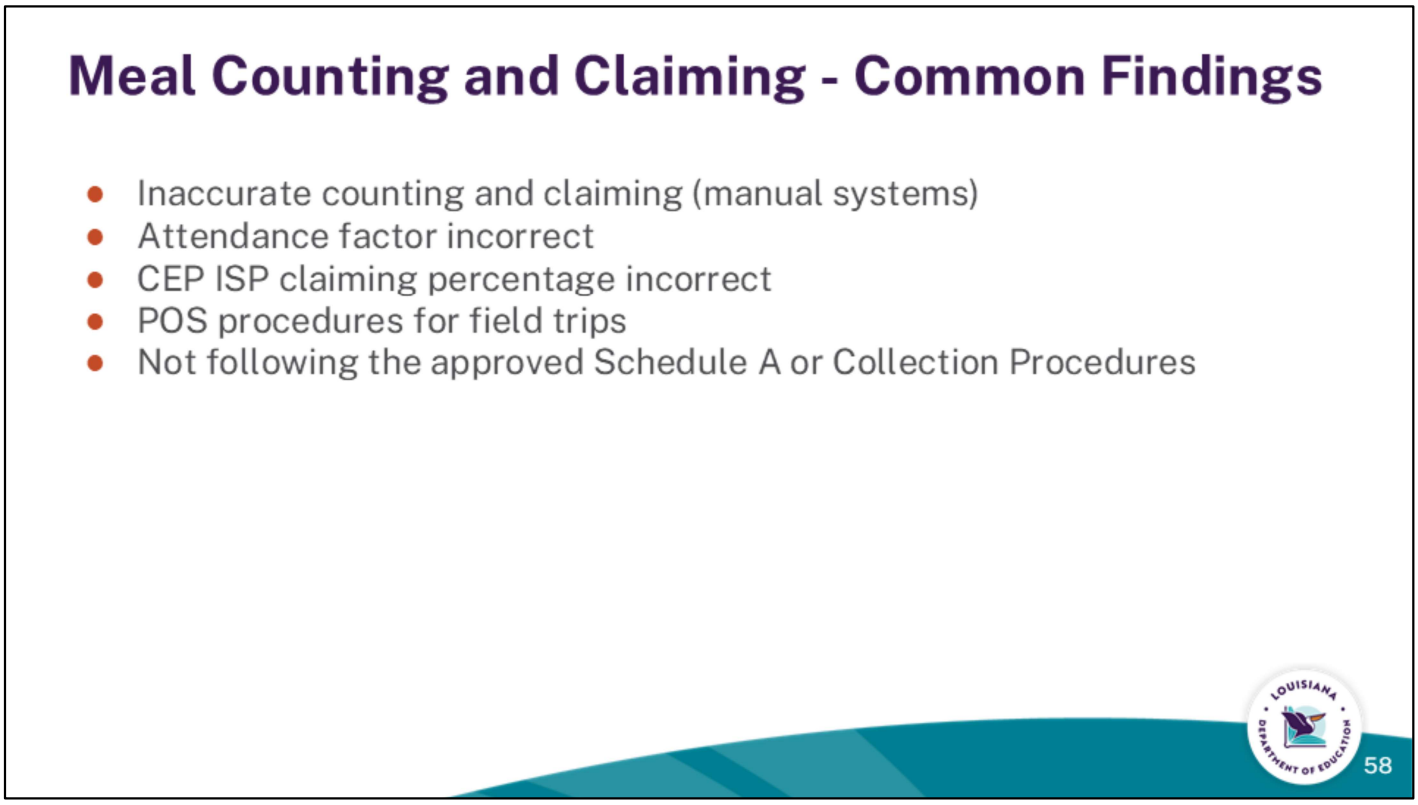
- How do you count meals at a point of service?
- How do you submit for reimbursement?
- Do you have edit checks?
- What is your meal charge policy?

Documents Needed:

- Meal Counting Procedures
- Daily Meal Counts
- Daily Edit Checks
- Meal Charge Policy

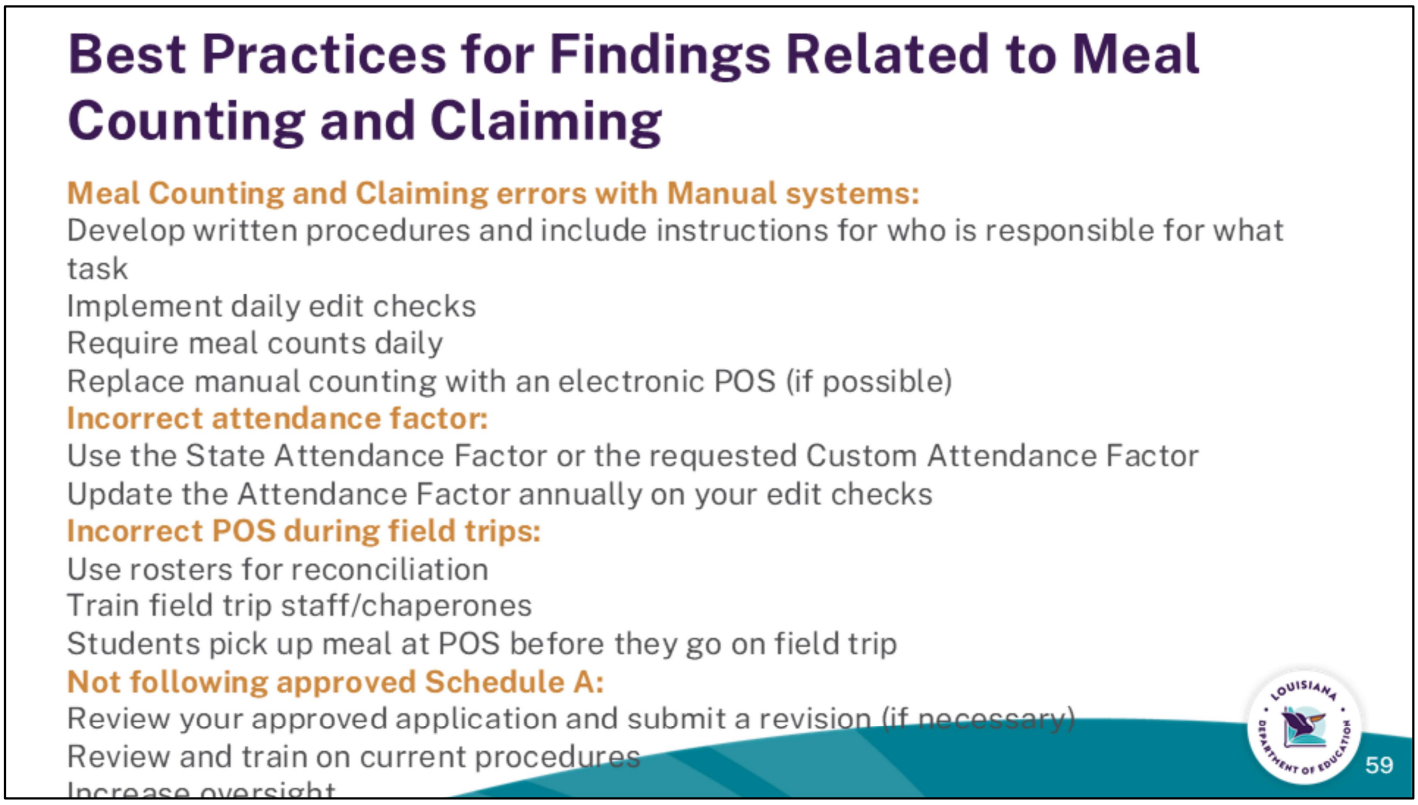
How to Prepare

- Ensure Edit Checks Are in Place
- Review Charging Policy
- Observe Your POS



Under Meal Counting and Claiming, the following errors were found on previous reviews:

- Inaccurate counting and claiming (specifically with manual systems)
- Attendance factor incorrect
- CEP ISP claiming percentage incorrect
- POS preedures for field trips
- Not following the approved Schedule A or Collection Procedures



If you had findings related to inaccurate counting and claiming because you had a manual systems:

- Develop specific, written procedures for meal counting and claiming, including clear instructions on who is responsible for each step. Use checklists to ensure each step is consistently followed.
- Implement daily edit check
- Require meal counts daily
- If possible, replace the manual counting and claiming system with a electronic one.

If you have an incorrect attendance factor, ensure you are using the State Attendence Factor that is calculated annually. Unless a Custom Attendance Factor is requested by a SFA, the default will be the State's currently approved attendance factor. Always remember to update the Attendance Factor annually in your software so that it is correct on your edit check reports.

In order to ensure that you have an accurate POS during field trips you can standardize procedures, have all procedures written in an SOP that covers the entire process, to include identifying reimbursable meals, counting meals and handling leftovers. You can have students pick up their meal at the POS before they leave for the field trip. Make sure all field trip staff and chaperones are trained on meal identification, counting procedures, and food safety standards. Lastly, a staff member can complete it during the field trip and return it to the kitchen to keep with daily paperwork.

If you are not following your Schedule A the first thing you should do is review your

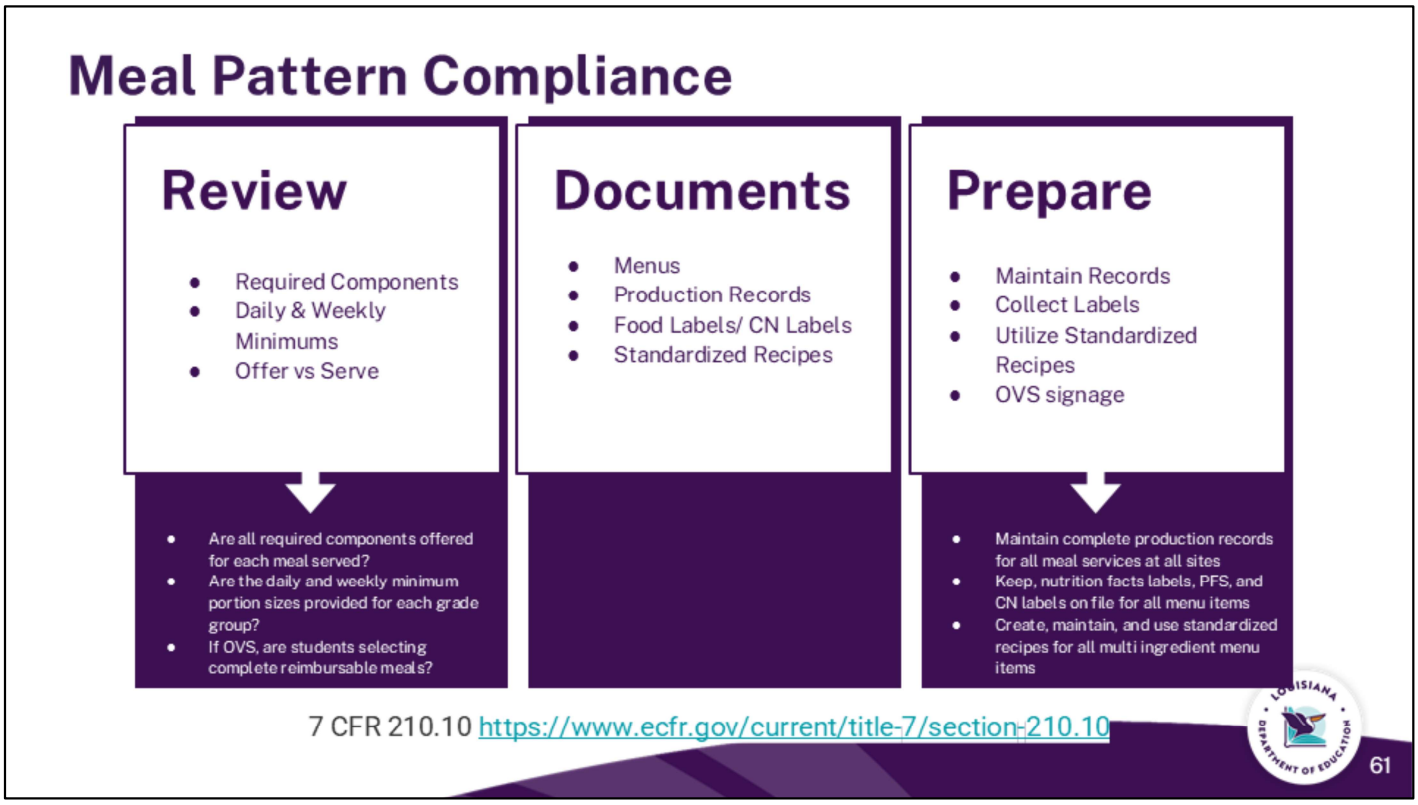
approved CNP application. Possibly some old information from last year is entered and doesn't reflect your current practices. In that is the case, submit a revision with the necessary corrections. Increasing oversight with routine monitoring to ensure staff are following correct processes.

Meal Pattern and Nutritional Quality

Meal Components & Quantities, Offer vs Serve, Dietary Specifications & Nutrient Analysis

Slide 60

3 @trandra.scott@la.gov
You will present Meal Pattern and Nutritional Quality section
Misty Woods, 4/13/2026



Meal Pattern Compliance
In this section, Required Components, Daily & Weekly Minimums, and Offer vs Serve is reviewed.

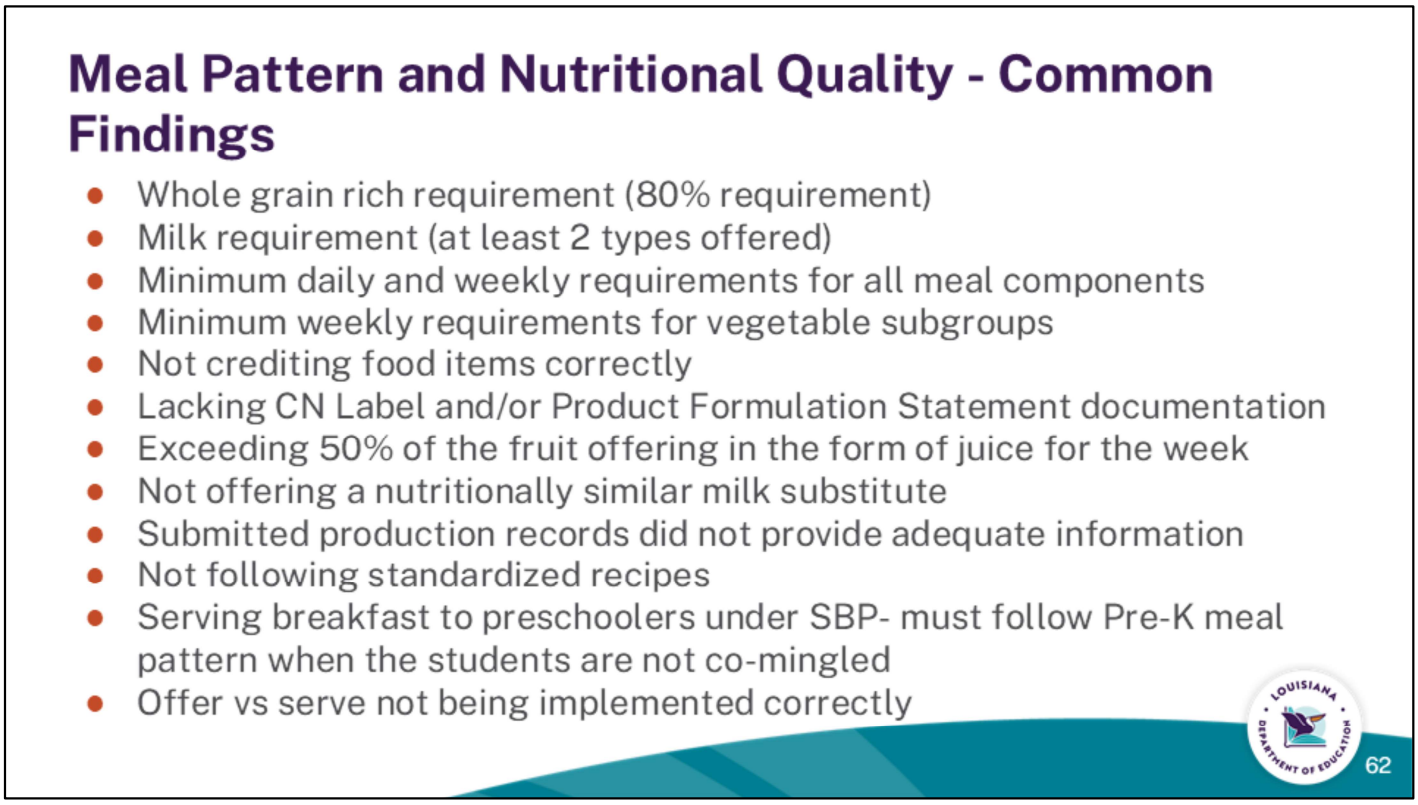
- Are all required components offered for each meal served?
- Are the daily and weekly minimum portion sizes provided for each grade group?
- If OVS, are students selecting complete reimbursable meals?

Documents Needed:

- Production Records
- Food Labels/ CN Labels
- Standardized Recipes

How to Prepare:

- Maintain Records - Maintain complete production records for all meal services at all sites
- Collect Labels - Keep nutrition facts labels, PFS, and CN labels on file for all menu items
- Utilize Standardized Recipes - Create, maintain, and use standardized recipes for all multi ingredient menu items
- If OVS, Ensure OVS signage is posted

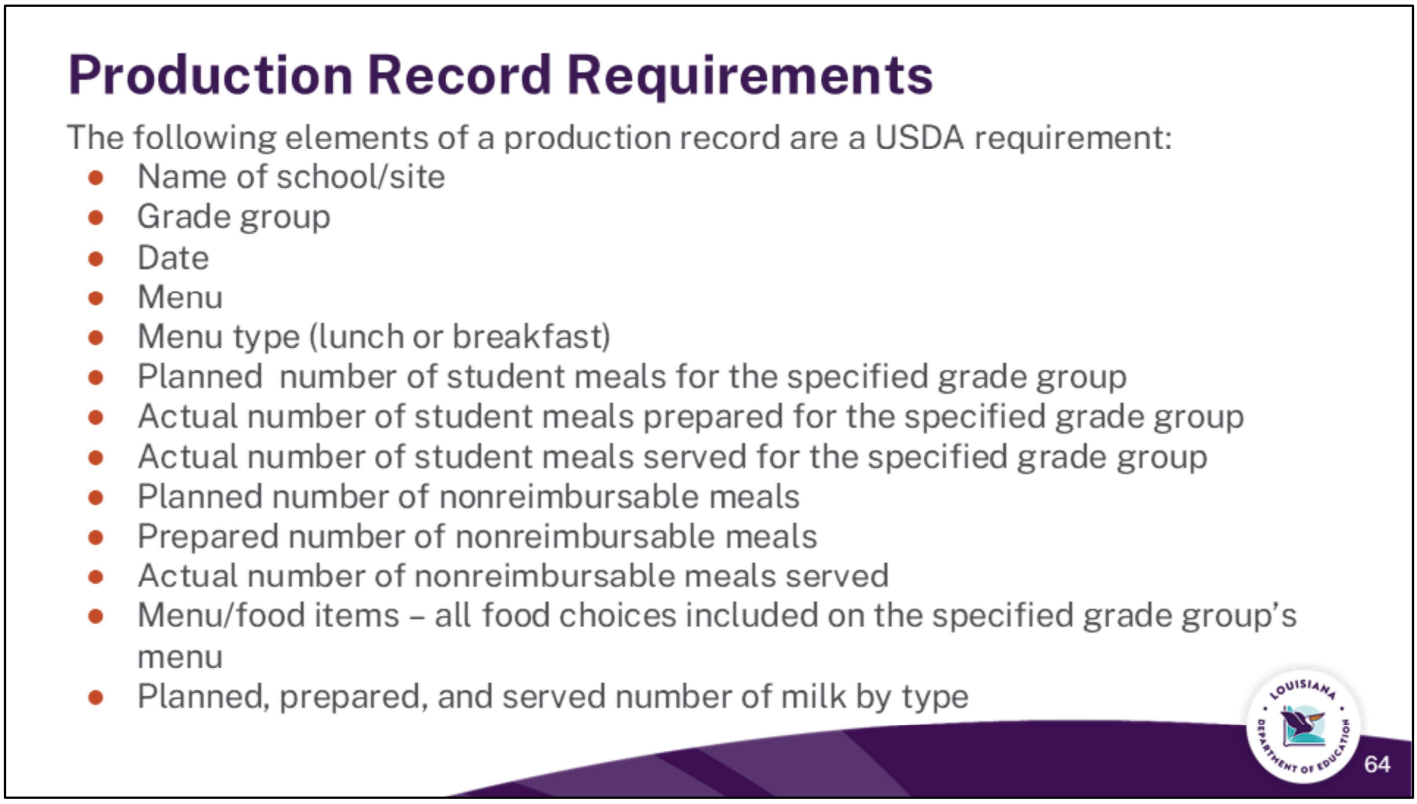


Under Meal Pattern and Nutritional Quality, the following errors were found on previous reviews:

- Whole grain rich requirement (80% requirement)
- Milk requirement (at least 2 types offered)
- Minimum daily and weekly requirements for all meal components
- Minimum weekly requirements for vegetable subgroups
- Not crediting food items correctly
- Lacking CN Label and/or Product Formulation Statement documentation
- Exceeding 50% of the fruit offering in the form of juice for the week
- Not offering a nutritionally similar milk substitute
- Submitted production records did not provide adequate information
- Not following standardized recipes
- Serving breakfast to preschoolers under SBP- must follow Pre-K meal pattern when the students are not co-mingled
- Offer vs serve not being implemented correctly

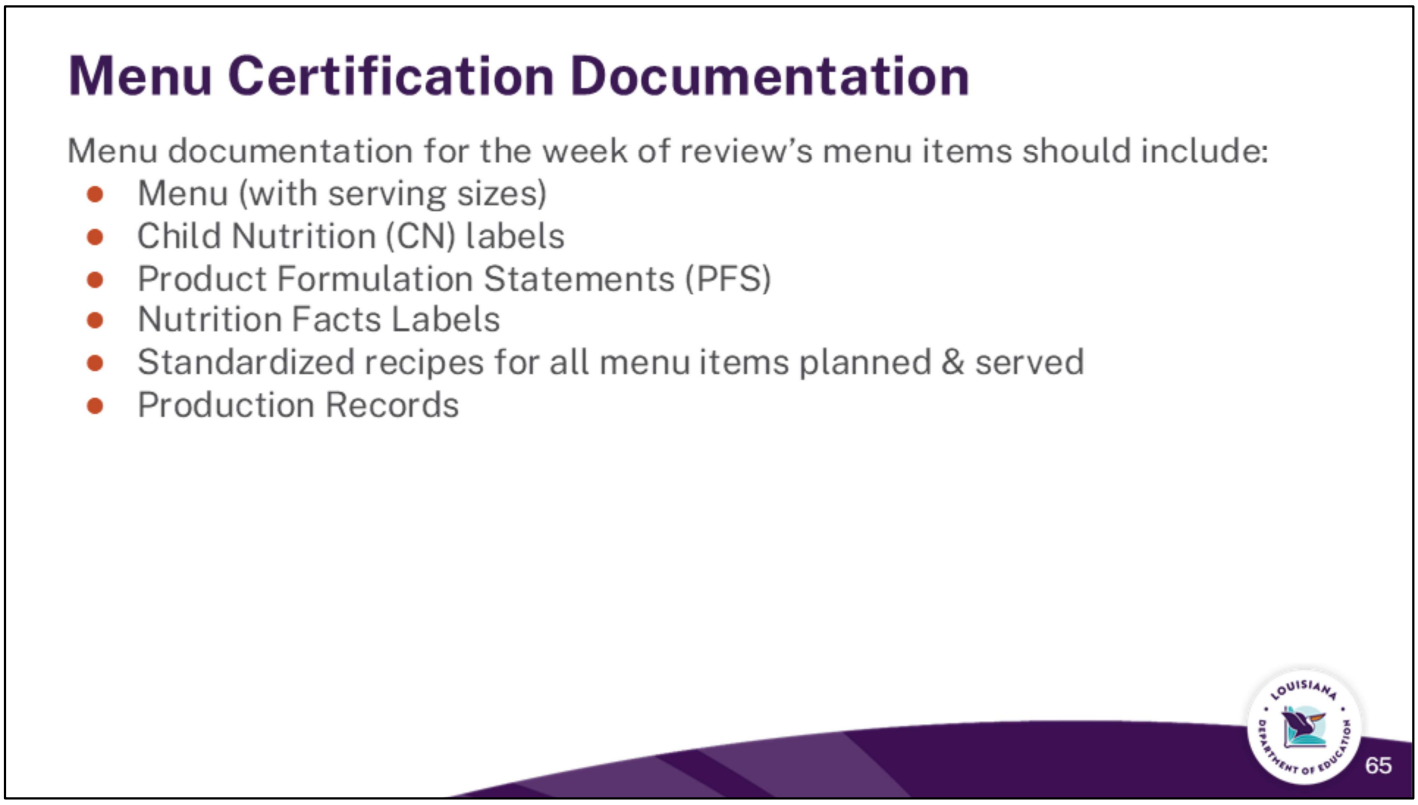
Some best practices for addressing errors within the Meal Pattern and Nutritional Quality section of the AR:

- Plan menus that meet the meal pattern
- Train staff on meal patterns for each grade group served at that site
- Verify whole-grain products
- Train on milk requirements and substitutes
- Credit foods with proper documentation
- Communicate effectively with manufacturer and vendor to obtain CN Labels & PFS
- Limit juice offerings
- Complete production records daily
- Use standardized recipes
- Utilize the Food buying guide
- Keep documentation organized
- Ongoing training



The following elements of a production record are a USDA requirement:

- Name of school/site
- Grade group
- Date
- Menu
- Menu type (lunch or breakfast)
- Planned number of student meals for the specified grade group
- Actual number of student meals prepared for the specified grade group
- Actual number of student meals served for the specified grade group
- Planned number of nonreimbursable meals
- Prepared number of nonreimbursable meals
- Actual number of nonreimbursable meals served
- Menu/food items – all food item choices included on the specified grade group's menu
- Planned, prepared, and served number of milk by type

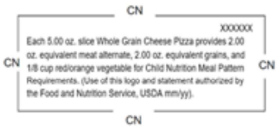


Menu documentation for the week of review's menu items should include:

- Menu (with serving sizes)
- Child Nutrition (CN) labels
- Product Formulation Statements (PFS)
- Nutrition Facts Labels
- Standardized recipes for all menu items planned & served
- Production Records

CN Labeling Program

- The child nutrition (CN) labeling program is a voluntary federal labeling program for child nutrition programs
- **The CN label on a product communicates how the product contributes to CNP meal pattern requirements**
- **Main dish products that contribute to the meats/meat alternates component of the meal pattern requirements are eligible for a CN label**
- Products served in child nutrition programs are not federally required to have a CN label
- If a CN labeled product is desired, CNP operators must clearly state this in their purchasing specifications
- In addition to required labeling features, a CN label will always contain the following:
  - The CN logo (which is a distinct border)
  - The meal pattern contribution statement
  - A 6-digit product identification number
  - USDA authorization statement
  - The month and year of approval



More information can be found on USDA's website https://www.fns.usda.gov/cn/labeling

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Child Nutrition (CN) Authorized Labels

CN Label Verification Report & CN Label Manufacturers Report

- These lists are updated and re-posted monthly; the data will not reflect newly authorized manufacturers and labels
- Additionally, the product name on the food carton with the CN label may not necessarily match the product description from the list
- Child Nutrition (CN) numbers that appear on the valid list apply to the CN logo and crediting statement only

More information can be found on USDA's website
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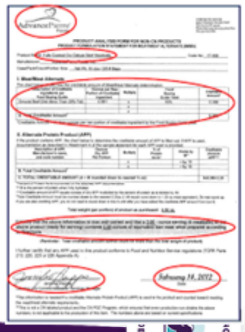
Product Formulation Statement

- **Product Formulation Statement (PFS) is a document that provides a way for a manufacturer to demonstrate how a processed food product may contribute to the meal pattern requirements in child nutrition programs**
- PFS are voluntarily provided by manufacturers at the request of program operators
- A manufacturer's PFS is not approved by USDA
- **A PFS is typically provided for processed products that do not have a CN label**
- Program operators should review and verify the crediting statement on a manufacturer's PFS

Tips for Evaluating a Manufacturer's Product Formulation Statement
https://www.fns.usda.gov/cn/labeling/tips-evaluating-pfs

More information can be found on USDA's website
https://www.fns.usda.gov/cn/manufacturer-documentation



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Nutrition Facts Labels

Nutrition Facts Labels can be utilized if CN labels or PFS are not available for a product

The label provides information on specific nutrients present in the item

The most pertinent nutrient content information is calorie, saturated fat, sodium, and added sugar content

The ingredient statement lists all the ingredients in descending order of weight in the product

The ingredient statement can provide the information to determine if an item is whole grain rich or enriched

The ingredient statement is also a useful tool to check for specific allergens

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The ingredient statement is also a useful tool to check for specific allergens that are not recognized as being in the top nine allergens.

Food Buying Guide for Child Nutrition Programs

The Food Buying Guide (FBG) is the essential resource for food yield information for all child nutrition programs

https://www.fns.usda.gov/tn/fbg

The FBG assists CNP operators with:

- Purchasing the correct amounts of foods for CNP
- Determining the contribution that each food makes toward meal pattern requirements

Foods listed in the Food Buying Guide are not required to have a CN Label or a manufacturer's Product Formulation Statement

- The SFA should document and provide the a copy of the FBG information that was used to determine the crediting as documentation for the AR

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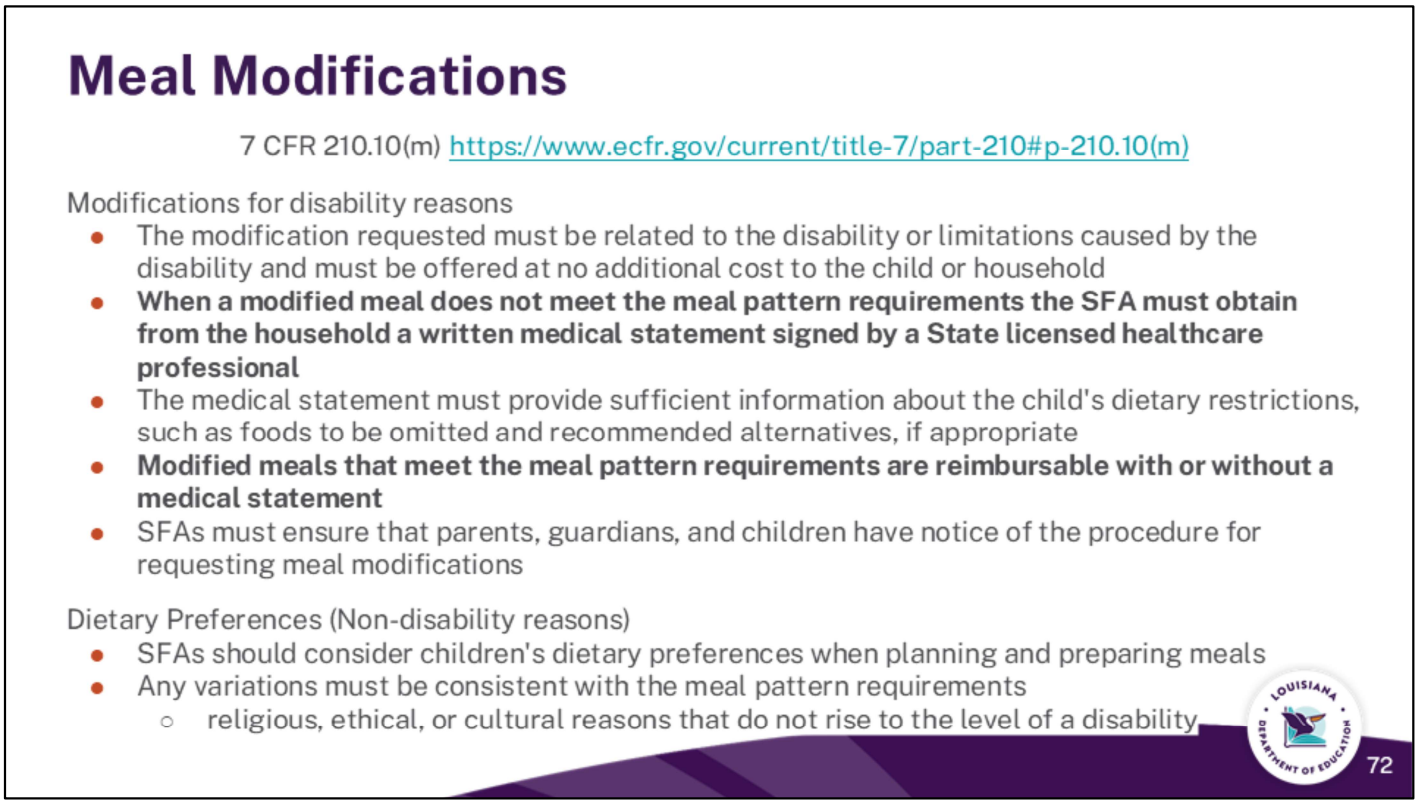
All schools must develop and follow standardized recipes.
A standardized recipe is a recipe that was tested to provide an established yield and quantity using the same ingredients for both measurement and preparation methods.
A standardized recipe should include the following parts:

- Recipe title
- Ingredients
- Preparation instructions
- Temperature, time, and cooking methods
- Recipe yield
- Serving and portion size
- Food safety
- Equipment and suggested tools for serving
- Nutrients per serving or nutrient analysis



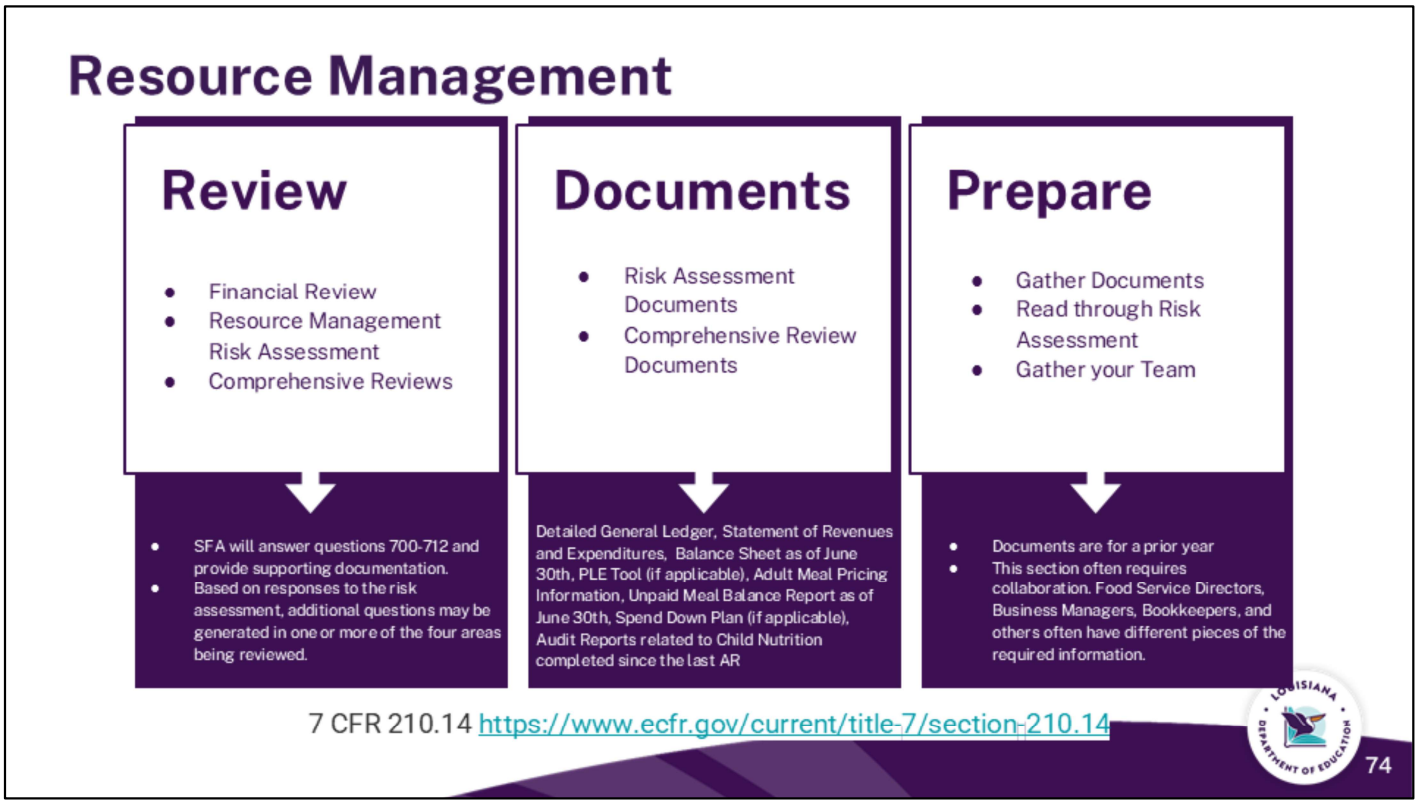
School food authorities must make meal modifications, including substitutions in lunches and afterschool snacks, for children with a disability and whose disability restricts their diet. The modification requested must be related to the disability or limitations caused by the disability and must be offered at no additional cost to the child or household. In order to receive Federal reimbursement when a modified meal does not meet the meal pattern requirements, the school food authority must obtain from the household a written medical statement signed by a State licensed healthcare professional.

The medical statement must provide sufficient information about the child's dietary restrictions, such as foods to be omitted and recommended alternatives, if appropriate. Modified meals that meet the meal pattern requirements in this section are reimbursable with or without a medical statement.

School food authorities must ensure that parents, guardians, and children have notice of the procedure for requesting meal modifications for disabilities.

School food authorities should consider children's dietary preferences when planning and preparing meals and afterschool snacks. Any variations must be consistent with the meal pattern requirements. A medical statement is not required for preferences. This would be for religious, ethical, or cultural reasons that do not rise to the level of a disability.

Resource Management



Resource Management
In this section, Financial Review, Resource Management Risk Assessment, and Comprehensive Reviews will be reviewed.
SFA will answer questions 700-712 and provide supporting documentation.
Based on responses to the risk assessment, additional questions may be generated in one or more of the four areas being reviewed.

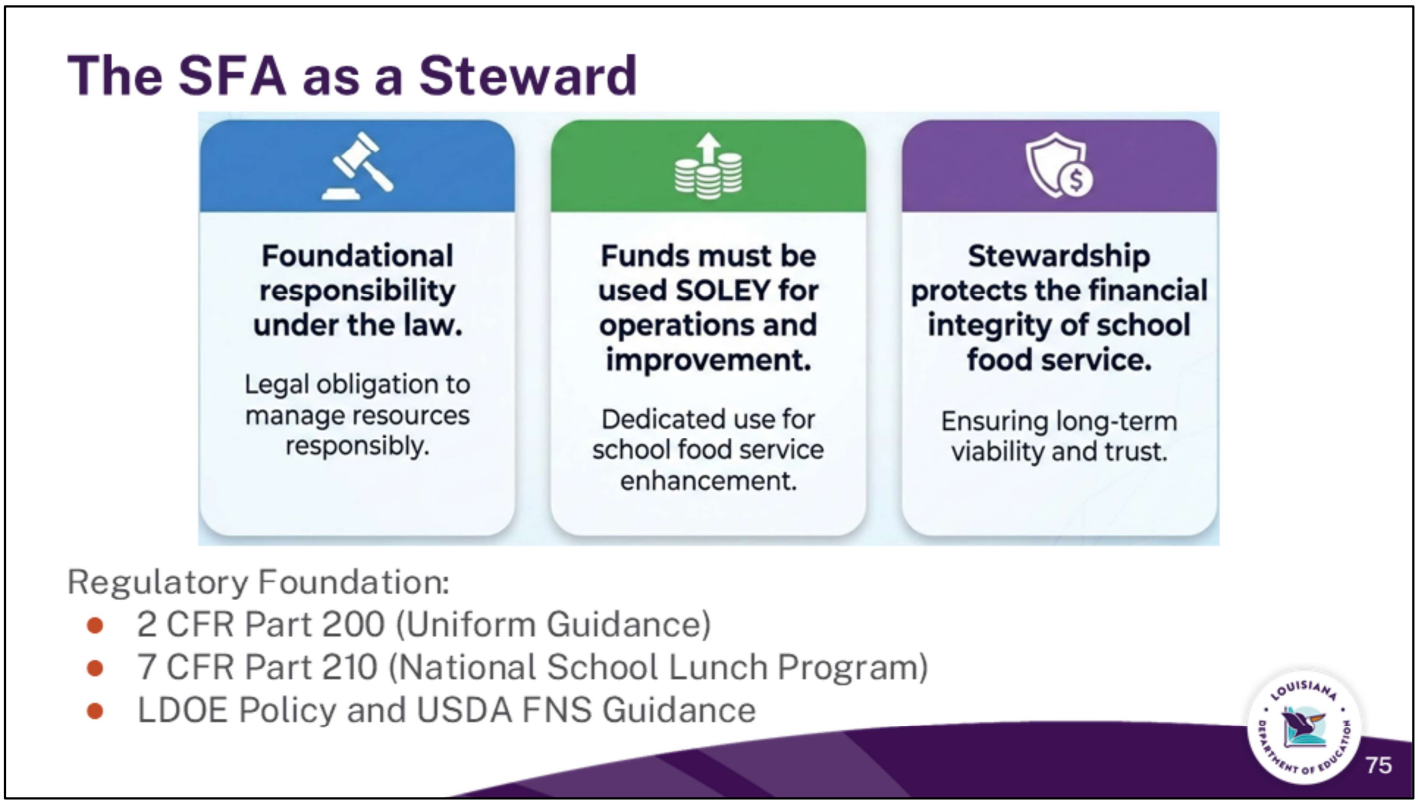
Documents Needed:

- Risk Assessment Documents
- Comprehensive Review Documents
- Detailed General Ledger
- Statement of Revenues and Expenditures
- Balance Sheet as of June 30th
- Paid Lunch Equity Tool (if applicable)
- Adult Meal Pricing Information
- Unpaid Meal Balance Report as of June 30th
- Spend Down Plan,(if applicable)
- Audit Reports related to Child Nutrition completed since the last AR

How to Prepare:

- Gather Documents (Documents are for a prior year)
- Read through Risk Assessment
- Gather your Team - This section often requires collaboration. Food Service Directors, Business Managers, Bookkeepers, and others often have different pieces

of the required information.



As an SFA, you are a steward of federal funds. Federal regulations are unequivocal: all reimbursements and revenues must stay within the program to operate and improve child nutrition.
All principles we discuss today are rooted in 2 CFR Part 200, which is the "Uniform Guidance" for federal awards. We also look at program-specific regulations like 7 CFR 210.14.

The Resource management section of the AR checks how food service program manages funds, revenues and expenditures. There are 4 areas that are looked at: maintenance of the nonprofit account, paid lunch equity, revenue from non-program foods and indirect cost.

Lets take the first section on the screen, maintenance of the Nonprofit School Food Service Account. What is reviewed in this section is allowable costs. Are the cost necessary, reasonable and allocable for operating or improving the school food service program. How is revenue used? Are all revenues deposited back into the nonprofit account? These funds cannot be diverted to other school programs or general fund. We look at net cash resources, are you over your 6 month operating budget? If so do you have a spend down plan to reduce the balance.

Next we look at paid lunch equity, are you charging enough for your paid lunch prices? The PLE tool compares the average price of your paid lunch prices to a USDA determined equity target to see if you are charging enough for your paid lunches.

The 3rd section we look at is the revenue from nonprogram foods, this section determines any food sold outside of the reimbursable meal is sold at least equal to what you obtained them for. We want to to ensure that nonprogram sales aren't subsidized from federal meal reimbursements. An example of this is if 20% of your food cost are for non-program foods then at least 20% of your revenue must come from non-program sales.

And lastly we look at indirect cost. If a SFA charges indirect cost to the Nonprofit School Food Service Account is the correct approved rate being applied? Is there double charging,

for example if a cost is already charged directly such as the food service pays their own electricity bill it cannot be charged indirectly for electricity. We look at records showing how indirect cost were calculated and charged to the nonprofit account.

The Allowability Filter

- Costs must be allowable before they can be classified as direct or indirect.
- Costs must be:
  - Necessary: Essential for Program performance
  - Reasonable: Does not exceed what a “prudent person” would spend
  - Sound business practices and competitive pricing
- Program-Specific Limitations:
  - Cost must adhere to award terms and federal regulations
  - Program-specific rules override general principles
  - E.g.: Construction is generally allowed in 2 CFR 200, but prohibited in 7 CFR 210.14(a) without FNS approval

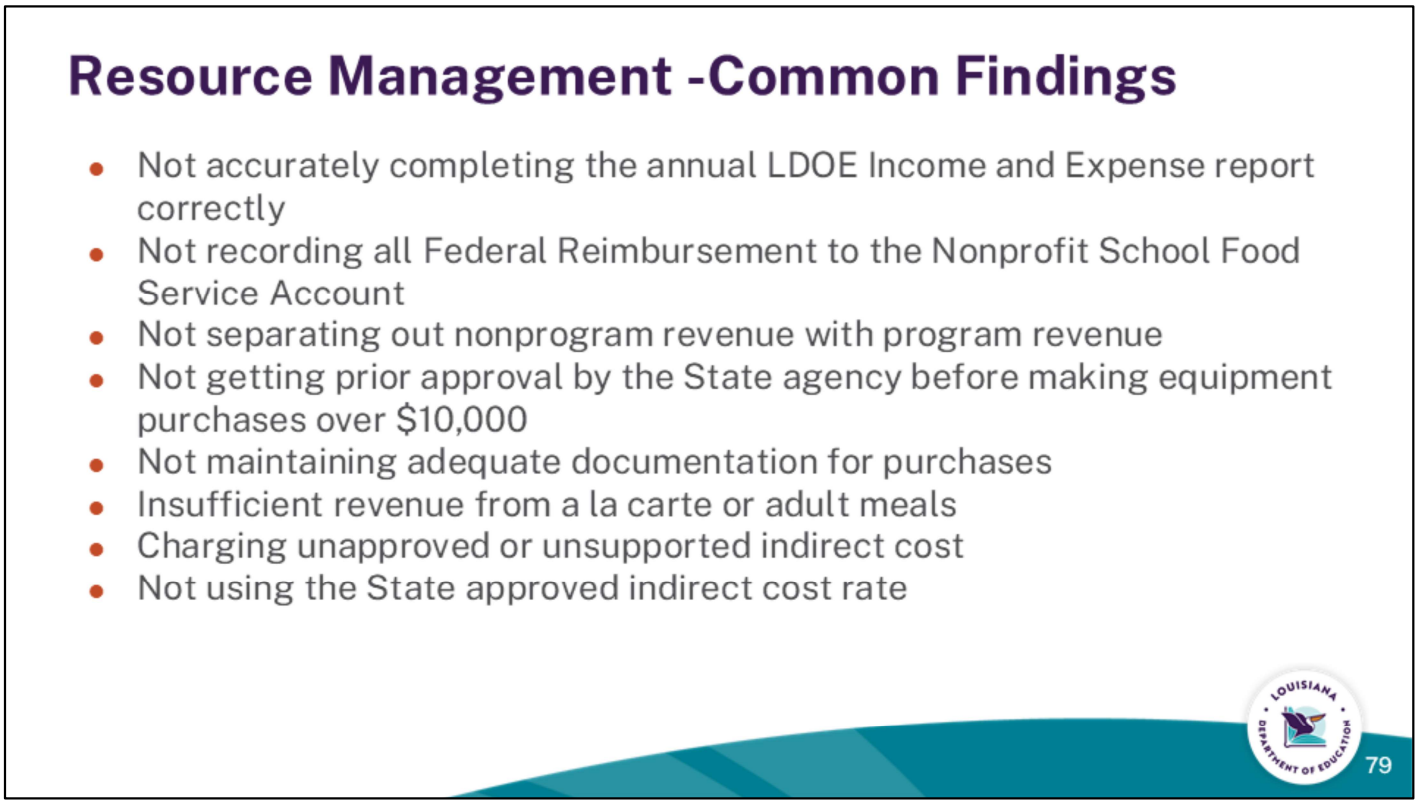
Necessary and Reasonable are the twin pillars of allowability. "Necessary" doesn't mean "nice to have"—it means essential.
"Reasonable" means you shopped around. If you are paying 20% above market rate for a service without a clear justification, you risk a finding during an Administrative Review.

Program-Specific limitations is where SFAs often get in trouble. Just because your district's business manager says a cost is "allowable under federal grants" (referring to 2 CFR 200), you must double-check the 7 CFR regulations. Building a new kitchen structure from scratch is a prime example of a cost that needs explicit prior approval.

Adequate Documentation

- Non-negotiable requirement for compliance
- Types:
  - Invoices
  - Receipts
  - Timecards
- Rule: If it isn't documented, it's unallowable

During an audit, "we've always done it this way" is not a defense. You must have a paper or digital trail for every penny spent. This documentation must be specific enough to show that the food service program—and only the food service program—received the benefit. Workers' compensation costs must be directly allocated for employees working on a single cost objective or 100% under school food services as referenced in AFR. In accordance with 2 CFR 200 Subpart E, documentation must clearly identify the portion of the cost attributable to full- or part-time employees and be based on reasonable, allocable and supportable methodology, such as, but not limited to, payroll proportion per FTE, claim detail, or insurance premium classification. For employees working on multiple cost objectives, workers' compensation costs must be allocated in alignment with how the employee's compensation is allocated and, in accordance with 2 CFR 200.412 treated consistently.



As a big picture to the common findings most of them come from missing documentation, not completing the required tools (PLE or nonprogram revenue), misusing funds or unallowable cost.

When it comes to the Non profit account these funds cannot be used for whatever purpose we deem necessary. These funds have to spent only on allowable cost. So they cannot be used for general school expenses, staff that doesn't work in the food service program or bad debt. All expenditures must be necessary, reasonable and allocable and adequately documented for effective and efficient operation of the Nonprofit School Food Service Account.

For Paid Lunch Equity some districts are not completing the tool annually or incorrectly calculating lunch prices or not adjusting when required. If you complete the PLE tool and your district is going to use non federal funds because they didn't want to raise prices then that transfer needs to be reflected in the non profit account.

Revenue from nonprogram foods, adults are eating for free and the general fund is not paying for them. The Nonprofit School Food Service Account can not pay for adult meals.

Classifying Direct vs. Indirect Costs

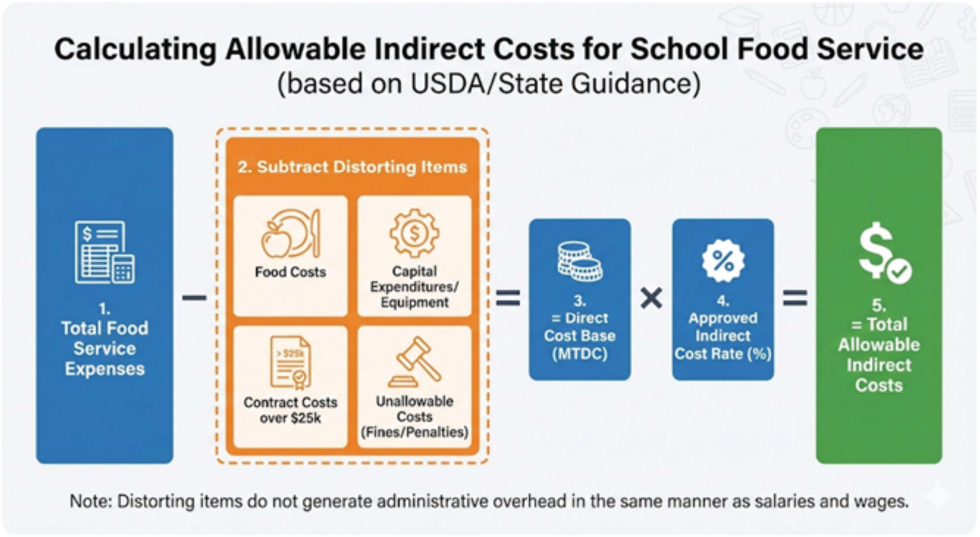
The “Who Benefited?” Test?

Classification depends on how the cost is accounted for, not the item itself.

- Direct: Identified specifically with a particular program (e.g., NSLP).
- Indirect: Common or joint purposes (e.g., district-wide HR).

The core question for direct costs is: "Who benefited from this?" If the answer is "the food service exclusively," it’s direct. If the answer is "everyone in the district," it’s indirect. Some examples of direct costs are wages or salaries of kitchen staff, purchased food and service supplies, and POS systems used only for food service. You must ALWAYS have a clear, documented method for documenting an allocation or shared cost. Even for common items like cleaning supplies, they are only direct if they are used exclusively in the kitchen. If you buy a pallet of cleaner for the whole school, that cost must be allocated or treated as indirect.

Indirect Cost Allocation



Recovered through a mathematical "Indirect Cost Rate"

- Benefit more than one cost objective

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Indirect costs are recovered through an Indirect Cost Rate which is set through LDOE Finance for all Public and Charter Schools. Non-publics are allowed to use up to the de minimum rate set in federal regulations which is 15%. Indirect Costs are used because you can't easily track how many minutes the Superintendent spends thinking about the cafeteria, so we use the IDC rate. It is a fair-share way for the food service to support the central office functions that keep the program running or for other things that can't be directly allocated.

The Principle of Consistent Treatment

- Mandatory consistency in “like circumstances”.
- Cannot direct charge a cost if similar costs are treated as indirect elsewhere.
- Designed to prevent double-charging

This is a major area of audit findings. If you treat a custodian's time as an indirect cost for the Title I program, you cannot turn around and charge it as a direct cost to the food service program. You have to pick a lane and stay in it across the entire SFA.

Custodial Case Study

- Option A (Direct):
  Time-reporting system for specific kitchen cleaning hours.
- Option B (Indirect):
  Approved IDC rate applied to the modified cost base.
- Potential Violation:
  Mixing these methods across different school departments.

If you use Option A for the cafeteria but Option B for the rest of the school, you are violating "Consistent Treatment." This will lead to questioned costs and potential repayment.

Shared Expenditures–Common Findings

Expense Category	Description	Supporting Documentation	Allowable or Unallowable Cost	Direct or Indirect Cost
Custodial Services	Cleans entire school, including kitchen/serving area	Timecards that do not break down time by area served; approved Indirect Cost Rate multiplied by the modified direct cost base	Allowable	Indirect
Custodial Services	Clean kitchen/serving areas	Timecards that identify the number of hours spent cleaning the kitchen, prep & serving areas or 2-week time study, for each employee, of hours worked for food service, number of days work performed, and actual wage of employee	Allowable	Direct

Shared Expenditure Allowability

Expense Category	Description	Supporting Documentation	Allowable or Unallowable Cost	Direct or Indirect Cost
Custodial Services	Clean kitchen/serving areas	Square footage of cafeteria/school used to allocate	Unallowable	Direct

Electricity	Payment for electricity used by School Food Service	Assessed via charge per meal served	Unallowable	Direct
Electricity	Payment for electricity used by School Food Service	Separate meter	Allowable	Direct
Electricity	Payment for electricity used by School Food Service	Square footage	Allowable	Direct
Electricity	Payment for electricity used by School Food Service	No supporting documentation other than approved Indirect Cost Rate multiplied by the modified direct cost base	Allowable	Indirect

Shared Expenditure Allowability

Expense Category	Description	Supporting Documentation	Allowable or Unallowable Cost	Direct or Indirect Cost
Equipment Purchase	Purchase of equipment (>$10,000) on pre-approved list	No procurement documentation; purchased from state contract	Unallowable	Direct
Equipment Purchase	Purchase of equipment (>$10,000) NOT on pre-approved list	Followed proper procurement, but didn't receive SA pre-approval to purchase	Unallowable	Direct

Disposal/Waste Management	Picks up trash for school and kitchen/serving areas	Vendor invoice is not itemized; approved Indirect Cost Rate multiplied by the modified direct cost base is on file	Allowable	Indirect
Disposal/Waste Management	Picks up trash for school and kitchen/serving areas	Itemized vendor invoice that specifies the cost of picking up trash in the kitchen/serving areas	Allowable	Direct
Disposal/Waste Management	Picks up trash for school and kitchen/serving areas	A waste/usage study is on-file to document allocation of shared costs	Allowable	Direct
Disposal/Waste Management	Picks up trash for school and kitchen/serving areas	School Square Footage used to allocate trash invoices	Unallowable	Direct
Disposal/Waste Management	Picks up trash for school and kitchen/serving areas	Estimates from staff on how much garbage school vs. child nutrition uses	Unallowable	Direct

Shared Expenditure Allowability

Expense Category	Description	Supporting Documentation	Allowable or Unallowable Cost	Direct or Indirect Cost
Utilities (i.e., gas, electricity, water, etc.)	Separate meter for kitchen/serving area or square footage allocation	Utility provided invoice or statement for utilities used in kitchen/serving areas or Square footage allocation for each building	Allowable	Direct
Utilities (gas, electricity, water, etc.)	One meter for the entire school	Utility provided invoice or statement for the entire school; approved Indirect Cost Rate multiplied by the modified direct cost base is on file	Allowable	Indirect

Shared Expenditure Allowability

Expense Category	Description	Supporting Documentation	Allowable or Unallowable Cost	Direct or Indirect Cost
Rent	Rent charged for kitchen and eating area for students	Pro-rated and documented agreement based on square footage and percent of time utilized by School Food Service	Unallowable, unless pre-approved by the SA	Direct

Rent

Per USDA's Indirect Cost Guidance, rent is often aligned with capital infrastructure costs which must be borne by the school district's general funds.

The State agency (SA) is requiring building rental expenses to be submitted on the *School Food Service Equipment Purchase/Capital Expenditure Pre-Approval Request Form*. Effective School Year 26-27, all building rental expenses must be pre-approved and assessed for allowability by the SA before they can be incurred by the Nonprofit School Food Service Account.

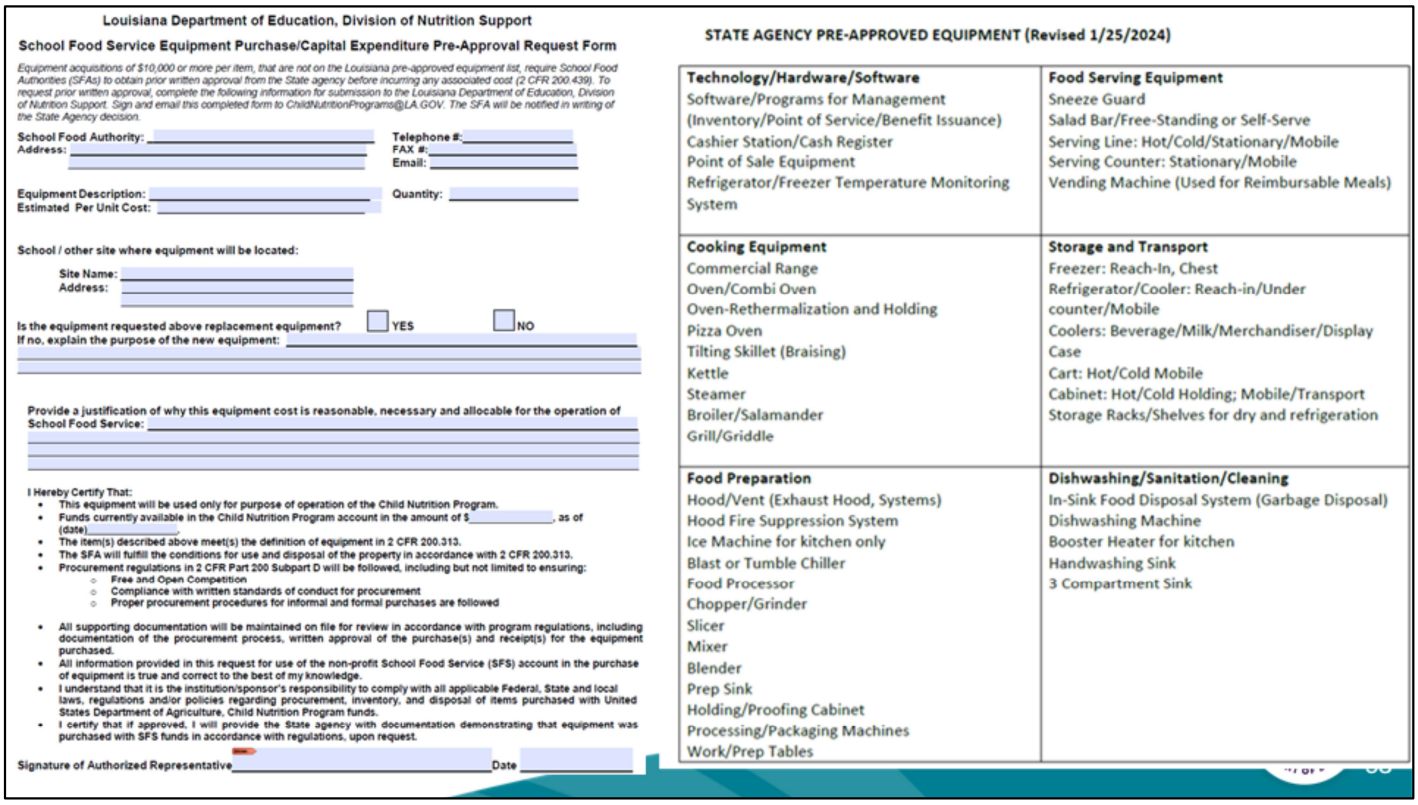
Common Finding: Equipment Pre-Approval

SFAs are required to obtain purchasing approval from the Louisiana Department of Education (LDOE) prior to incurring the cost of equipment and other capital expenditures with a per-unit acquisition cost of $10,000 or more and accruing to an SFA's Nonprofit School Food Service Account. To request approval, SFAs must complete the Equipment Purchase/Capital Expenditure Pre-Approval Request Form.

Prior to submitting a request, check the State Agency Preapproved Equipment List. Any item on this equipment list receives automatic LDOE approval without needing to submit a pre-approval request.

Equipment must be procured according to the SFAs procurement plan. The State Contract may be used as one price quote. Under Louisiana law, three price quotes must be obtained.

SFAs are required to obtain purchasing approval from the Louisiana Department of Education (LDOE) prior to incurring the cost of equipment and other capital expenditures with a per-unit acquisition cost of $10,000 or more and accruing to an SFA's NPSFSA. To request approval, SFAs must complete the Equipment Purchase/Capital Expenditure Pre-Approval Request Form.
Prior to submitting a request, check the State Agency Preapproved Equipment List. Any item on this equipment list receives automatic LDOE approval without needing to submit a pre-approval request.
Equipment must be procured according to the SFAs procurement plan. The State Contract may be used as one price quote. Under Louisiana law, three price quotes must be obtained.



Louisiana Department of Education, Division of Nutrition Support

School Food Service Equipment Purchase/Capital Expenditure Pre-Approval Request Form

Equipment acquisitions of $10,000 or more per item, that are not on the Louisiana pre-approved equipment list, require School Food Authorities (SFAs) to obtain prior written approval from the State agency before incurring any associated cost (2 CFR 200.439). To request prior written approval, complete the following information for submission to the Louisiana Department of Education, Division of Nutrition Support. Sign and email this completed form to ChildNutritionPrograms@LA.GOV. The SFA will be notified in writing of the State Agency decision.

School Food Authority: _____ **Telephone #:** _____
Address: _____ **FAX #:** _____
Email: _____

Equipment Description: _____ **Quantity:** _____
Estimated Per Unit Cost: _____

School / other site where equipment will be located:

Site Name: _____
Address: _____

Is the equipment requested above replacement equipment? ☐ YES ☐ NO
If no, explain the purpose of the new equipment: _____

Provide a justification of why this equipment cost is reasonable, necessary and allocable for the operation of School Food Service: _____

I Hereby Certify That:

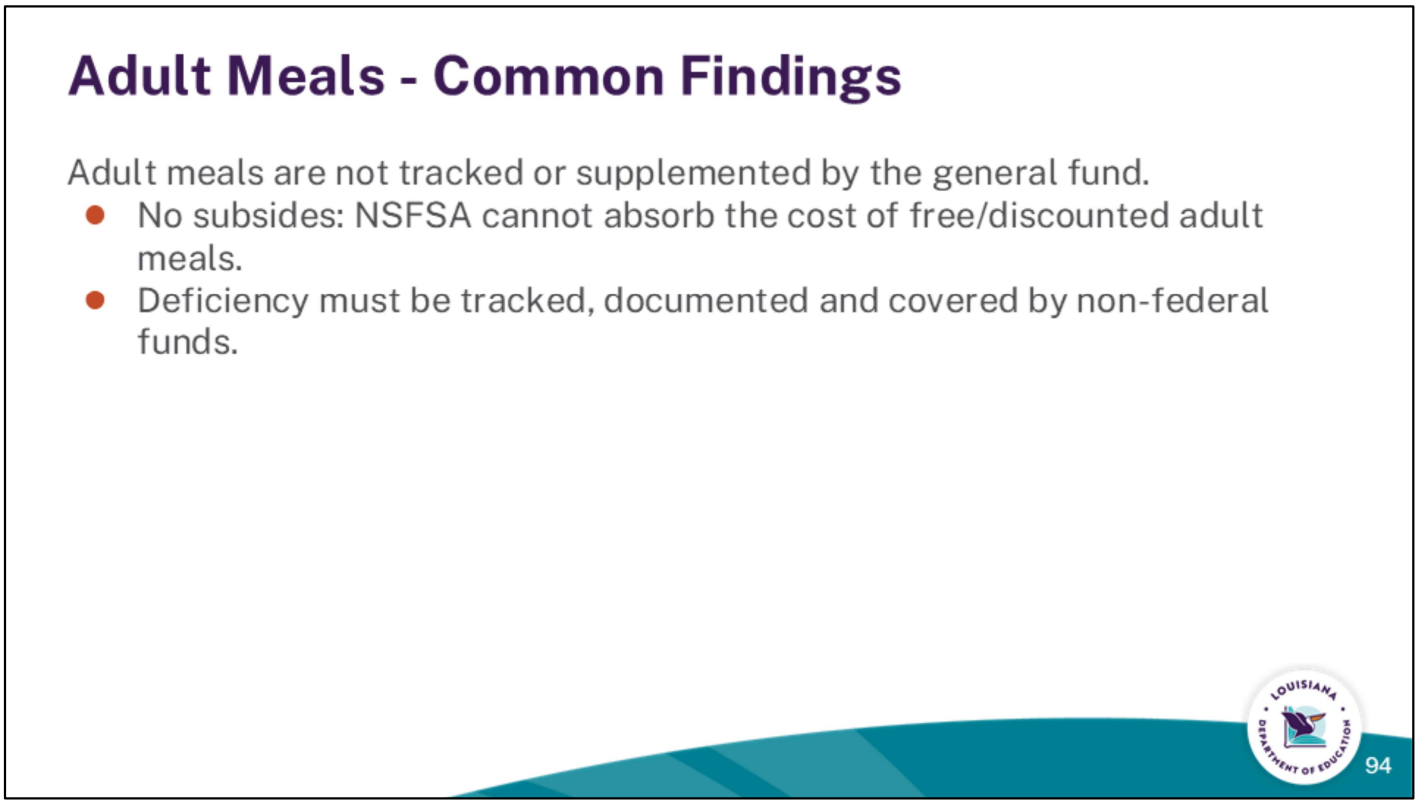
- This equipment will be used only for purpose of operation of the Child Nutrition Program.
- Funds currently available in the Child Nutrition Program account in the amount of $_____, as of (date)_____.
- The item(s) described above meet(s) the definition of equipment in 2 CFR 200.313.
- The SFA will fulfill the conditions for use and disposal of the property in accordance with 2 CFR 200.313.
- Procurement regulations in 2 CFR Part 200 Subpart D will be followed, including but not limited to ensuring:
  - Free and Open Competition
  - Compliance with written standards of conduct for procurement
  - Proper procurement procedures for informal and formal purchases are followed
- All supporting documentation will be maintained on file for review in accordance with program regulations, including documentation of the procurement process, written approval of the purchase(s) and receipt(s) for the equipment purchased.
- All information provided in this request for use of the non-profit School Food Service (SFS) account in the purchase of equipment is true and correct to the best of my knowledge.
- I understand that it is the institution/sponsor's responsibility to comply with all applicable Federal, State and local laws, regulations and/or policies regarding procurement, inventory, and disposal of items purchased with United States Department of Agriculture, Child Nutrition Program funds.
- I certify that if approved, I will provide the State agency with documentation demonstrating that equipment was purchased with SFS funds in accordance with regulations, upon request.

Signature of Authorized Representative_____ **Date** _____

STATE AGENCY PRE-APPROVED EQUIPMENT (Revised 1/25/2024)

Technology/Hardware/Software	**Food Serving Equipment**
Software/Programs for Management (Inventory/Point of Service/Benefit Issuance) Cashier Station/Cash Register Point of Sale Equipment Refrigerator/Freezer Temperature Monitoring System	Sneeze Guard Salad Bar/Free-Standing or Self-Serve Serving Line: Hot/Cold/Stationary/Mobile Serving Counter: Stationary/Mobile Vending Machine (Used for Reimbursable Meals)
Cooking Equipment	**Storage and Transport**
Commercial Range Oven/Combi Oven Oven-Rethermalization and Holding Pizza Oven Tilting Skillet (Braising) Kettle Steamer Broiler/Salamander Grill/Griddle	Freezer: Reach-In, Chest Refrigerator/Cooler: Reach-in/Under counter/Mobile Coolers: Beverage/Milk/Merchandiser/Display Case Cart: Hot/Cold Mobile Cabinet: Hot/Cold Holding; Mobile/Transport Storage Racks/Shelves for dry and refrigeration
Food Preparation	**Dishwashing/Sanitation/Cleaning**
Hood/Vent (Exhaust Hood, Systems) Hood Fire Suppression System Ice Machine for kitchen only Blast or Tumble Chiller Food Processor Chopper/Grinder Slicer Mixer Blender Prep Sink Holding/Proofing Cabinet Processing/Packaging Machines Work/Prep Tables	In-Sink Food Disposal System (Garbage Disposal) Dishwashing Machine Booster Heater for kitchen Handwashing Sink 3 Compartment Sink

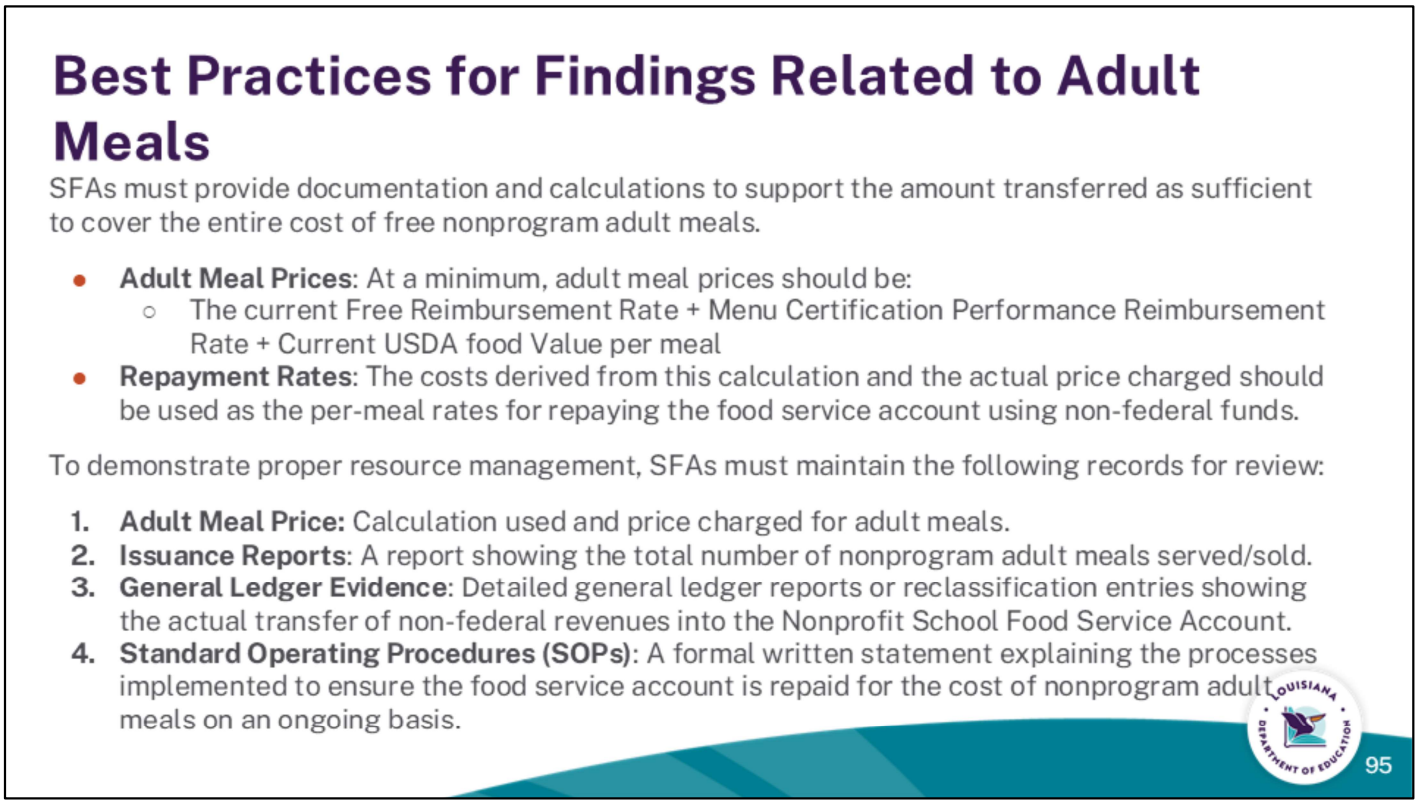
This is what the Equipment Purchase/Capital Expenditure Pre-Approval Request Form looks like as well as the Pre-Approved Equipment list.



With Adult Meals, the following errors were found on previous reviews:
Adult meals are not tracked or supplemented by the general fund.

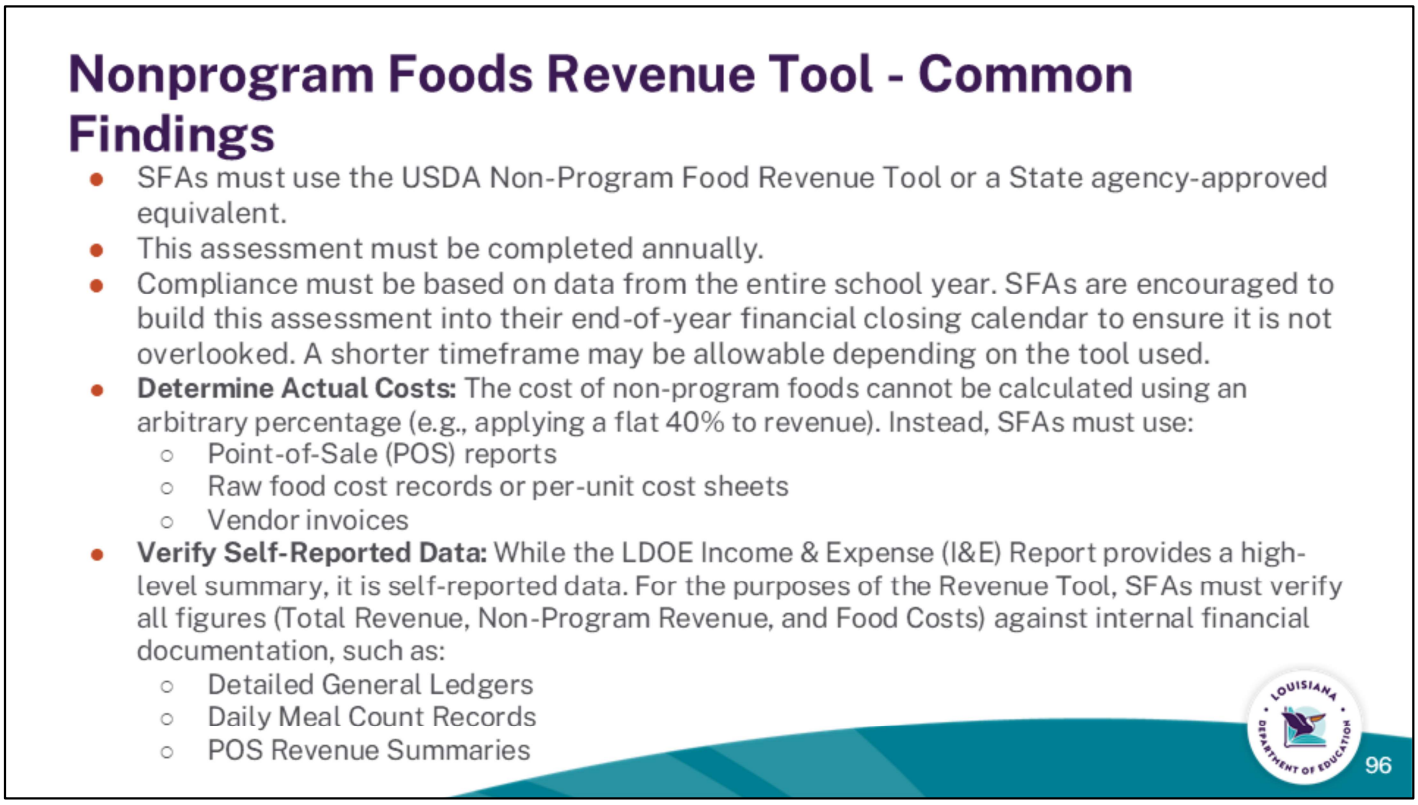
- No subsides: NSFSA cannot absorb the cost of free/discounted adult meals.
- Deficiency must be tracked, documented and covered by non-federal funds.

If you give your teachers free lunch or discounted price, the money to pay for that lunch cannot come from the federal meal reimbursement. You must move money from the general fund into the food service account to "buy" those meals back. While a general fund may absorb an overall program deficit, these funds must be explicitly identified as repayment for nonprogram adult meals rather than just a general subsidy. Non-federal funds used for adult meals must be identified separately on financial reports (such as the LDOE Income & Expenses Report) and distinct from funds used to supplement an overall program deficit.



SFAs must provide documentation and calculations to support the amount transferred as sufficient to cover the entire cost of free nonprogram adult meals.
Adult Meal Prices: At a minimum, adult meal prices should be the current Free Reimbursement Rate + Menu Certification Performance Reimbursement Rate + Current USDA food Value per meal. **Note:** We plan to add this calculation to the CNP application for the upcoming school year.
Repayment Rates: The costs derived from this calculation and the actual price charged should be used as the per-meal rates for repaying the food service account using non-federal funds.

To demonstrate proper resource management, SFAs must maintain the following records for review:
Adult Meal Price: Calculation used and price charged for adult meals.
Issuance Reports: A report showing the total number of nonprogram adult meals served/sold.
General Ledger Evidence: Detailed general ledger reports or reclassification entries showing the actual transfer of non-federal revenues into the Nonprofit School Food Service Account.
Standard Operating Procedures (SOPs): A formal written statement explaining the processes implemented to ensure the food service account is repaid for the cost of nonprogram adult meals on an ongoing basis.



SFAs must ensure that the revenue generated from the sale of non-program foods (a la carte items, adult meals, catering, vending, etc.) is at least equal to the proportion of total food costs attributed to those non-program foods. The purpose of this regulation is to ensure that federal reimbursement funds intended for children's reimbursable meals are not used to subsidize the sale of other food items.

SFAs must use the USDA Non-Program Food Revenue Tool or a State agency-approved equivalent.
This assessment must be completed annually.
Compliance must be based on data from the entire school year. SFAs are encouraged to build this assessment into their end-of-year financial closing calendar to ensure it is not overlooked. A shorter timeframe may be allowable depending on the tool used.
Determine Actual Costs: The cost of non-program foods cannot be calculated using an arbitrary percentage (e.g., applying a flat 40% to revenue). Instead, SFAs must use:

- Point-of-Sale (POS) reports
- Raw food cost records or per-unit cost sheets
- Vendor invoices

Verify Self-Reported Data: While the LDOE Income & Expense (I&E) Report provides a high-level summary, it is self-reported data. For the purposes of the Revenue Tool, SFAs must verify all figures (Total Revenue, Non-Program Revenue, and Food Costs) against internal financial documentation, such as:

- Detailed General Ledgers
- Daily Meal Count Records
- POS Revenue Summaries

Nonprogram Foods Revenue Guide

- Nonprogram foods include any non-reimbursable foods and beverages purchase using funds from the Nonprofit School Food Service Account.
- All revenue from the sale of nonprogram foods must be despoisted into the Nonprofit School Food Service Account.
- SFAs are required to determine if the percent of total revenue that is generated from nonprogram food sales is **equal to or greater than** the percent of total food costs attributable to the purchase of nonprogram foods.
- The USDA Nonprogram Food Revenue Tool must be completed annually to assess compliance.
- If the tool shows noncompliance, the SFA must increase nonprogram food revenue or transfer non-federal funds in the amount of the nonprogram revenue shortfall.

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All revenue from the sale of nonprogram foods must be despoisted into the Nonprofit School Food Service Account.
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The USDA Nonprogram Food Revenue Tool must be completed annually to assess compliance.
If the tool shows noncompliance, the SFA must increase nonprogram food revenue or transfer non-federal funds in the amount of the nonprogram revenue shortfall.

Nonprogram Foods Revenue Tool - USDA

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	$ -	

Nonprogram Foods Revenue Tool Calculations - CNR

Reference Period:

Average Per-Meal Breakfast Cost	
Average Per-Meal Lunch Cost	

Nonprogram Food Cost			
Item	Quantity Sold	Per-Unit/Per-Meal Cost	Total Cost
Total Nonprogram Food Cost			$ -

Nonprogram Food Revenue			
Item	Quantity Sold	Per-Unit/Per-Meal Price	Total Revenue
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
			$ -
Total Nonprogram Food Revenue			$ -

Program Food Cost			
Item	Quantity Sold	Per-Unit/Per-Meal Cost	Total Cost
Student Breakfast			$ -
Student Lunch			$ -
Total Program Food Cost			$ -

Program Food Revenue			
Item	Quantity Sold	Reimbursement Rate	Total Revenue
Free Student Breakfast	0		$ -
Free Student Lunch	0		$ -
Total Program Food Revenue			$ -

Nonprogram Food Revenue	$ -
/ Total Revenue	$ -
= Revenue Ratio	#DIV/0!

Nonprogram Food Cost	$ -
/ Total Food Cost	$ -
= Food Cost Ratio	#DIV/0!

Nonprogram Foods Revenue Best Practices

If the annual assessment reveals that non-program revenue is **not** meeting the required proportion, the SFA must take immediate corrective action. Potential strategies include:

- Increasing prices for a la carte items and adult meals.
- Lowering the production costs of non-program items.
- Directly transferring non-federal funds into the Nonprofit School Food Service Account (NPSFSA) to cover the shortfall.

Common Pitfalls to Avoid

- Using a "rule of thumb" percentage to guess food costs instead of using actual invoice data.
- Failing to save the POS reports or invoices used to fill out the USDA Tool; if it isn't documented, it didn't happen during an audit.
- Waiting for an Administrative Review to complete the tool rather than doing it annually as part of standard financial health checks.

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- Increasing prices for a la carte items and adult meals.
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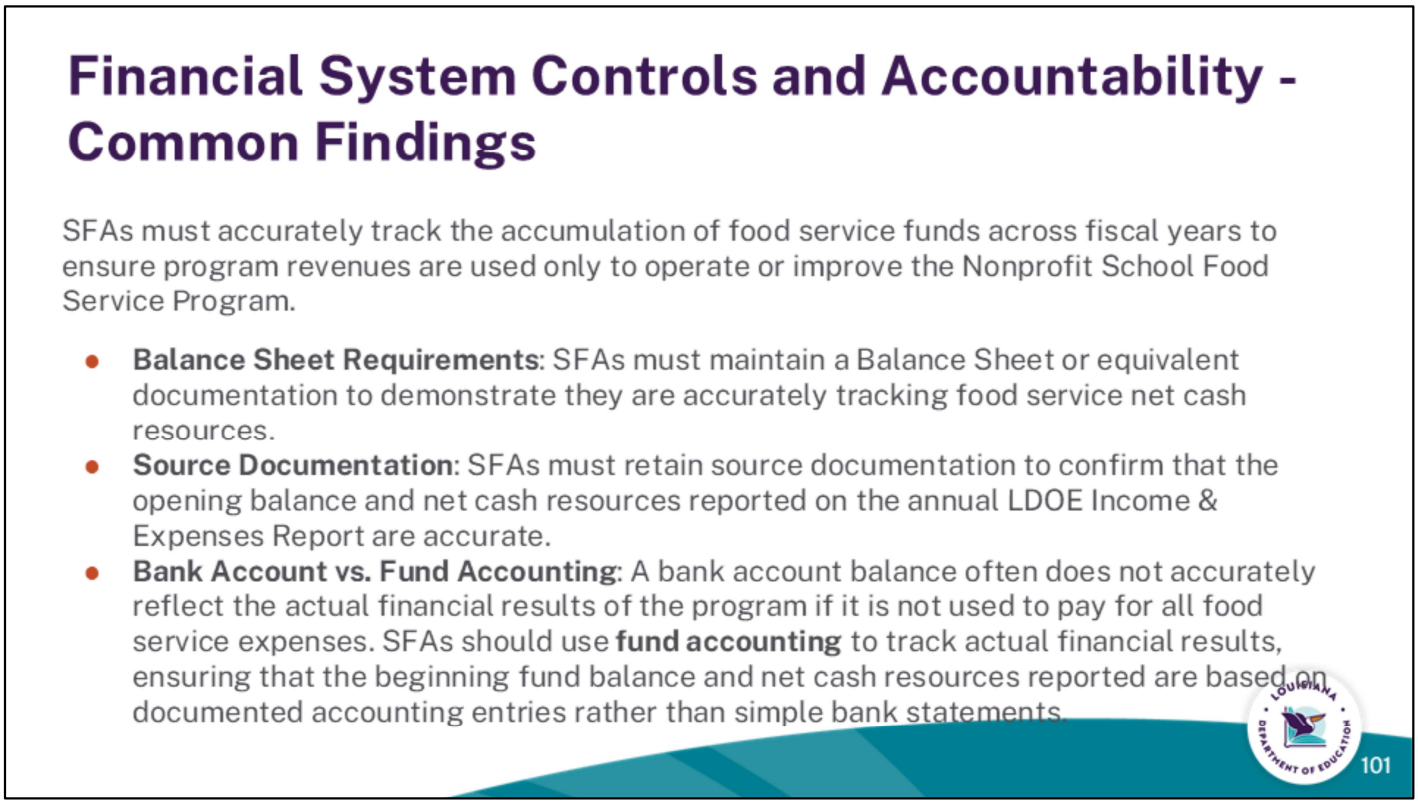


Per **2 CFR 200.302(b)**, every SFA must maintain a financial management system that provides accurate, current, and complete disclosure of the financial results of the federal award. SFAs are required to maintain effective control over, and accountability for, all funds, property, and other assets to ensure they are used solely for authorized purposes.

SFAs must accurately track the accumulation of food service funds across fiscal years to ensure program revenues are used only to operate or improve the Nonprofit School Food Service program.
Balance Sheet Requirements: SFAs must maintain a Balance Sheet or equivalent documentation to demonstrate they are accurately tracking food service net cash resources.
Source Documentation: SFAs must retain source documentation to confirm that the opening balance and net cash resources reported on the annual LDOE Income & Expenses Report are accurate.
Bank Account vs. Fund Accounting: A bank account balance often does not accurately reflect the actual financial results of the program if it is not used to pay for all food service expenses. SFAs should use fund accounting to track actual financial results, ensuring that the beginning fund balance and net cash resources reported are based on documented accounting entries rather than simple bank statements.

Recording and Reconciling Revenues

Include in your Income (on I&E):

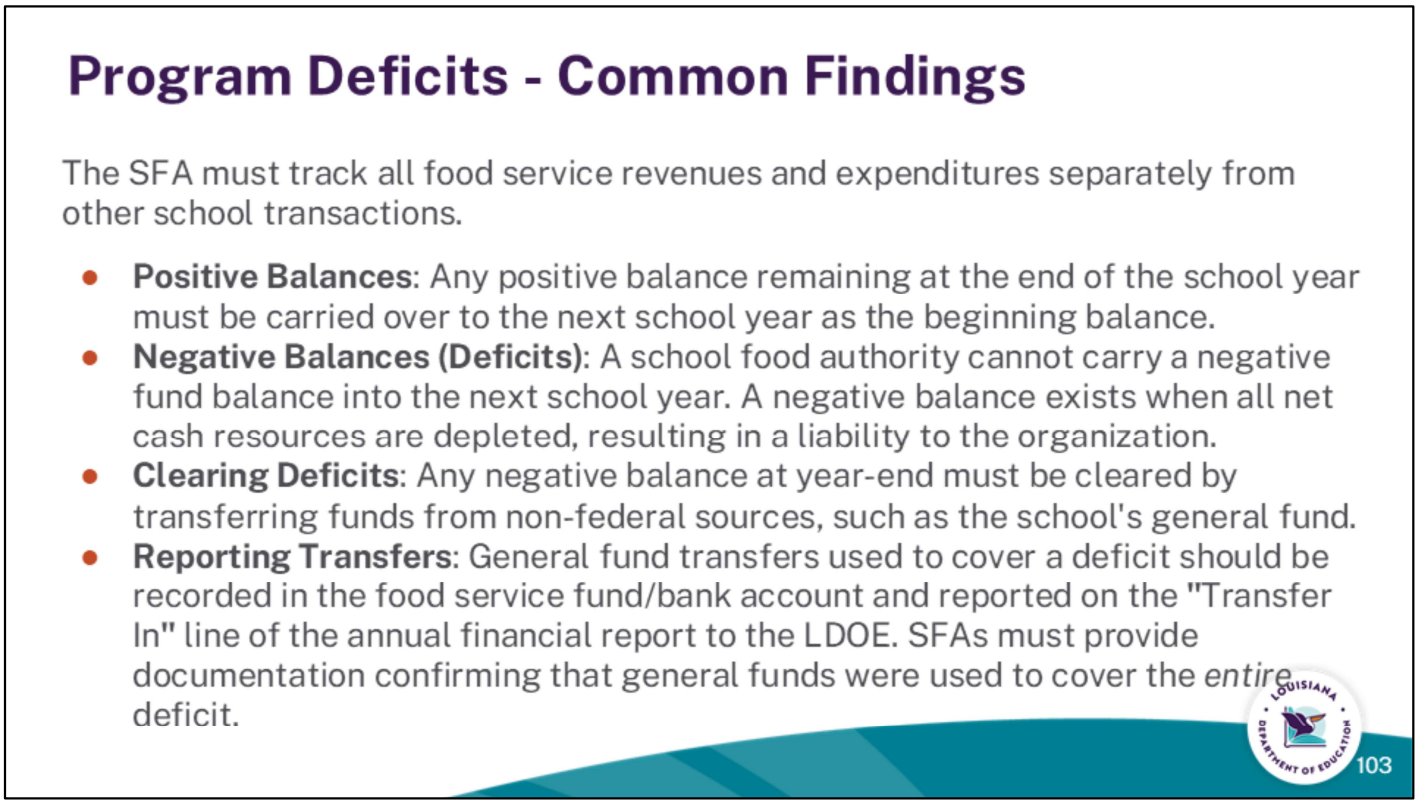
- Prior Year End-Of Year Balance (6/30)
- Federal Reimbursement
- Value of Commodities/CIL
- MFP (and any transfer over required MFP)
- Payments from Meals
- Non-Program Revenue
- HB Act 305 (Reduced copay)

Do not include:

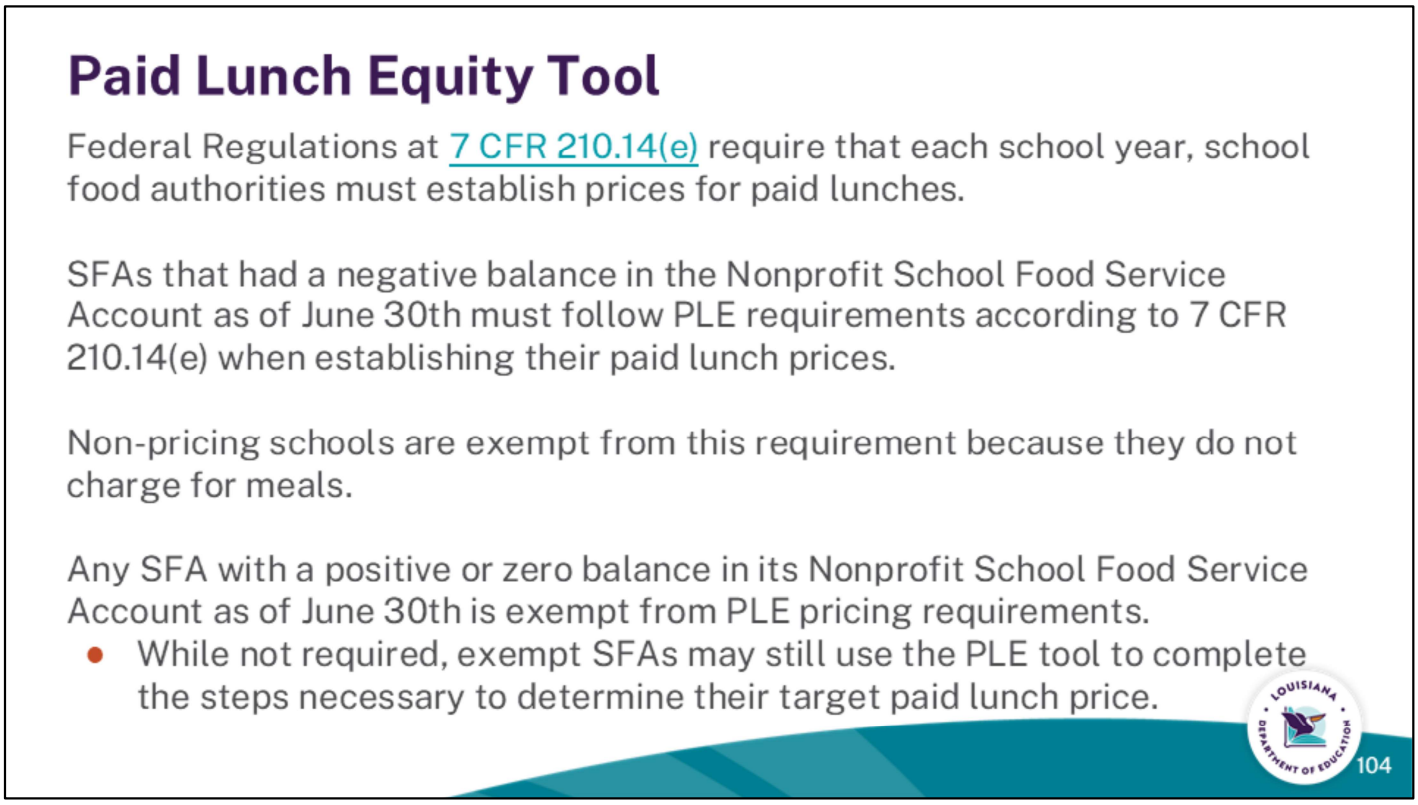
- SFSP
- CACFP At-Risk

Sponsors participating in the National School Lunch Program (NSLP) are required to submit an accurate LDOE Income & Expenses Report (LDOE I&E Report) to the State agency each year. The LDOE I&E Report is essential for ensuring the proper use of Nonprofit School Food Service funds and for providing transparency regarding program operations. Inaccurate reporting can compromise program oversight and may misrepresent the financial status of the food service account.

It is strongly recommended that the Sponsor establish separate revenue and expense accounting codes for SFSP and CACFP transactions to ensure they are tracked separately from SBP and NSLP activity in the detailed general ledger and can be accurately monitored and reported.



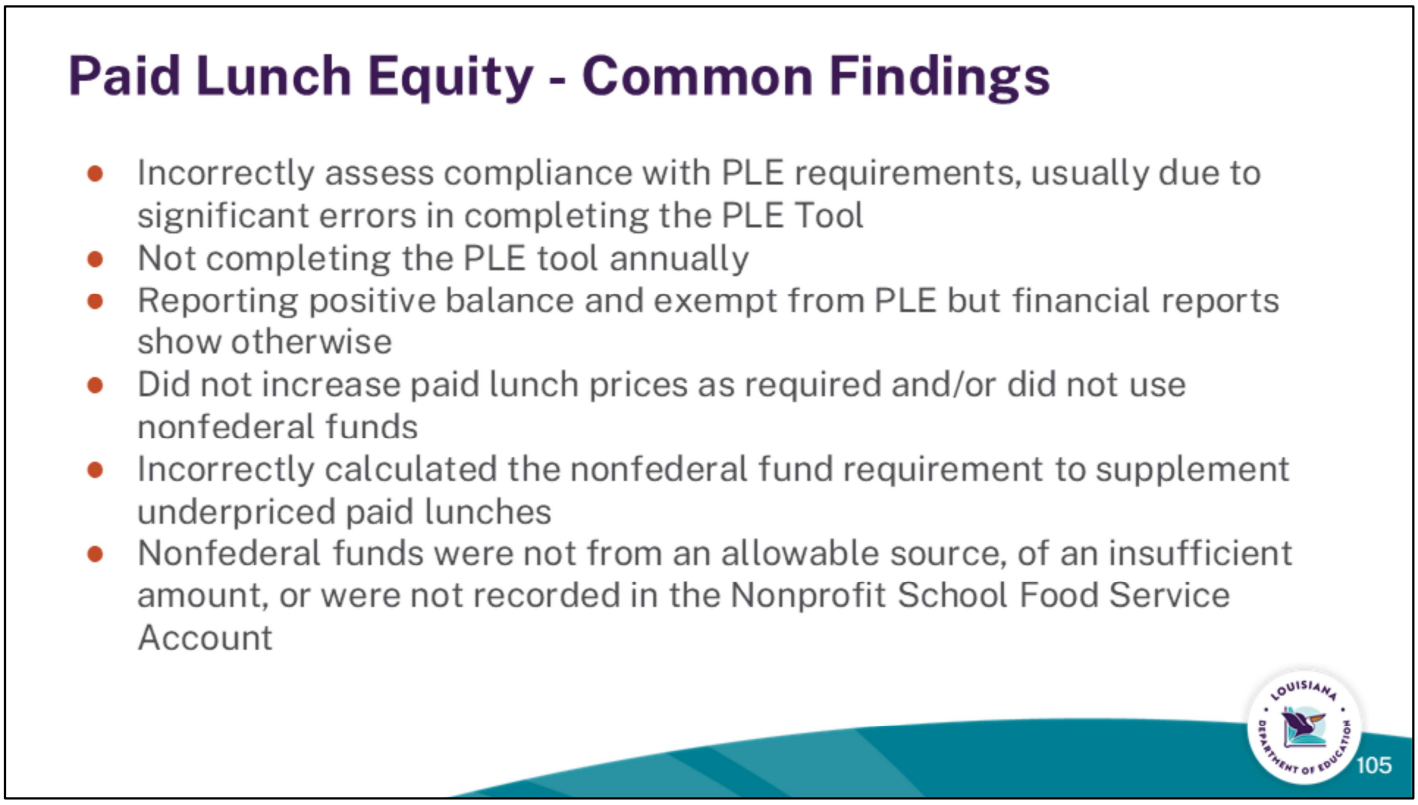
The SFA must track all food service revenues and expenditures separately from other school transactions.
Positive Balances: Any positive balance remaining at the end of the school year must be carried over to the next school year as the beginning balance.
Negative Balances (Deficits): A school food authority cannot carry a negative fund balance into the next school year. A negative balance exists when all net cash resources are depleted, resulting in a liability to the organization.
Clearing Deficits: Any negative balance at year-end must be cleared by transferring funds from non-federal sources, such as the school's general fund.
Reporting Transfers: General fund transfers used to cover a deficit should be recorded in the food service fund/bank account and reported on the "Transfer In" line of the annual financial report to the LDOE. SFAs must provide documentation confirming that general funds were used to cover the entire deficit.



Federal Regulations at 7 CFR 210.14(e) require that each school year, school food authorities must establish prices for paid lunches. SFAs that had a negative balance in the Nonprofit School Food Service Account as of June 30th must follow PLE requirements according to 7 CFR 210.14(e) when establishing their paid lunch prices. This means the PLE tool must be completed annually.

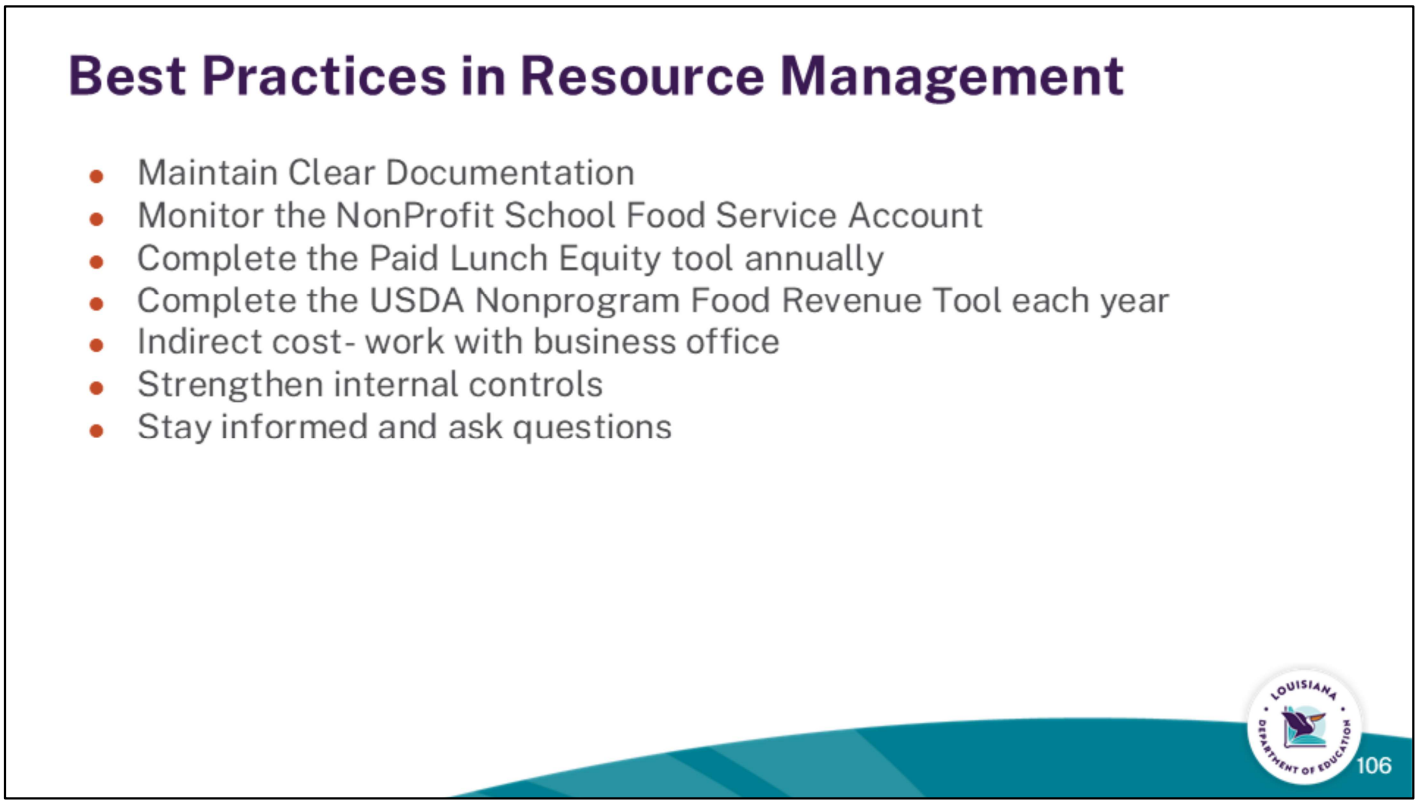
Non-pricing schools are exempt from this requirement because they do not charge for meals.

Any SFA with a positive or zero balance in its Nonprofit School Food Service Account as of June 30th is exempt from PLE pricing requirements. While not required, exempt SFAs may still use the PLE tool to complete the steps necessary to determine their target paid lunch price.



For Paid Lunch Equity, the following errors were found on previous reviews:

- Incorrectly assess compliance with PLE requirements, usually due to significant errors in completing the PLE Tool
- The SFA is not completing the PLE Tool annually
- SFA is not completing they PLE tool because they are reporting they are exempt due to a positive balance but the financial reports are showing otherwise so they are not exempt
- The SFA did not increase paid lunch prices as required and/or did not use nonfederal funds
- Incorrectly calculated the nonfederal fund requirement to supplement underpriced paid lunches
- Nonfederal funds were not from an allowable source, of an insufficient amount, or were not recorded in the NPSFSA. If PLE tool is completed and the district is going to use non federal funds because they didn't want to raise prices then that transfer needs to be reflected in the non profit account.



Listed on the screen you will see some best practices for Resource management compliance.
In order to maintain clear and documentation you need to keep invoices, receipts and financial reports, they should be organized by food labor, supplies, indirect cost, etc. Use a binder or digital folder with labels for each of the resource management sections.
You should review balances monthly to ensure they don't exceed the 3 month operating balance or if they do this will help you keep track on how much you will have to spend if you need to buy equipment for you cafeterias. Make sure to verify that costs are reasonable, necessary and allowable.
Complete tools like the PLE and Nonprogram Food revenue tool each year. Set adult meal charges and a la carte prices to cover both food and labor/overhead cost. This prices should be looked at yearly especially since the price of food has increased significantly.
Work with your business office to ensure any indirect cost charges are using the State approved rate, keep the documentation showing how the charges were calculated. Make sure you are not being double charged for the same cost.
In order to strengthen internal controls, separate out duties when possible (cross training staff can be a little labor intensive at first but it will free you up later). Reconcile bank statements and financial reports regularly. This might take you working with the business office on this because this might be a role they fill for the district.
Review USDA and State agency guidance regularly, come to training if they are offered. This will help you keep up with the changes as they come out.
Never guess, contact the State agency if your unsure about charging or documenting an expense.
Always think to yourself "Can I explain this cost and show proof it was necessary for the

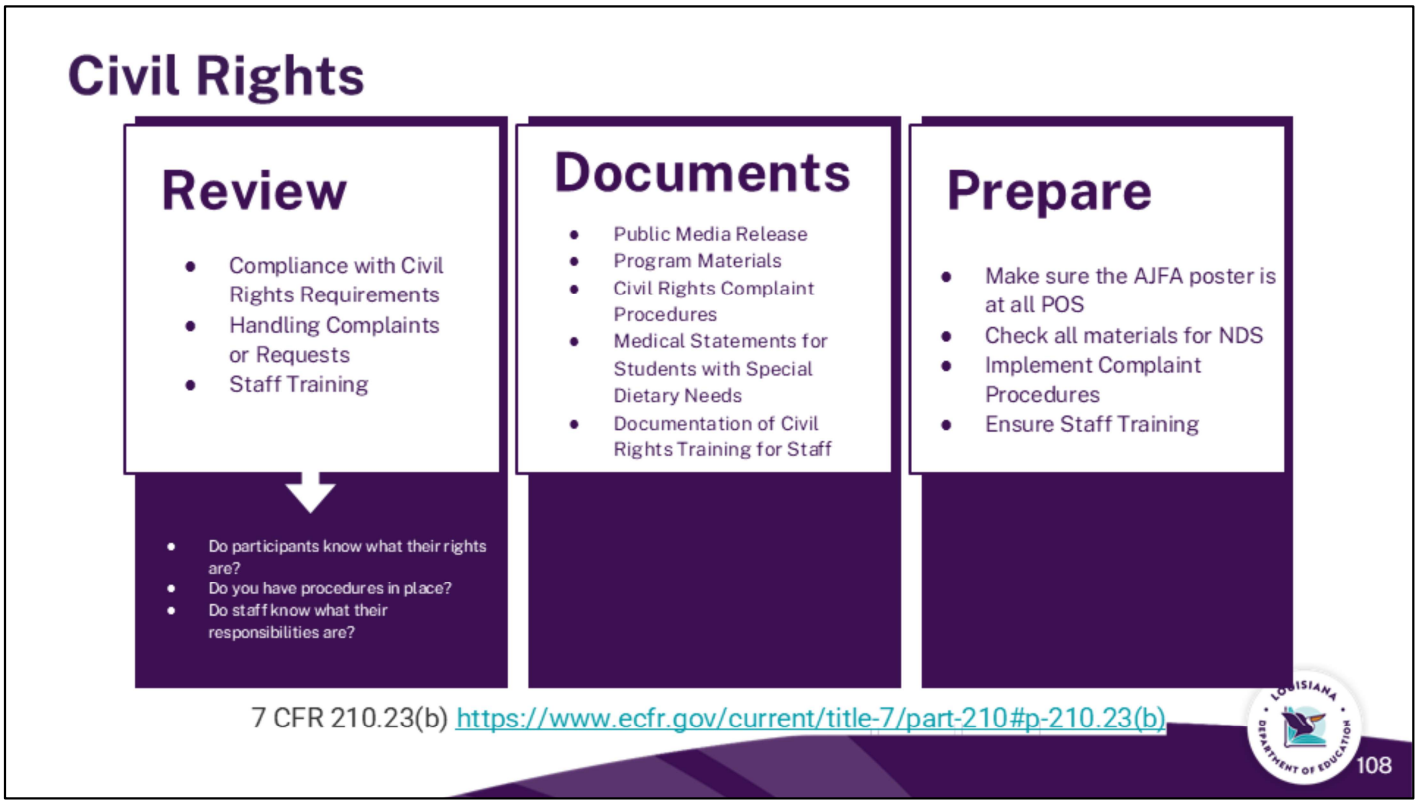
school meal program”.

General Areas

Civil Rights, SFA On-Site Monitoring, Local School Wellness Policy, Smart Snacks, Professional Standards, Water Availability, Food Safety, Storage, Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Slide 107

4 @kylee.champagne@la.gov
You will present the general areas sections (Civil Rights, SFA On-Site Monitoring, Local School Wellness Policy, Smart Snacks, Professional Standards, Water Availability, Food Safety, Storage, Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach)
Misty Woods, 4/13/2026



Civil Rights
In this section, Compliance with Civil Rights Requirements, Handling Complaints or Requests and Staff Training will be reviewed.

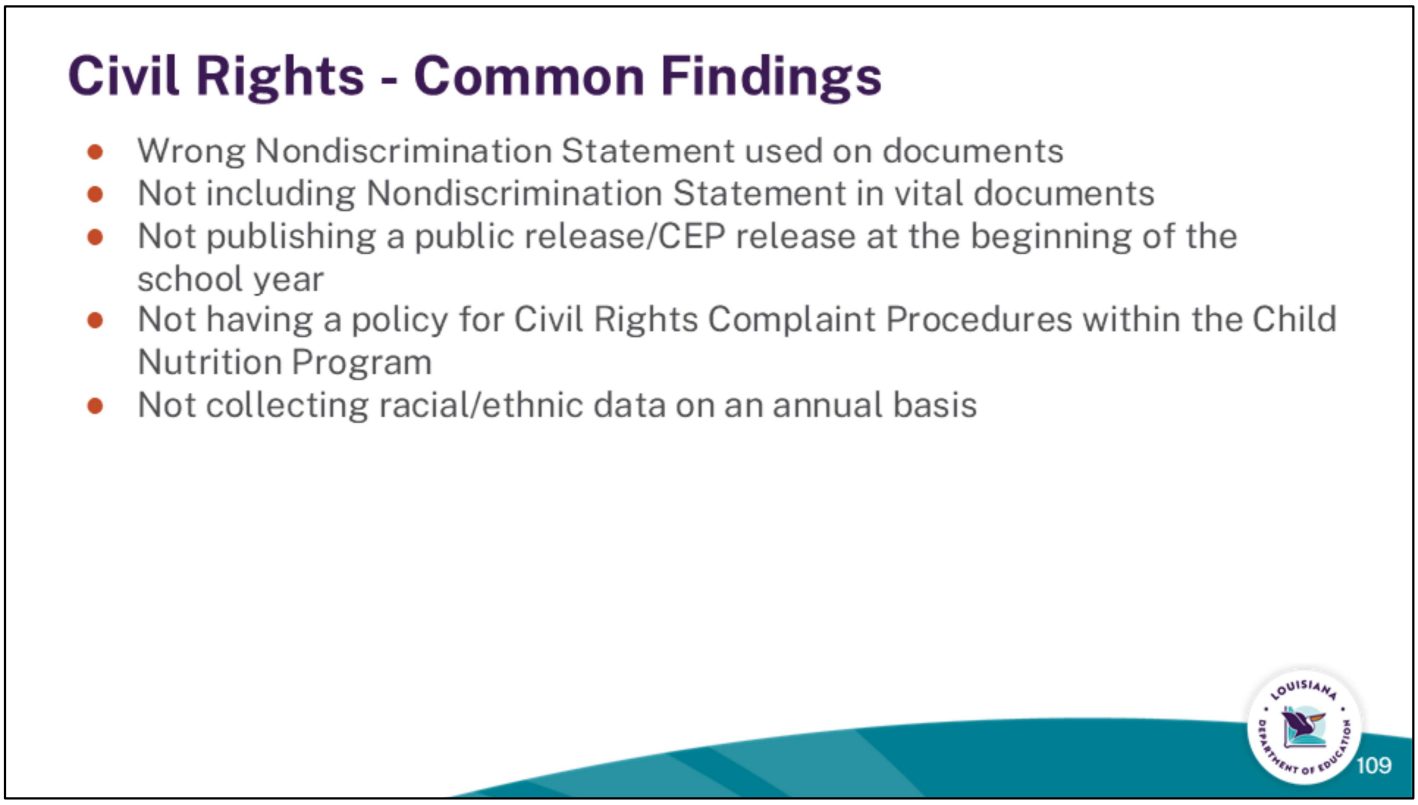
- Do participants know what their rights are?
- Do you have procedures in place?
- Do staff know what their responsibilities are?

Documents Needed:

- Public Media Release
- Program Materials
- Civil Rights Complaint Procedures
- Medical Statements for Students with Special Dietary Needs
- Documentation of Civil Rights Training for Staff

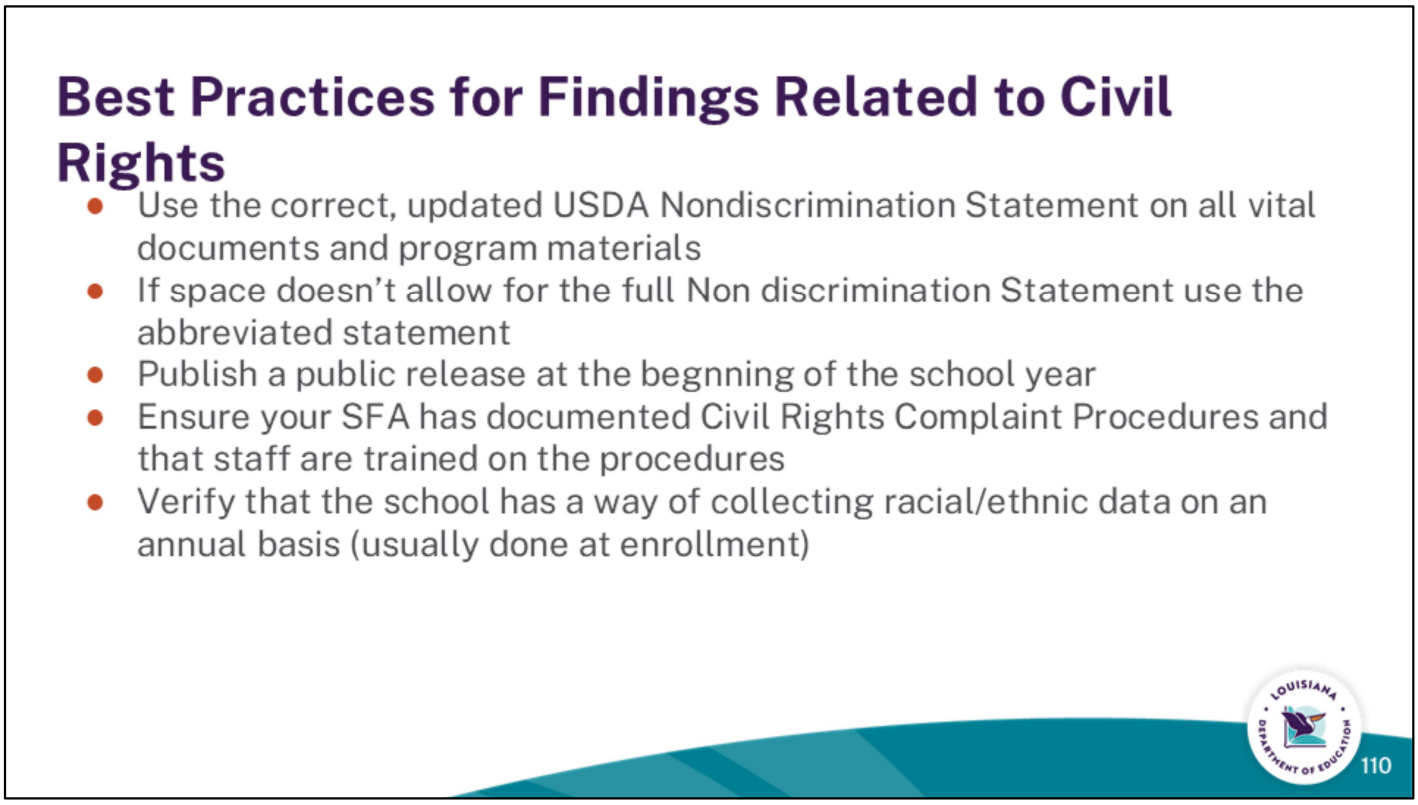
How to Prepare:

- Make sure the And Justice For All poster is at all POS
- Check all materials for Non-Discrimination Statement
- Implement Complaint Procedures
- Ensure Staff Training



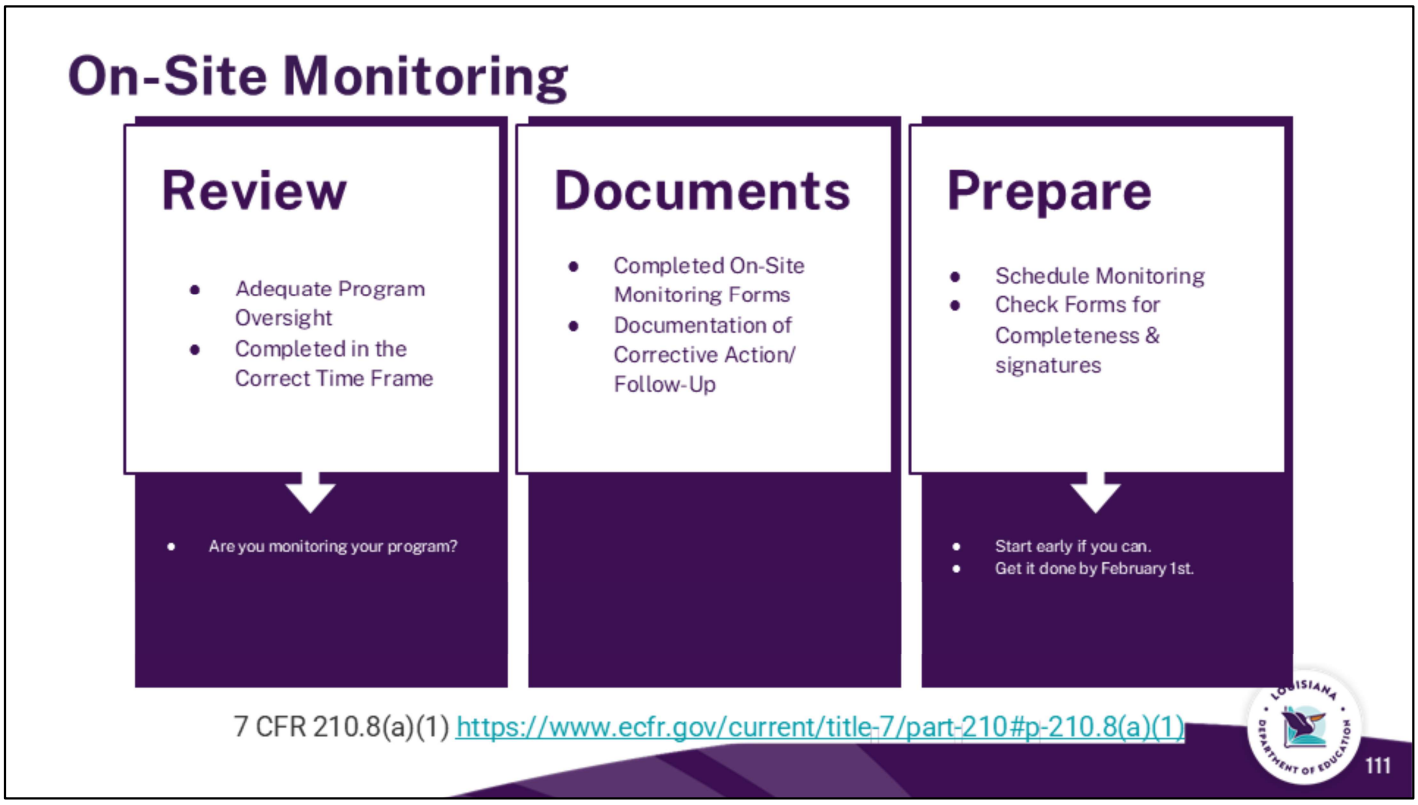
Under Civil Rights, the following errors were found on previous reviews:

- Wrong Nondiscrimination statement used on documents
- Not including nondiscrimination statement in vital documents
- Not publishing a public release/CEP release at the beginning of the school year
- Not having a policy for Civil Rights Complaint Procedures within the Child Nutrition Program
- Not collecting racial/ethnic data on an annual basis



Some best practices for addressing errors within the Civil Rights section of the AR:

- Use the correct, updated USDA Nondiscrimination Statement on all vital documents and program materials
- If space doesn't allow for the full non discrimination statement then use the abbreviated statement.
- Publish a public release/CEP release at the beginning of the school year
- Ensure your SFA has documented Civil Rights Complaint Procedures and that staff are trained on the procedures
- Verify that the school has a way of collecting racial/ethnic data on an annual basis (usually done at enrollment



Monitoring
In this section, Adequate Program Oversight and Completed in the Correct Time Frame is reviewed.

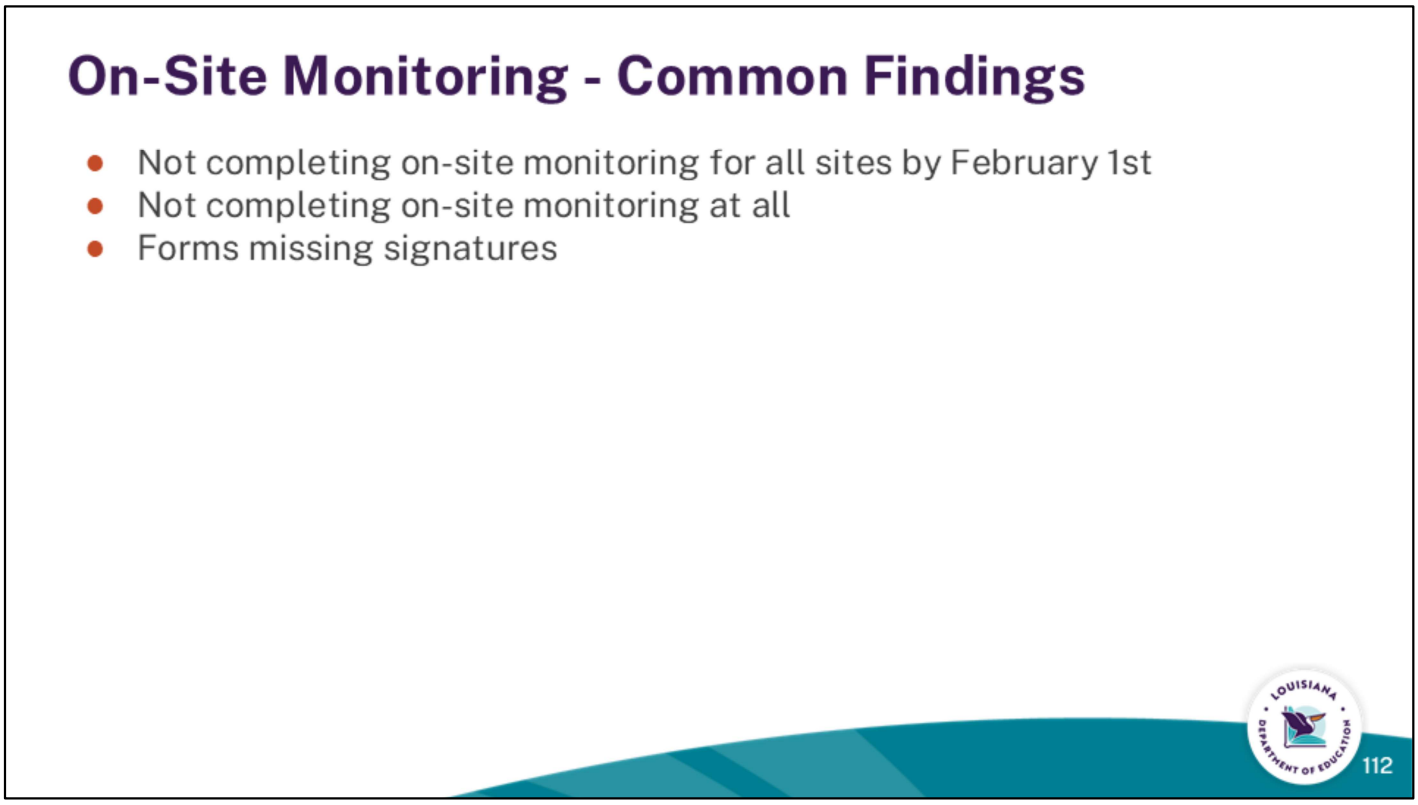
- Are you monitoring your program?

Documents Needed:

- Completed On-Site Monitoring Forms
- Documentation of Corrective Action/ Follow-Up

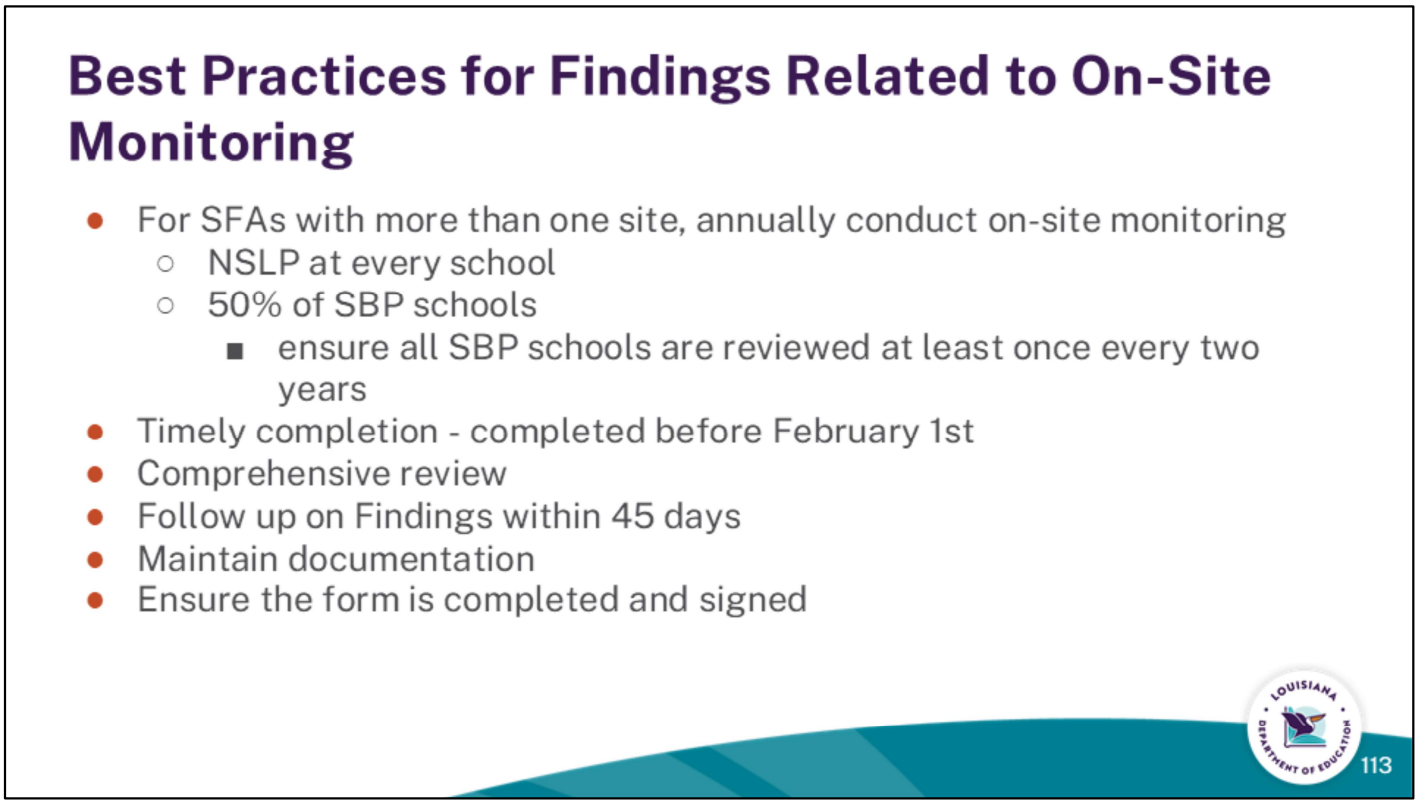
How to Prepare:

- Schedule Monitoring - Start early if you can. Get it done by February 1st.
- Check Forms for Completeness & signatures



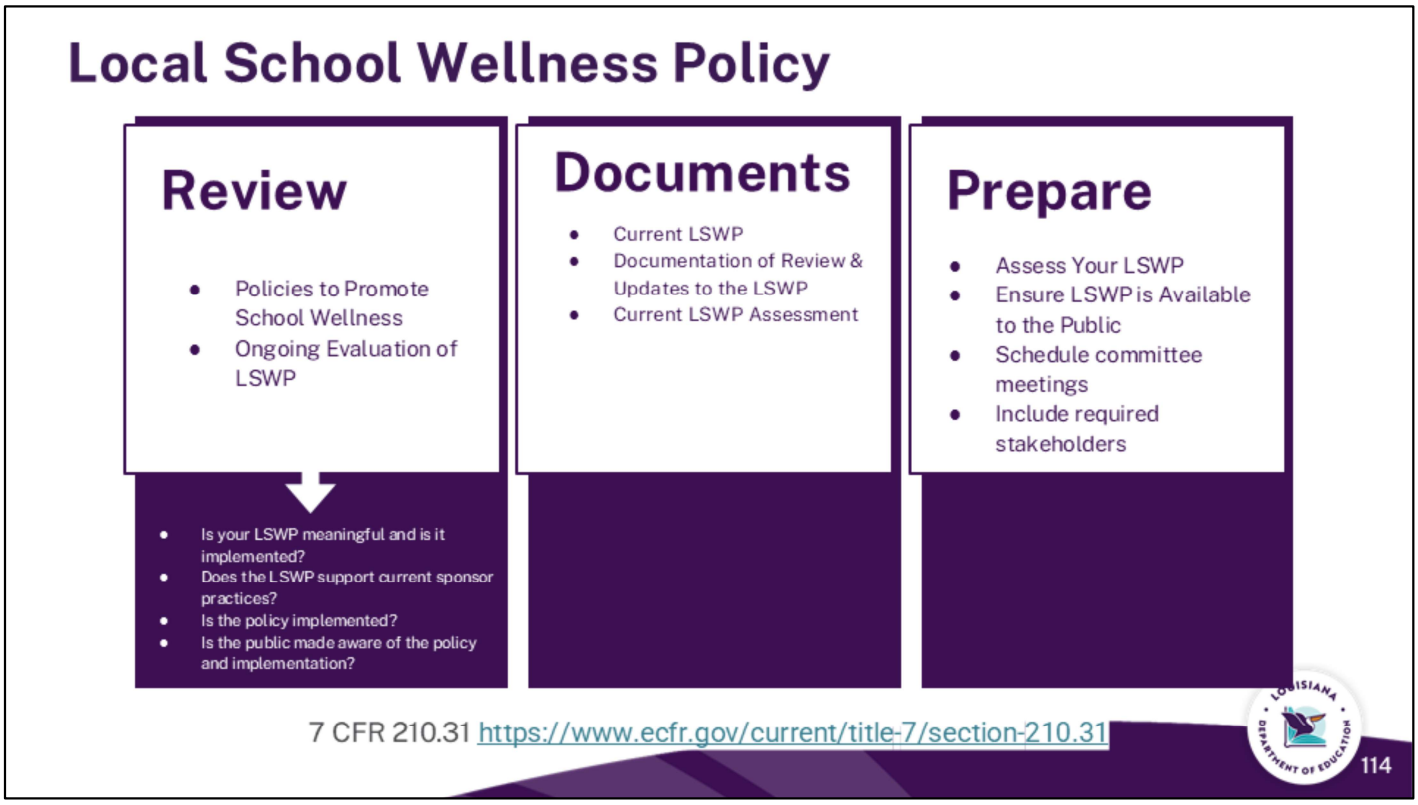
Under On-Site Monitoring, the following errors were found on previous reviews:

- Not completing on-site monitoring for all sites by February 1st
- Not completing on-site monitoring at all
- Forms missing signatures



Some best practices for addressing errors within the On-Site Monitoring section of the AR:

For SFAs with more than one site, conduct on-site monitoring for the National School Lunch Program (NSLP) at every school and for 50% of School Breakfast Program (SBP) schools annually, ensuring all schools with SBP are reviewed at least once every two years.
All monitoring reviews should be completed before February 1st.
If monitoring reveals issues the SFA should ensure corrective action is implemented within 45 days to confirm that corrective action resolves the problems.
Like many other findings always maintain documentation to include the date, findings, corrective action taken and any follow up activities.
Lastly, ensure the form is completed and signed



Local School Wellness Policy
In this section, Policies to Promote School Wellness and Ongoing Evaluation of LSWP is reviewed.

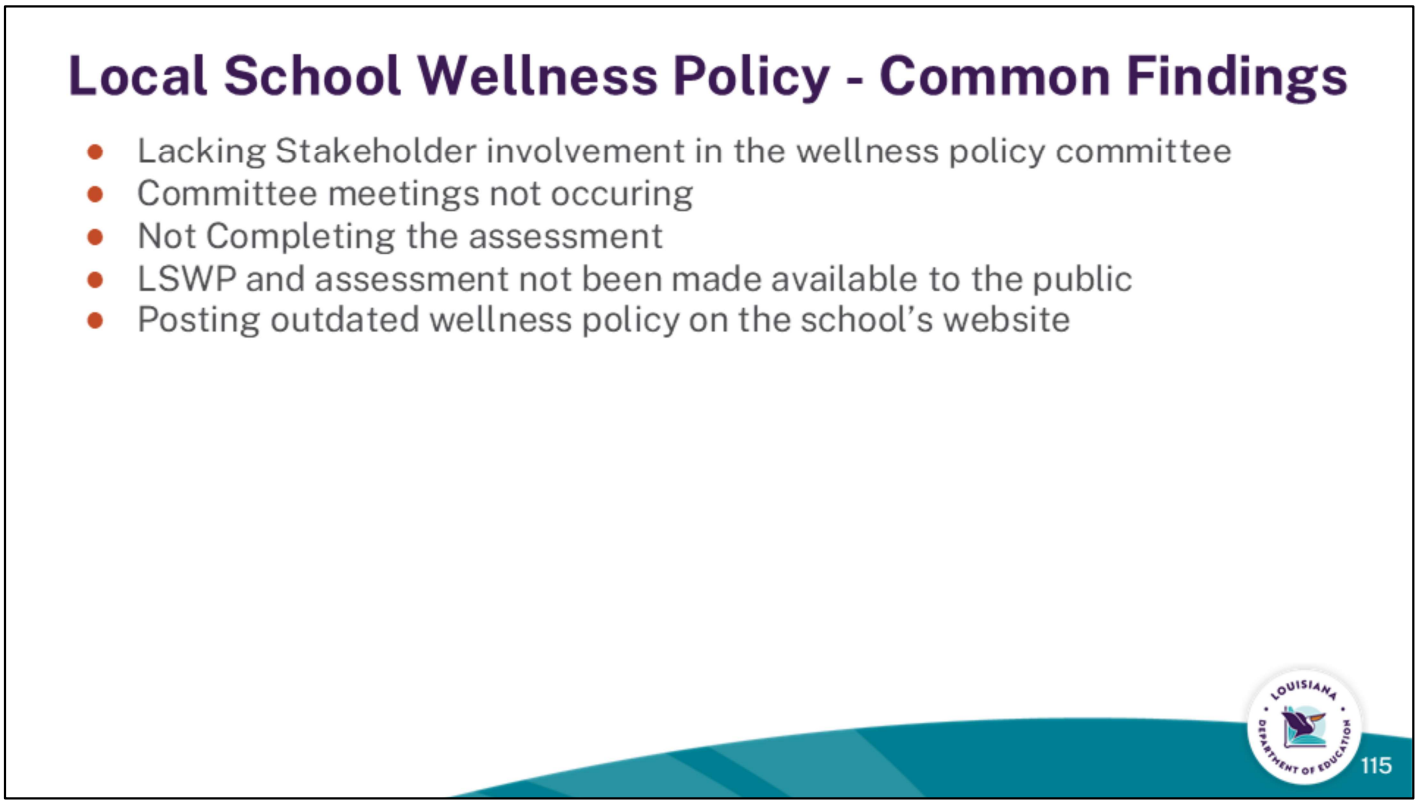
- Is your LSWP meaningful and is it implemented?
- Does the LSWP support current sponsor practices?
- Is the policy implemented?
- Is the public made aware of the policy and implementation?

Documents Needed:

- Current LSWP
- Documentation of Review & Updates to the LSWP
- Current LSWP Assessment

How to Prepare:

- Assess Your LSWP
- Ensure LSWP is Available to the Public
- Schedule committee meetings
- Include the required stakeholders



Under Local School Wellness Policy, the following errors were found on previous reviews:

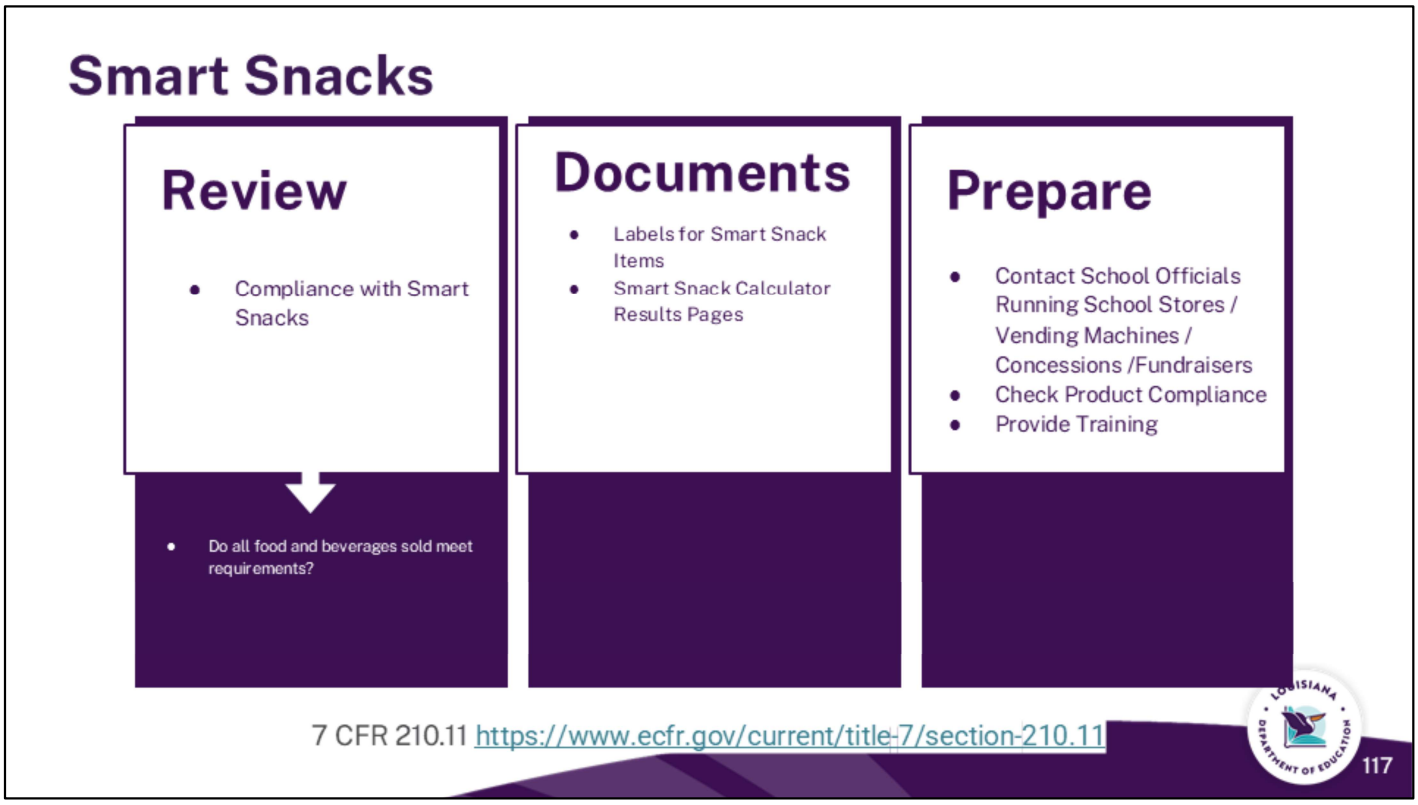
- Lacking Stakeholder involvement in the wellness policy committee
- Committee meetings not occuring
- Not completing the assessment
- LSWP and assessment not been made available to the public
- Posting outdated wellness policy on the school's website

Some best practices for addressing errors within the Local Wellness Policy section of the AR:

Establish a Wellness committee that actively involve a diverse group of stakeholders, including parents, students, SFA representatives and school health professionals and the general public in developing, implementing and reviewing the wellness policy.
Annually inform and update the public about the content, implementation, and assessment of the wellness policy. This ensures transparency and community involvement.

Triennial Assessment is a formal assessment of the wellness policy every three years. This assessment should evaluate compliance with the policy, compare it to model policies, and measure progress toward goals. Once you have completed your triennial assessment make the wellness policy and the assessment available to the public on your SFA's website and other communication channels ensuring the policy is easy to find.

Lastly, keep your website current and updated with the approved wellness policy.
Two resources to use are:
Federal Regulations at 7 CFR 210.31 https://www.ecfr.gov/current/title-7/section-210.31
USDA's Local School Wellness Policies https://www.fns.usda.gov/tn/wellness-policy



Smart Snacks
In this section, Compliance with Smart Snacks is reviewed.

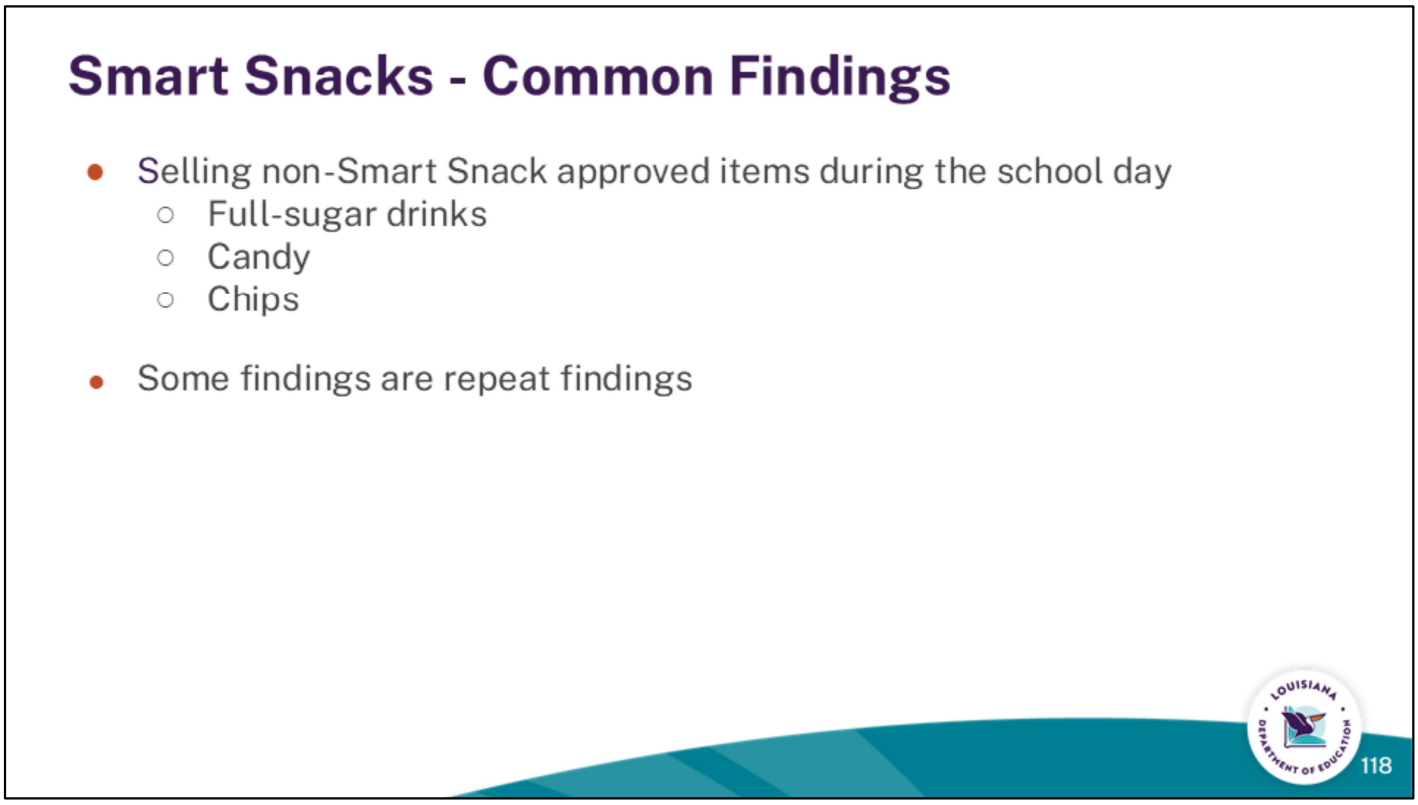
- Do all food and beverages sold meet requirements?

Documents Needed:

- Labels for Smart Snack Items
- Smart Snack Calculator Results Pages

How to Prepare:

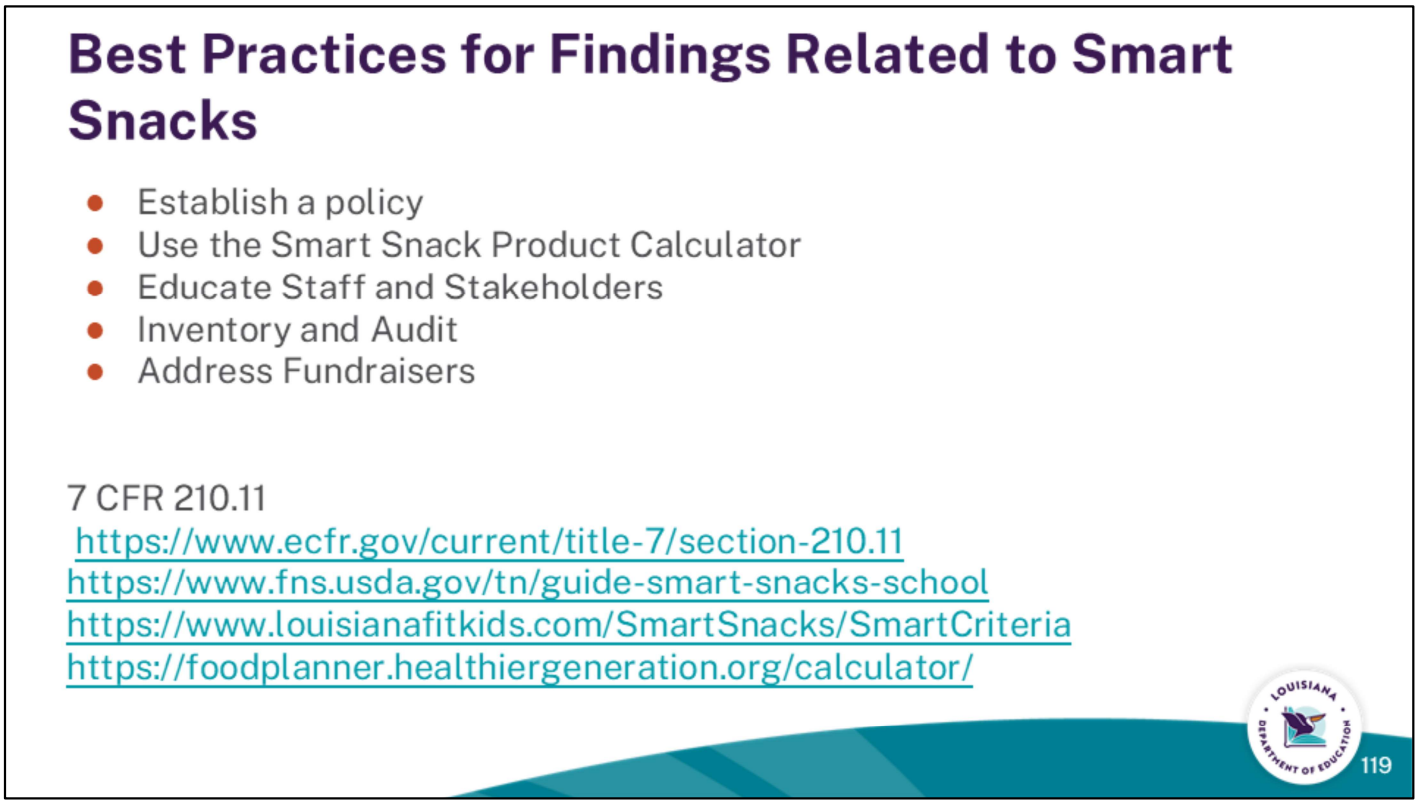
- Contact School Officials Running School Stores/Vending Machines/Concessions/Fundraisers, etc.
- Check Product Compliance
- Provide training



Under Smart Snacks, the following errors were found on previous reviews:

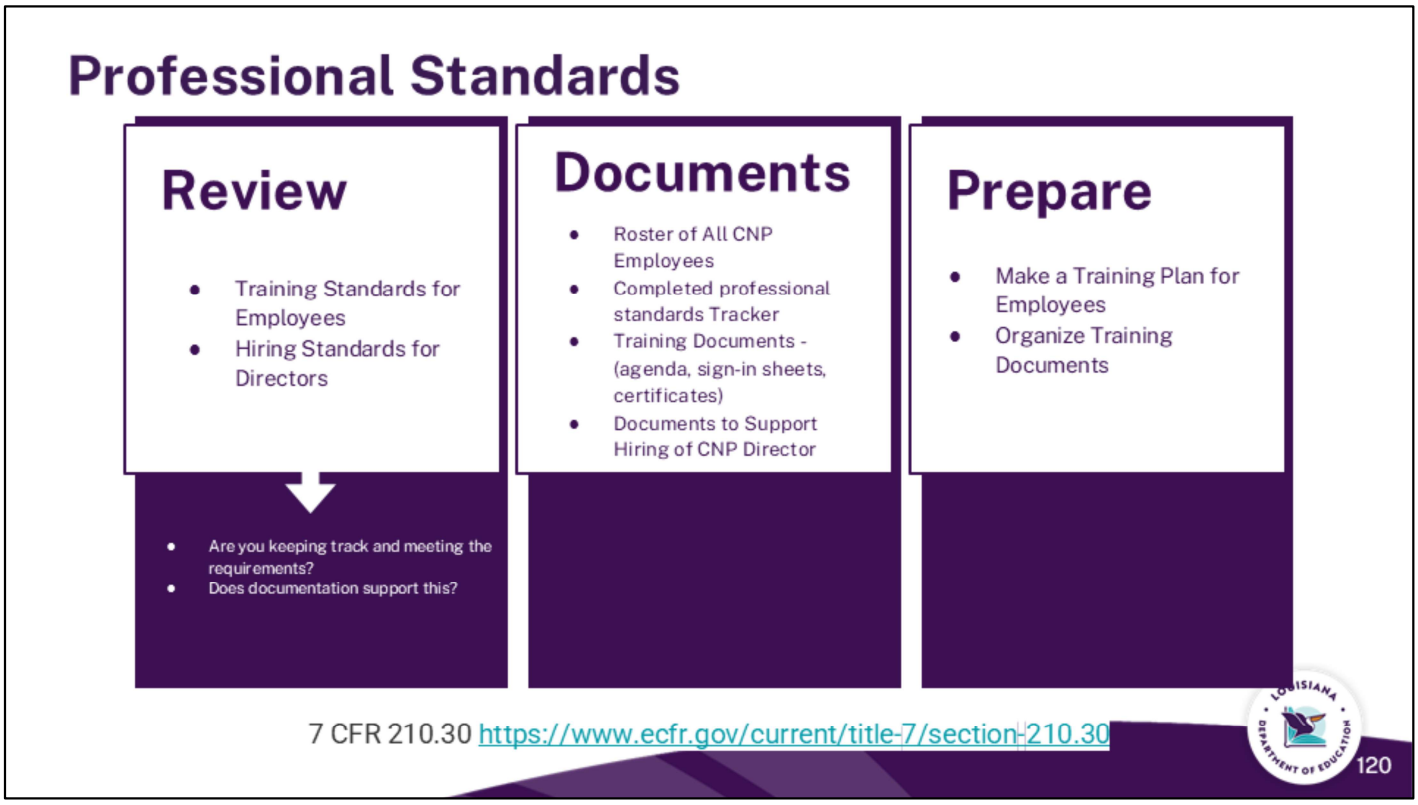
- Selling non-Smart Snack approved items during the school day
  - full-sugar drinks, candy and chips

Some findings found on reviews are repeat findings.



Some best practices to be in compliance with Smart snacks are to establish a written policy for all foods sold on campus during the school day, include items sold a la carte, in vending machines and in student concessions. The school day is defined as midnight until 30 minutes after the end of the school day.
Ensure the policy is shared with all relevant staff, students, and parents.
For any packaged foods, use the USDA's Smart Snacks Product Calculator to verify that they meet the calorie, sodium, fat, and sugar limits before they are sold.Train all school staff, particularly those involved in sales, on the Smart Snacks standards. Inform parents and students about the regulations to help them understand why certain items are no longer available during the school day.
Conduct a full inventory of all foods and beverages currently sold on school grounds during the school day. Eliminate all non-compliant items and replace them with options that meet the standards. Negotiate with vendors to increase the availability of compliant snacks.
The state agency does not allow exemptions for fundraisers. All fundraisers selling foods on campus during the school day must be compliant.

Some resources resources to use are:
Federal Regulations 7 CFR 210.11 https://www.ecfr.gov/current/title-7/section-210.11
USDA: A Guide to Smart Snacks in School
PBRC/LDOE: Louisiana Smart Snacks Meeting Recommended Criteria
Alliance for a Healthier Generation: Smart Snacks Product Calculator



Professional Standards

In this section,Training Standards for Employees and Hiring Standards for Directors will be reviewed.

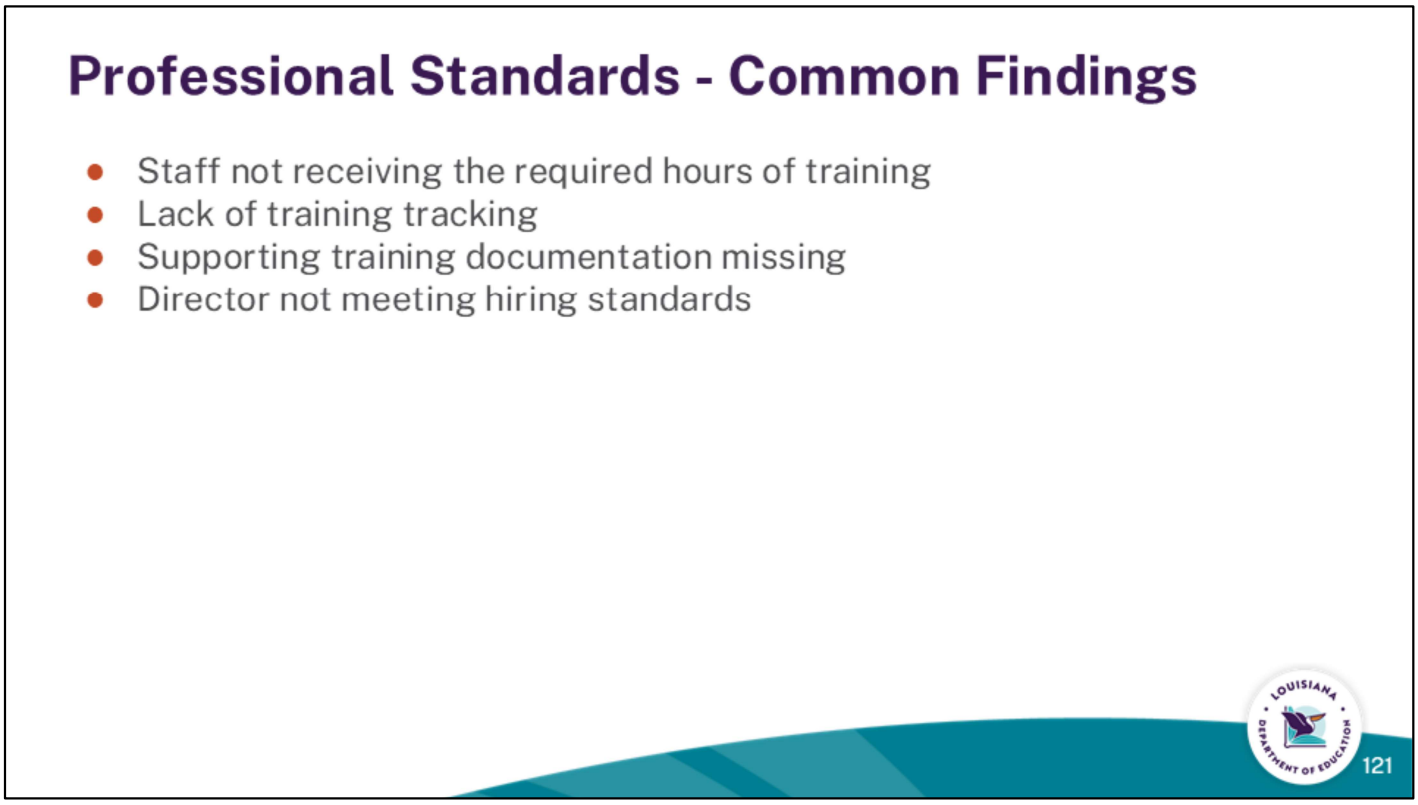
- Are you keeping track and meeting the requirements?
- Does documentation support this?

Documents Needed:

- Roster of All CNP Employees (full time, part time, office staff, managers, technicians, etc.)
- Completed Professional Standards Tracker
- Training Documents (agendas, sing-in sheets, certificates, etc.)
- Documents to Support Hiring of CNP Director

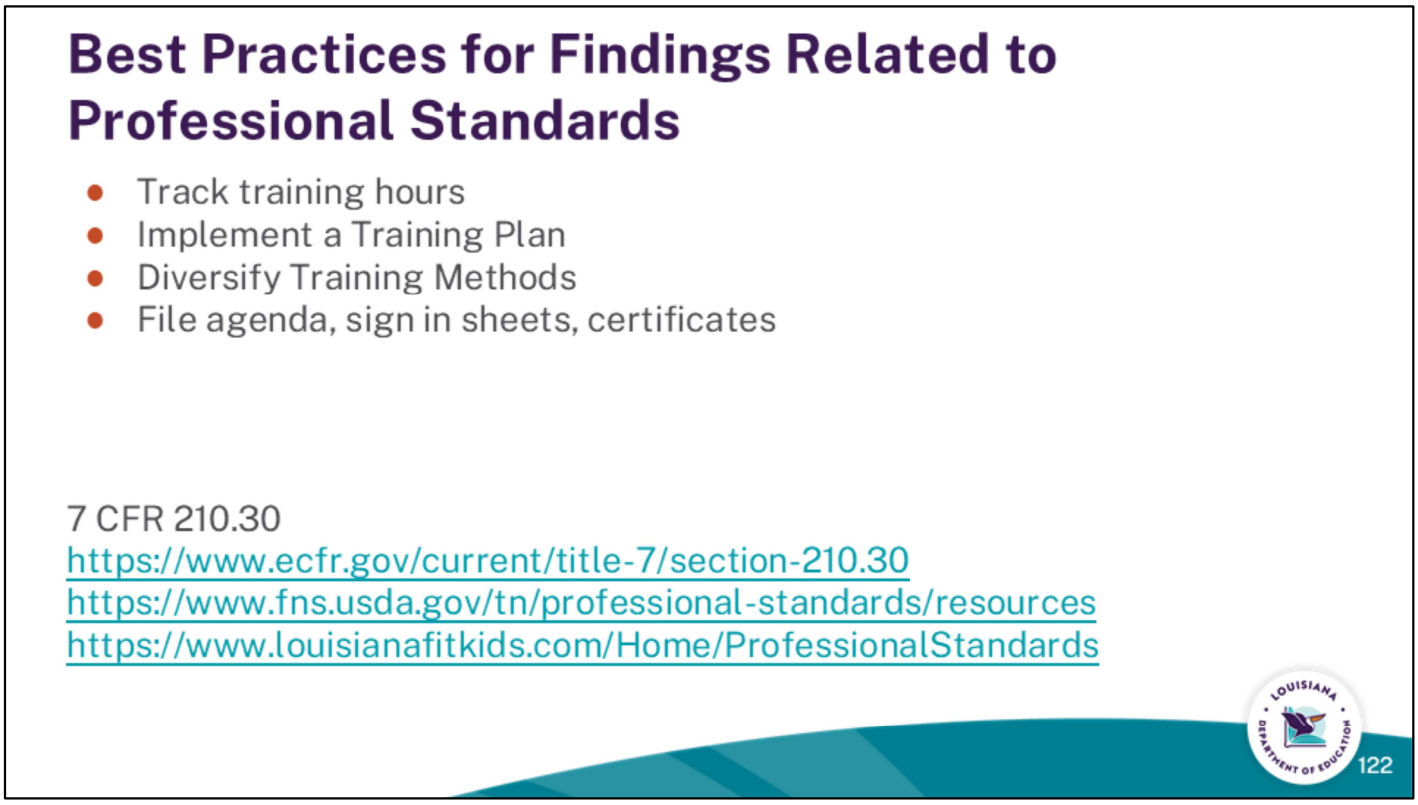
How to Prepare:

- Make a Training Plan for Employees
- Organize Training Documents



Under Professional Standards, the following errors were found on previous reviews:

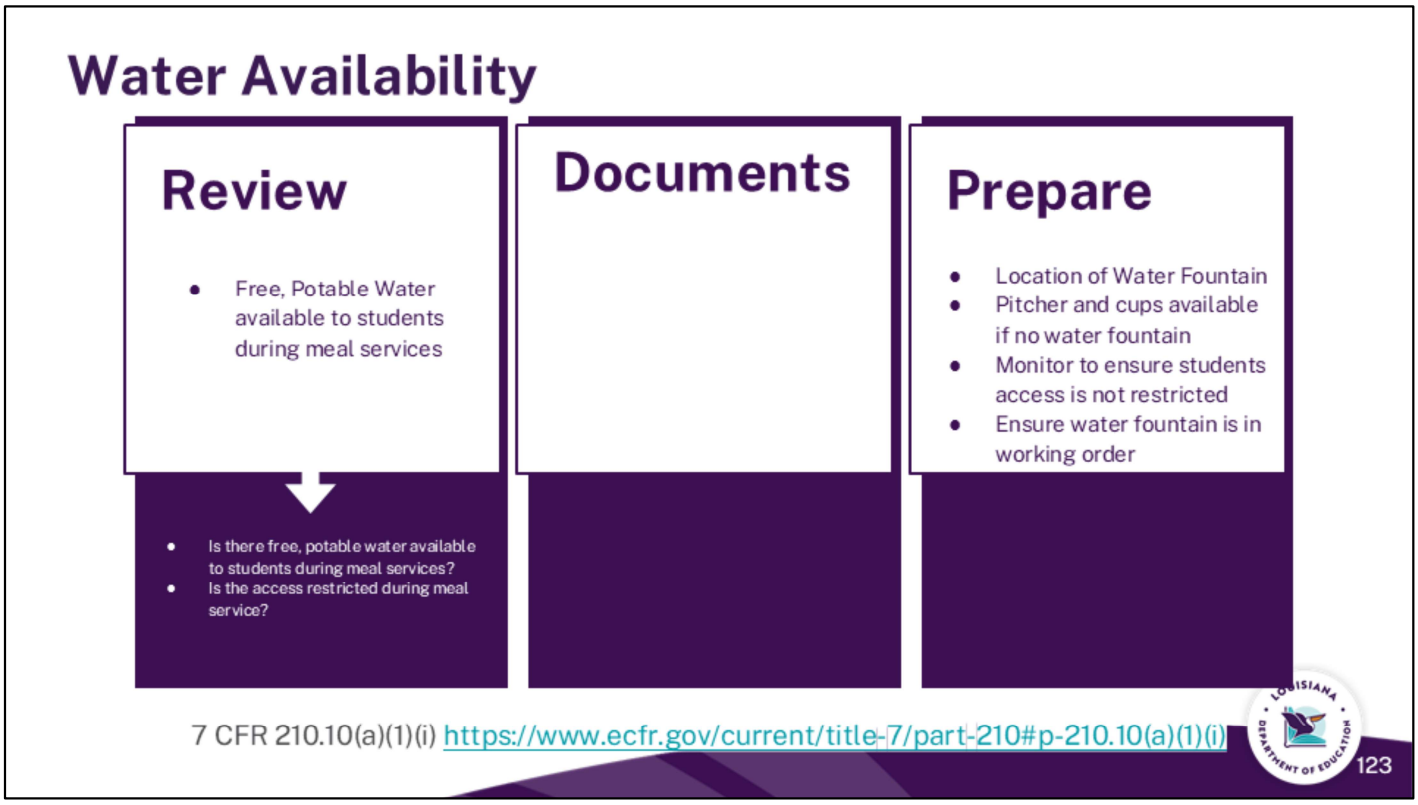
- Staff not receiving the required hours of training
- Lack of training tracking
- Supporting training documentation missing
- Director not meeting hiring standards



Some best practices for addressing errors within the Professional Standards section of the AR:

The SFA must have a system for tracking annual training hours for all food service staff, including directors, managers, and all other personnel. This can be done using the USDA's Professional Standards Training Tracker Tool, Louisiana Fit Kids tracker tool, or if you don't want to use either of the tracking tools you can use a spreadsheet.
Ensure all staff meet the required annual training hours based on their position, regardless of whether they are full-time or part-time.
Create a training plan at the start of each school year to ensure all staff receive the required training. The plan should include mandatory training on core areas like food safety, nutrition, and operation, as well as job-specific training. The plan can be so simple as 15 minutes a week.
In order to keep everyone engaged with the trainings try to diversify the training methods. Such as such as webinars, online classes, in-person training, and conference attendance, this will help you meet the needs and schedules of all staff.
Document the training activity, dates, topics, and hours completed for each employee.

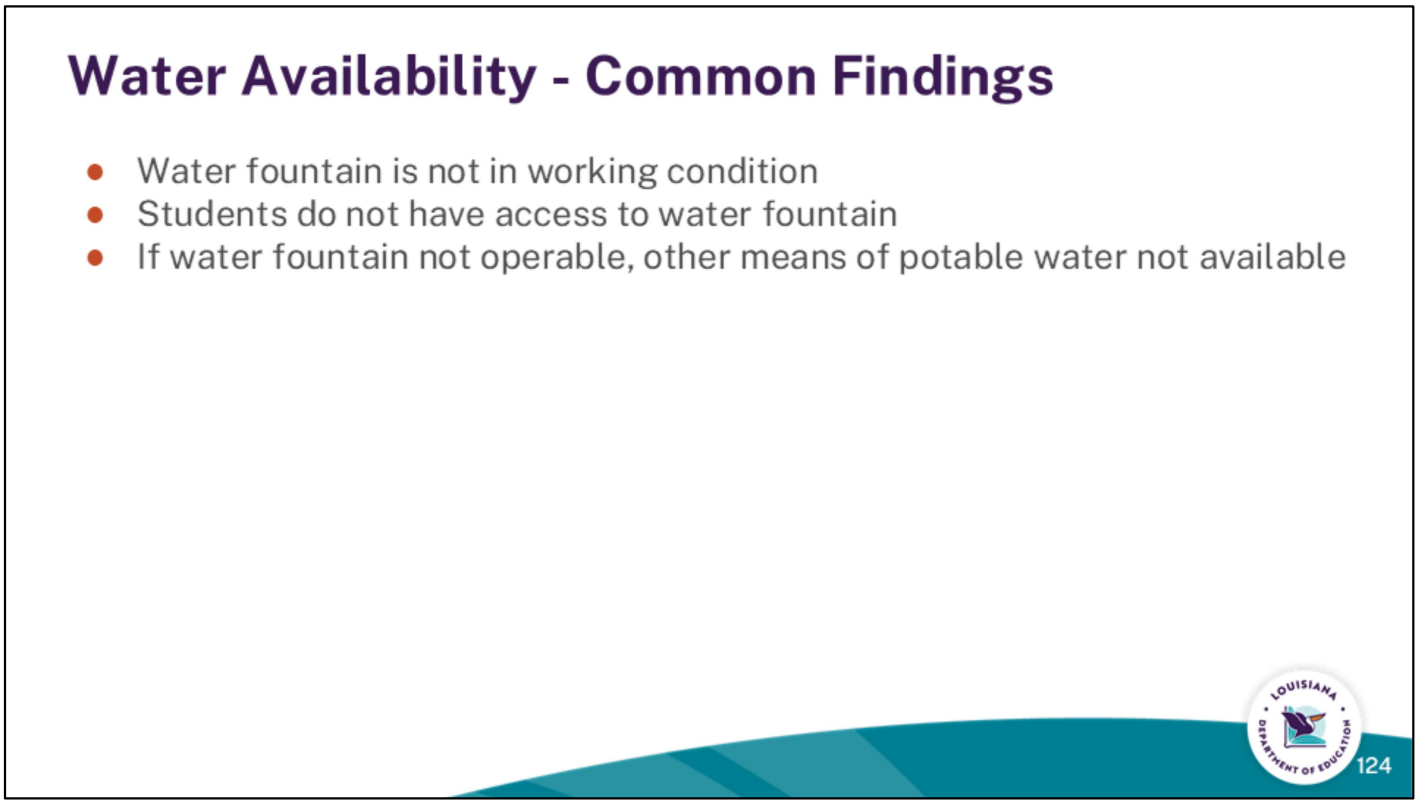
Some resources resources to use are:
7 CFR 210.30 https://www.ecfr.gov/current/title-7/section-210.30
USDA Professional Standards resources https://www.fns.usda.gov/tn/professional-standards/resources
Louisiana Fit Kids Professional Standards
https://www.louisianafitkids.com/Home/ProfessionalStandards



Water Availability

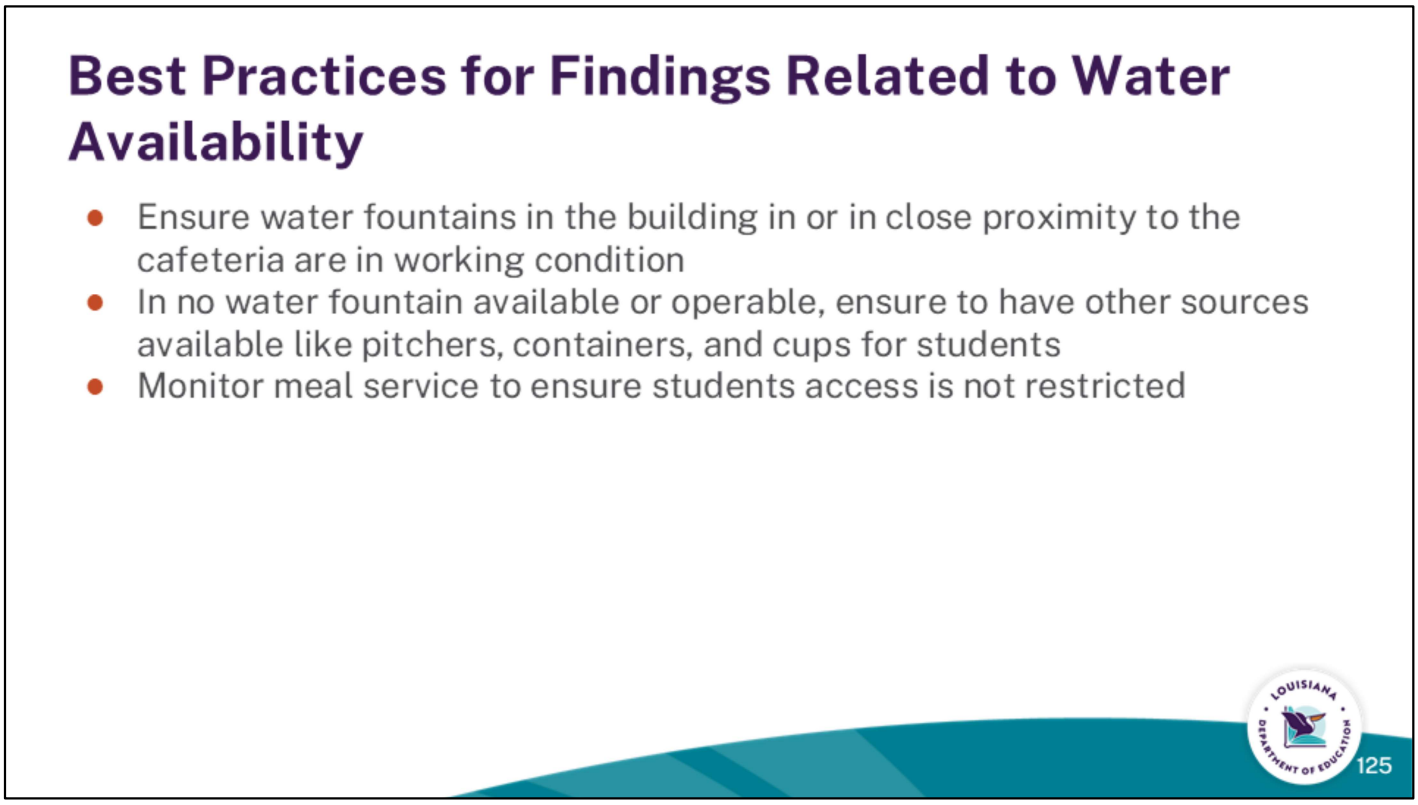
In this section, the availability of free potable water for students during breakfast and lunch meal service is reviewed.
Reviewers will look for water fountain locations and/or other means of ways students can get water such as water pitchers, containers and cups.
Reviews will also ensure students access to the water location is not restricted.

How to Prepare:
Locate the water fountains in the building in or in close proximity to the cafeteria
In no water fountain available, ensure to have other means available like pitchers, containers, and cups for students.
Monitor meal service to ensure students access is not restricted.
Ensure water fountain is in working condition.

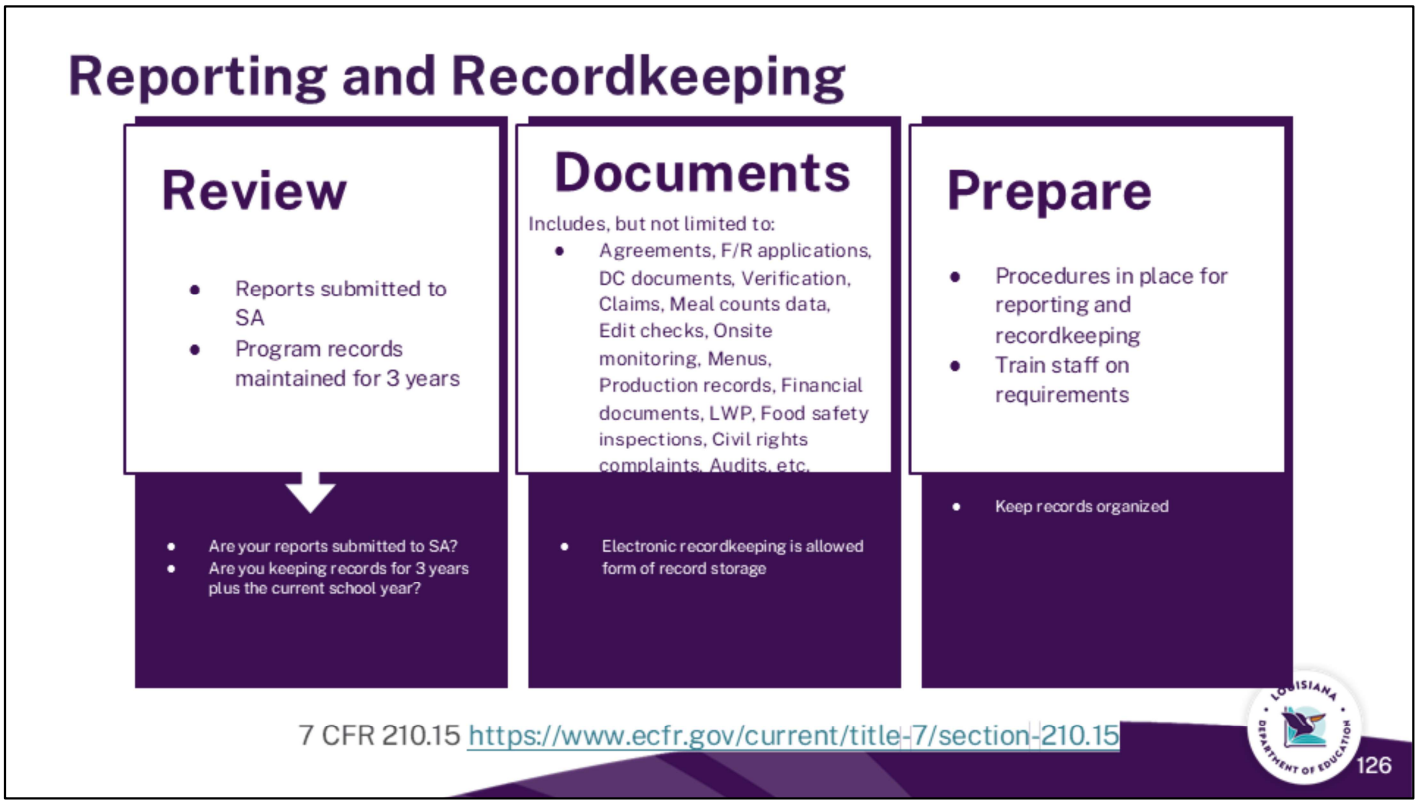


Under Water Availability, the following errors were found on previous reviews:

- Water fountain located in or near the cafeteria is not in working condition
- Students do not have access to water fountain during meal service if it is not located inside the cafeteria
- If water fountain not operable, other means of potable water not available



Some best practices for addressing errors within the Water Availability section of the AR:
Ensure water fountains in the building in or in close proximity to the cafeteria are in working condition. Work with the school administration and maintenance department if necessary.
In no water fountain available or operable, ensure to have other sources available like pitchers, containers, and cups for students. Each school site may vary, so ensure that staff have what they need to be able to provide the water to students.
Monitor meal service to ensure students access is not restricted. Work with school administration and staff to ensure that students have access or if you will need to provide an alternate source of water.

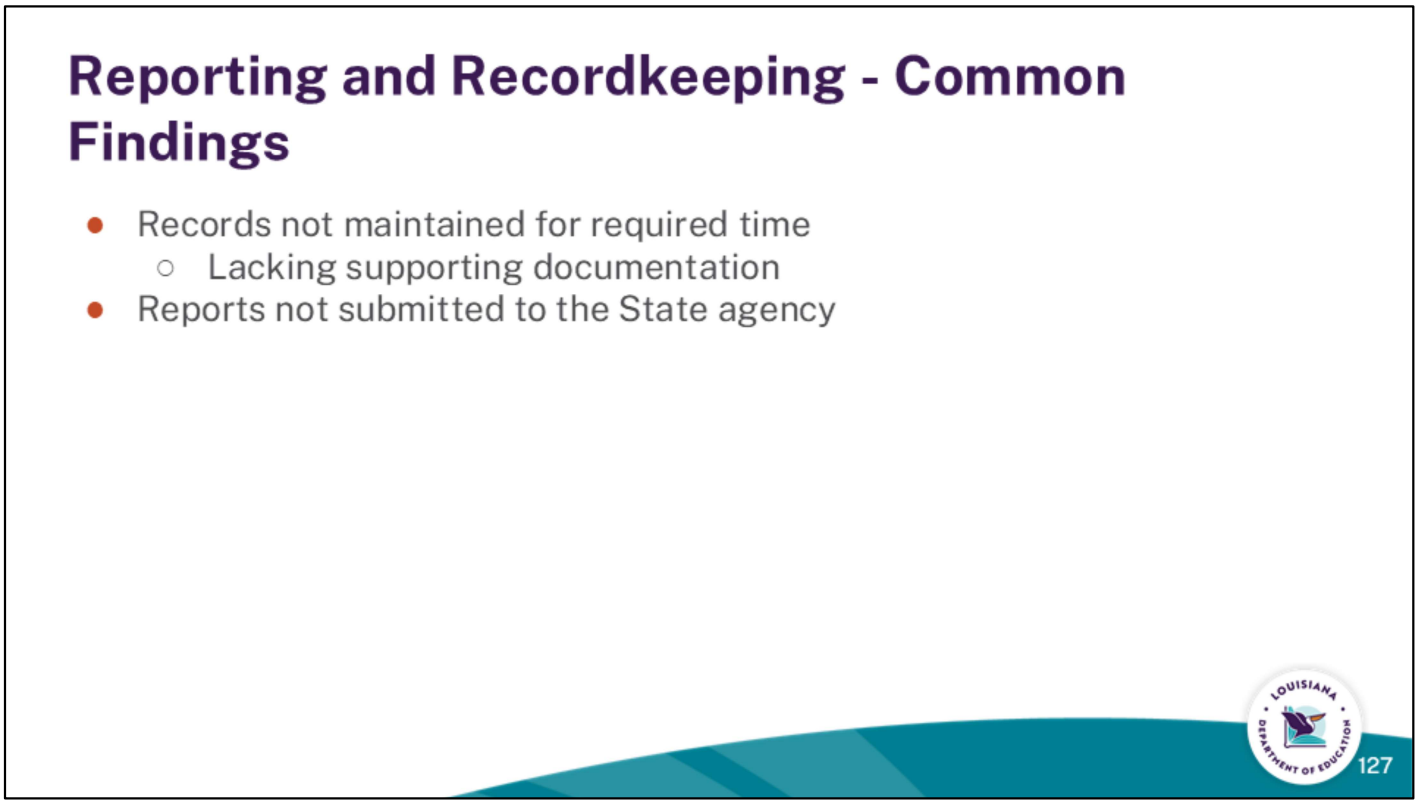


Reporting and Recordkeeping

In this section, review will determine whether reports are submitted as required to the SA and maintained program records for a period of 3 years.
Per regulations, School food authority records shall be retained for a period of 3 years after submission of the final Claim for Reimbursement for the fiscal year. If audit findings have not been resolved, the records shall be retained beyond the 3-year period as long as required for the resolution of the issues raised by the audit.
Are your reports submitted to SA?
Are you keeping records for 3 years plus the current school year?

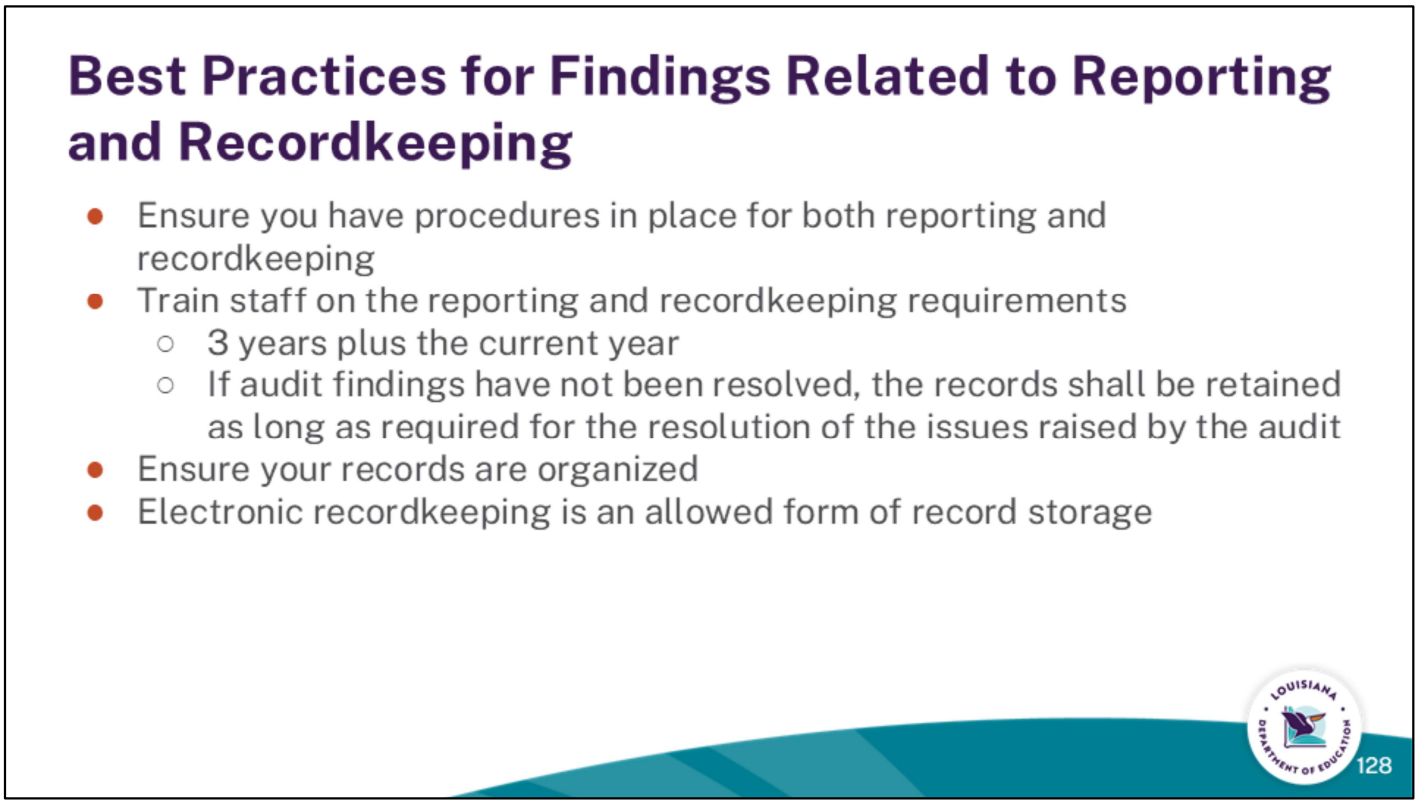
Documents Needed:
The reports and records include, but are not limited to:
Agreements, F/R applications, DC documents, Verification, Claims for reimbursement, Meal counts data, Edit checks, Onsite monitoring, Menus, Production records, Financial documents, LWP, Food safety inspections, Civil rights complaints, Audits, etc.

How to Prepare:
Ensure you have procedures in place for both reporting and recordkeeping.
Train staff on the reporting and recordkeeping requirements.
Ensure your records are organized.



Under Reporting and Recordkeeping, the following errors were found on previous reviews:

- Records not maintained for required time or lacking supporting documentation
- Reports not submitted to the State agency



Some best practices for addressing errors within the Reporting and Recordkeeping section of the AR:

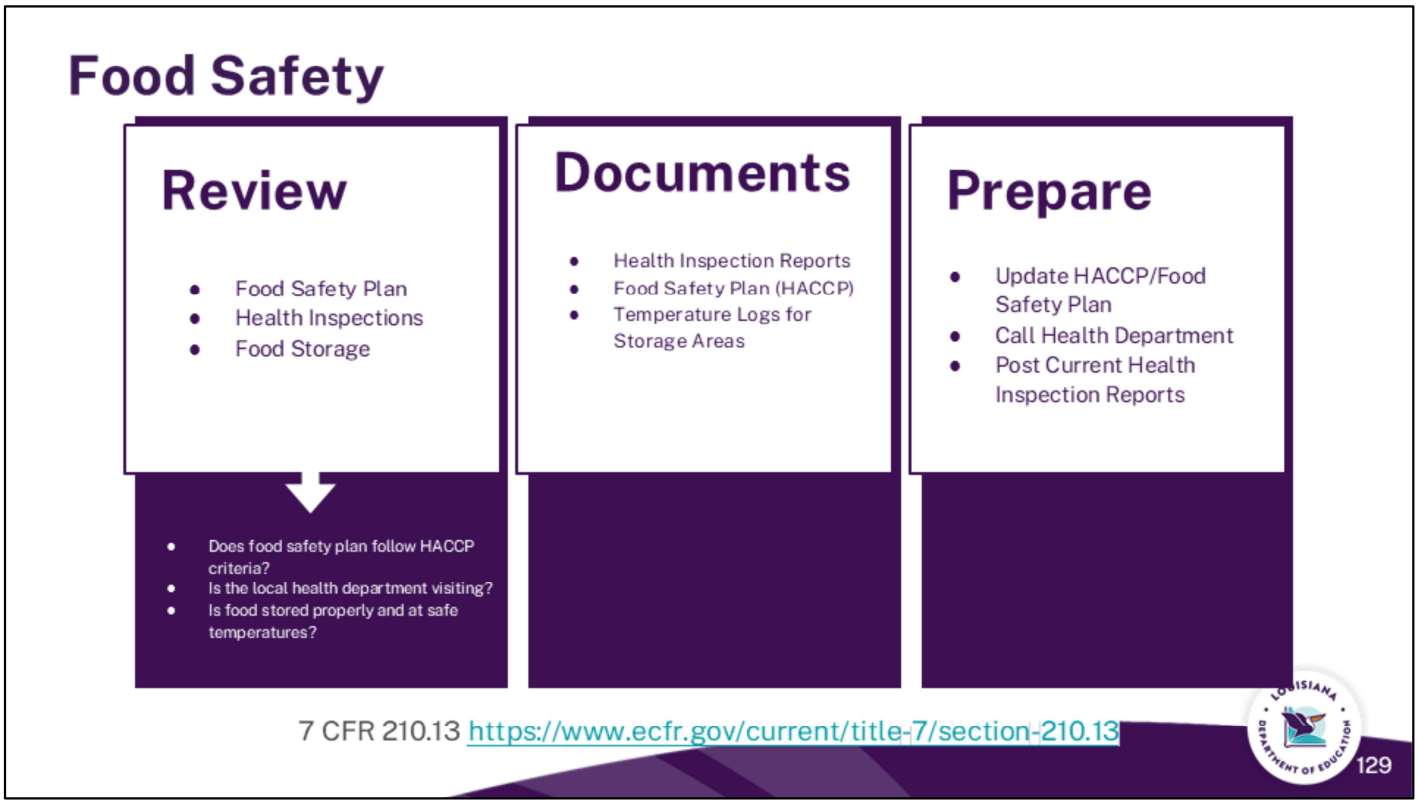
Ensure you have procedures in place for both reporting and recordkeeping

Train staff on the reporting and recordkeeping requirements

- 3 years plus the current year
- If audit findings have not been resolved, the records shall be retained as long as required for the resolution of the issues raised by the audit

Ensure your records are organized

Electronic recordkeeping is an allowed form of record storage



Food Safety

In this section, Food Safety Plan, Health Inspections and Food Storage is reviewed.

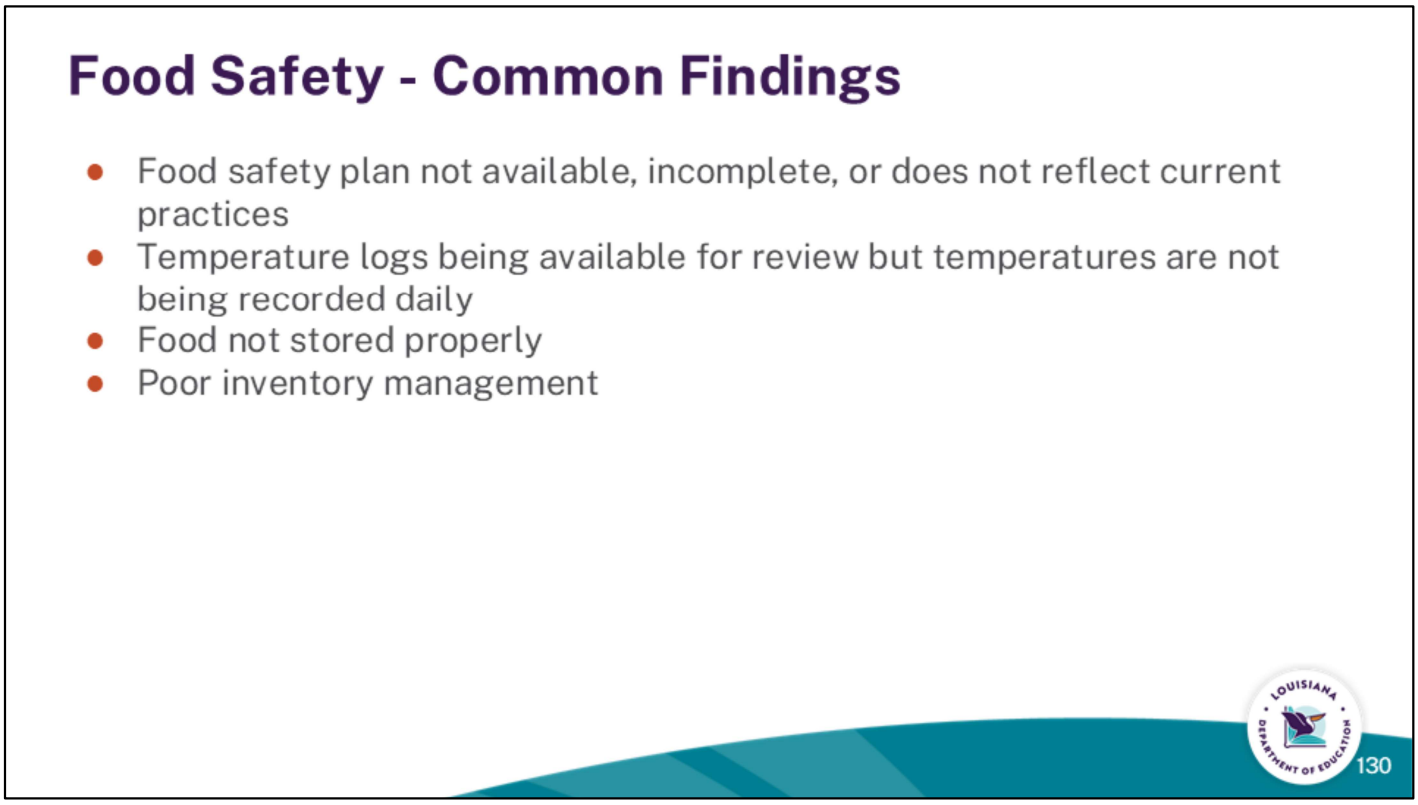
- Does food safety plan follow HACCP criteria?
- Is the local health department conducitng inpsections?
- Is food stored properly and at safe temperatures?

Documents Needed:

- Health Inspection Reports
- Food Safety Plan (HACCP)
- Temperature Logs for Storage Areas

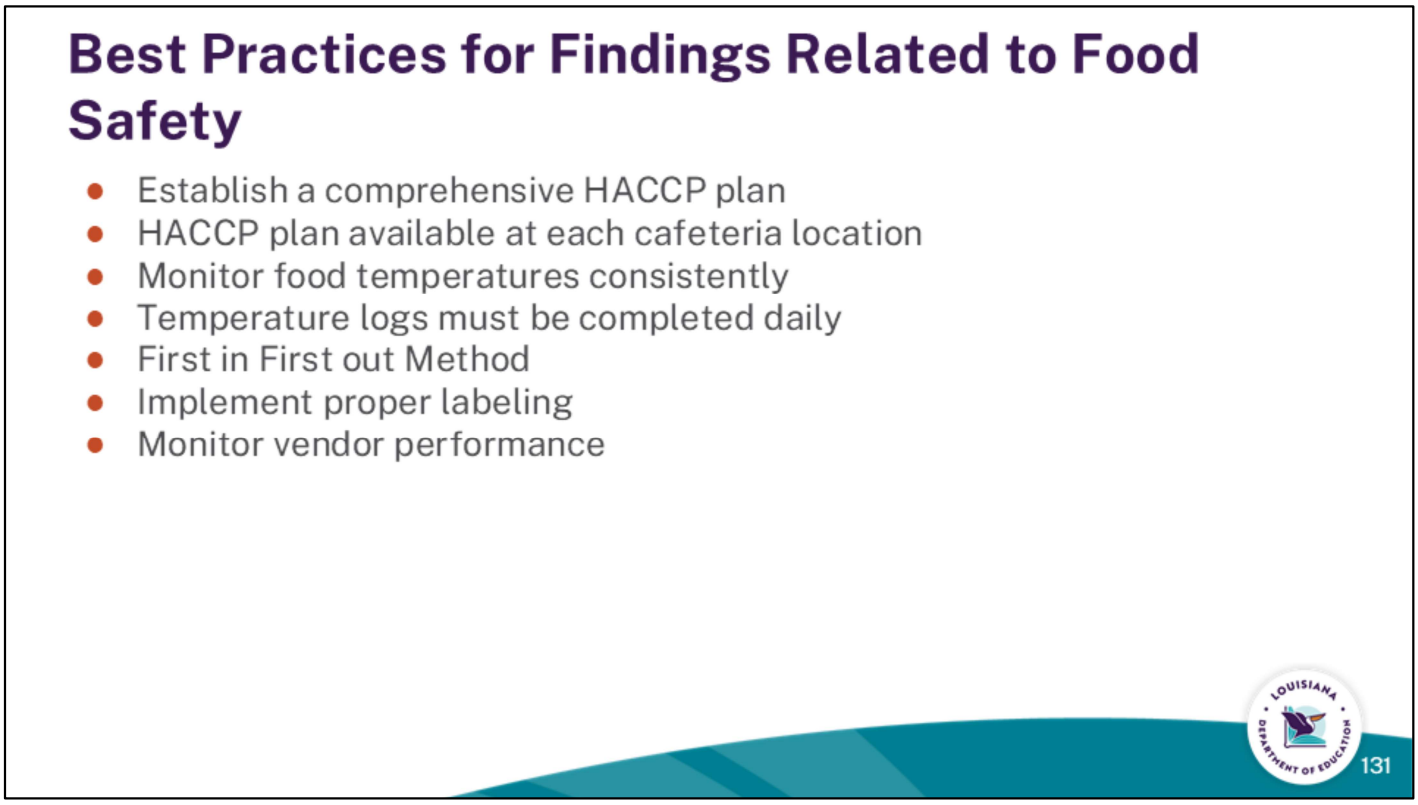
How to Prepare:

- Update HACCP/Food Safety Plan
- Call Health Department
- Post Current Health Inspection Reports



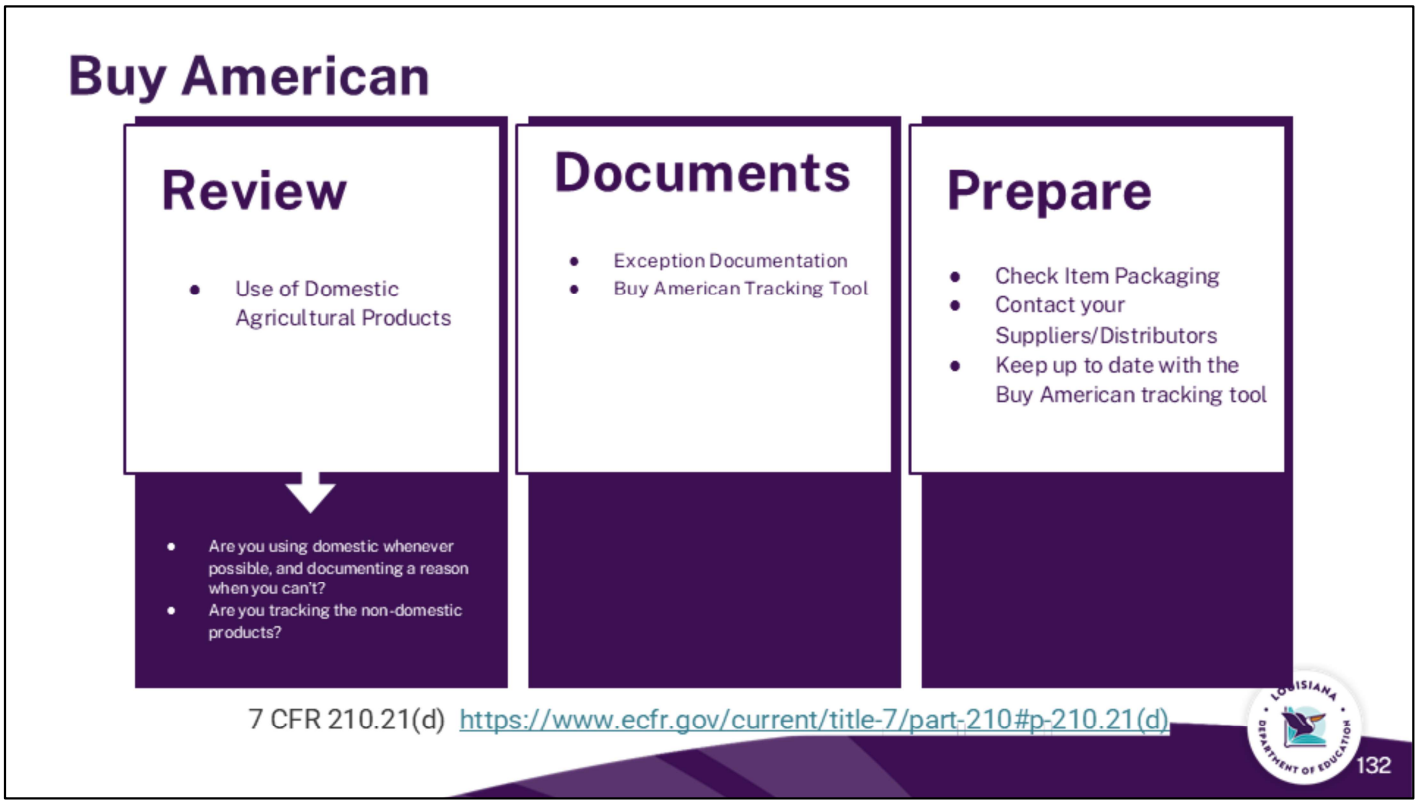
Under Food Safety, the following errors were found on previous reviews:

- Food safety plan not available, incomplete, or does not reflect current practices
- Temperature logs being available for review but temps are not being recorded daily
- Food not stored properly
- Poor inventory management



Some best practices for addressing errors within the Food Safety section of the AR:

First establish a written HACCP plan for each site that covers all steps of food preparation, from receiving to service. Ensure the HACCP plan is available at each cafeteria location. Use calibrated thermometers to monitor and log temperatures at critical control points during receiving, storage, cooking, and holding. Train staff on how to calibrate a thermometer. Ensure staff are documenting and signing on temperature log regularly. . Consistently apply the First In First Out method to all stored items. Place older stock in the front so it is used first to minimize spoilage and waste.
Label all food items in storage with their contents and the date they were received or prepared. Use airtight, food-safe containers to protect food from contamination and pests. Monitor your vendor performance and address any issues relating to food safety immediately.



Buy American

In this section, the Use of Domestic Agricultural Products will be reviewed.

- Are you using domestic whenever possible, and documenting a reason when you can't?
- Are you tracking the non-domestic products?

Documents Needed:

- Exception Documentation
- Buy American Tracking Tool

How to Prepare:

- Check Item Packaging
- Contact your Suppliers/Distributors
- Keep up to date with the Buy American tracking tool

Under Buy American, the following errors were found on previous reviews:

- Lack of Buy American documentation
- Insufficient monitoring of vendors
- Lack of tracking Buy American products

Some best practices for addressing errors within the Buy American section of the AR:

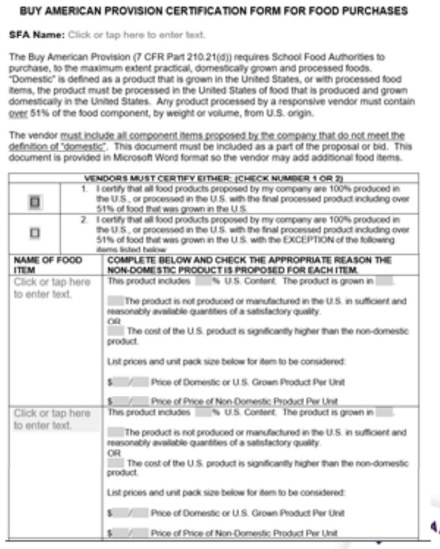
First, you should add language in all solicitation documents that specifies the requirement for domestic food products. By adding the language to your solicitation this notifies the Vendor of your need to comply with the Buy American provision. This will help you actively monitor vendor compliance by reviewing invoices, and product labels to confirm that the products received are domestic.
If a product cannot meet the Buy American provision then you need to document the non-domestic product is purchased, retain documentation justifying the exception based on a valid reason, such as unavailability or unreasonable cost.
This year you were required to start tracking your non-domestic purchases and stay within a 10% CAP.
Monitor your vendor performance and address any issues relating to Buy American.

Some resources resources to use are:
Federal Regulations 7 CFR 210.21(d) https://www.ecfr.gov/current/title-7/part-210#p-210.21(d)

Buy American Documentation

Buy American Provision Certification Form for Food Purchases for all non-domestic items

- unless on FAR list



BUY AMERICAN PROVISION CERTIFICATION FORM FOR FOOD PURCHASES

SFA Name: Click or tap here to enter text.

The Buy American Provision (7 CFR Part 210.21(d)) requires School Food Authorities to purchase, to the maximum extent practical, domestically grown and processed foods. "Domestic" is defined as a product that is grown in the United States, or with processed food items, the product must be processed in the United States of food that is produced and grown domestically in the United States. Any product processed by a responsive vendor must contain over 51% of the food component, by weight or volume, from U.S. origin.

The vendor must include all component items proposed by the company that do not meet the definition of "domestic". This document must be included as a part of the proposal or bid. This document is provided in Microsoft Word format so the vendor may add additional food items.

VENDORS MUST CERTIFY EITHER: (CHECK NUMBER 1 OR 2)	
☐	1. I certify that all food products proposed by my company are 100% produced in the U.S., or processed in the U.S. with the final processed product including over 51% of food that was grown in the U.S.
☐	2. I certify that all food products proposed by my company are 100% produced in the U.S., or processed in the U.S. with the final processed product including over 51% of food that was grown in the U.S. with the EXCEPTION of the following items listed below:

NAME OF FOOD ITEM	COMPLETE BELOW AND CHECK THE APPROPRIATE REASON THE NON-DOMESTIC PRODUCT IS PROPOSED FOR EACH ITEM.
Click or tap here to enter text.	This product includes ___% U.S. Content. The product is grown in ___. ☐ The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR ☐ The cost of the U.S. product is significantly higher than the non-domestic product. List prices and unit pack size below for item to be considered: $___/___ Price of Domestic or U.S. Grown Product Per Unit $___/___ Price of Price of Non-Domestic Product Per Unit
Click or tap here to enter text.	This product includes ___% U.S. Content. The product is grown in ___. ☐ The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR ☐ The cost of the U.S. product is significantly higher than the non-domestic product. List prices and unit pack size below for item to be considered: $___/___ Price of Domestic or U.S. Grown Product Per Unit $___/___ Price of Price of Non-Domestic Product Per Unit

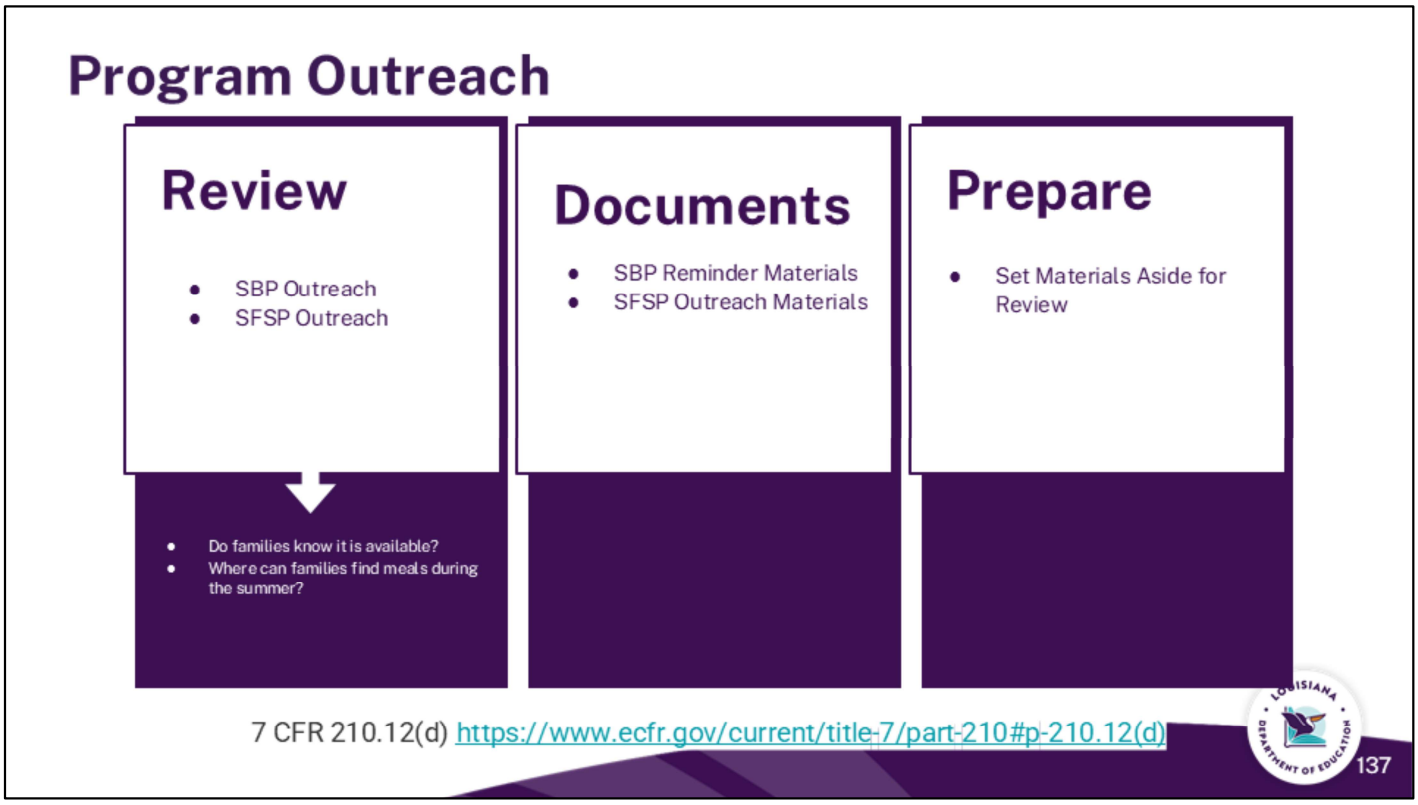
Here's what the Buy American Certification Form looks like. This form should be included in your bid documents for vendors to complete for non-domestic items.

Buy American Exceptions Tracking

Buy American Exceptions Tracking Standard Form Template

- Optional template that school food authorities can use to document the use of exceptions to purchase non-domestic foods under the Buy American provision
- Purpose of this form is to track both the exceptions and costs related to non-domestic product purchases
- SFAs can input data related to non-domestic product costs in the Exceptions Tracker tab
- Exceptions Summary tab will help the SFA calculate its percentage of costs from non-domestic products within a specified time frame

The Exceptions Tracking Standard Form is an optional template that school food authorities can use to document the use of exceptions to purchase non-domestic foods under the Buy American provision.
The link on this slide will take you to the USDA website where you can find the tracking form can be found under the resources materials.
The purpose of this form is to track both the exceptions and costs related to non-domestic product purchases.
School food authorities can input data related to non-domestic product costs in the Exceptions Tracker tab, and the Exceptions Summary tab will help the school food authority calculate its percentage of costs from non-domestic products within a specified time frame.



Program Outreach
In this section, the SBP Outreach and SFSP Outreach will be reviewed.

- Do families know SBP and SFSP is available?
- Where can families find meals during the summer?

Documents Needed:

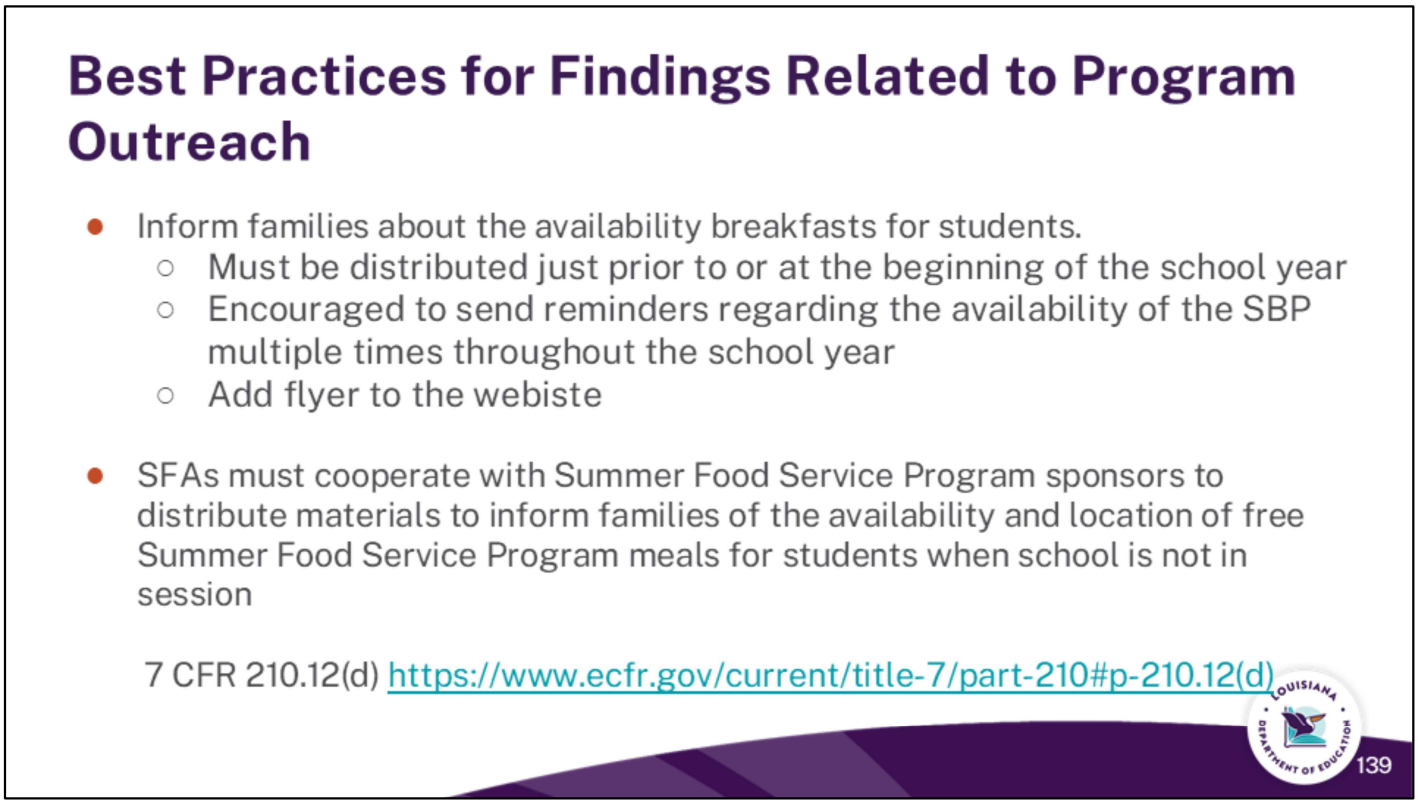
- SBP Reminder Materials
- SFSP Outreach Materials

How to Prepare:

- Set Materials Aside for Review

Under Program Outreach, the following errors were found on previous reviews:

- SBP Outreach not available to parents
- SFSP Outreach not available to parents



Some best practices for addressing errors within the Program Outreach section of the AR:

To the maximum extent practicable, SFAs must inform families about the availability breakfasts for students. Information about the School Breakfast Program must be distributed just prior to or at the beginning of the school year. In addition, schools are encouraged to send reminders regarding the availability of the School Breakfast Program multiple times throughout the school year. This can easily be achieved by adding a flyer to your website.

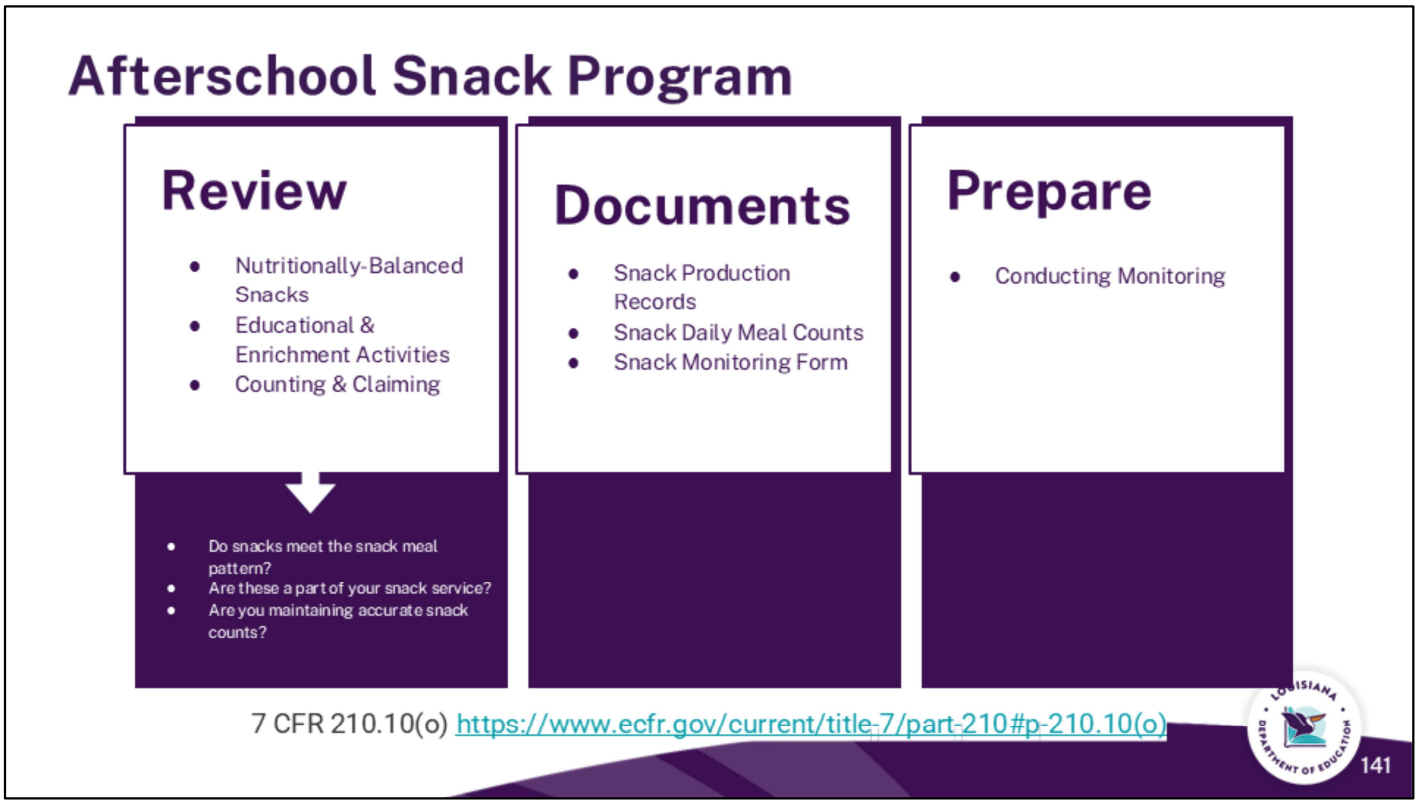
SFAs must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

Some resources resources to use are:
Federal Regulations 7 CFR 210.12(d) https://www.ecfr.gov/current/title-7/part-210#p-210.12(d)

Other Federal Program Reviews

Slide 140

5 @trandra.scott@la.gov
You will present the Other Federal Program Reviews section (Afterschool Snack, FFVP, SSO)
Misty Woods, 4/13/2026



Afterschool Snack Program

In this section, Nutritionally-Balanced Snacks, Educational & Enrichment Activities, and Counting & Claiming will be reviewed.

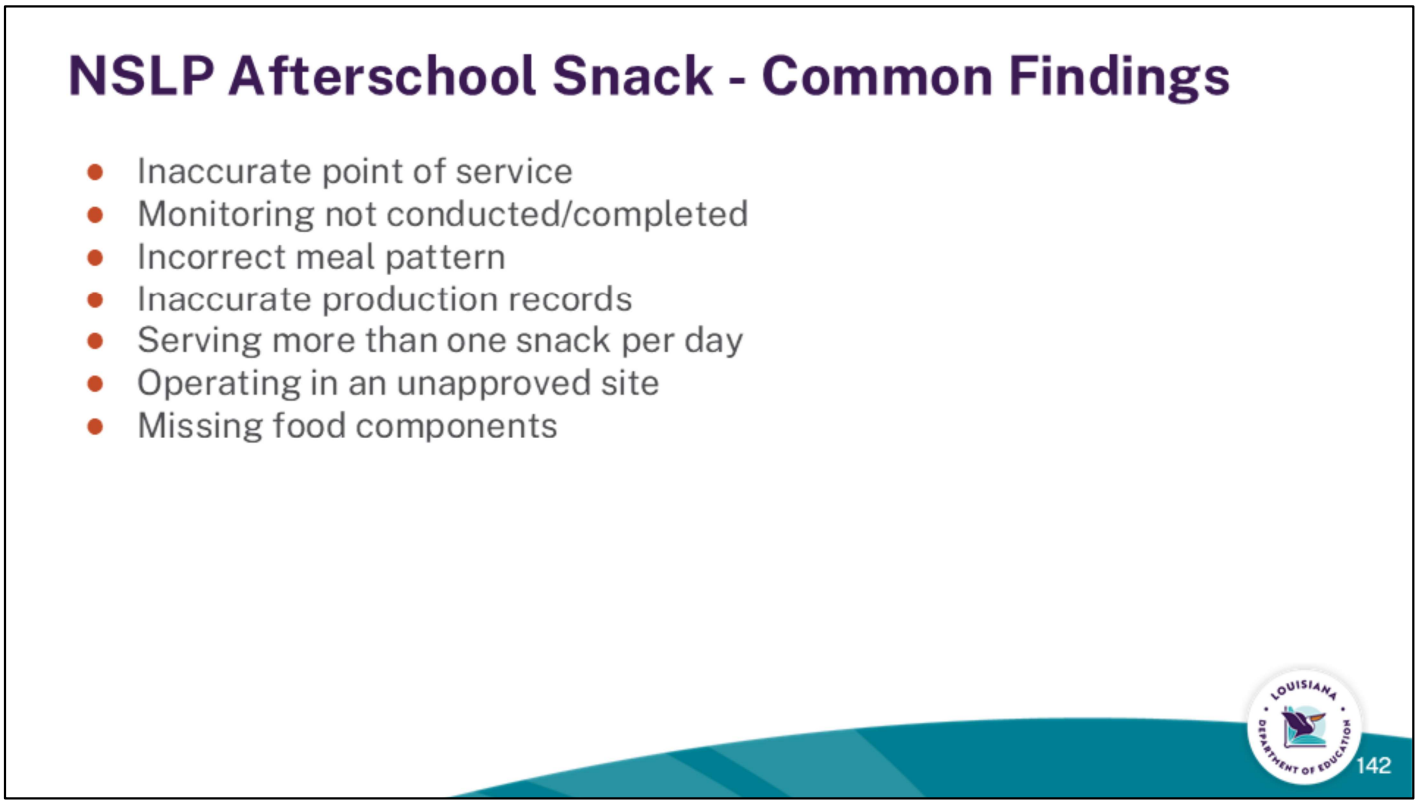
- Do snacks meet the snack meal pattern?
- Are these a part of your snack service?
- Are you maintaining accurate snack counts?

Documents Needed:

- Snack Production Records
- Snack Daily Meal Counts
- Snack Monitoring Form

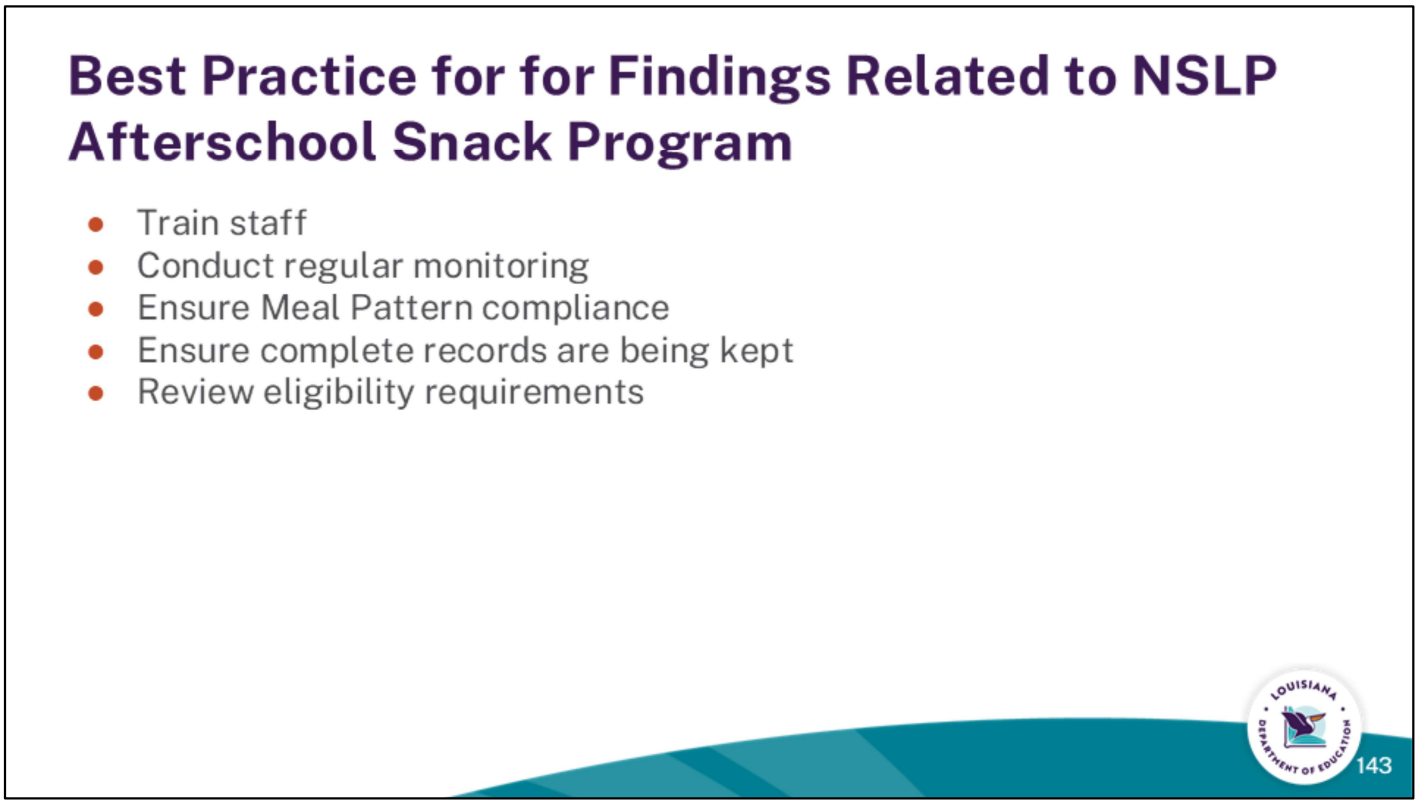
How to Prepare:

- Conducting Monitoring



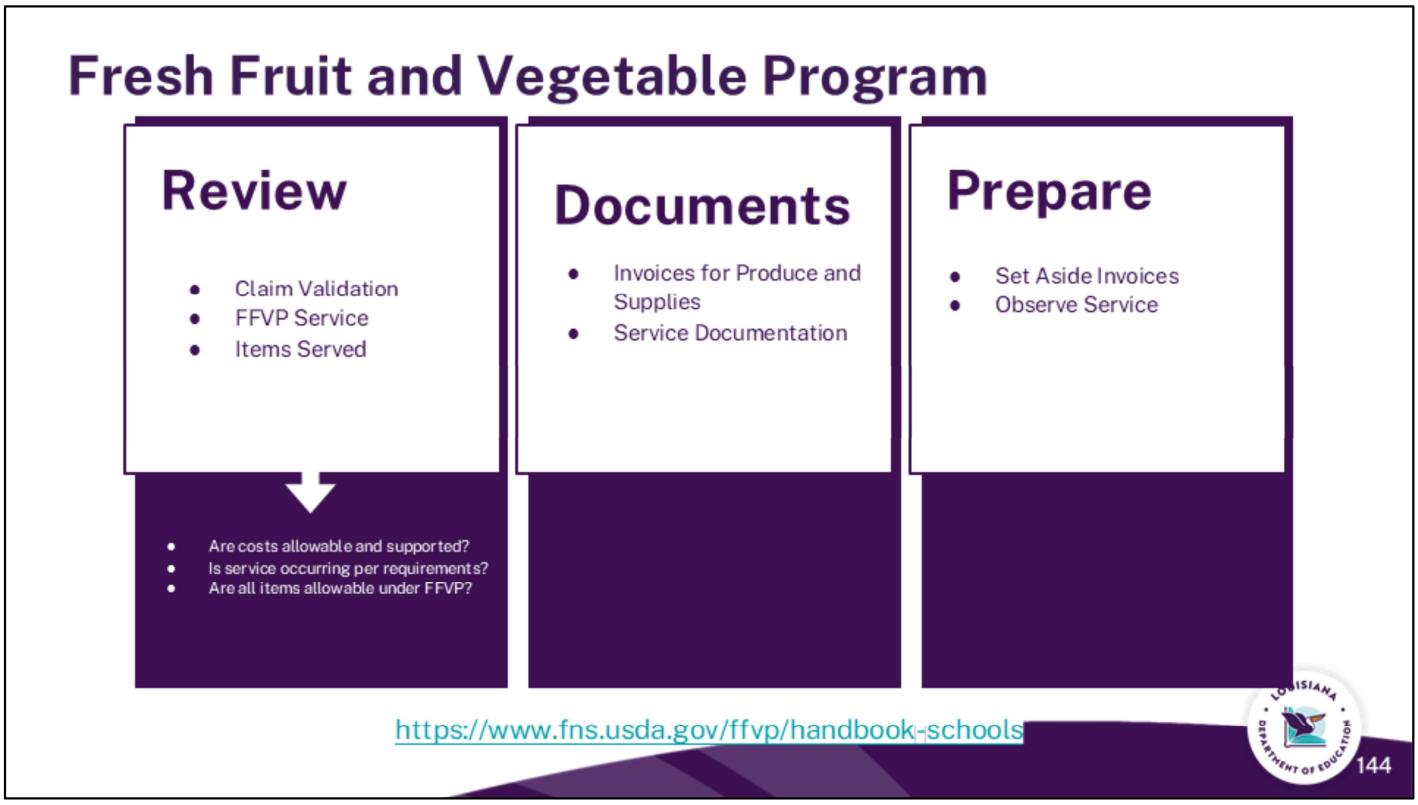
Under NSLP Afterschool Snack, the following errors were found on previous reviews:

- Inaccurate point of service
- Monitoring not conducted/completed
- Incorrect meal pattern
- Inaccurate production records
- Serving more than one snack per day
- Operating in an unapproved site
- Missing food components



Some best practices for addressing errors within the NSLP Afterschool Snacks section of the AR:

Train your staff on correct POS procedures, this can improve accuracy.
Go to your sites and conduct on-site monitoring, you must conduct the first one within the first 4 weeks of operation and the next one before the end of the school year.
Meal pattern compliance is a big one, a best practice is to maintain accurate production records and menu documentation to verify snacks meet meal pattern requirement with two full servings of the required components of ether fluid milk, meat/meat alt, vegetables, fruits or grain.
Production records must be filled out completely and include the date, site, menu items, components, serving size, and quantity prepared. Accurately record the number of snacks prepared, served, and any leftovers. Use this data for proper forecasting and inventory management.
Lastly, Ensure that all potential sites meet the eligibility requirements, such as operating in a school attendance area where at least 50% of the enrolled children are eligible for free and reduced-price meals.



Fresh Fruit and Vegetable Program
In this section, Claim Validation, FFVP Service and Items Served will be reviewed.

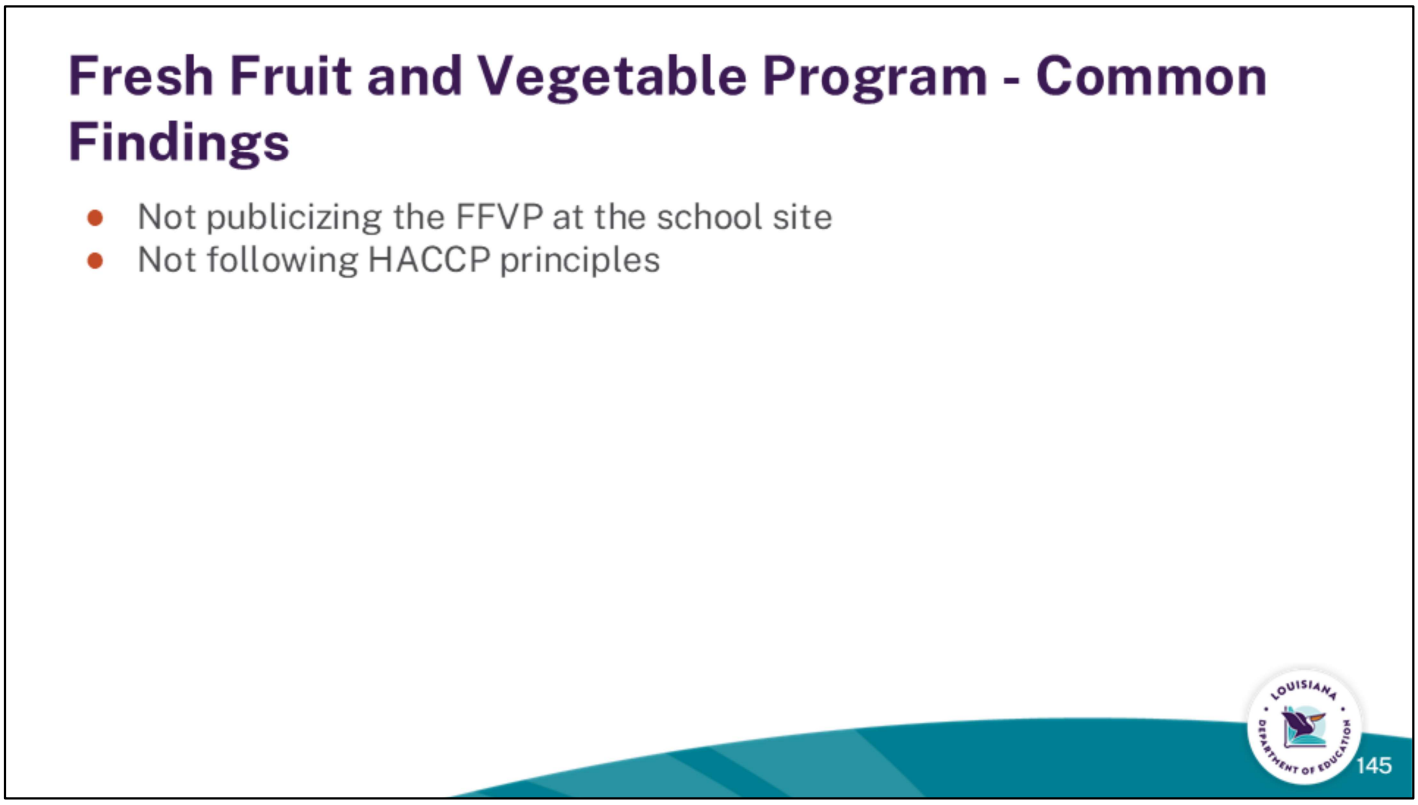
- Are costs allowable and supported?
- Is service occurring per requirements?
- Are all items allowable under FFVP?

Documents Needed:

- Invoices for Produce and Supplies
- Service Documentation

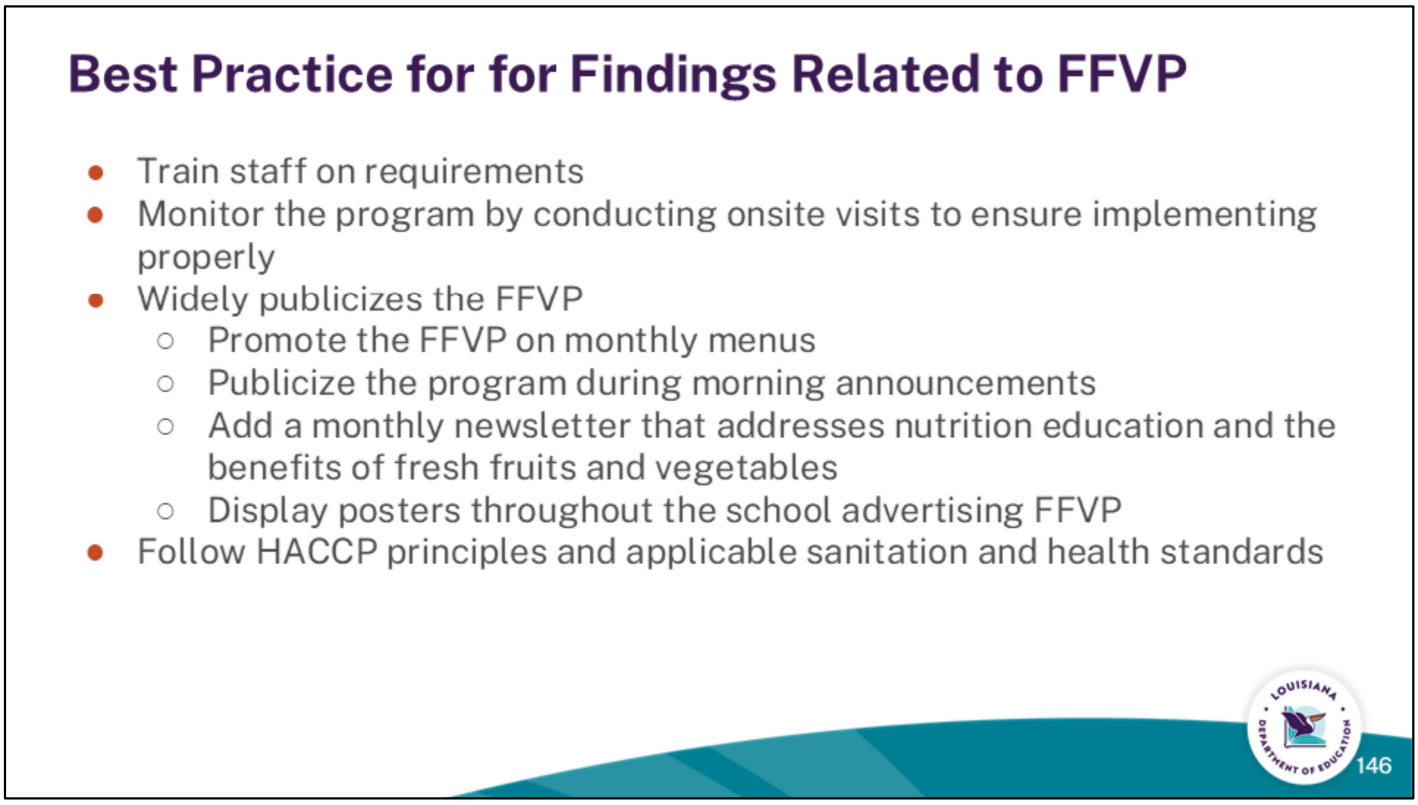
How to Prepare:

- Set aside invoices
- Observe FFVP Service



Under FFVP, the following errors were found on previous reviews:

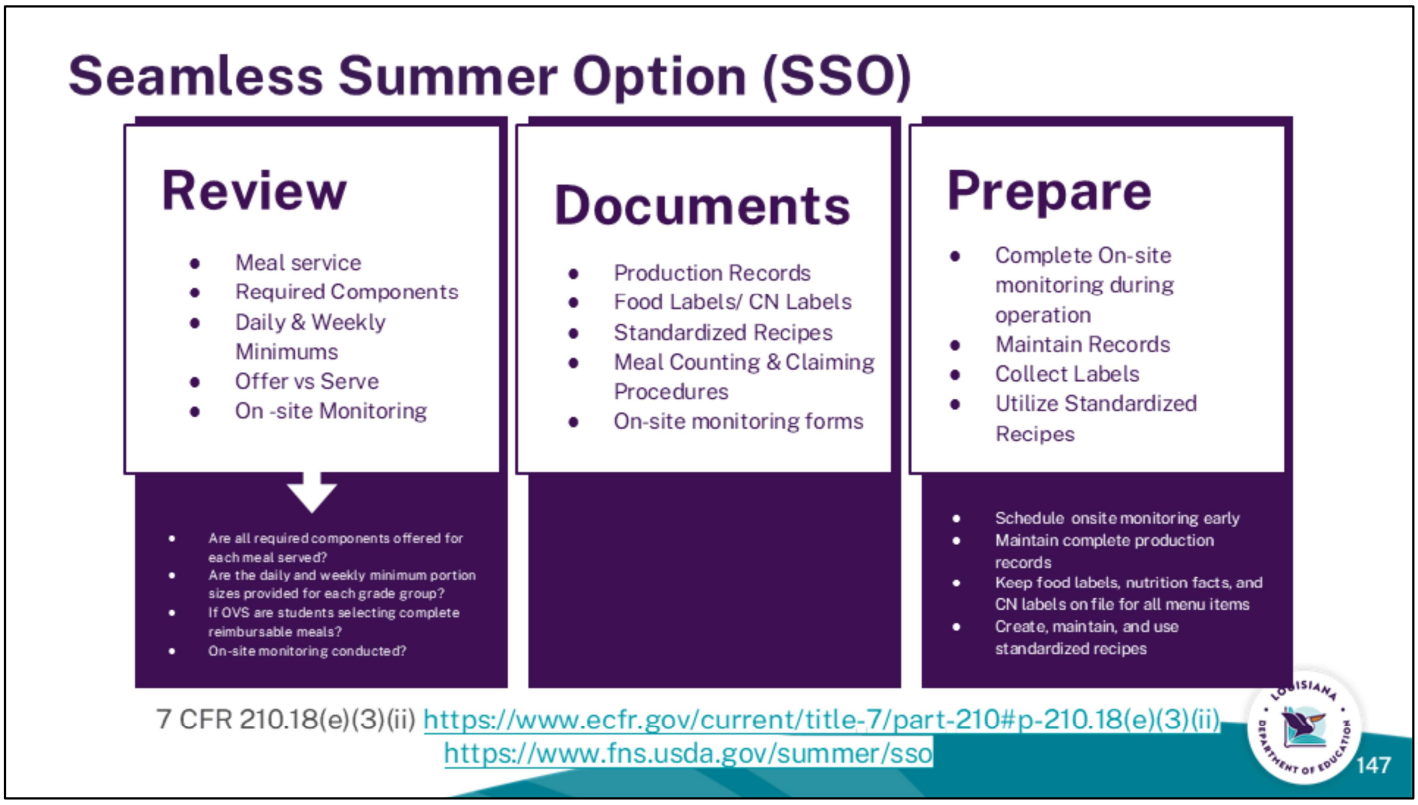
- Not publicizing the FFVP at the school site
- Not following HACCP principles



Some best practices for addressing errors within the FFVP section of the AR:
Train staff on requirements.
Monitor the program by conducting onsite visits to ensure implementing properly.
Widely publicizes the FFVP.

- Promote the FFVP on monthly menus
- Publicize the program during morning announcements
- Add a monthly newsletter that addresses nutrition education and the benefits of fresh fruits and vegetables
- Display posters throughout the school advertising FFVP

Follow HACCP principles and applicable sanitation and health standards.



Seamless Summer Option (SSO)
In this section, meal service, menu required components, daily and weekly minimum portions sizes of components, offer versus serve, and onsite monitoring will be reviewed.

- Are all required components offered for each meal served?
- Are the daily and weekly minimum portion sizes provided for each grade group?
- If OVS are students selecting complete reimbursable meals?
- On-site monitoring conducted?

Documents Needed:

- Production Records
- Food Labels/ CN Labels
- Standardized Recipes
- Meal Counting & Claiming Procedures
- On-site monitoring forms

How to Prepare:

- Complete On-site monitoring during operation. Schedule onsite monitoring early to ensure completed during the operation.
- Maintain complete production records
- Collect Labels. Keep food labels, nutrition facts, and CN labels on file for all menu items
- Create, maintain, and use standardized recipes

State agencies must conduct administrative reviews of all school food authorities participating the Seamless Summer Option at least once during a 5-year review cycle. Reviews of the SSO occur when the SSO is in operation (during the summer months). During the onsite portion of the review, SA staff will observe meal service at one (or more) sites.

USDA Food and Nutrition Services (FNS) requires that SSO sponsors receive their SSO review in either the summer immediately preceding or the summer immediately following their scheduled SFS Administrative Review (AR).

Preparing for the Day of Review

Slide 149

6 @dana.dauzat@la.gov
You will present the Preparing for the Day of Review section.
Misty Woods, 4/13/2026

Preparing for the Day of Review

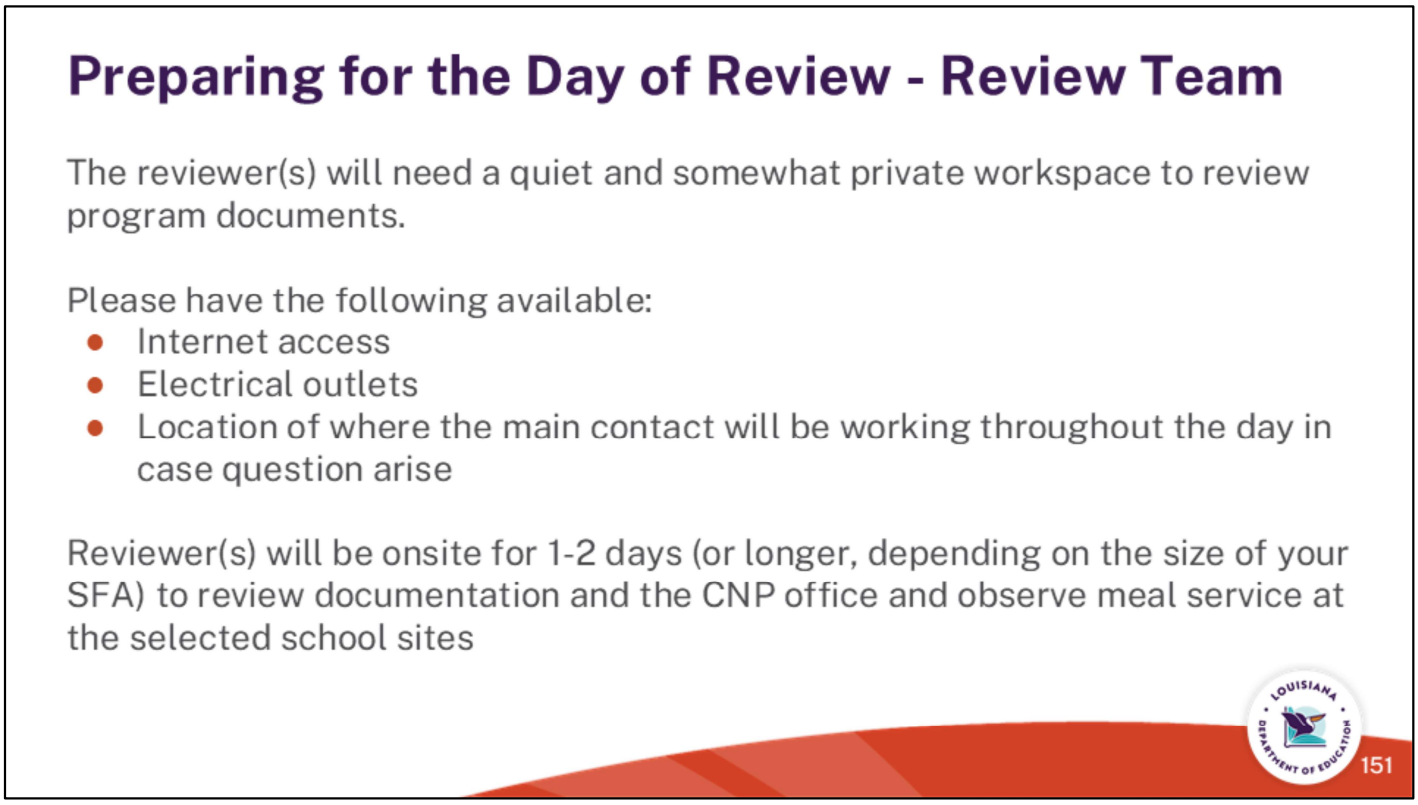
Prior to the Day of Review, the reviewer will work with the SFA to confirm the location(s) and time of the entrance conference and the on-site visit(s)

Reviewer will confirm the meal times with the SFA to the to ensure meal services of the following are observed:

- Breakfast
- Lunch
- Afterschool Snack (if applicable)
- Fresh Fruit and Vegetable Program (if applicable)

Prior to the Day of Review, the reviewer will work with the SFA to confirm the location(s) and time of the entrance conference and the on-site visit(s).

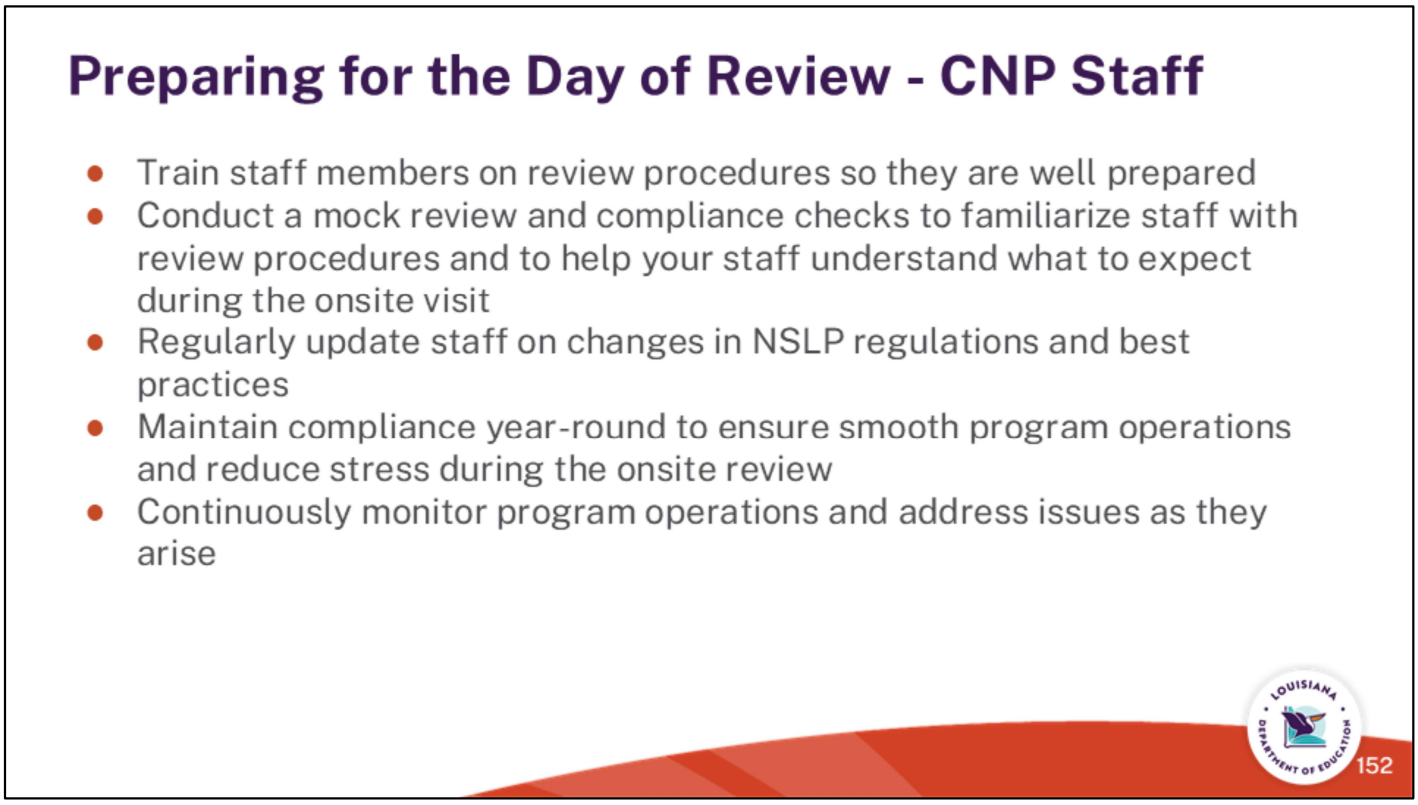
Reviewer will confirm the meal times with the SFA to the to ensure meal services of the following are observed:
Breakfast
Lunch
Afterschool Snack (if applicable)
Fresh Fruit and Vegetable Program (if applicable)



The reviewer team will need a quiet and somewhat private workspace to review program documents.

Please have the following available:
Internet access
Electrical outlets
Location of where the main contact will be working throughout the day in case question arise

Reviewer(s) will be onsite for 1-2 days (or longer, depending on the size of your SFA) to review documentation and the CNP office and observe meal service at the selected school sites.



How to prepare your CNP staff for the Day of the Review:

- Train staff members on review procedures so they are well prepared
- Conduct a mock review and compliance checks to familiarize staff with review procedures and to help your staff understand what to expect during the onsite visit
- Regularly update staff on changes in NSLP regulations and best practices
- Maintain compliance year-round to ensure smooth program operations and reduce stress during the onsite review
- Continuously monitor program operations and address issues as they arise

Documentation Organization

- Use binders, digital folders, or a document management system to keep everything in one place.
- Clearly label and categorize your files to make it easier for reviewers
- Consolidate and organize records by key areas to ensure they are easily accessible
- Ensure documents are up-to-date

Ensure all required documents are organized, accurate, and easily accessible.
Use binders, digital folders, or a document management system to keep everything in one place.
Clearly label and categorize your files to make it easier for reviewers
Consolidate and organize records by key areas to ensure they are easily accessible.
Ensure documents are up-to-date.

An entrance conference will occur on the day of the on-site review. If the SFA serves breakfast, it may occur after meal service concludes. The lead reviewer will discuss with you prior to being onsite is meal service observation will occur before the entrance conference.
The entrance conference gives the SFA and Reviewer the opportunity for introductions, a review of the agenda, and a time to discuss documents that were gathered off-site.
At a minimum, the Food Service Director is required to participate in the entrance conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.
Be prepare to engage in an entrance conference.

Preparing for the Day of Review

Inform administration and teachers when the Administrative Review will be occurring at the school sites

- Especially in schools participating in Breakfast in the Classroom, Afterschool Snack, and/or Fresh Fruit and Vegetable Program where the reviewer will be entering classrooms during meal service to conduct a meal observation

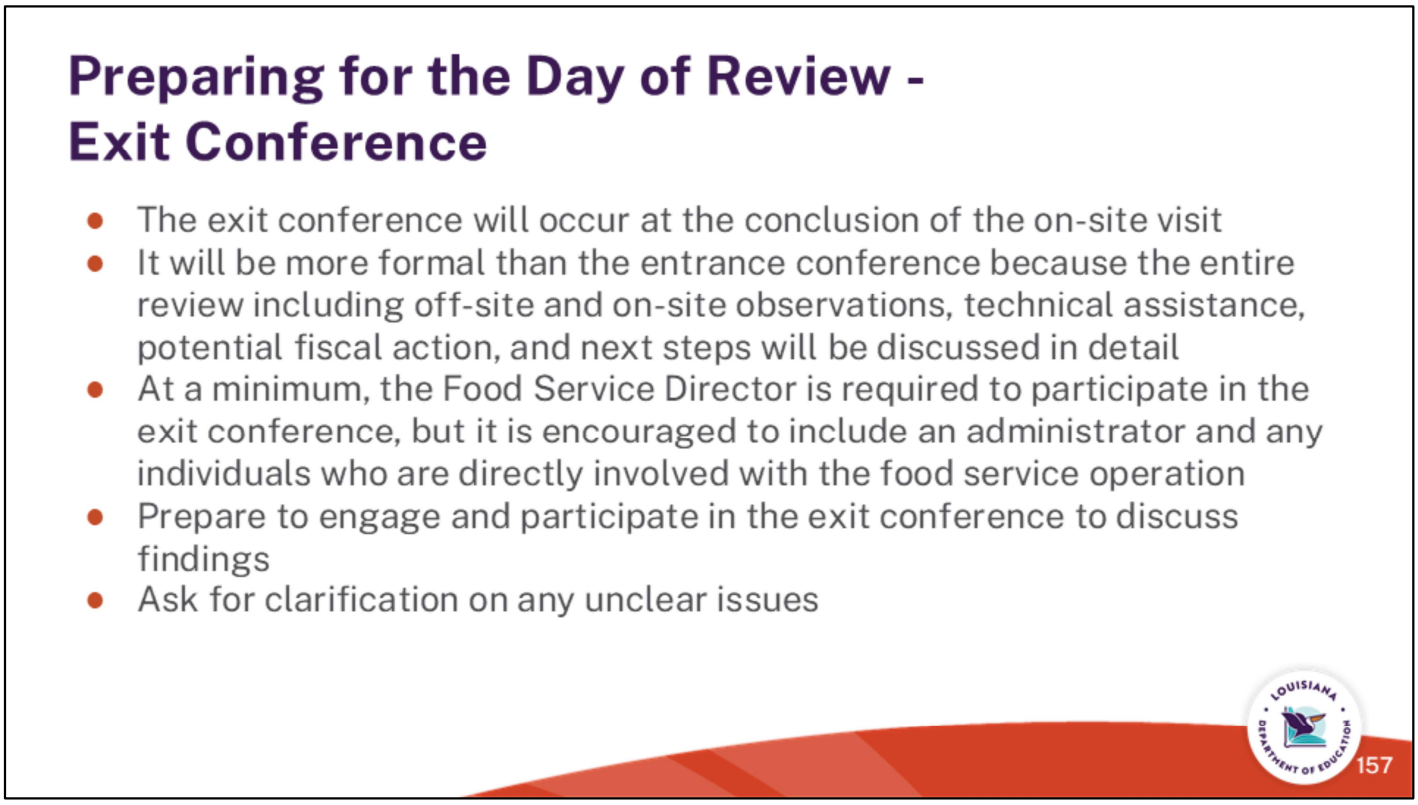
Provide reviewer(s) with any special instructions for when they arrive at the school site

- Visitor policy and procedures
- Parking

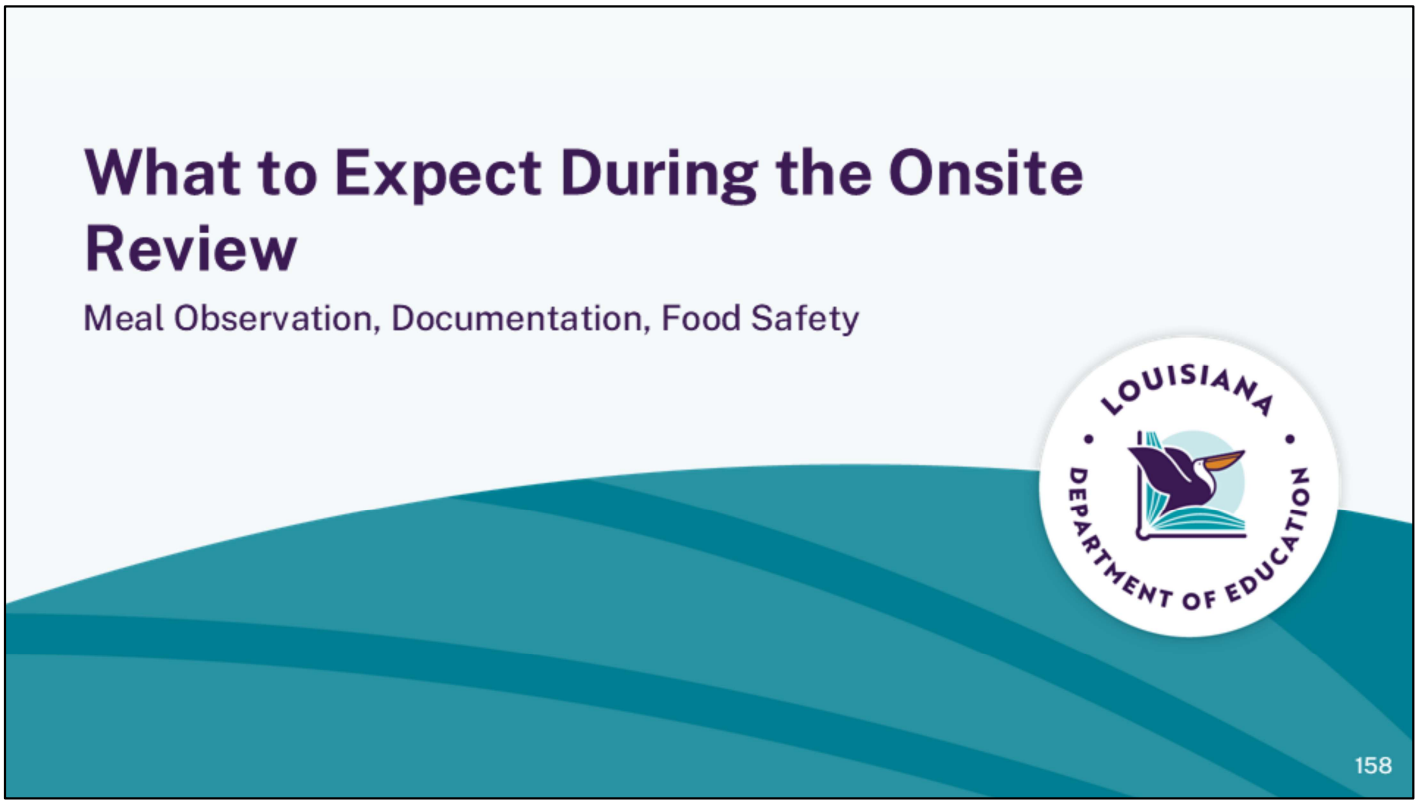
Inform administration and teachers when the Administrative Review will be occurring at the school sites. This is especially important in schools participating in Breakfast in the Classroom, Afterschool Snack, and/or Fresh Fruit and Vegetable Program where the reviewer will be entering classrooms during meal service to conduct a meal observation. Provide reviewer(s) of any special instructions for when they arrive at the school campus such as the school's visitor policy and procedures, parking, etc.

How to Prepare for the Meal Observation:

Provide reviewers with a clear picture of the day-to-day operations and the typical meal service.
Ensure the SFA contact listed on the approved application is available for the Day of Review and for the entrance and exit conference.
Designate a point person to work with the reviewers at the school site if the SFA contact is not available at the school site.
Ensure staff understand they may be interviewed regarding food safety practices, food preparation, menu requirements, etc.



The exit conference will occur at the conclusion of the on-site visit. The reviewer(s) will work with the SFA to confirm the location and time of the exit conference.
It will be more formal than the entrance conference because the entire review including off-site and on-site observations, technical assistance, potential fiscal action, and next steps will be discussed in detail.
Like the Entrance conference, at a minimum, the Food Service Director is required to participate in the exit conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation. Ensure key staff members are present for the exit conference to understand and address any findings.
Prepare to engage and participate in the exit conference to discuss findings.
Ask for clarification on any unclear issues.



Reviewer(s) will visit your school site to observe meal service, review documentation, and evaluate food safety practices.

Slide 158

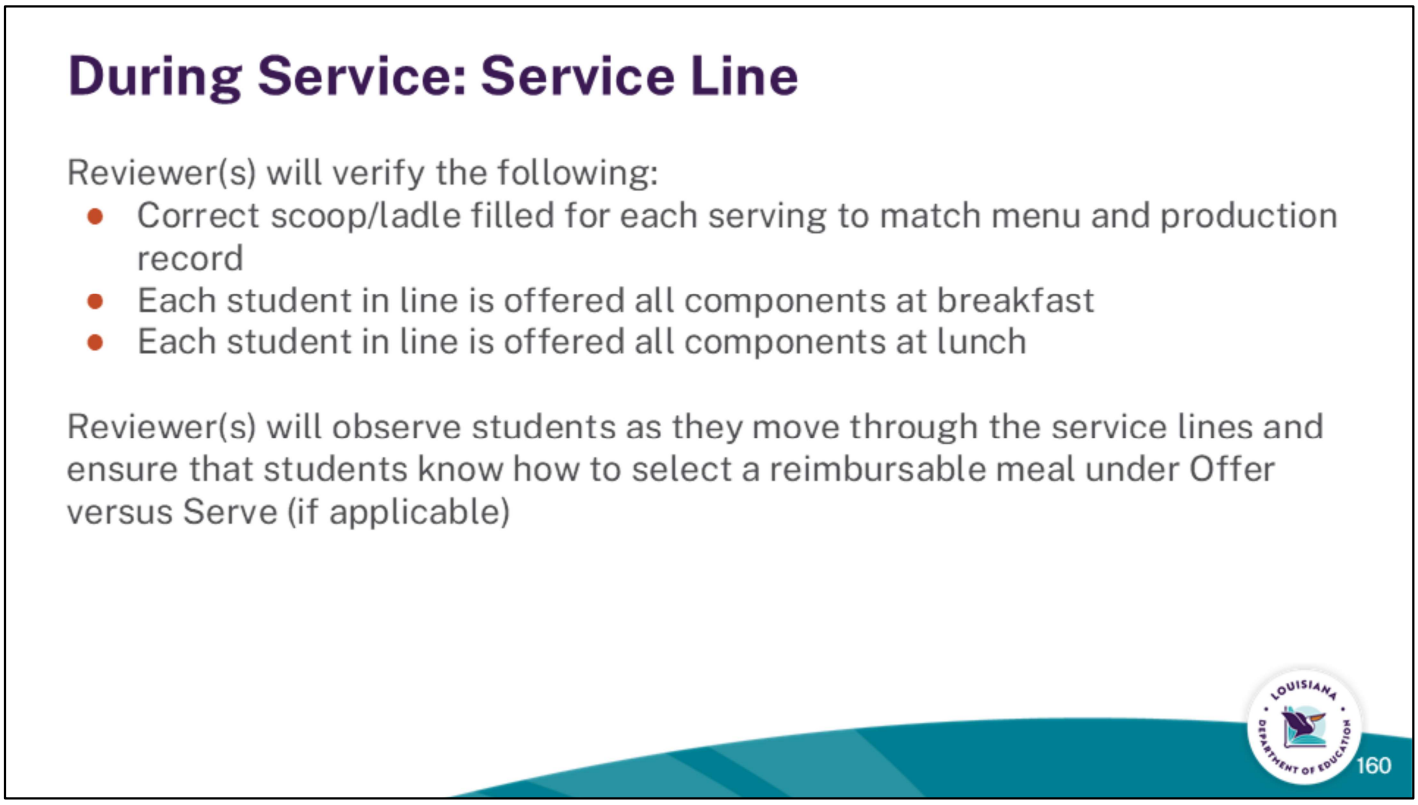
7 @tosha.washington2@la.gov
You will present What to Expect during the onsite review slides
Misty Woods, 4/13/2026

Service Line: Before Service

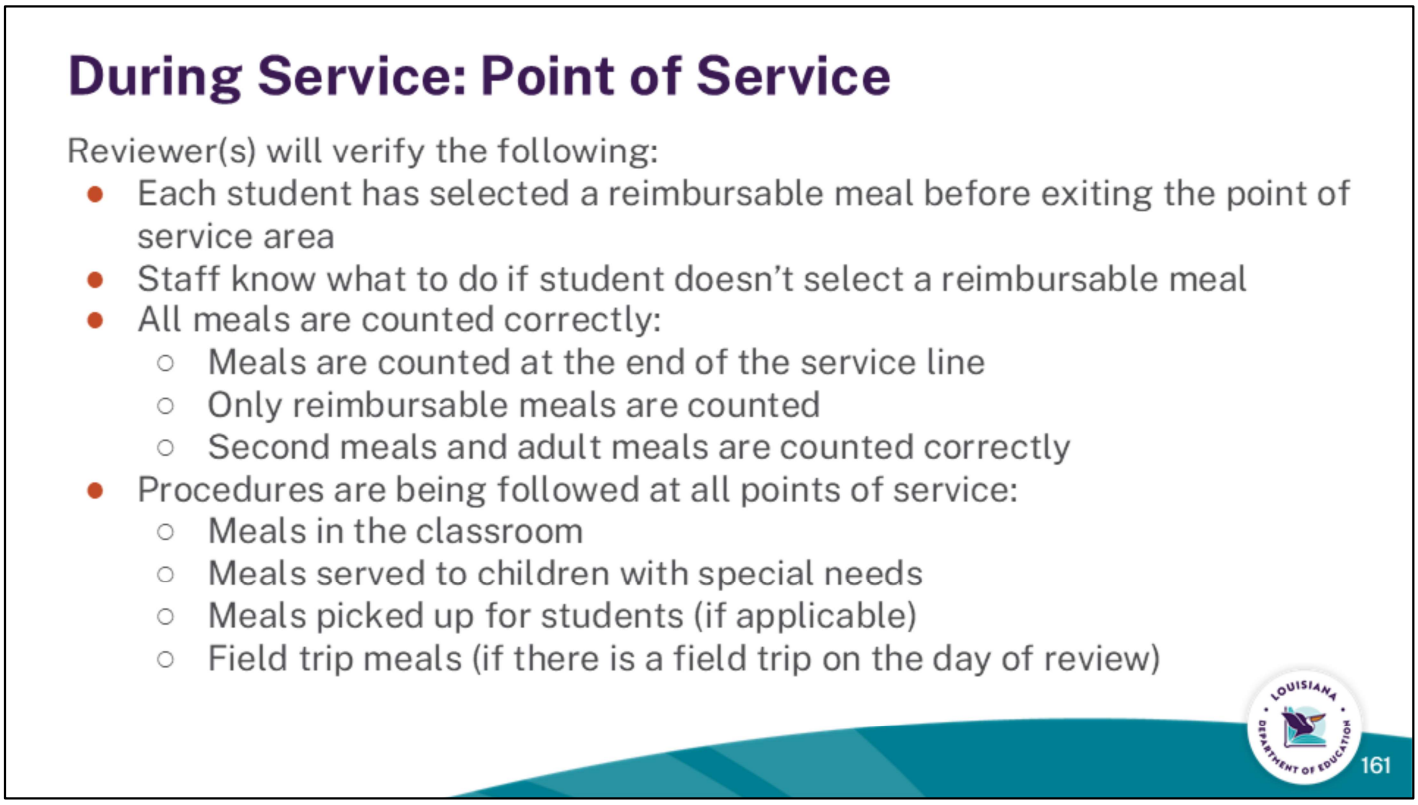
Reviewer(s) will verify the following:

- The menu items on the serving line matches the planned menu
  - All required components
- Component/Item matches serving size on the planned menu
- Temperature checks within guidelines
- Correct scoop/ladle sizes

Prior to the meal service beginning, reviewer(s) will verify that the menu items on the serving line matches the planned menu to ensure all required components are available.
They will verify that the component/item matches the servign size of the planned menu.
They will check temperature logs to ensure temepatures are being logged and are within guidelines.
They will verify that the correct scoops/ladles are used to serve the menus items and that it matches the production records.



During the meal service, the reviewer(s) will verify that the scoop/ladle is filled properly for each serving to match the menu and production record.
The reviewer(s) will ensure that each student in line is offered all components at breakfast and at lunch.
The reviewer(s) will observe students as they move through the service lines and ensure that students know how to select a reimbursable meal under Offer versus Serve (if applicable).



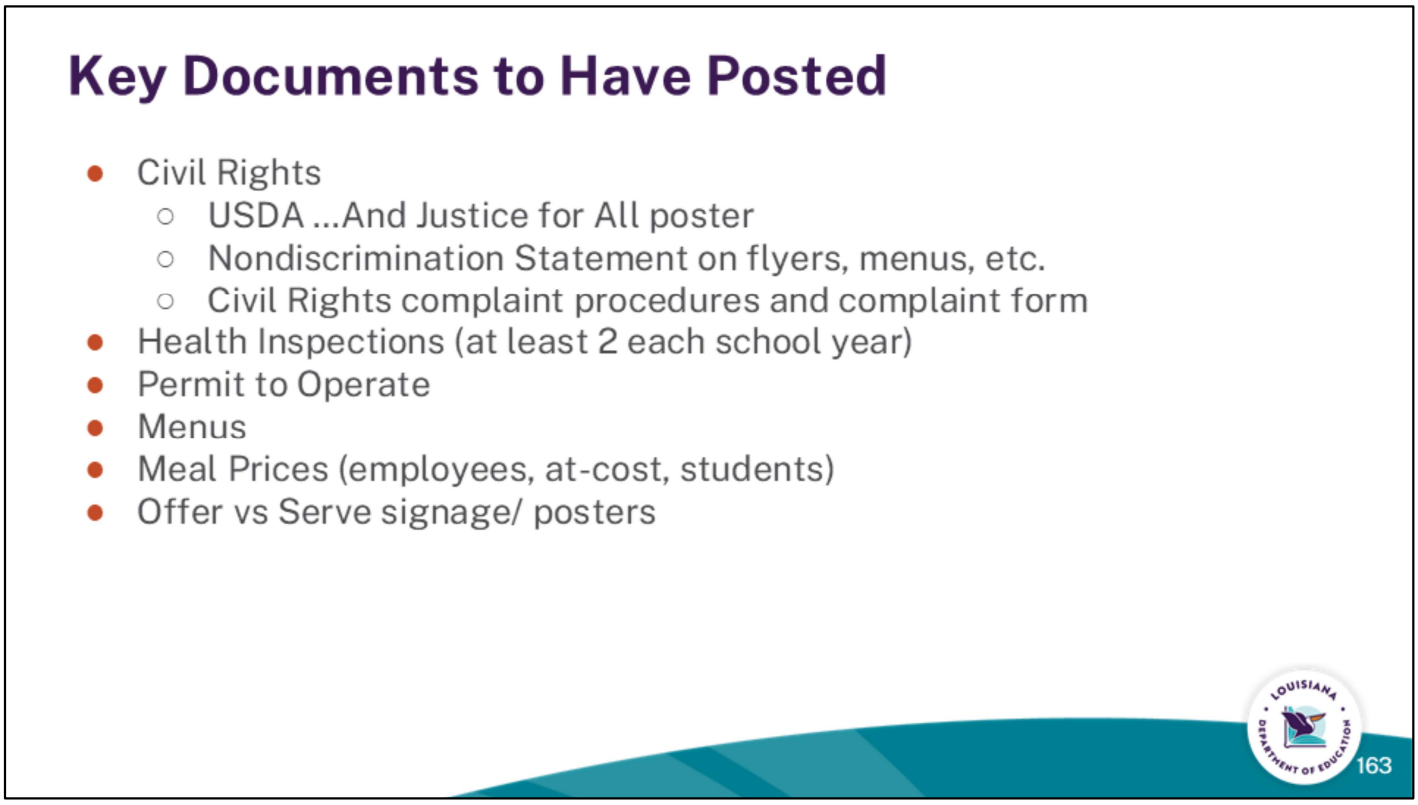
At the Point of Service (POS), the reviewer(s) will verify that each student has selected a reimbursable meal before exiting the point of service.
The reviewer(s) will also ensure that staff know what to di if a student does not select a reimburesble meal.
The reviewer(s) will check to see that all meals are counted correctly by verifying that meals are counted at the end of the service line, only reimbursable meals are counted. and that second meals and adult meals are counted correctly.
The reviewer(s) will also ensure that the procedures are being followed at all points of service that match the collection procedure on your approved application. They will review/observe procedures for meals in the classroom, meals served to children with special needs, meals picked up for students, and field trip meals if any of these occur on the day of the review.

During Service: Meal Modifications

Reviewer(s) will verify the following:

- Staff has access to list of students with meal modifications
  - Meal Modification form or Medical Statement on file for the student
  - Must be checked on serving line or at the point of service
  - Must have substitution available that doctor recommended

If there are any meal modifications for students, the reviewer(s) will verify with staff the procedures that are follwoed. The staff should have access to the list of students with meal modifications. The reviewer will ensure the meal modification form or medical statment is on file for the student. The review will ensure that staff are checking for the meal modification on the serving line or at the point of service. They will also ensure the substitution on the meal modification form is available for the student.



Key Documents to Have Posted

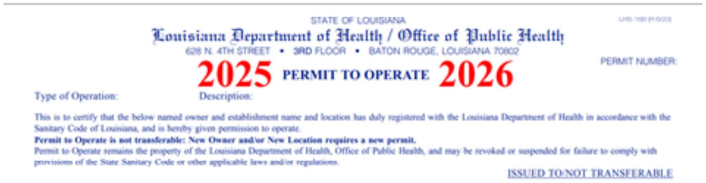
Civil Rights
- USDA …And Justice for All poster
- Nondiscrimination statement on flyers, menus, etc.
- Civil Rights complaint procedures and complaint form

Health Inspections (at least 2 each school year)
Permit to Operate
Menus
Meal Prices (employees, at-cost, students)
Offer vs Serve signage/posters

Permit to Operate

Must be

- valid
- current school year
- publicly displayed



STATE OF LOUISIANA

Louisiana Department of Health / Office of Public Health

628 N. 4TH STREET • 3RD FLOOR • BATON ROUGE, LOUISIANA 70802

2025 PERMIT TO OPERATE 2026

PERMIT NUMBER:

Type of Operation: Description:

This is to certify that the below named owner and establishment name and location has duly registered with the Louisiana Department of Health in accordance with the Sanitary Code of Louisiana, and is hereby given permission to operate.

Permit to Operate is not transferable: New Owner and/or New Location requires a new permit.

Permit to Operate remains the property of the Louisiana Department of Health, Office of Public Health, and may be revoked or suspended for failure to comply with provisions of the State Sanitary Code or other applicable laws and/or regulations.

ISSUED TO/NOT TRANSFERABLE

The Permit to Operate must be valid, from the current school year, and publicly dispalyed.

...And Justice for All Poster

- In each school
- In a location that is easily visible to the students and the public in the food service area
- Must be 11” x 17” in size

Prominently display the
“And Justice for All”
USDA Nondiscrimination poster

The And Justice for All Poster must be posted in each school in a location that is easily visible to the students and the public in the food service area.
The poster must be 11” x 17” in size.

New posters have not been published since 2019. If you have one dated 2019 or newer, you are in compliance.
If you do Breakfast in the Classroom and/or Grab & Go, signage must be available at the place of meal service.

Non-Discrimination Statement

The USDA required Nondiscrimination Statement must be included on ALL forms of communication and program materials; including all materials for public information, education, or distribution that mentions USDA programs.

Long Version: Use whenever possible. The long version is required on all documents pertaining to student eligibility even if they are only a page long (prototypes such as letters to households, verification, Direct Certification, State agency and program webpages (English and Spanish), etc.); or where space permits. The long version must be used on all vital material.

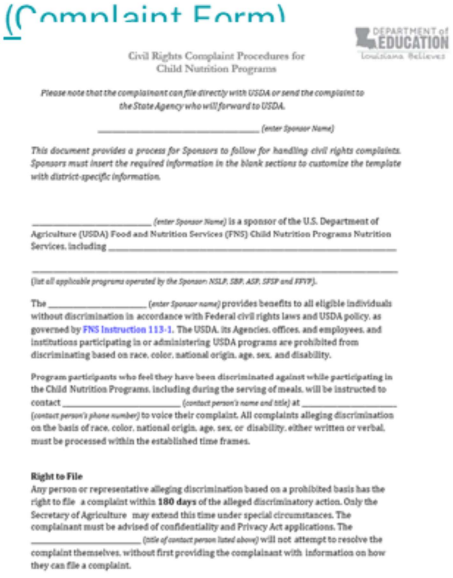
Short Version: required if the material or document is too small to permit the full (long) statement — 9 point font required (such as on menus or one page flyers).

"This institution is an equal opportunity provider."

The USDA required Nondiscrimination Statement must be included on ALL forms of communication and program materials; including all materials for public information, education, or distribution that mentions USDA programs.
As we have mentioned before, there has been no guidance regarding the use of the "new" non-dicrimination statement.

The long version should be used whenever possible.
The short version can be used if the material or document is too small to permit the full (long) statement on such as menus and flyers.

Civil Rights Complaint Procedures (Complaint Form)



Civil Rights Complaint Procedures for Child Nutrition Programs

Please note that the complainant can file directly with USDA or send the complaint to the State Agency who will forward to USDA.

_____ *(enter Sponsor Name)*

This document provides a process for Sponsors to follow for handling civil rights complaints. Sponsors must insert the required information in the blank sections to customize the template with district-specific information.

_____ *(enter Sponsor Name)* is a sponsor of the U.S. Department of Agriculture (USDA) Food and Nutrition Services (FNS) Child Nutrition Programs Nutrition Services, including _____

_____

(list all applicable programs operated by the Sponsor: NSLP, SBP, ASP, SFSP and SFVP).

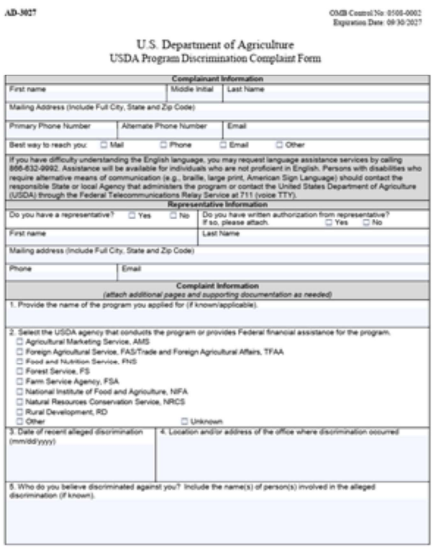
The _____ *(enter Sponsor name)* provides benefits to all eligible individuals without discrimination in accordance with Federal civil rights laws and USDA policy, as governed by FNS Instruction 113-1. The USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, age, sex, and disability.

Program participants who feel they have been discriminated against while participating in the Child Nutrition Programs, including during the serving of meals, will be instructed to contact _____ *(contact person's name and title)* at _____ *(contact person's phone number)* to voice their complaint. All complaints alleging discrimination on the basis of race, color, national origin, age, sex, or disability, either written or verbal, must be processed within the established time frames.

Right to File

Any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint within **180 days** of the alleged discriminatory action. Only the Secretary of Agriculture may extend this time under special circumstances. The complainant must be advised of confidentiality and Privacy Act applications. The _____ *(title of contact person listed above)* will not attempt to resolve the complaint themselves, without first providing the complainant with information on how they can file a complaint.

AD-3027



AD-3027

OMB Control No: 0508-0002
Expiration Date: 09/30/2027

U.S. Department of Agriculture
USDA Program Discrimination Complaint Form

Complainant Information		
First name	Middle Initial	Last Name
Mailing Address (Include Full City, State and Zip Code)		
Primary Phone Number	Alternate Phone Number	Email
Best way to reach you: ☐ Mail ☐ Phone ☐ Email ☐ Other		
If you have difficulty understanding the English language, you may request language assistance services by calling 866-632-9992. Assistance will be available for individuals who are not proficient in English. Persons with disabilities who require alternative means of communication (e.g., braille, large print, American Sign Language) should contact the responsible State or local Agency that administers the program or contact the United States Department of Agriculture (USDA) through the Federal Telecommunications Relay Service at 711 (voice TTY).		
Representative Information		
Do you have a representative? ☐ Yes ☐ No	Do you have written authorization from representative? If so, please attach. ☐ Yes ☐ No	
First name	Last Name	
Mailing address (Include Full City, State and Zip Code)		
Phone	Email	

Complaint Information
(attach additional pages and supporting documentation as needed)

1. Provide the name of the program you applied for (if known/applicable).

2. Select the USDA agency that conducts the program or provides Federal financial assistance for the program.
☐ Agricultural Marketing Service, AMS
☐ Foreign Agricultural Service, FAS/Trade and Foreign Agricultural Affairs, TFAA
☐ Food and Nutrition Service, FNS
☐ Forest Service, FS
☐ Farm Service Agency, FSA
☐ National Institute of Food and Agriculture, NIFA
☐ Natural Resources Conservation Service, NRCS
☐ Rural Development, RD
☐ Other ☐ Unknown

3. Date of recent alleged discrimination (mm/dd/yyyy)	4. Location and/or address of the office where discrimination occurred

5. Who do you believe discriminated against you? Include the name(s) of person(s) involved in the alleged discrimination (if known).

Reviewer(s) will verify with staff the civil rights complaints procedures and will verify the availability of the civil rights complaint form.

Menus and Meal Prices

Recommend and best practice is to have menu posted before the POS

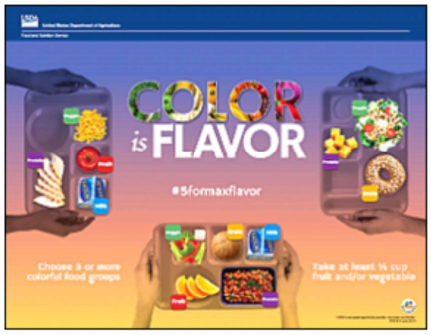
Recommend and best practice to post menus on school website and in cafeteria

Meal Prices must be posted near the POS

- Students
- Nonprogram adults
- A la carte

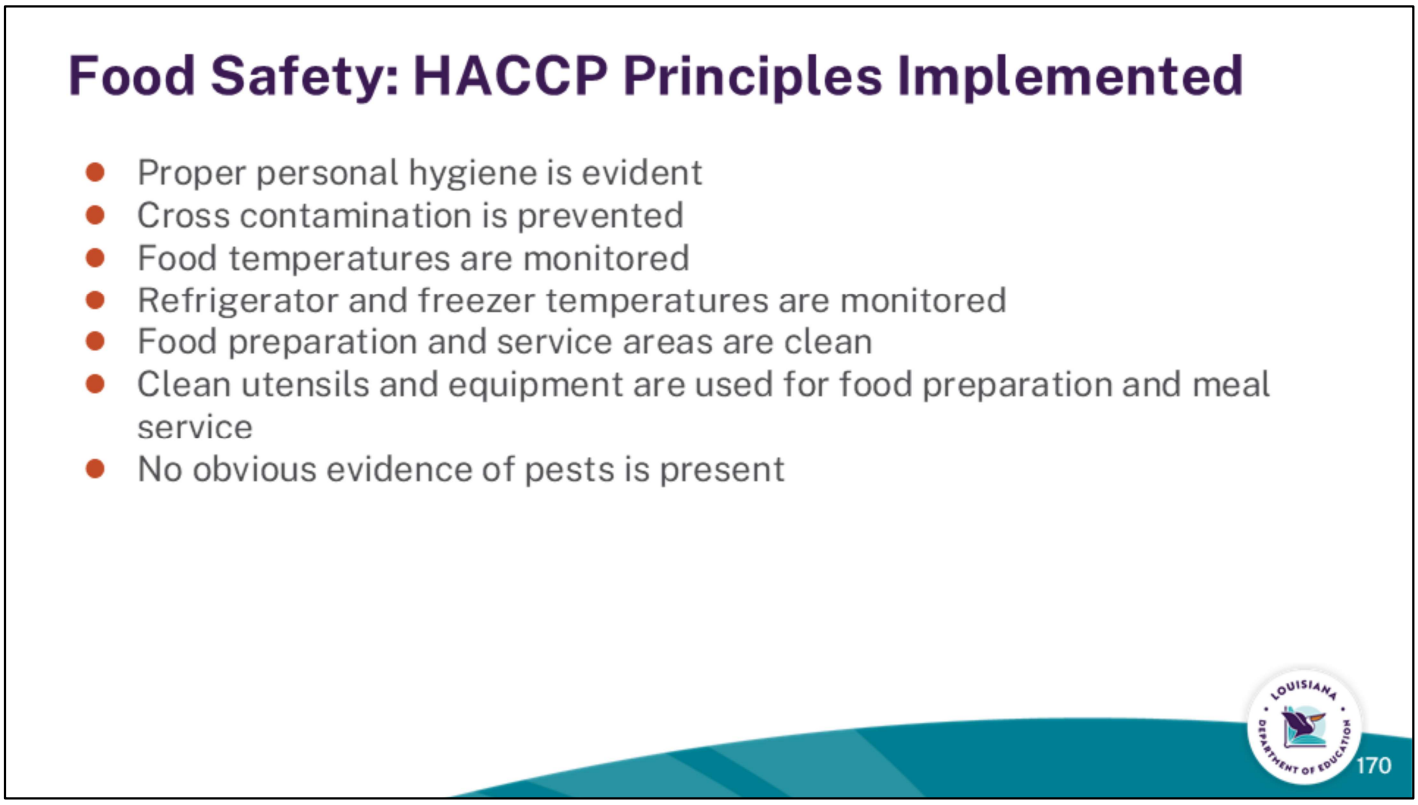
It is recommended and best practice to have menus posted before the point of service. It is also recommended and best practice to post menus on school website and in the cafeteria. Meal prices must be posted near the point of service that includes student meal prices, adult prices, and a la carte prices.

OVS signage - Must show what food items constitute a reimbursable meal.



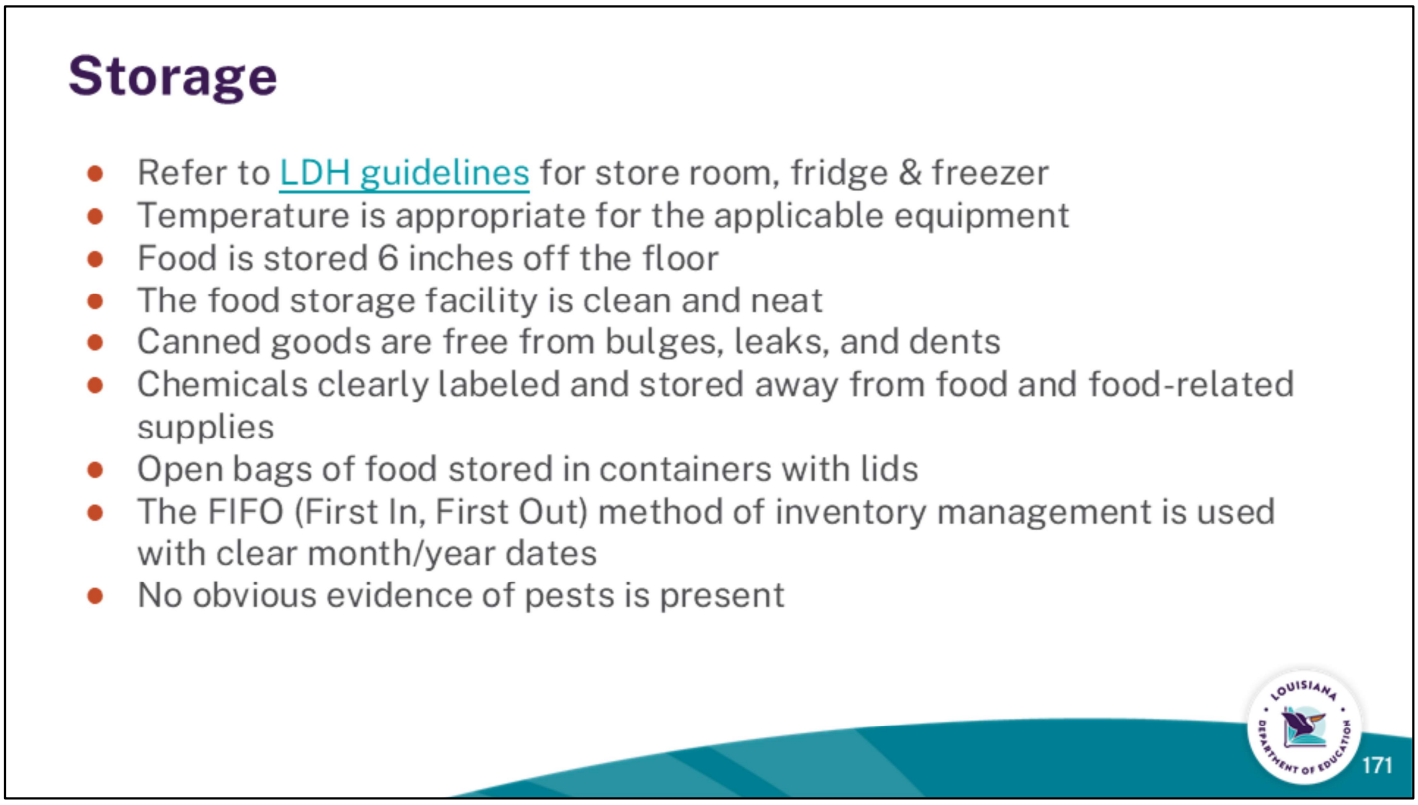
https://www.fns.usda.gov/tn/nslp/offer-versus-serve-posters

If the offer vs serve is implemented, there must be OVS signage to show what food items constitute a reimbursable meal. Offer vs Serve signage must indicate what students must take for a reimbursable meal for breakfast and lunch. If you do OVS for Breakfast in the Classroom and/or Grab & Go, signage must be available at the place of meal service. These are just some examples of OVS posters available through USDA's Team Nutrition Program.

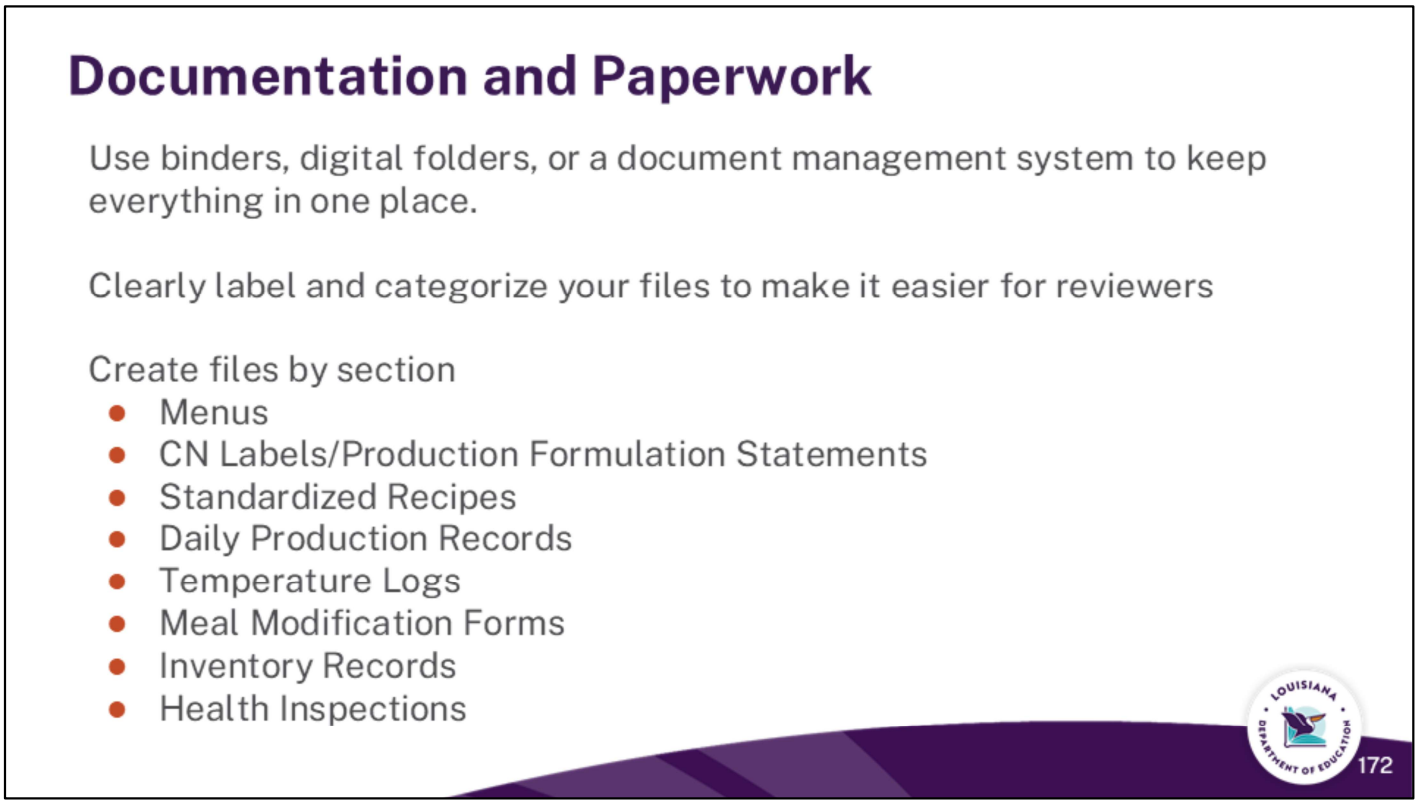


On the day of the review, reviewer(s) will review the Food Safety/HACCP Plan and that the principles are implemented.

- Proper personal hygiene is evident (e.g., hairnets, gloved hands, appropriate hand washing)
- Cross contamination is prevented
- Food temperatures are monitored
- Refrigerator and freezer temperatures are monitored
- Food preparation and service areas are clean
- Clean utensils and equipment are used for food preparation and meal service
- No obvious evidence of pests is present



On the day of the review, reviewer(s) will observe for any storage violations.
Proper storage practices include, but are not limited to: temperature is appropriate for the applicable equipment (e.g., freezer, refrigerator, milk cooler); food is stored 6 inches off the floor; the food storage facility is clean and neat; canned goods are free from bulges, leaks, and dents; chemicals are clearly labeled and stored away from food and food-related supplies; open bags of food are stored in containers with tight fitting lids; the FIFO (First In, First Out) method of inventory management is used; and no obvious evidence of pests is present.

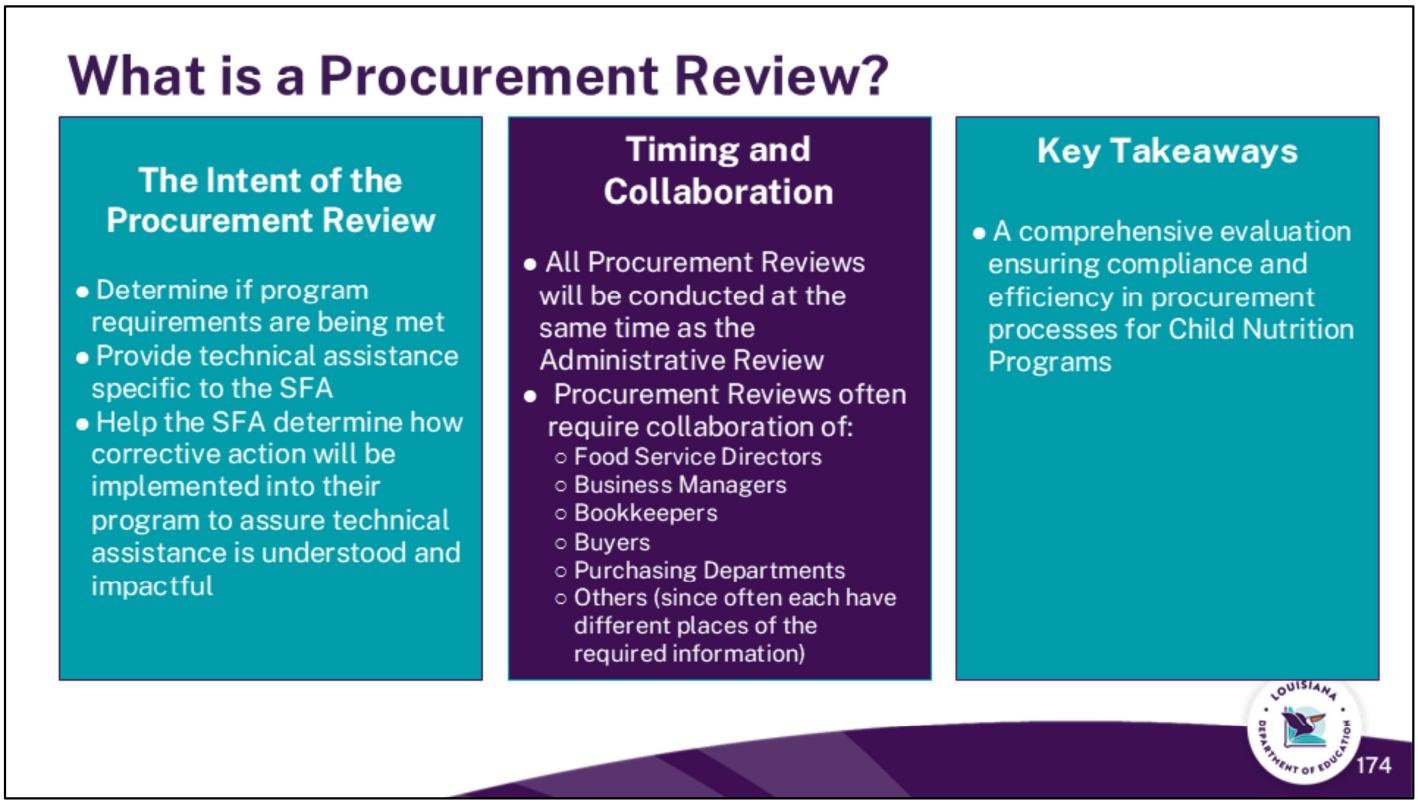


The reviewer(s) will verify that documentation and paperwork is available and organized.
Use binders, digital folders, or a document management system to keep everything in one place.
Clearly label and categorize your files to make it easier for reviewers.

Create files by section

- Menus
- CN Labels/Production Formulation Statements
- Standardized Recipes
- Daily Production Records
- Temperature Logs
- Meal Modification Forms
- Inventory Records
- Health Inspections

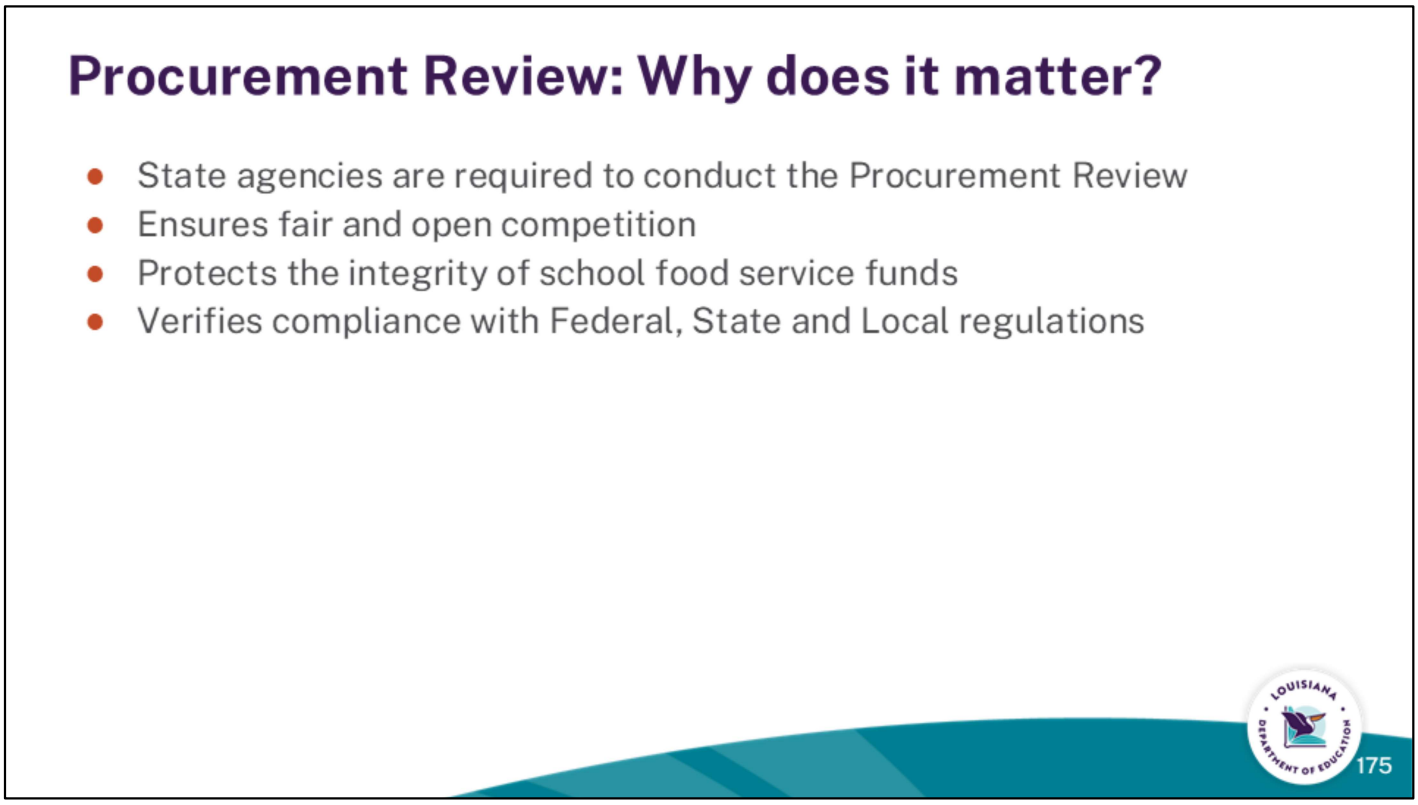
Now we are going to get into the Procurement review process. We are going to take you on a step by step guide of the questions we as the State agency reviewer have to answer as well as the documentation that will be collected as part of the review process.



Procurement Review (PR)
A Procurement Review is a comprehensive evaluation of the procurement processes and policies in place at a district, primarily concerning CNP funds.

The review intends to determine the SFA's compliance with Federal, State, and local procurement regulations and statutes. For any areas of non-compliance, corrective action or technical assistance will be provided by the State agency (SA) reviewer to bring the SFA into compliance.

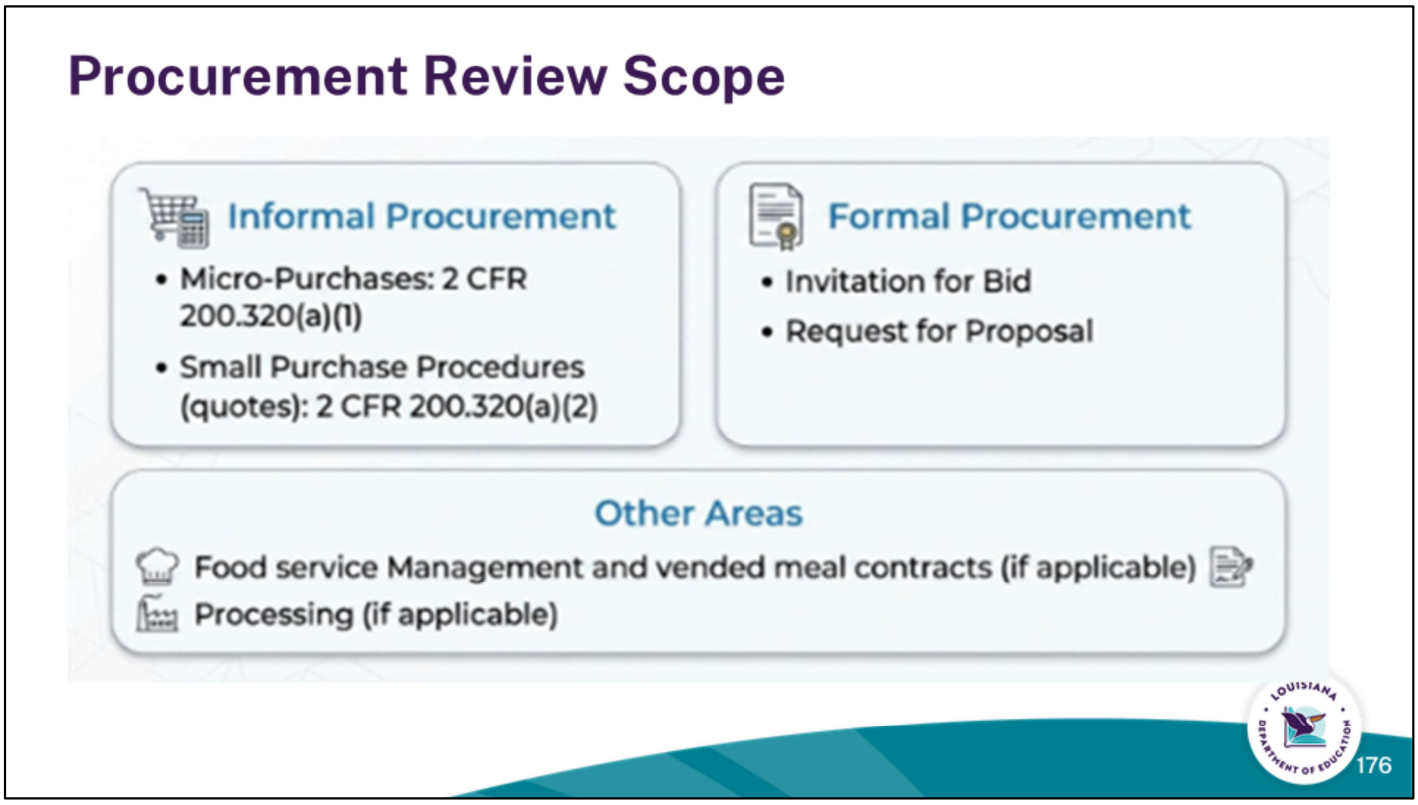
All Procurement Reviews will be conducted at the same time as the Administrative Review (AR). Procurement Reviews often require collaboration of Food Service Directors, Business Managers, Bookkeepers, Buyers, Purchasing Departments, and others, since often each has different pieces of the required information.



Now we will discuss the purpose of the Procurement Review. Many people think the PR is a part of the AR because they are frequently conducted at the same time. However, the PR is its own separate review. The purpose of the PR is to ensure Federal funds are spent according to Federal regulations, which ensures that taxpayer dollars are used properly, competitively, and transparently.

When conducting a Procurement Review, the SA reviewer assesses how the SFA has purchased food, supplies, and services with Nonprofit School Food Service Account (NPSFSA) funds. This includes everything from micro and small purchases to large contracts. We also review if you have an FSMC or a processor.

The SA reviewer assesses if the SFA's purchases were made competitively and fairly, followed the correct procurement method (such as micro purchase, small purchase, formal procurement (bids/RFPs)), if the contracts and agreements are current, signed, and compliant with federal provisions, and if all purchases are documented with quotes, bids, scoring sheets, and invoices.



What is reviewed during the Procurement Review? Every purchase made with nonprofit school food service funds is subject to review. This includes food, beverages, supplies, services, and equipment paid for with school food service funds.

Micro Purchases are small direct purchases that can be awarded without soliciting competitive price or rate quotes if the recipient considers the price to be reasonable based on research, experience, or purchase history. You must maintain documentation to support this conclusion. The Federal threshold for Micro purchase is $15,000. If you self-certify, then the threshold can be increased up to $30,000. With Micro Purchases, you must distribute the purchase equitably among qualified suppliers.

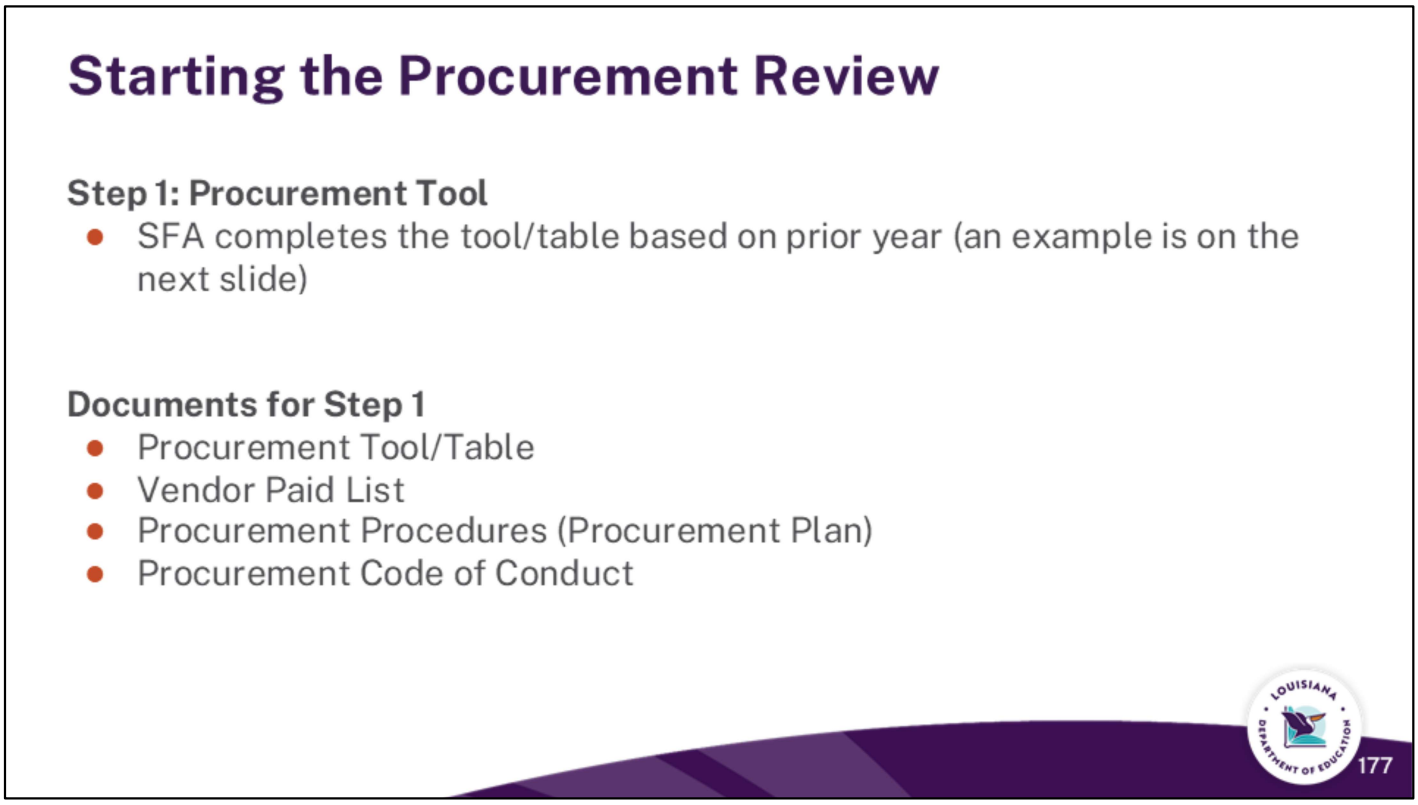
Small Purchases must be purchased using the small purchase threshold, which for the State of Louisiana is under $60,000. For Charter SFAs, the small purchase threshold is the same as the federal Simplified Acquisition Threshold (SAT) of $350,000. This procurement method requires you to obtain quotes from at least 3 vendors. This can be done by telephone, fax, email, or in person. When doing this, you must give each vendor the same specifications to receive a comparative, or an "apples-to-apples" quote.

Formal procurement must be used for purchases over $60,000. For Charter SFAs, purchases over $350,000. With formal procurement, you can use either an Invitation for Bid (IFB) or a Request for Proposal (RFP) for your solicitation. Each method has different requirements. IFB, for example, must result in a fixed price contract; it must be publicly advertised, publicly opened, and awarded to the lowest responsive and responsible bidder. An RFP can either be a fixed or cost reimbursable contract; it requires a public notice

where all evaluation factors must be identified, and the contract is awarded to the proposal that is the most advantageous to the SFA, with price and other factors considered.

If you have an FSMC, we will review the contract, the renewals, and any amendments to ensure compliance.

If you have a processor that processes your USDA foods, we will review that documentation as well.



Pass out Procurement Tool Table Handout during this slide

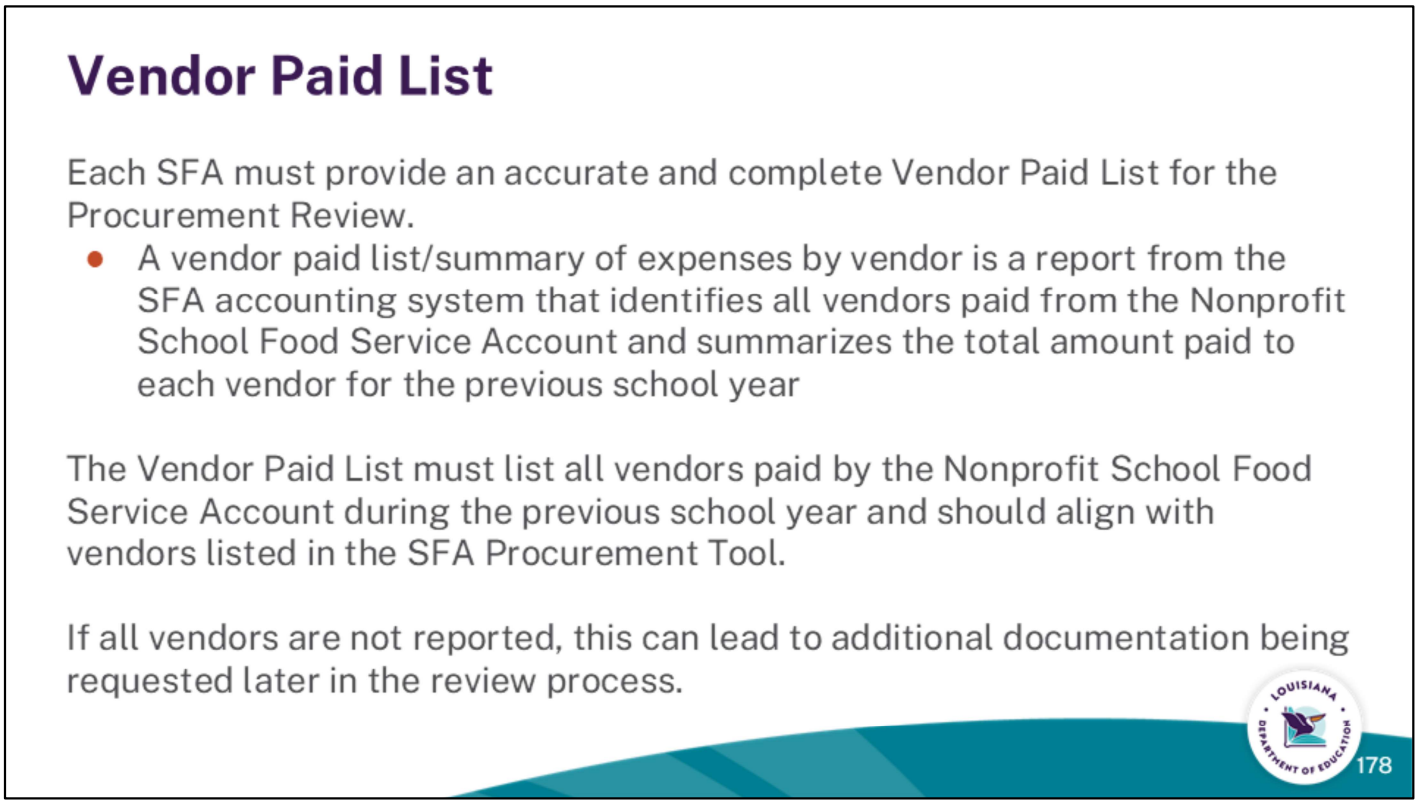
The Procurement Tool Table is an Excel document that the SFA will complete by entering the required information such as:

- Vendors
- Total amount paid to vendor
- Goods/services purchased
- Competitive procurement method to procure the product(s) or service(s)

Once the information has been entered, the SFA will:

- Save the Excel file and return the file to the SA reviewer
- Provide a Vendor Paid List/summary of expenses by vendor

When completing the Procurement table include the actual dollar amount spent by the vendor instead of using the drop down box. The drop down box just gives a dollar range to select from, but the SA reviewer needs to match the total spent by each vendor to the Vendor Paid List or General Ledger.



The Vendor Paid List is a report that lists all vendors and corresponding expenses paid from the Nonprofit School Food Service Account. The report is an Excel spreadsheet that can be obtained from your district's finance department.

The report categorizes all expenses made to the NPSFSA by vendor, identifying the total amount paid to each. When completing the Procurement table, the SFA must report each vendor paid from the Nonprofit School Food Service Account listed in the report by the SFA's purchasing thresholds.

The Vendor Paid List report should reflect all vendors paid from the NPSFSA indicated on the SFA's General Ledger to the amount spent to each vendor.

Procurement Review

Step 2: The SA reviews the Vendor paid list and the completed Procurement table

Micro purchases (Individual transactions below $10,000 or most restrictive)	8		
(Prioritize vendors receiving the highest dollar value of purchases	2	1 or more	2
Greatest total number of micro-purchases to review: 3			
Small Purchase Procedures/Informal Procurement: (Purchases below $250,000 or most restrictive threshold) Select procurements as applicable below:	2	1 to 3	2
Choose vendor (s) for review with the highest dollar value of purchases.			
Only one response was received		1 or more	1
[NEW] Third Party entity (See instructiions above.)		1 or more	1
(Greatest total number of small purchases to review: 4	0		
Sealed Bids & Competitive Procurements/Formal (IFB & RFP) (Commonly *above $250,000 or most restrictive threshold*): Selected procurements will not include FSMCs. See instructions to prioritize the selection of contracts for review.	3	1 to 3	2
[NEW] Market Basket Analysis to Contract Award: (See State agency instructions)	2	1 or more	1
[NEW] Group Purchasing Entities, when identified: (See State agency instructions)	0	1 or more	1
Only one response was received		1 or more	1
(Greatest total number of formal sealed bids/requests for proposals to review: 5			
Food Service Management Company (FSMC) contracts (*Review all FSMC contracts)*	2		
(Greatest total number of FSMC contracts to review: **All)**	2	1 or more	*All*
Processing contracts:	0		
Choose vendor (s) for review with the highest dollar value of purchases.		1 to 3	2
Only one response was received		1 or More	1
All other processing contracts:		1 or More	1
(Greatest total number of processing contracts to review: 4			

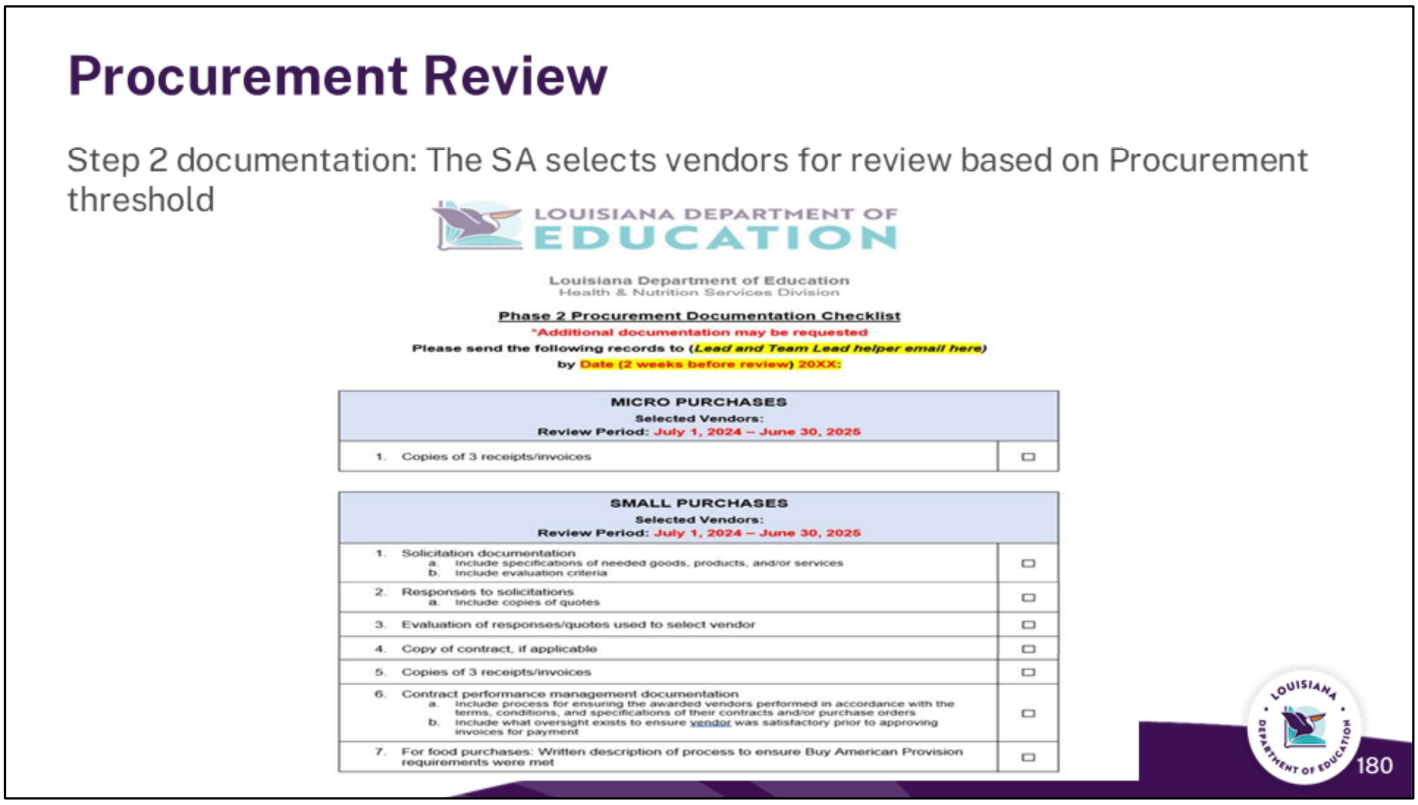
The SA reviews the Vendor paid list and the completed Procurement table to ensure that all vendors paid from the Nonprofit School Food Service Account have been include on the Procurement table, as well as ensuring the vendors have been categorized under the correct purchasing method.

Next, the SA reviewer select vendors in each category based on the Procurement tool guidelines as seen on this slide.

The Procurement tool instructions help reviewers determine the number of vendors/contracts for review. The reviewer will count the vendors on the vendor paid list, then enter the number of vendors in column 2. Using the chart above, the reviewer will select the number of vendors for review as designated in the third column. A minimum of 3 vendors will be selected for each procurement method, except sealed bids and competitive proposals (formal procurements). A review of formal procurements may require as many as 6 contracts. New sections are added to review when an SFA uses the market basket analysis for contract award and when Co-ops, State contracts, or another third party entities are used. When an SFA procures a processor for USDA foods, the State agency will use the applicable procurement method AND the Processing tab for this review.

Procurement Review

Step 2 documentation: The SA selects vendors for review based on Procurement threshold



LOUISIANA DEPARTMENT OF EDUCATION

Louisiana Department of Education
Health & Nutrition Services Division

Phase 2 Procurement Documentation Checklist

*Additional documentation may be requested

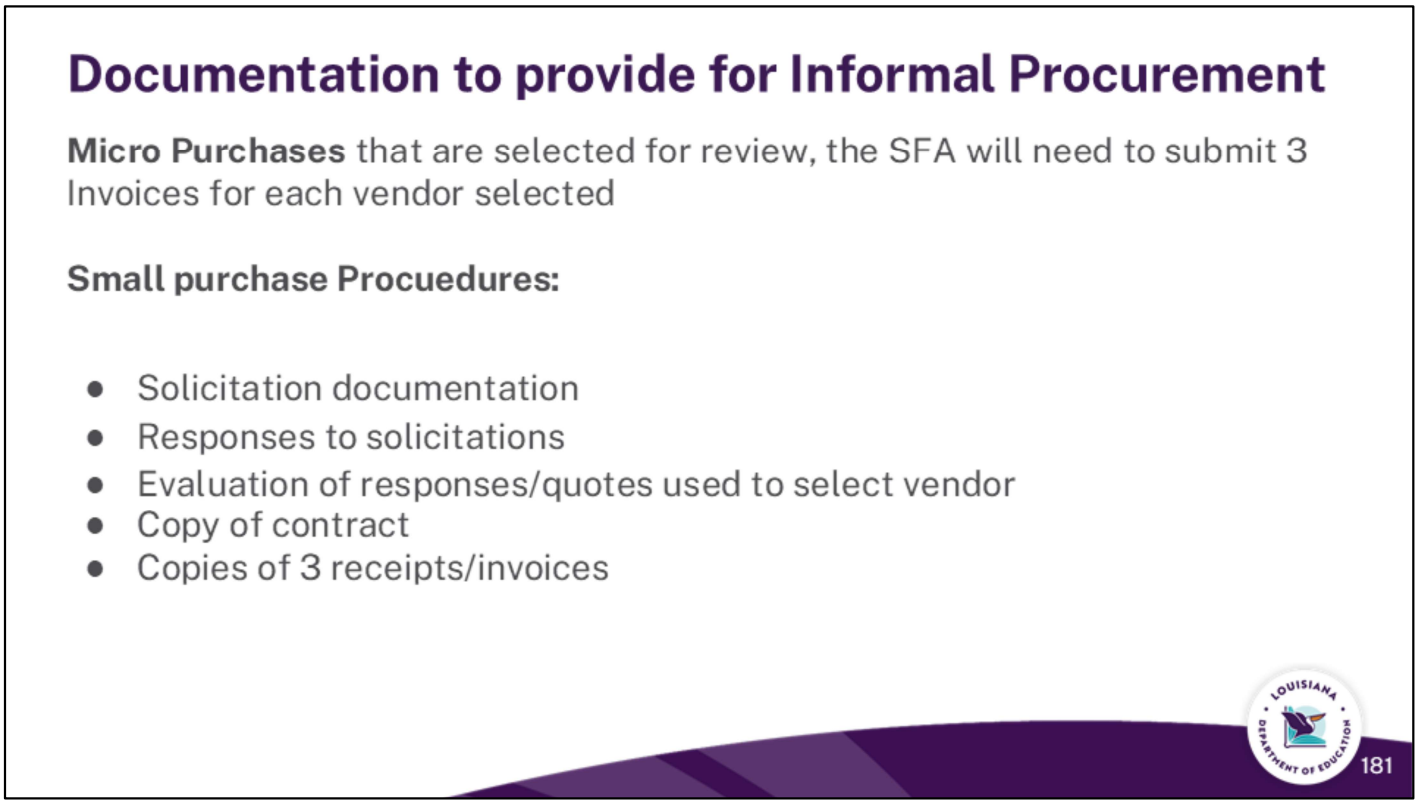
Please send the following records to (*Lead and Team Lead helper email here*) by Date (2 weeks before review) 20XX:

MICRO PURCHASES Selected Vendors: Review Period: July 1, 2024 – June 30, 2025	
1. Copies of 3 receipts/invoices	☐

SMALL PURCHASES Selected Vendors: Review Period: July 1, 2024 – June 30, 2025	
1. Solicitation documentation a. Include specifications of needed goods, products, and/or services b. Include evaluation criteria	☐
2. Responses to solicitations a. Include copies of quotes	☐
3. Evaluation of responses/quotes used to select vendor	☐
4. Copy of contract, if applicable	☐
5. Copies of 3 receipts/invoices	☐
6. Contract performance management documentation a. Include process for ensuring the awarded vendors performed in accordance with the terms, conditions, and specifications of their contracts and/or purchase orders b. Include what oversight exists to ensure vendor was satisfactory prior to approving invoices for payment	☐
7. For food purchases: Written description of process to ensure Buy American Provision requirements were met	☐

A sample of vendors must be selected to review procurement documentation for depending on the number of vendors utilized in each procurement category during the previous school year. This is a snippet of the form we will send you to show which vendors have been selected and what documentation to provide for both Micro Purchase and Small Purchase Procedures.

Provide the Step 2 document to audience



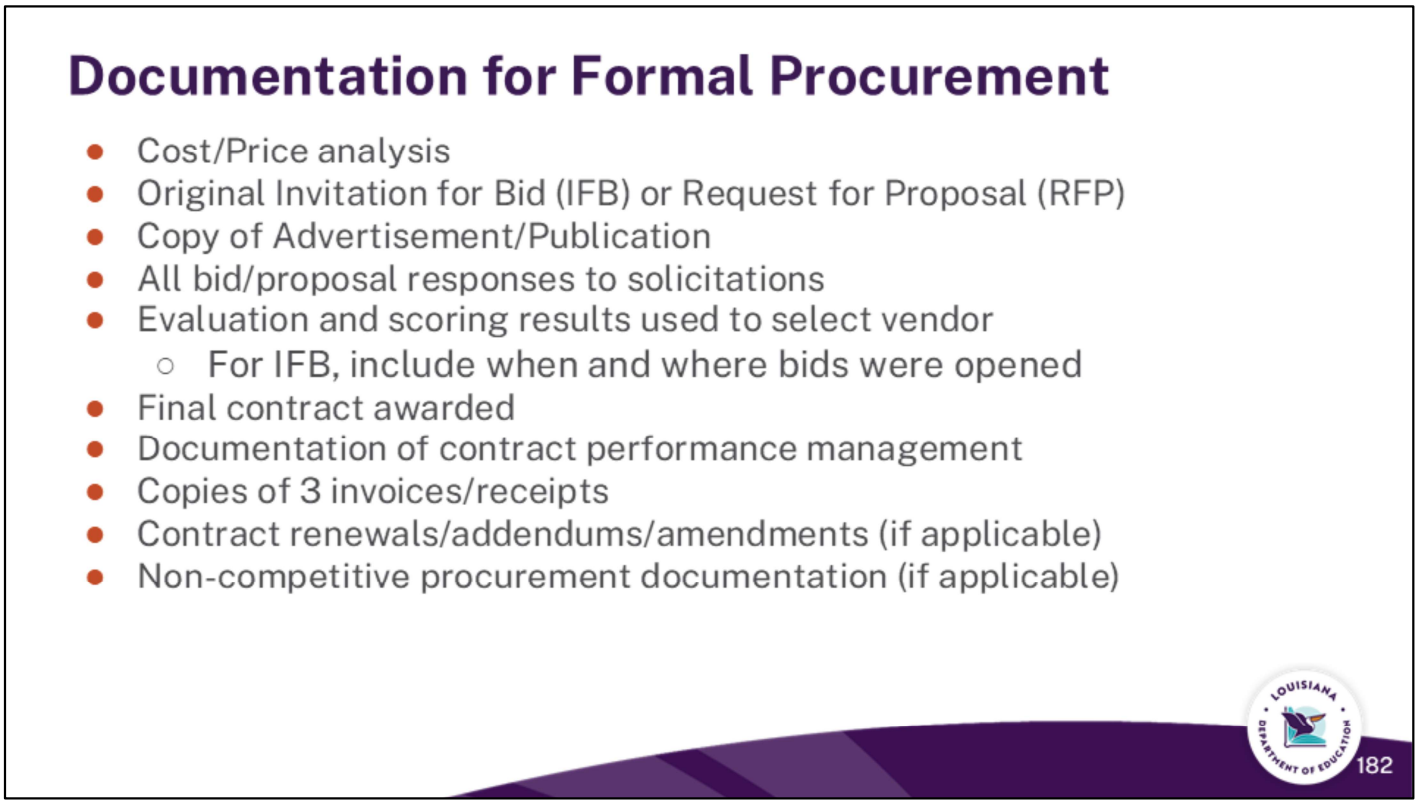
Micro Purchase: Based on the vendors that are selected for review under the threshold, the SFA will need to submit 3 invoices for each vendor that the State agency reviewer selects. Many times, we see SFAs splitting their purchases to avoid the Micro Purchase threshold. An example, the SFA needs to purchase two ovens, each oven cost $10,000. So the SFA purchases each oven separately in order to avoid having to go out for bid if both ovens are purchased at the same time period.

Small Purchase: For vendors that fall under the small purchase threshold, a little more documentation is required to be submitted by the SFA. If you notice on the sheet that was just passed around, you will be required to provide the solicitation documentation for the goods and services under $60,000, or $350,000, depending on the type of SFA (i.e., Public School, Charter school, private school, RCCI). This encompasses the evaluation criteria, responses from vendors or quotes, the evaluation done by your SFA for the quotes received, a signed copy of the contract, as well as 3 receipts or invoices. In addition, contract performance management documentation must be provided showing the SFA that awarded vendors perform in accordance with the specification outlined in the contract, and the Buy American provision must be included in the specification or told to the vendor over the phone, email, or in person.

Keep in mind that all this documentation must be provided for all vendors selected.

As you know, small purchase procedure quotes can be obtained by email, in person, over the phone, etc. If you obtain quotes over the phone or in person, documentation must be provided to include who you spoke with (person responsible for giving the

quote), what you spoke about(specification), and when you spoke to them(date of when the quote was obtained). All of this must be documented in order to evaluate all vendor quotes in order to award the contract to the most responsible bidder.



Formal Procurement: For vendors that received payments that total $60,000 or more, or $350,000 for charter SFAs, documentation to support that formal procurement methods were followed must be provided. This includes a cost/price analysis, which estimates how much the SFA anticipates to spend on a particular good or service in the new SY/FY, a copy of the original solicitation, a copy of the newspaper advertisements from two different dates, proof of the interactive electronic bidding platform used, a copy of all bids/proposals received, a copy of scorecards/evaluation results used to select a vendor (since IFBs are open to the public, documentation of when and where the bids were opened is required), a copy of the signed executed contract, documentation that the SFA is monitoring the vendor's performance to ensure alignment with the terms/conditions outlined in the contract, a copy of 3 invoices/receipts, and any renewals/addendums/amendments.

For SFAs that receive only one response to the solicitation, all of the aforementioned documentation is required, with the addition of a copy of the approved Non-Competitive Procurement Request Form. We will go into more detail later in the presentation about non-competitive procurement.

Procurement Review

Step 3: State Agency Documentation Review

- Reviewer will complete the review and ask any follow-up questions needed

Step 3: Documentation Review
The SA reviewer will complete the review and ask any follow-up questions needed. Now let's get into what we look at for the procurement review.

Procurement Review General Tab

Assess Procurement plan and Code of Conduct

0	Compliant/Non-Compliant	Comments & Technical Assistance
SA Instructions: Obtain the SFA/LEA **written codes of conduct and written procurement procedures** [2 CFR 200.318(c)(1)] [NEW] (NOTE: compliant **code of conduct = 1)**Prohibits officers, employees and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors or parties of subcontracts; **2)** Provides for disciplinary actions for violations by officers, employees, or agents; **3)** Includes language that the SFA will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, **OR** language with standards for situations when the financial interest is not substantial or the gift is unsolicited and of nominal value. (**NOTE:** If nominal value allowed, record dollar value allowed in comment box.) For **written procurement procedures**, regulations only specify compliance with Federal, State, and local procurement standards.) **RESPONSE: YES= Compliant; NO= Non-compliant.**		
1) Is the SFA **written code of conduct** compliant? (NOTE: If non-compliant, record the non-compliant portion in the comment box with the technical assistance provided.)	Compliant	
2) Is the SFA/LEA's documented **Procurement Procedures/plan** compliant with Federal, State and local procurement standards? [2 CFR 200.318(a)]	Non-compliant	COMMENT IS REQUIRED
Additional Comments:		

Earlier in the slides on the Step 1 documentation, we asked for the Code of Conduct and the Procurement Plan. We ask for these documents because on the General tab of the Procurement tool, we have to answer questions concerning these documents.

The SA Instructions require a review of the Code of Conduct. At a minimum, the Code of Conduct must contain 3 things for State agency reviewers to consider it compliant.
1) Prohibits officers, employee, and agents from soliciting or accepting gratuities, favors, or anything of monetary value from contractors or parties of subcontracts; (who should not do this)
2) Includes language that the SFA will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, (what they should not do)
3) Provides for disciplinary actions for violations by officers, employees, or agents; (if they do this, what are the repercussions)
The Code of Conduct could also include: language with standards for situations when the financial interest is not substantial, or the gift is unsolicited and of nominal value. (the amount would be noted as well, i.e., $10,000)

SFAs are not required to follow our Code of Conduct, but at a minimum, the SFA's Code of Conduct should include these three areas.

The question for the written procurement procedures only gives an option of compliant or non-compliant in order to specify compliance with Federal, State, and local procurement standards. There is more that is looked at to determine a compliant or non-compliant

answer.

LDOE offers a Procurement Plan template for your SFA to use, which includes General Procurment procedures, a Code of Conduct, Micro purchase procedures, Small purchase procedures, a table for SFAs to identify what goods and services are procured using Micro or Small purchase procedures, Formal procurement procedures with a table to identify the goods and services procured formally, Advertising and Electronic Bidding requirements, procuring a commodity processor, Piggybacking, Cooperative Bidding, guidelines for awarding IFBs and RFPs, procuring and awarding Services and Professional Services Contracts, procuring and awarding an FSMC or Vended Meal contract, the required provisions for all Formal bids/proposals from Appendix II to Part 200 - Contract Provisions for Non-Federal Entity Contract under Federal Awards, Other required provisions (i.e. Buy American Provision and Civil Rights Laws), Noncompetitive procurement, Emergency procurement, and procedures to comply with Act #463 - Prohibited Ingredients in SFS and Disclosure of Harmful Ingredients.

Oftentimes, during a review, we notice that an SFA does not have any procurement procedures or is using an outdated plan from 10 years ago that does not show the SFA's current practices. Many may ask what a procurement plan is. It is a detailed document that outlines the steps, roles, and responsibilities involved in the procurement process for School Food Authorities (SFAs).

Or we see that an SFA does not follow their procurement procedures. For example, the SFA might have a more restrictive Micro-purchase threshold of $5,000 but their plan say $10,000. They may be using informal procurement when a formal bid was required. Or, they may not be obtaining the required number of quotes, or you are splitting purchases to avoid conducting a formal procurement process. Even though we offer a Procurement plan template for SFAs to utilize, you must still make the plan specific to what your district is doing.

Wthin the items sent to print we included the Example Code of Conduct and Procurement Plan templates

Micro Purchase Tab Questions

Micro Purchase Procedures Review Worksheet ($10,000 or below)			
If no questions are identified in this column, this tab is either not used by the SFA or the State agency reviewer failed to select vendors for review in the SFA Procurement Table. STATE AGENCY INSTRUCTIONS: Obtain copies of LEA/SFA purchase orders issued, and invoices, receipts, etc. to determine if the SFA was compliant with vendor transactions below $10,000 as of June 20, 2018, if goods/services are necessary, allocable, and prices were reasonable, and if purchases were equitably distributed among all qualified sources. Review 3 invoices of vendors selected. **RESPONSE: YES** = Compliant; **NO** = Non-compliant.	COMPLIANT/NONCOMPLIANT	Noncompliant Party	Noncompliant Party
1) Based on a review of invoices/receipts, is the SFA compliant with having each vendor transaction below $10,000? [2 CFR 200.320(a)]	Non-compliant		sams club
2) If the SFA paid a membership to a club warehouse, third-party entity, etc., are the purchases made from this entity necessary, reasonable, and equitably distributed among qualified sources/vendors?	Compliant	sams club	sams club
3) Based on a review of invoices/receipts, is the SFA compliant with distributing purchases equitably among all qualified sources? [2 CFR 200.320(a)]	Compliant	costco	sams club
4) If the SFA paid a membership to a club warehouse, third-party entity, etc., are the purchases made from this entity necessary, reasonable, and equitably distributed among other qualified sources/vendors?	Non-compliant		
5) Is the SFA compliant with maintaining records sufficient to detail the significant history of the procurement? [2 CFR 200.318(i)]	Non-compliant		
ADDITIONAL COMMENTS:			

Micro purchase is the easiest of the three procurement methods to utilize. The micro purchase tab has the least amount of questions and documentation that needs to be submitted for review. Micro purchase requires the SA reviewer to obtain 3 receipts from each of the vendors selected for review. The purpose of collecting the invoices is to ensure that the SFA has stayed under the threshold of $15,000. The micro purchase threshold has increased from $10,000 to $15,000 on October 1, 2025.

SFAs are also allowed to self-certify for a higher threshold of up to $30,000 in the Schedule A of the CNP Application. The SA reviewer will assess if the SFA has followed the self-certified micro purchase threshold when procuring goods or services.

For example, when an SFA goes to SAM's Club or Costco, the membership dues for a warehouse retailer would need to fall under $15,000, or $30,000 if the SFA has self-certified for the higher threshold.

The SA reviewer will assess if the SFA has distributed purchases equitably among like vendors. Equitably is spreading the dollar value across like vendors. We recognize that some SFAs are in rural areas and only have one local retailer to purchase goods from, and/or the district has a purchase account with. We do not expect the SFA to travel to the next city/parish to purchase goods. If this is the case for your SFA, this should be included in your district's procurement plan.

Question 4 is similar to question 2, and compliance would be determined the same for these questions.

For the SA reviewer to determine if the SFA is compliant with question 5, the SFA must be able to produce documentation, such as receipts or invoices. If the SFA is unable to produce the required documentation, they will be deemed non-compliant. Please save all paper receipts and invoices electronically as a backup, as the ink may fade over time. Be sure to keep a record of all paper receipts and invoices received in a centralized location, such as a file cabinet or some other storage.

A common finding we see on reviews is that the SFA is using a higher Micro purchase threshold, but they have not filled out the higher threshold self-certification within the Schedule A of their CNP Application. To use the higher Micro purchase threshold, you must fill out the self-certification section on your Schedule A, as well as update your procurement plan to ensure that your plan reflects what you, as a district, are actually doing.

Small Purchase Tab

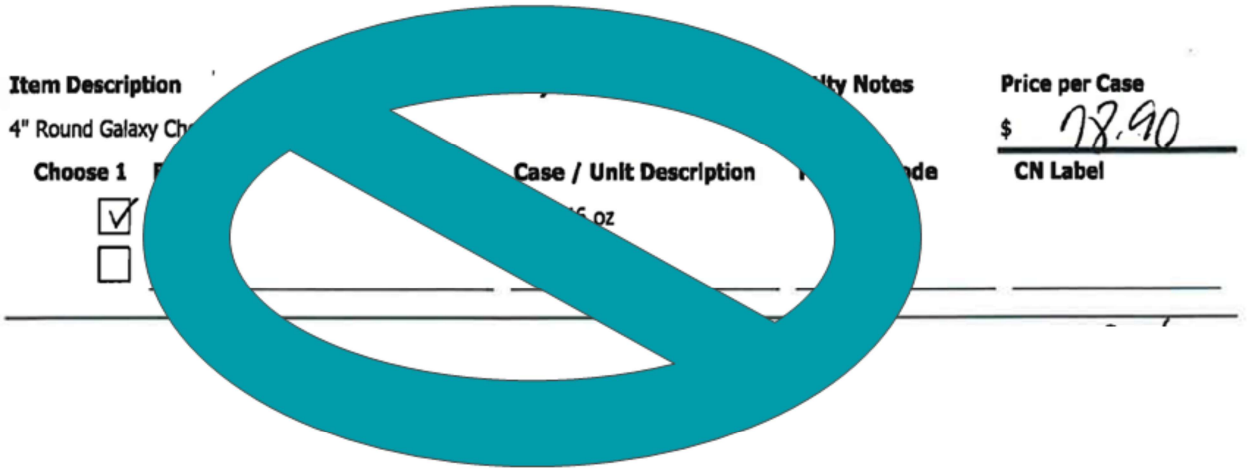
Small Purchase LEA Threshold	Small Purchase State Threshold		
$0	$0		
Small Purchase Procedures/Informal Procurement Review Worksheet			
solicitation documents, specifications, evaluation criteria, contract and contract terms (if applicable), purchase orders, and any other documentation needed to evaluate performance such as invoices, receipts, etc. for each informal procurement selected for review. **RESPONSE: YES**= Compliant; **NO**= Non-compliant; **NA**= Not applicable.		**Compliant/Noncompliant**	**Noncompliant Party**
Solicitation			
1) Prior to making a purchase, is the SFA compliant with obtaining price/rate quotes from an adequate # of qualified sources (2 or more) and providing clear and accurate descriptions of goods/services procured? [2 CFR Part 200.319(c)(1), .320(b) (NOTE: A 'no bid' response is not an appropriate bidder response.			
2) Is the SFA compliant with full and open competition, does not restrict competition? (NOTE: Restricting competition includes placing unreasonable requirements, unnecessary experience, or specifying a 'brand name' product (not allowing 'an equal' with performance or relevant requirements.) [2 CFR 200.319(a)]			
3) [For food purchases only] Is the SFA compliant with the Buy American provision by requiring vendors to purchase domestic foods? (NOTE: Domestic foods are foods produced, and processed in the United States substantially using domestic foods having over 51% domestic food components by weight or volume. [7 CFR 210.21 and SP02-2017 and SP 38-2017 Compliance with and Enforcement of the Buy American Provision, June 30, 2017]			

PASS OUT LA STATUES QUICK REFERENCE PAMPLET

For questions 1 and 2, the SA reviewer will assess if the SFA has obtained the required minimum number of quotes; in Louisiana, 3 quotes are required. If the SFA receives a statement of no bid from an SFA, this can be considered a response. It is not the SFA's fault if the solicited vendor did not respond to the solicitation.

Restricting competition is defined as placing unreasonable requirements in the solicitation, such as specifying a brand name without allowing an equivalent, a delivery driver requiring a bachelor's degree, or a vendor having 10 years of experience in the industry. We request the original solicitation to assess the requirements/specifications the SFA is requiring from vendors to ensure fair and open competition.

Restricted or Open Competion?

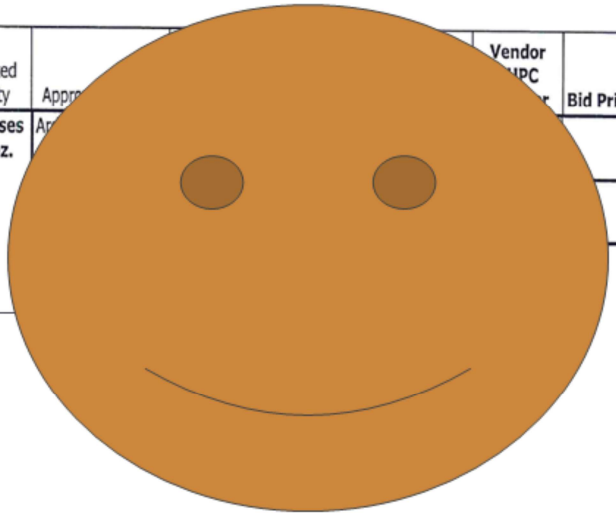


You can see from the example on this slide that the SFA does not have a place within the specification page that allows for a brand equivalent. The SFA is stating they will only accept Tony's pizza with no other equivalent brands considered. This is an example of placing unreasonable requirements, resulting in restricting competition.

Example of full and open competition

Allows for a brand equivalent

Item Description	Requested Quantity	Appr	Vendor UPC	Bid Price	Extended Bid Price
20035 Juice, Apple, Frozen, 4 oz. US Grade A, 100% fruit juice, no sugar added, no pouch pack, pasteurized. Carton; to meet 1/2 cup fruit to meet CNP fruit requirements. Must meet USDA's Buy American Provision Requirements. Price per case.	**7710 cases 70/4 oz.**	Ar			



You can see from the example on this slide that the SFA has a place within the specification page that allows for a brand equivalent. The SFA is not saying that they can only accept MOTTS apple juice; they are allowing other brands to be considered. This creates full and open competition when a brand equivalent is accepted.

Buy American Provision

The next question asked is whether the SFA is compliant with Buy American. For a Procurement review, the reviewers are not looking through the store room like they do with the Administrative review. The reviewers are looking for language within your solicitation that tells vendors that they are to comply with the Buy American provision when purchasing food items. If the vendor is unable to purchase items domestically, there is an exception form that the SFA must provide to the vendor in order to specify which items they cannot get domestically.

Questions 4 and 5 talk about agents and GPOs/Co-ops. What are those?

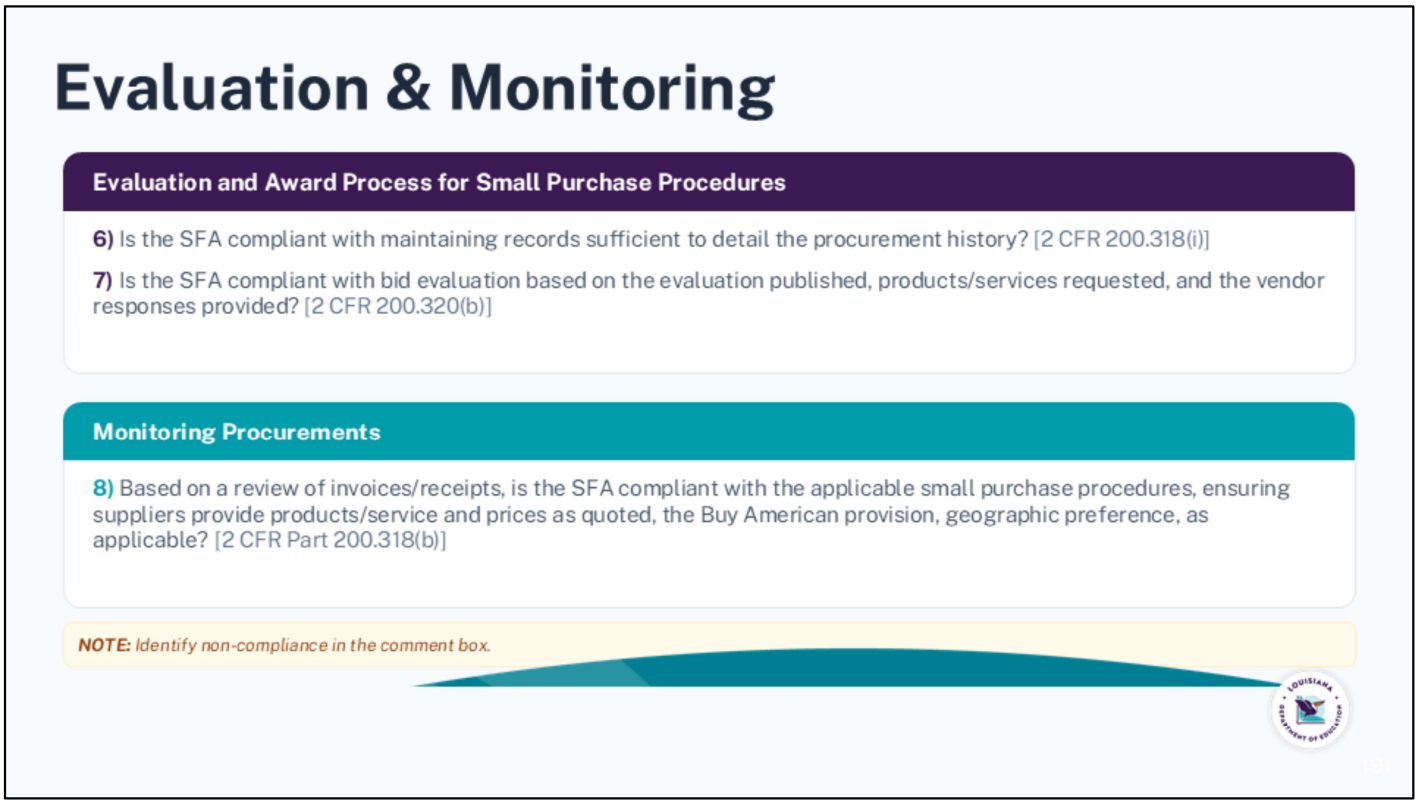
An agent acts on behalf of an SFA and procures for the SFA. In some cases, the SFA may not have a qualified person to procure goods and services for the district. So, the SFA hires an agent to procure on their behalf. Since they are acting as an agent of the SFA, they must follow all procurement requirements outlined in 2 CFR 200.318-327 and 7 CFR 210.21 the SFA must follow. They procure the vendors just as an SFA would, except the SFA must sign all contracts/agreements with the vendors.

It is in the best interest of the SFA to have the agent sign a code of conduct to ensure they are being held to the same standard of ethics as their own employees.

Question 5 talks about third-party entities. This could encompass School Co-ops, GPOs (Group Purchasing agents), and GBOs (Group Buying Organizations).

There is a difference between these third-party entities mentioned. A School Co-op only serves school districts that have agreed to come together to decide on items they are going to purchase. An example of this is the Northeast Co-op.

A GPO and a GBO are basically the same thing; these group purchasing organizations are made up of various entities, such as hospitals, jails, State or city governments, school districts, etc. An example of this is the State contract, where different entities may purchase from the contract.



Now we will discuss the Evaluation and Monitoring questions. Question 6 is the same as the Micro Purchase tab, asking if the SFA is compliant with maintaining records. If the SFA cannot provide the reviewers with the records requested, such as the solicitation or the evaluation of vendor invoices, this will be a finding. Maintaining records is a vital way to show proof that your SFA is operating in conformance with Federal and State requirements.

Question 7 refers to the bid evaluation. Reviewers want to see if bids or quotes are being evaluated based on what the SFA sent them. For example, if you sent out a solicitation to different food vendors and did not tell them that you wanted the same thing, such as Golden Delicious, Grade A, 135 pack, you may get a quote for mandarin oranges. Each vendor must be given the same specifications for there to be fair and open competition.

Question 8 is the same as the Micro Purchase tab, where reviewers will look at 3 invoices. This is necessary to ensure that quotes submitted by the vendor match the amount on the invoice that the SFA is paying for the product, and if the amount matches the Vendor Paid List as well as the General Ledger.

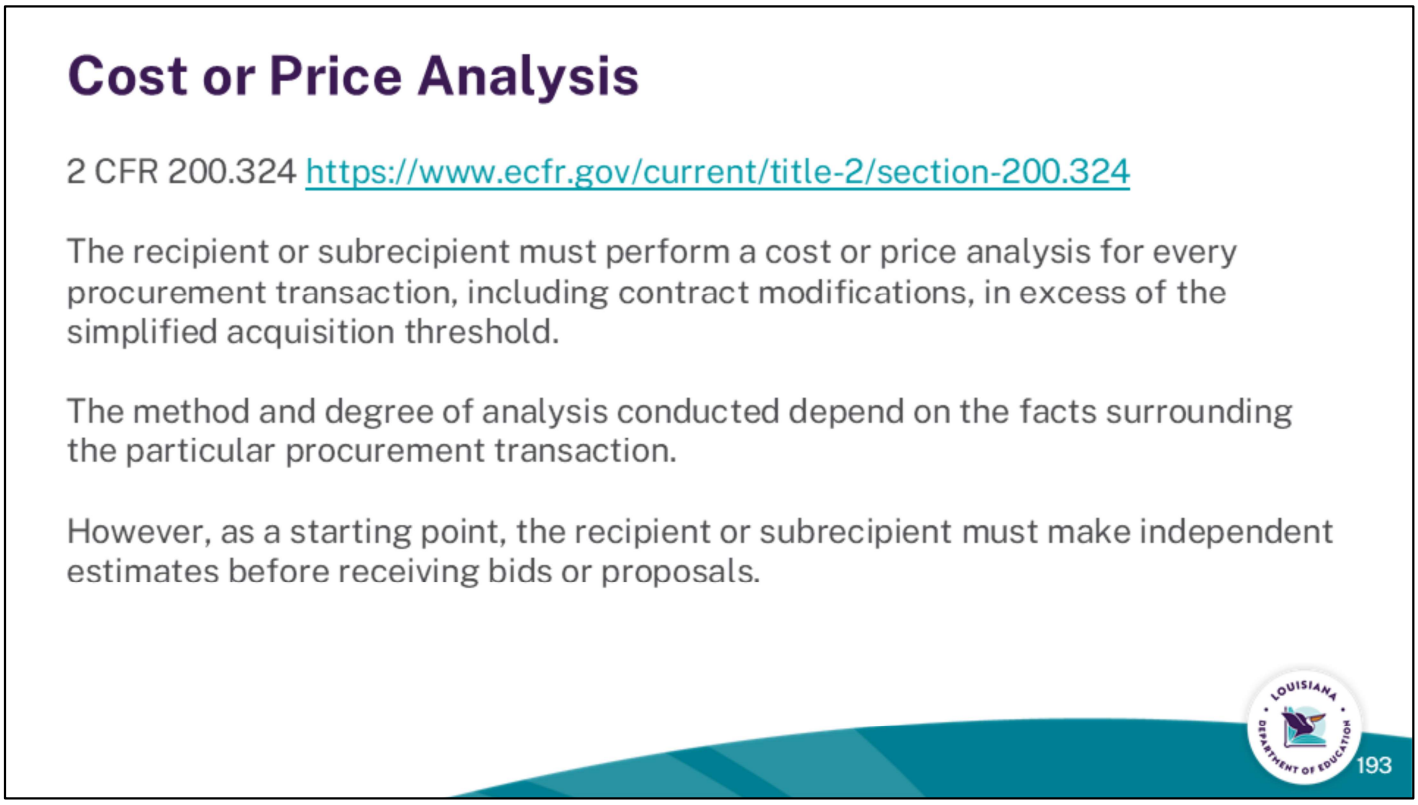
Formal Procurement tab

FORMAL PROCUREMENT PROCEDURES (Sealed Bids (Invitation for Bids)/Competitive Proposals (Request for Proposals) REVIEW WORKSHEET		
Small Purchase LEA Threshold $0 / Small Purchase State Threshold $0		
STATE AGENCY INSTRUCTIONS: Prior to answering the questions in this tab, obtain copies of SFA procurement solicitation documents, specifications, evaluation criteria and contract terms for each contract reviewed and per the contract selection chart. **RESPONSE: YES=** Compliant; **NO=** Non-compliant; **NA=** Not applicable.	**Compliant/Noncompliant**	**Noncompliant Party**
General Solicitation Process		
1) Is the SFA compliant with conducting a cost/price analysis prior to soliciting? [2 CFR 200.323 [NEW] (NOTE: see reviewer tip and compliant = prior year, or other analysis used; non-compliant is no prior year and no analysis conducted.)		
2) Is the SFA compliant with full and open competition, i.e., does not restrict competition? (NOTE: Restricting competition includes placing unreasonable requirements, unnecessary experience, or specifying a 'brand name' product (not allowing 'an equal' with performance or relevant requirements.) [2 CFR 200.319(a)] (NOTE: if competition is restricted, this is a finding and corrective action is to modify the document and conduct a new solicitation process. Designate situation in the comment box.)		

Now we will discuss the Formal section of the Procurment tool.

The very first question that is asked is about Cost/Price Analysis. According to 2 CFR 200.324, this must be done any time the SFA will be procuring any goods or services over the simplified acquisition threshold. In LA, this is $60,000 for public school districts/private schools. Charter schools follow the federal threshold of $350,000. We will go into detail on cost price analysis in the next few slides, but I wanted to finish sharing with you the questions on this screen.

A common finding we see is that the SFA does not conduct a Cost and/or Price analysis when procuring formal contracts.



PASS OUT COST/PRICE ANALYSIS FORM:

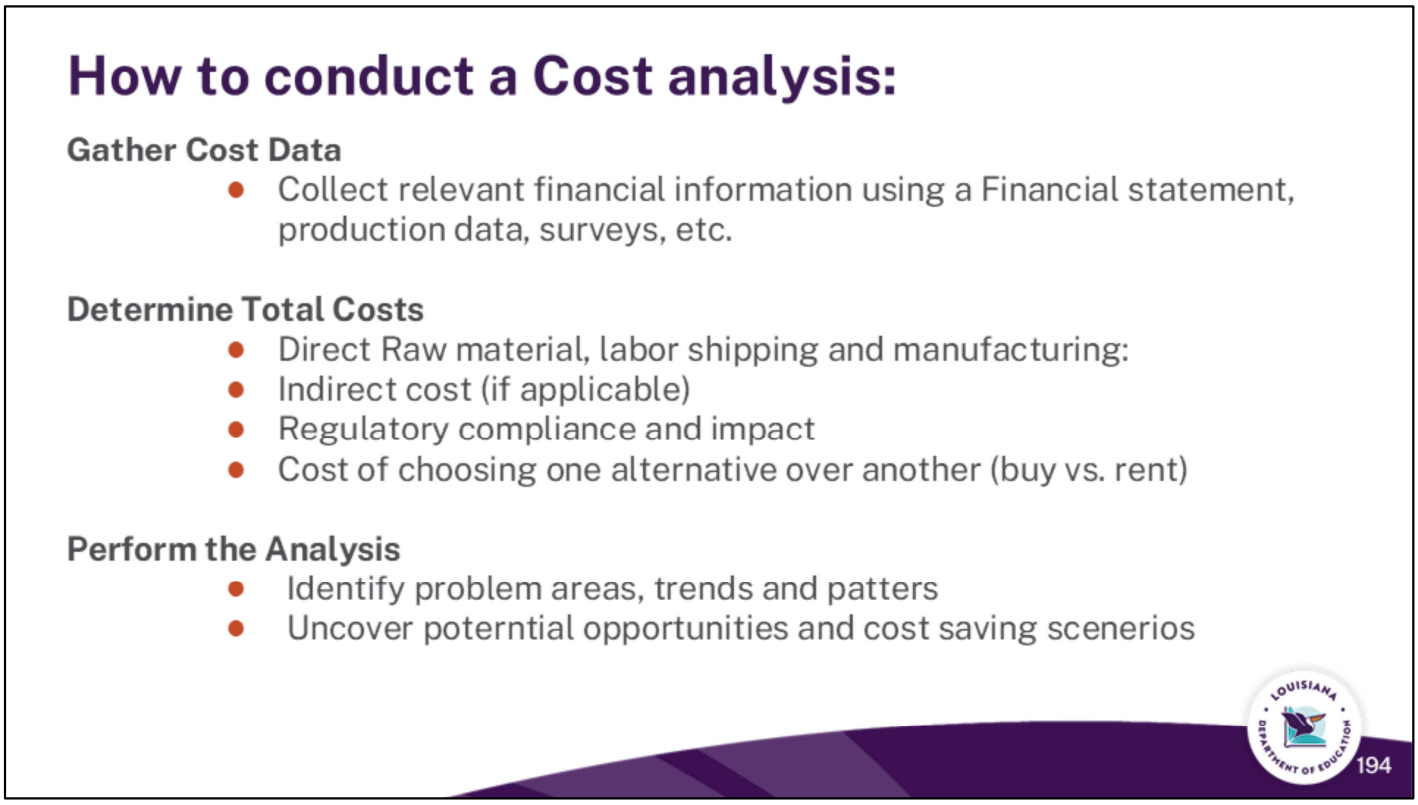
The first question on the Formal tab asks if the SFA performed a cost /price analysis for each of their Formal procurements. We have many questions surrounding this topic, so I thought we could take some time to go over what a Cost/Price analysis is. These are actually two separate ways to determine the true cost of a product or service and determine the best sales price. Proper management of cost if the cost you are going to expend on a vendor is reasonable, necessary, and allocable.

Cost analysis is the process of analyzing the total cost of a product, project, or service.

and price analysis is the process of analyzing the pricing of a product or service to determine whether it is reasonable, competitive, and profitable. This is typically done by comparing the price of a product or service against similar products or services in the market. SFAs should develop written procedures requiring documented cost or price analyses for all applicable Formal Procurement and train procurement staff on these requirements. Maintaining thorough documentation of whichever analysis your SFA conducts, with supporting rationale, will demonstrate due diligence and compliance with federal procurement standards.

The handout that we sent for you all to print is more reflective of a price analysis. There are 4 columns that should be filled in. the first one asked you to identify the the product or service, then enter current cost of the contract then provide the estimated cost using the CPI Index rate to adjust for inflation and lastly you have to determine if the new cost is

reasonable and sustainable.



A cost analysis is a detailed examination of the individual components that make up the total cost of product service. A cost analysis involves examining the individual cost elements of a contract to assess whether the total price is fair and reasonable. While a cost analysis can be more complex than a price analysis (particularly when the good or service is not readily available in the commercial marketplace), the goal is straightforward: evaluate each cost element to ensure overall pricing is justified.

Typical cost elements in food service contracts include direct costs such as labor (e.g., wages for kitchen staff and food service workers), materials (e.g., food ingredients, packaging), and supplies (e.g., cleaning products). Indirect costs may include overhead (e.g., utility expenses, administrative support) and proposed profit margins. To estimate these elements, SFAs must understand the fee schedule components likely to appear in the eventual contract. For example, in a food service contract, cost elements might include food costs (e.g., per meal pricing), labor costs (e.g., staff wages for meal preparation and serving), equipment usage (e.g., rental fees for kitchen appliances), and transportation costs (e.g., delivery fees for ingredients).

SFAs should gather and document comprehensive data to support their cost analysis. This data will be essential for creating an independent estimate prior to issuing a solicitation and will also be used to evaluate proposals once received.

Key steps in performing a cost analysis include:

Compare the same vendor's pricing: Review actual costs incurred by the same vendor for the same or similar work. This helps determine consistency in pricing and cost allocation.

Compare other vendors' pricing: If the vendor has not completed the same or similar work, assess actual costs incurred by other vendors for comparable projects. This provides a benchmark for industry-standard pricing.

Review previous cost estimates: Use past cost estimates from the same vendor or from others for similar work to evaluate whether the proposed pricing is fair and reasonable.

By following these steps, SFAs can ensure that procurement prices are fair, reasonable, and align with the standards set by the Uniform Guidance.

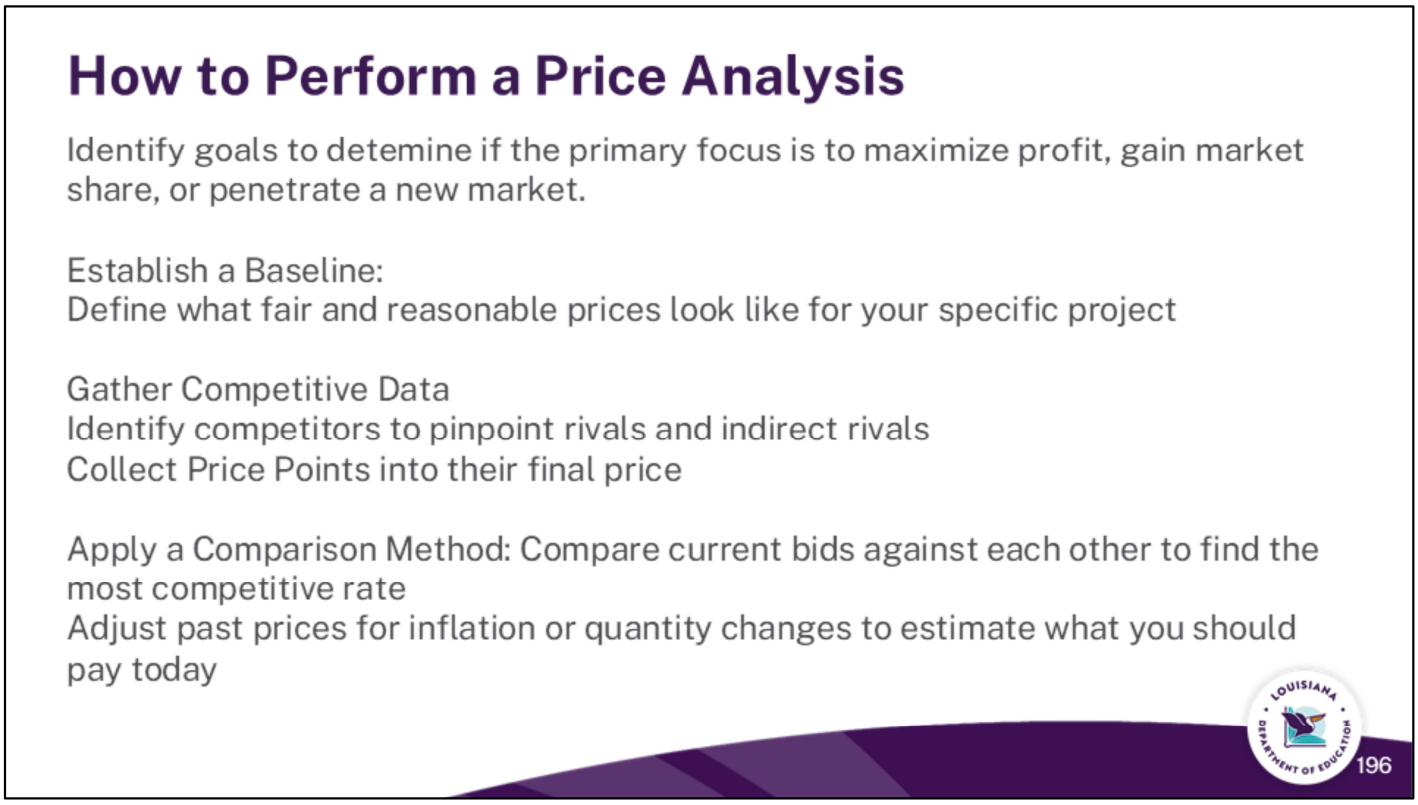
Example of a Pre-Procurement Independent Estimate-Cost analysis

Cost Element	Calculation/Source	Estimated Cost
Direct Food	Projected meal count (e.g., 100,000) × average raw food cost per meal ($1.50)	$150,000
Direct Labor	10 FTEs × average hourly rate ($18) × annual hours	$300,000
Benefits/Taxes	30% of Direct Labor	$90,000
Supplies	Disposable trays, hairnets, cleaning chemicals	$15,000
Management Fee	Industry standard fixed fee per meal (e.g., $0.10)	$10,000
Total Estimate	**Sum of all identified cost elements**	**$565,000**

Step-by-Step Breakdown of the Analysis Process

1. **Identify Elements**: The SFA defines every "bucket" of spending required to run the program, including staff wages, raw ingredients, transportation, and equipment maintenance.
2. **Verify Necessity**: For each item, the school asks: "Is this cost required for the scope of work?" For instance, if an FSMC proposes a $5,000 marketing budget, the SFA must verify if that aligns with the program's goals.
3. **Compare Against Benchmarks**: The SFA compares the vendor's line items to:
    1. **Previous actual costs** incurred by the district in prior years.
    2. **Industry-standard pricing** or catalog rates for similar services.
    3. **Independent estimates** developed internally prior to the solicitation.
4. **Evaluate Profit**: Profit must be evaluated as a separate element to ensure it isn't excessive. Federal regulations prohibit "cost-plus-percentage-of-cost" contracts, so profit is typically a fixed fee.
5. **Audit Rebates and Credits**: In cost-reimbursable contracts, the analysis includes verifying that all USDA Foods values, discounts, and rebates are properly credited

back to the SFA’s Nonprofit School Food Service Account.

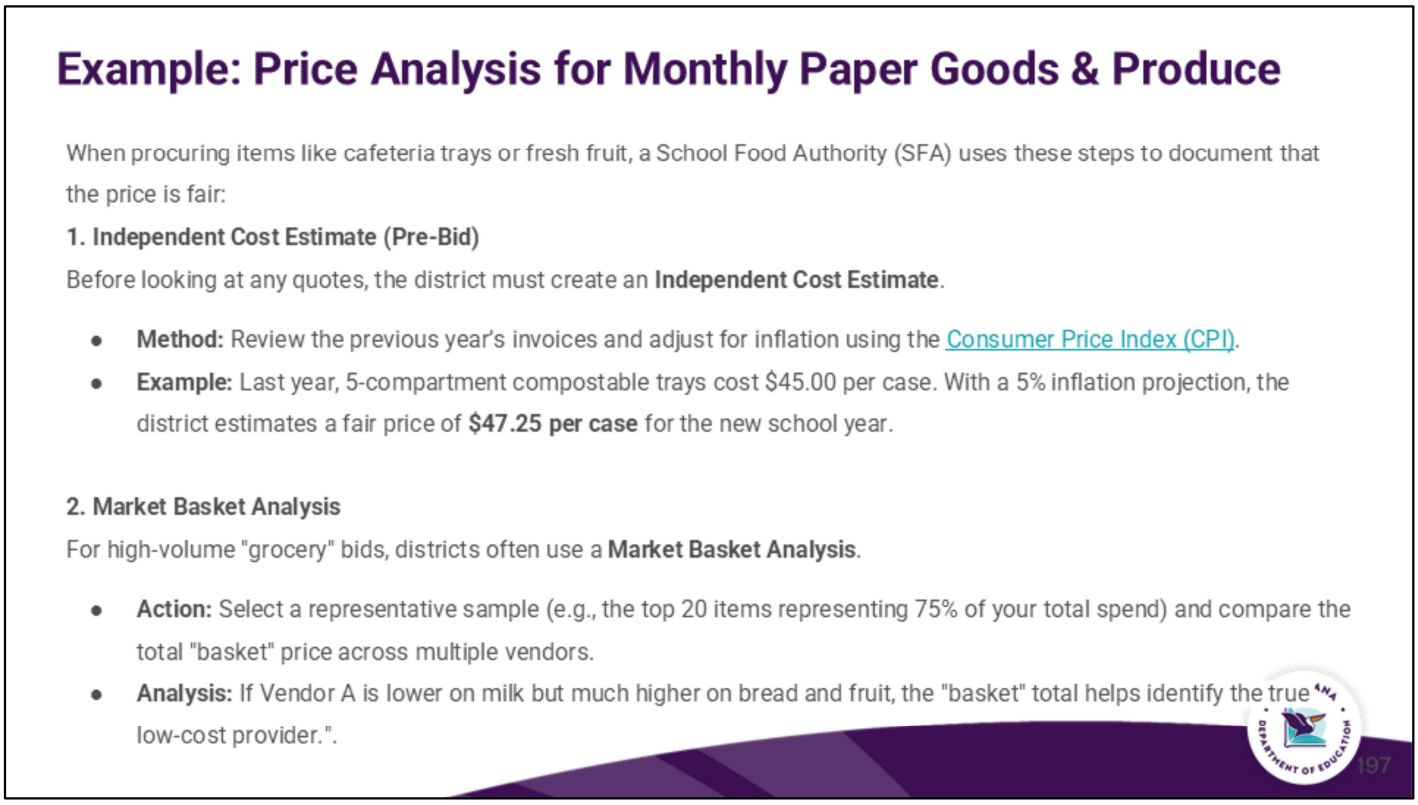


While **cost analysis** examines the internal components of a product's price, **price analysis** focuses on the overall price to determine if it is fair and reasonable compared to the external market

First you need to determine what is a fair and reasonable price looks like
Then pinpoint direct rival or same buyer category Food and supplies (PFG, Sysco, US foods etc.)
Next you can use published price list, catalogs or websites pricing to assess how competitors bundle feature, quality and service into their final price.
Then you will use a comparison method, you can use market comparison where you compare current bids against each other to find the most competitive rate, or you can do a historial comparison where you adjust past prices for inflation (such as the CPI index).

Next you would align your price with your internal cost analysis to ensure profitability while remaining in the market.

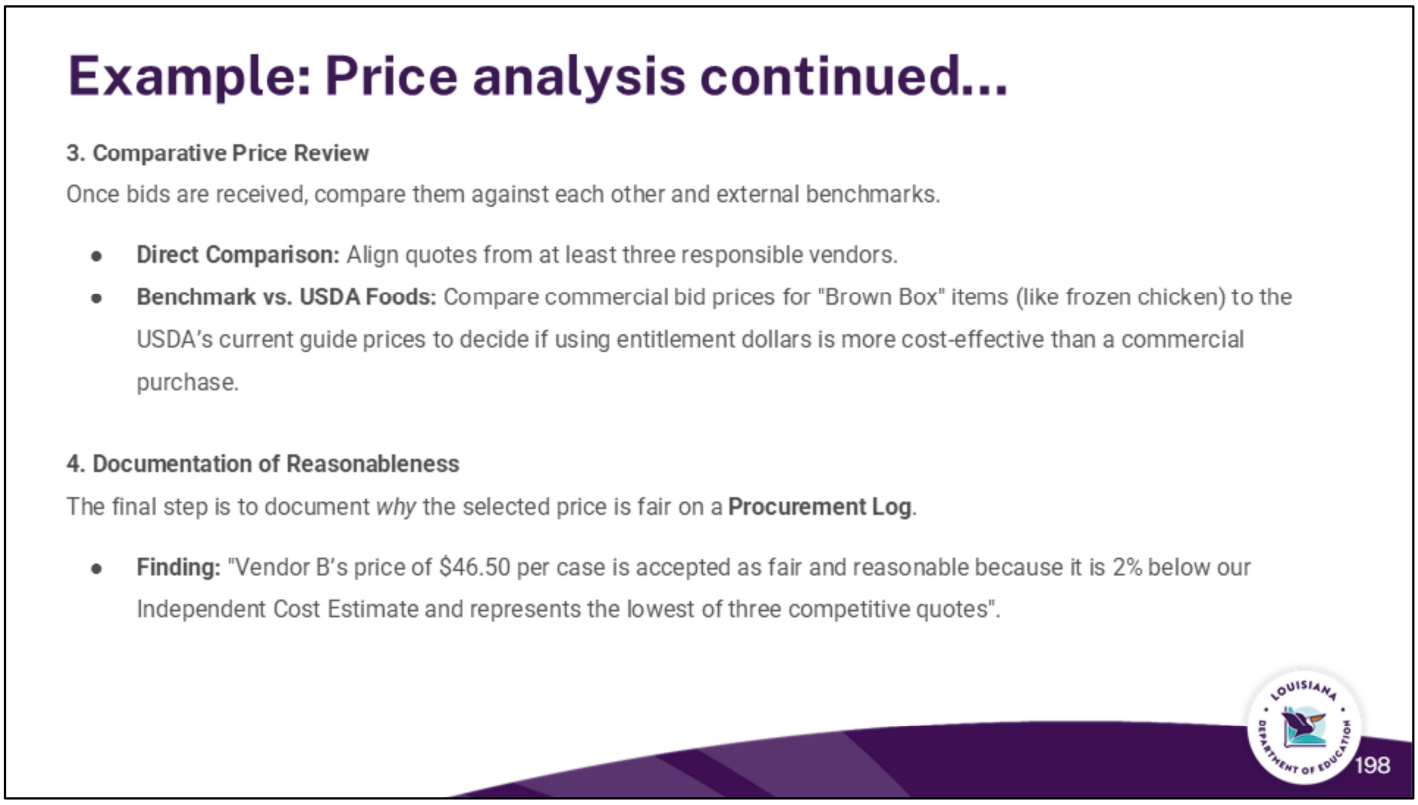
And to expound on a price analysis this is done by comparing pricing of similar products. For example if you are buying a combi oven.



When we buy anything—from cafeteria trays to fresh fruit—we have to prove we're getting a fair deal. Here are the two primary ways we document that.

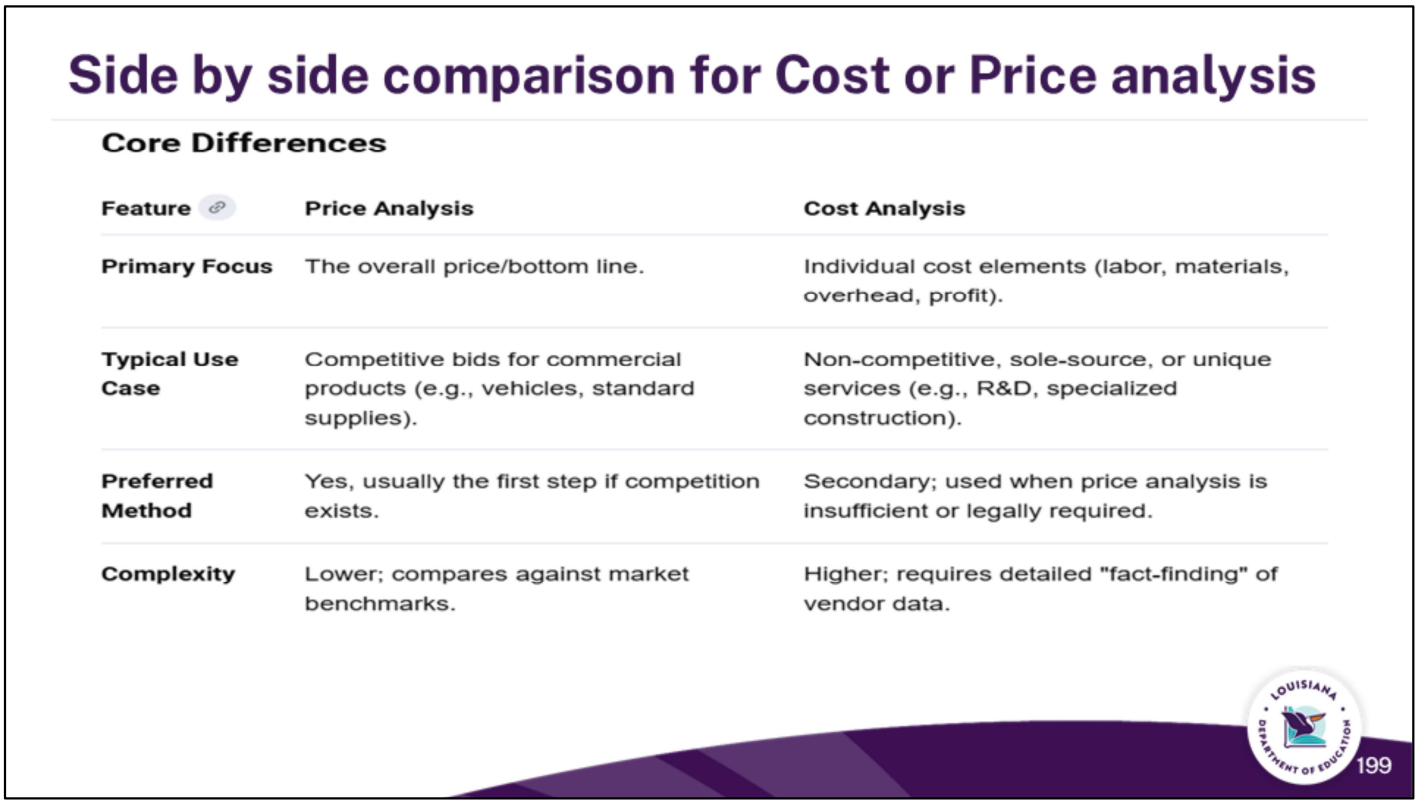
- Step 1: Independent Cost Estimate):
    - Think of this as your "internal benchmark." You must do this before you see a single vendor quote.
    - How to do it: Look at last year's invoices and adjust for current inflation (CPI).
    - The Math: If a case of compostable trays was $45 last year and inflation is up 5%, your ICE is $47.25. If a bid comes in at $60, you now have the data to question it.
- Step 2: Market Basket Analysis:
    - We use this for those massive "grocery" bids where item lists are too long to analyze one by one.
    - The Strategy: Don't get distracted by "loss leaders." Select your top 20 items—the ones that make up about 75% of your total spend.

    - The Goal: Compare the total basket cost across vendors. Vendor A might have cheaper milk, but if their bread and fruit prices are sky-high, the Market Basket Analysis will show they aren't actually the low-cost provider.
- Closing: These steps ensure we are good stewards of school funds and stay compliant with procurement regulations.



- Step 3: Comparative Price Review:
    - The "Rule of Three": Once the bids are in, line them up. You want to see quotes from at least three responsible vendors to ensure true competition.
    - Commercial vs. USDA Foods: For items like frozen chicken, don't just look at the vendor price. Compare that "Brown Box" commercial bid against the USDA guide prices.
    - Decision Point: This comparison tells us if we should use our entitlement dollars or if a straight commercial purchase is actually more cost-effective this year.
- Step 4: Documentation of Reasonableness:
    - The Paper Trail: This is the most critical step for an audit. You must record *why* you chose a price on your Procurement Log.
    - The Justification: Don't just say "it was cheap." Use a specific finding.
    - Example: "We accepted Vendor B at $46.50 because it was 2% below our ICE (Independent Cost Estimate) and was the lowest of three competitive

quotes." This proves due diligence.



Here is a side by side of a Price or Cost analysis

- **Use Price Analysis when:**
  - Multiple vendors are competing for the same contract
  - The item has a published catalog or established market price
  - There is historical data for the same or similar items
  - The purchase is for standard commercial goods
- **Use Cost Analysis when:**
  - Price competition is inadequate or non-existent
  - Certified cost or pricing data is required by regulations
  - Evaluating contract modifications or change orders
  - The project involves specialized Reasearch & Deleopment where no market benchmarks exist

Full and open competition

FORMAL PROCUREMENT PROCEDURES (Sealed Bids (Invitation for Bids)/Competitive Proposals (Request for Proposals) REVIEW WORKSHEET		
Small Purchase LEA Threshold $0 / Small Purchase State Threshold $0		
STATE AGENCY INSTRUCTIONS: Prior to answering the questions in this tab, obtain copies of SFA procurement solicitation documents, specifications, evaluation criteria and contract terms for each contract reviewed and per the contract selection chart. **RESPONSE: YES=** Compliant; **NO=** Non-compliant; **NA=** Not applicable.	**Compliant/Noncompliant**	**Noncompliant Party**
General Solicitation Process		
1) Is the SFA compliant with conducting a cost/price analysis prior to soliciting? [2 CFR 200.323 [NEW] (NOTE: see reviewer tip and compliant = prior year, or other analysis used; non-compliant is no prior year and no analysis conducted.)		
2) Is the SFA compliant with full and open competition, i.e., does not restrict competition? (NOTE: Restricting competition includes placing unreasonable requirements, unnecessary experience, or specifying a 'brand name' product (not allowing 'an equal' with performance or relevant requirements.) [2 CFR 200.319(a)] (NOTE: if competition is restricted, this is a finding and corrective action is to modify the document and conduct a new solicitation process. Designate situation in the comment box.)		

Now we are going to cover Question 2. It asks if the SFA is compliant with full and open competition. Is there anything in the bid or proposal that would cause the SFA to receive few bids or no bids at all?

An example of this would be to have in the solicitation a requirement that delivery drivers must have a bachelor's degree. Is that necessary or reasonable? Of course not. This would restrict competition, and the SFA may not receive any bids due to this requirement in the solicitation. In the slides for small purchase procedures, we gave the example of allowing a brand equivalent within your specifications when describing a name-brand product like Tony's pizza.

Example of if an RFP is restricting competion

SFSPac
Division of PortionPac Chemical Corp.

SFSPac Food Safety & Sanitation System
400 N. Ashland Avenue
Chicago, IL 60622-6392

(312) 226-0400
Fax (312) 226-5400
sfspac.com

June 27, 2016

Michele Coker
Director of School Nutrition
Walker County School District
201 South Duke Street
LaFayette, GA 30728

Ms. Coker,

Thank you for including us as a potential vendor for your recent solicitation, RFP #17-3 School Nutrition Ware Washing/Safety/Sanitation System. We have eagerly awaited the opportunity to compete for Walker County Schools' business since 2012. You may recall that, although we were the lowest priced qualified respondent at the time, the district's business was awarded to another vendor.

Though initially excited to receive this solicitation, I was disappointed to learn of the truncated time period in which vendors were given to submit questions. Although the bid period opened on June 16, our notice of the solicitation was postmarked Friday, June 17, resulting in our receipt of the solicitation on the deadline for question submittal of Tuesday, June 21. This made it impossible for a thorough review of the document prior to the expiration of the submission deadline.

In addition, I was discouraged to discover a radical change to the Evaluation Criteria point system. Out of 150 potential points, cost is allocated only 25 points while references is weighted heavily with 50 points. This seems to contradict the most recent USDA Procurement Regulations which state that cost should be the most important evaluating factor.

For these reasons, I believe this RFP poses a problem for other members of the GEC who in practice view the solicitation as a cooperative agreement rather than a district specific solicitation that contains a "piggybacking clause". The net effect of which amounts to what is the largest school district in the state of Georgia, representing 402 schools, that does not have the opportunity to learn about the alternative programs available for purchase.

Due to the lack of opportunity to send questions and contradictory evaluation criteria point system, both of which result in a lack of opportunity for all potential vendors to compete, we are responding no bid.

Best regards,

Chuck Ainsworth

Chuck Ainsworth
SFSPac® Division Manager

LOUISIANA DEPARTMENT OF EDUCATION

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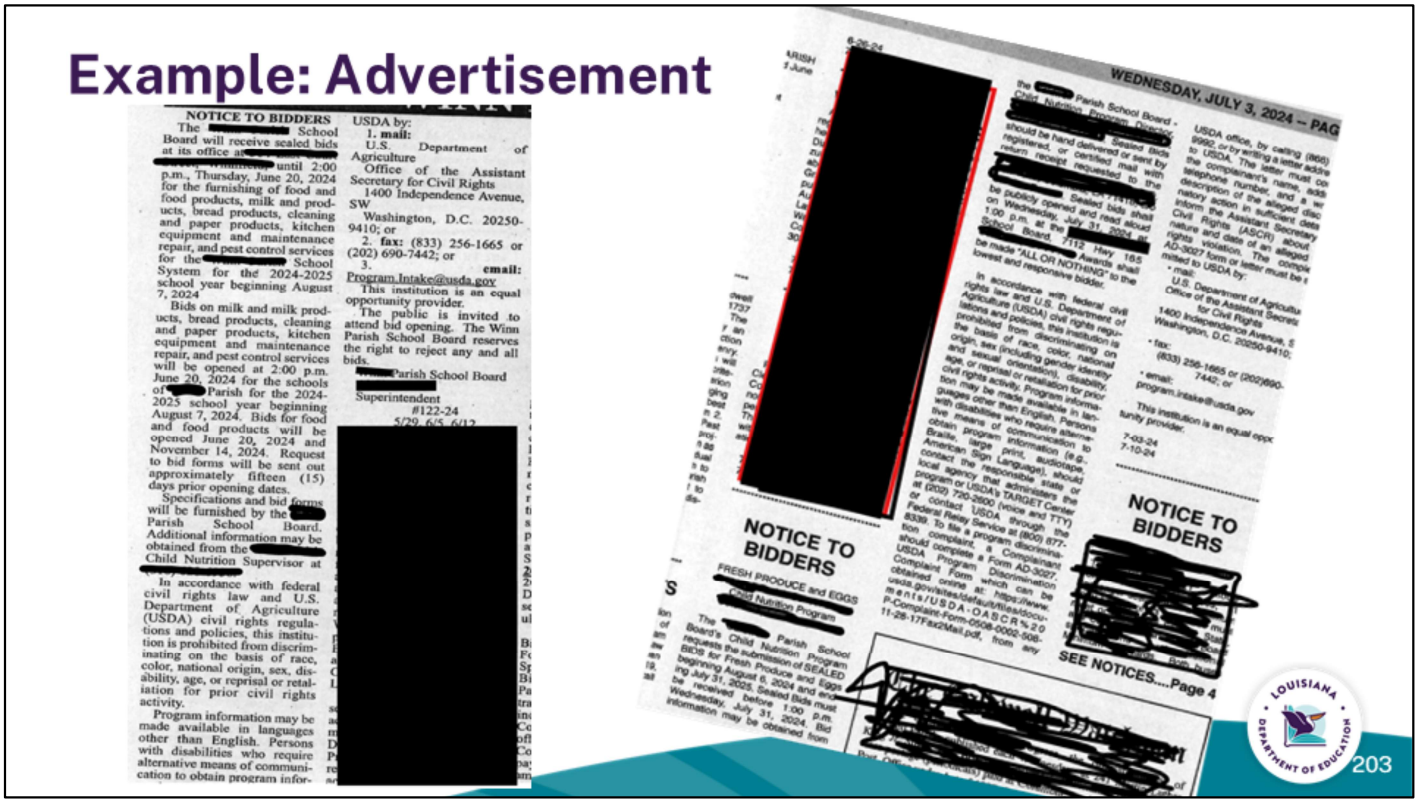
I didn't redact this slide since it was an example from another State. This letter is from a vendor that didn't bid on a contract because the SFA didnt allow enough time for vendors to submit questions and recieve a proper response. When SFAs don't advertise for a long enough time frame or have too short turn around times this can restrict competion. Within the time frame for vendors to ask questions this is necessary on their end to ask questions in order to submit a bid or proposal that will work for you but also be work for them.

Question 3 is asking about advertising, did you provide enough time for responses prior to opening, did you include evaluation factors in your specifications.

Why is advertising important, without it you will not receive any bidders, which can directly impact your program. You need vendors to bid so you can have groceries or supplies for the next school year. Typically an SFA starts this process February or March so there is enough time to line up your vendors by July 1.

You should advertise the solicitation in various formats, such as newspapers or websites. As long as the information is accessible to the public, you may also reach out to known bidders. Louisiana requires Contractors be provided the option to submit bids for public contracts through uniform and secure electronic interactive system.

Example: Advertisement



NOTICE TO BIDDERS

The [redacted] School Board will receive sealed bids at its office at [redacted] until 2:00 p.m., Thursday, June 20, 2024 for the furnishing of food and food products, milk and products, bread products, cleaning and paper products, kitchen equipment and maintenance repair, and pest control services for the [redacted] School System for the 2024-2025 school year beginning August 7, 2024

Bids on milk and milk products, bread products, cleaning and paper products, kitchen equipment and maintenance repair, and pest control services will be opened at 2:00 p.m. June 20, 2024 for the schools of [redacted] Parish for the 2024-2025 school year beginning August 7, 2024. Bids for food and food products will be opened June 20, 2024 and November 14, 2024. Request to bid forms will be sent out approximately fifteen (15) days prior opening dates.

Specifications and bid forms will be furnished by the [redacted] Parish School Board. Additional information may be obtained from the [redacted] Child Nutrition Supervisor at [redacted]

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information may be obtained from 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; or
2. **fax:** (833) 256-1665 or (202) 690-7442; or
3. **email:** Program.Intake@usda.gov

This institution is an equal opportunity provider.

The public is invited to attend bid opening. The Winn Parish School Board reserves the right to reject any and all bids.

[redacted] Parish School Board

[redacted]

Superintendent

#122-24

5/29, 6/5, 6/12

[redacted]

WEDNESDAY, JULY 3, 2024 – PAG

NOTICE TO BIDDERS

FRESH PRODUCE and EGGS

[redacted] Child Nutrition Program

NOTICE TO BIDDERS

SEE NOTICES....Page 4

LOUISIANA DEPARTMENT OF EDUCATION

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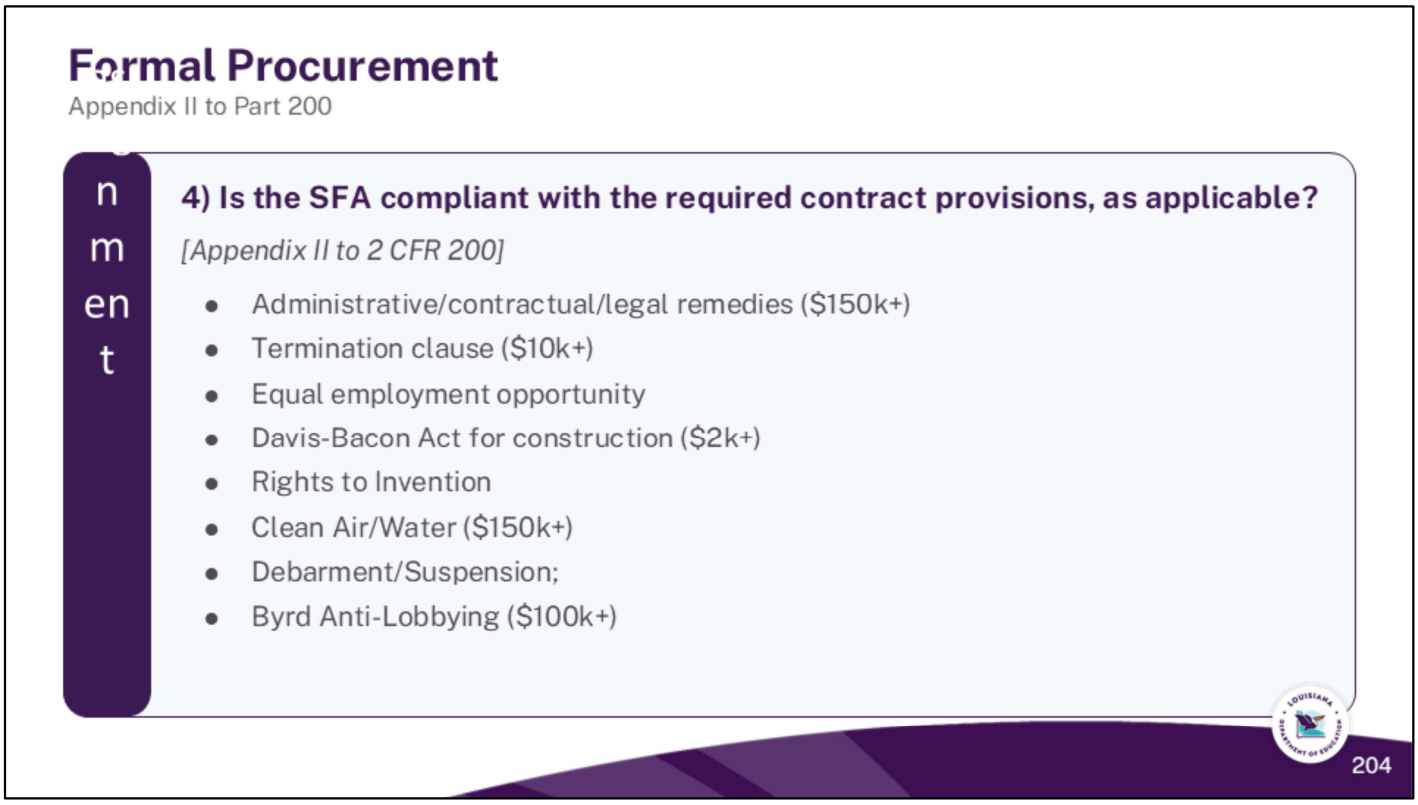
Here are a couple of examples of adververtising that we will look at to answer Question 3



The SA reviewer will assess if all formal contracts selected for review include the required contract provisions in Appendix II to Part 200.

In the table on the slide, you will notice that next to a few provisions, there are dollar amounts indicated. The reason is that some provisions are not required in certain contracts, depending on the value or type of project the contract is for. However, a lot of the time we see the required language/provisions missing in contracts when we are out conducting reviews (such as the termination clause, debarment & suspension certification).

Contracts valued more than the simplified acquisition threshold ($60,000 for public SFA's and $350,000 for Charter school) must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

Contracts valued more than $10,000 must address termination for cause and for convenience by the SFA, including the manner by which it will be effected and the basis for settlement. Termination for cause and for convenience language is important to include in all contracts to protect the SFA's program integrity. Without this provision, you are unprotected if you need to get out of your contract because the vendor is not performing according to the terms/conditions in the contract. For example, they are not consistent with deliveries each week, even though within the contract, you specifically state you need

weekly deliveries. This termination clause allows you to get out of your contract before it ends, so you can find a vendor that will perform and abide by the terms/conditions you have specified in the contract.

Equal Employment Opportunity Executive Order 11245 applies to contracts using Federal funds; it prohibits discrimination based on age, color, disability, national origin, race, and gender.

Contract Work Hours and Safety Standards provision applies to contracts that involve mechanics or laborers exceeding $100,000 using Federal funds. It also establishes standards for hourly and salaried employees related to workweek and overtime.

The Davis Bacon for construction provision is only required in prime construction contracts valued more than $2,000. This is a Federal law that requires all on-site employees to be paid a fair wage, benefits, and overtime while working on Federally funded construction, alteration, or repairs for public buildings or public works projects. Contracts that require this provision should include the Copeland Anti-Kickback Act provision. The Copeland Anti-Kickback is a part of the Davis Bacon Act, which prohibits federal contractors or subcontractors engaged in construction or repair from inducing an employee to give up any part of the compensation to which he or she is entitled under his or her employment contract and requires such contractors and subcontractors to submit weekly statements of compliance.

Contracts valued more than $150,000 must include the Clean Air Act and the Federal Water Pollution Control Act provision.

All contracts must include the Debarment and Suspension provision and language. The purpose of the Debarment and Suspension language in the contract and the certification form is to ensure SFAs are not awarding a contract to any vendors listed on the governmentwide exclusions in the System for Award Management (SAM) due to misconduct like fraud, antitrust violations, or poor performance. This provision also lets the contractor know that debarred or suspended companies will not be awarded the contract.

Contracts that are valued more than $100,000 must include the Byrd Anti-Lobbying Amendment provision and the certification form for vendors to certify they do not participate in any lobbying activities. Vendors must complete specific forms related to lobbying (influencing or attempting to influence) in connection with obtaining a contract.

Any contracts that are missing the applicable required provisions will be noted in the procurement table for the reviewer to develop the necessary corrective action the SFA must take, which will be to amend the contract(s). We have seen where an SFA sends the Byrd Anti-Lobbying and Debarment and Suspension certification forms for vendors to sign,

however the language must be included in the contract as well.

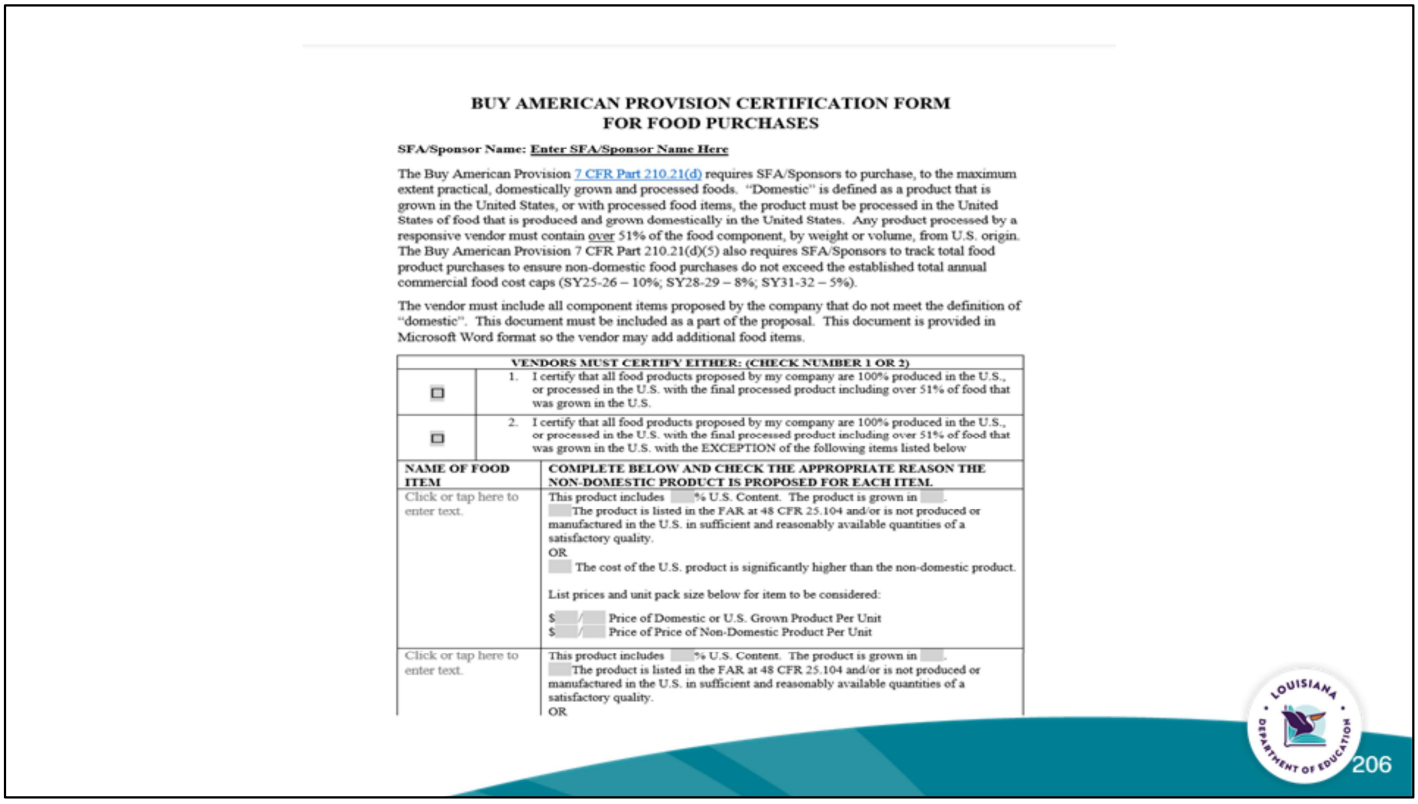
Buy American

05. Buy American [For food purchases only] Is the SFA compliant with Buy American by ensuring its food vendors comply with "&"the Buy American provision? (NOTE: Domestic foods are foods produced, and processed in the United States substantially using domestic foods having over 51% domestic food components by weight or volume. "&"[7 CFR 210.21 and SP02-2017 and SP 38-2017 Compliance with and Enforcement... Buy American Provision, June 30, 2017]) "

pineapple tidbits 6/10	This product includes 0 % U.S. Content. The product is grown in ☑ The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR ☐ The cost of the U.S. product is significantly higher than the non-domestic product. List prices and unit pack size below for item to be considered: $ / Price of Domestic or U.S. Grown Product Per Unit $ / Price of Non-Domestically Grown Product Per Unit
Tuna, Lt Chunk in Water 6/66.5oz	This product includes 0 % U.S. Content. The product is grown in ☑ The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR ☐ The cost of the U.S. product is significantly higher than the non-domestic product. List prices and unit pack size below for item to be considered: $ / Price of Domestic or U.S. Grown Product Per Unit $ / Price of Non-Domestically Grown Product Per Unit

Question 5 is asking if the SFA is compliant with the Buy Amercian provision. We are looking for language within your solicitation that tells the vendor that they must buy domestic products to the maximum extend possible. Also included in your solicitation will be the form BUY Amercian provision certification form for food Purchases. Within this form the vendor will fill out which products they can not get domestically and list them.

Here is an example of a completed form that a vendor has submitted back to the SFA.



BUY AMERICAN PROVISION CERTIFICATION FORM FOR FOOD PURCHASES

SFA/Sponsor Name: Enter SFA/Sponsor Name Here

The Buy American Provision 7 CFR Part 210.21(d) requires SFA/Sponsors to purchase, to the maximum extent practical, domestically grown and processed foods. "Domestic" is defined as a product that is grown in the United States, or with processed food items, the product must be processed in the United States of food that is produced and grown domestically in the United States. Any product processed by a responsive vendor must contain over 51% of the food component, by weight or volume, from U.S. origin. The Buy American Provision 7 CFR Part 210.21(d)(5) also requires SFA/Sponsors to track total food product purchases to ensure non-domestic food purchases do not exceed the established total annual commercial food cost caps (SY25-26 – 10%; SY28-29 – 8%; SY31-32 – 5%).

The vendor must include all component items proposed by the company that do not meet the definition of "domestic". This document must be included as a part of the proposal. This document is provided in Microsoft Word format so the vendor may add additional food items.

VENDORS MUST CERTIFY EITHER: (CHECK NUMBER 1 OR 2)	
☐	1. I certify that all food products proposed by my company are 100% produced in the U.S., or processed in the U.S. with the final processed product including over 51% of food that was grown in the U.S.
☐	2. I certify that all food products proposed by my company are 100% produced in the U.S., or processed in the U.S. with the final processed product including over 51% of food that was grown in the U.S. with the EXCEPTION of the following items listed below

NAME OF FOOD ITEM	COMPLETE BELOW AND CHECK THE APPROPRIATE REASON THE NON-DOMESTIC PRODUCT IS PROPOSED FOR EACH ITEM.
Click or tap here to enter text.	This product includes ____% U.S. Content. The product is grown in ____. ☐ The product is listed in the FAR at 48 CFR 25.104 and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR ☐ The cost of the U.S. product is significantly higher than the non-domestic product. List prices and unit pack size below for item to be considered: $____/____ Price of Domestic or U.S. Grown Product Per Unit $____/____ Price of Price of Non-Domestic Product Per Unit
Click or tap here to enter text.	This product includes ____% U.S. Content. The product is grown in ____. ☐ The product is listed in the FAR at 48 CFR 25.104 and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. OR

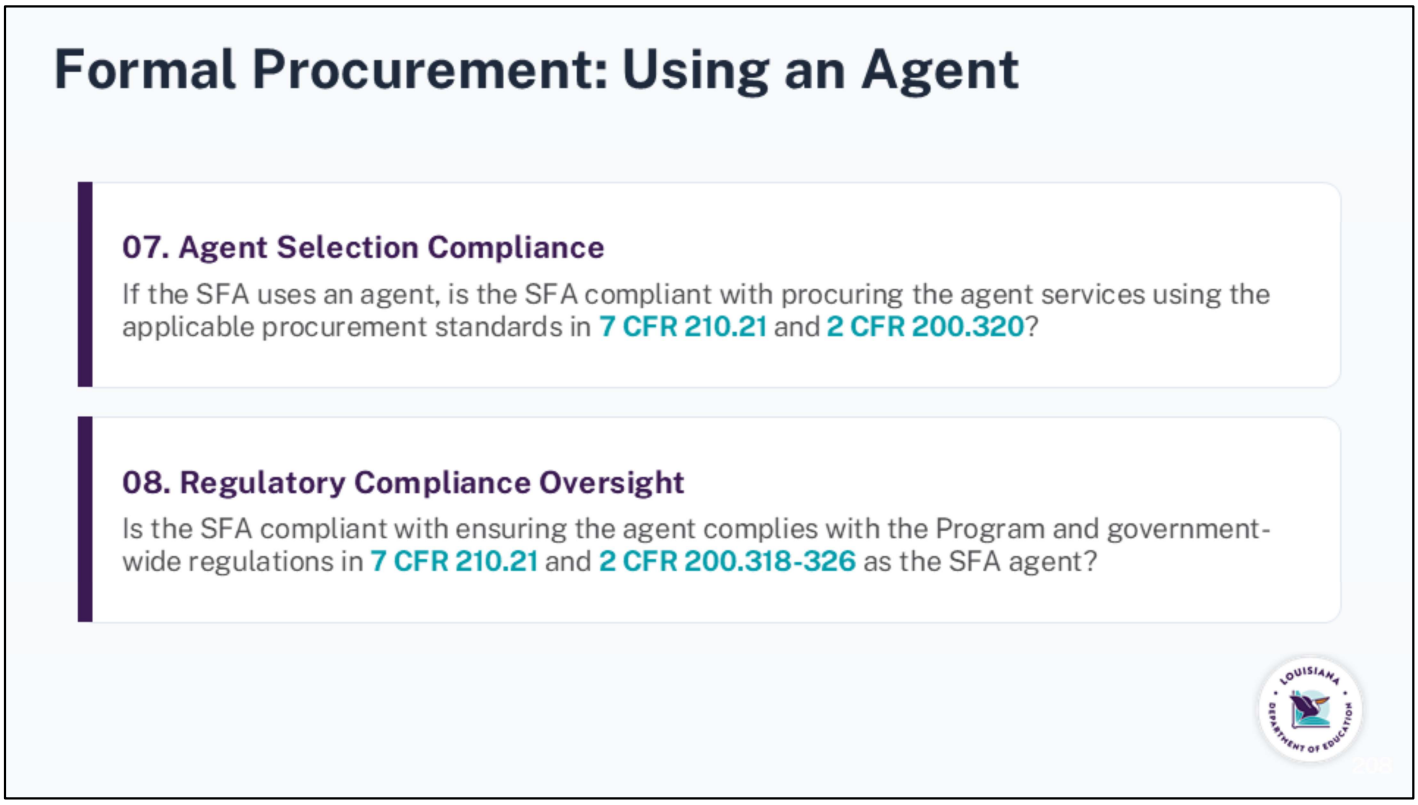
Here is an example of the form. It is located within the sample procurement plan on our website. This will be sent to your vendor when you solicit your food bids or proposals.

Question 6 talks about Piggybacking. What is it? Have you heard of this? Within memo SP 05-2017 it gives us guideance when adding parties to either a fixed-price or cost-reimbursable contract, or what you know it as "piggybacking," the contract must have been procured in compliance with 2 CFR Part 200.318-.327 and applicable program regulations.

Contracted parties considering additional parties must include a provision allowing "piggybacking" in their contracts in order to avoid creating a material change. If such a provision is not included in the contract and a material change is determined, a new competitive procurement is required.

Louisiana has more restrictive rules concerning Piggybacking in Title 38: §321.1: Piggybacking. Within LA an SFA can only piggyback onto a contract within one year of the opening of bids, provided that the following conditions are met:

First of all the contract must be bid in compliance with R.S. 38:2211 et seq. 2nd, The total purchases on the contract do not exceed two times what was purchased by the party bidding the contract.
3rd, you must get written consent of the party which bid the contract, as well as the contract number, and if applicable, the resolution accepting the contract must also be obtained. 4th, The vendor services this contract must agree within the additional purchases. and 5th, the vendor, product, materials, supplies, vehicles, or equipment are identical to those specified in the existing contract of the, and the price is the same as the original contract price.



The next couple of question the reviewer has to answer are about an agent.First of all what is an agent? They are a person or business authorized to act on a client's or SFA's behalf. An agency may be necessary for procuring goods or services when/if the client does not have the necessary technical understanding of the equipment, service, food or other food service supplies to be purchased; or lacks time or expertise to conduct a proper procurement. A procurement agent represents a special fiduciary relationship of trust between itself and its client. In other words, the agent must be contractually required to conduct all competitive procurement methods with its client's interests solely in mind. An agent's services in excess of the micro-purchase threshold currently set at $15,000 must be competitively procured in accordance with Federal procurement methods outlined in 2 CFR 200.320.

When an agent is needed to procure goods and services on behalf of the Program operator, the Program operator must first determine if the agent fee is within the micro-purchase threshold or if a competitive procurement method must be conducted for the services of the agent. If a solicitation is required, the scope of duties and responsibilities must be clearly defined as well as how prices/costs for services are to be quoted for evaluating agents' bids/responses for contract award.

If you don't have an agent then these questions are not applicable for your school district.

This question pertains to non child nutrition co-ops. a third party entity is what we can Group buying organization or Group purchasing organization. The State contract is considered a third party entity because the members are not comprised of just school district but hospitals, jails, states can all join and procure off these type of contracts.

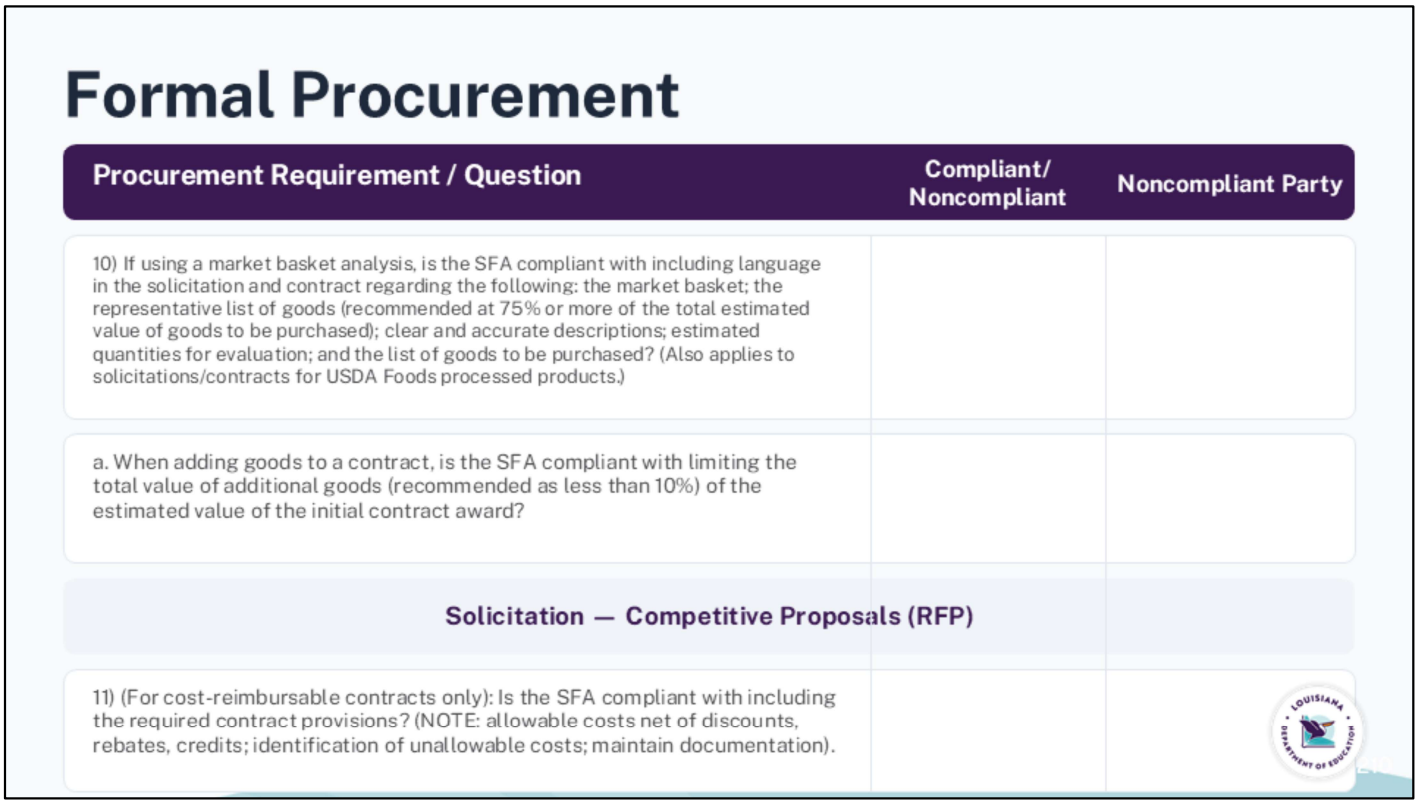
Group Purchasing Organizations, Buying Organizations, and Third-Party Vendors. The business model of a GPO may include a variety of services of which facilitating procurement for members/member agencies and procuring products and services from an external source such as an affiliated or unaffiliated full-line distributor are included.

Membership involves paying a fee in addition to the price of products and services purchased. However, paying a fee does not constitute compliance with the competitive procurement process that Program operators are required to conduct when through their guidance portal, except to establish historical facts. incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available Guidance documents lack the force and effect of law, unless expressly authorized by statute or procuring products and services. A Program operator may pay a membership fee to multiple GPOs and when using micro or small purchase procedures may consider the price for products from GPOs as one source among an adequate number of qualified sources.

For the procurement of good and services greater than $60,000, Program operators must publish sealed bids or competitive proposals to which GPOs may respond provided the GPO has not drafted such solicitations. Likewise, responses to bids/proposals must be evaluated by the Program operator to determine the lowest responsible and responsive

bidder/offeror with price as the primary factor.

Purchasing goods and services from a GPO without conducting a compliant procurement process is limited to the micropurchase threshold. Under the micro-purchase threshold, transactions are below $15,000, prices would be reasonable, and purchases would be equitably distributed among qualified suppliers.



Formal Procurement

Procurement Requirement / Question	Compliant/ Noncompliant	Noncompliant Party
10) If using a market basket analysis, is the SFA compliant with including language in the solicitation and contract regarding the following: the market basket; the representative list of goods (recommended at 75% or more of the total estimated value of goods to be purchased); clear and accurate descriptions; estimated quantities for evaluation; and the list of goods to be purchased? (Also applies to solicitations/contracts for USDA Foods processed products.)		
a. When adding goods to a contract, is the SFA compliant with limiting the total value of additional goods (recommended as less than 10%) of the estimated value of the initial contract award?		
Solicitation — Competitive Proposals (RFP)		
11) (For cost-reimbursable contracts only): Is the SFA compliant with including the required contract provisions? (NOTE: allowable costs net of discounts, rebates, credits; identification of unallowable costs; maintain documentation).		

What is Market Basket? It is a way of awarding contracts based on an evaluation of the lowest price a vendor can offer for a representative sample of goods the Program operators wish to obtain.
Evaluating the price on all goods, either as an aggregate (bottom line or total cost) or by line item, is the preferred method of awarding a contract. USDA recognizes price analysis can be simplified and a valid price analysis can still be achieved when only the bottom line costs of major items are totaled to determine lowest price between bidders.

Some questions from the memo to help understand market basket:

1. How do I create the list of all goods to be purchased when developing asolicitation? First forcast the quantity of goods needed. A velocity report from your previous vendor can be used when developing a list of all goods anticipated for purchase in a solicitation.

    1. Next, estimate quantities needed when using a market basket analysis. All solicitations, regardless of the process for contract award, must include reasonable estimates of usage for every item to be included in the solicitation. This includes solicitations for processed end products containing USDA Foods purchased using any value pass through system.
    2. List all goods to be procured under the contract (whether or not a market-basket evaluation method is used). Additional goods may be added if allowed under the original solicitation and contract. This ensures all procurement transactions be conducted in a manner providing full and open competition as required by 2 CFR 200.319(a). Likewise, clear and accurate

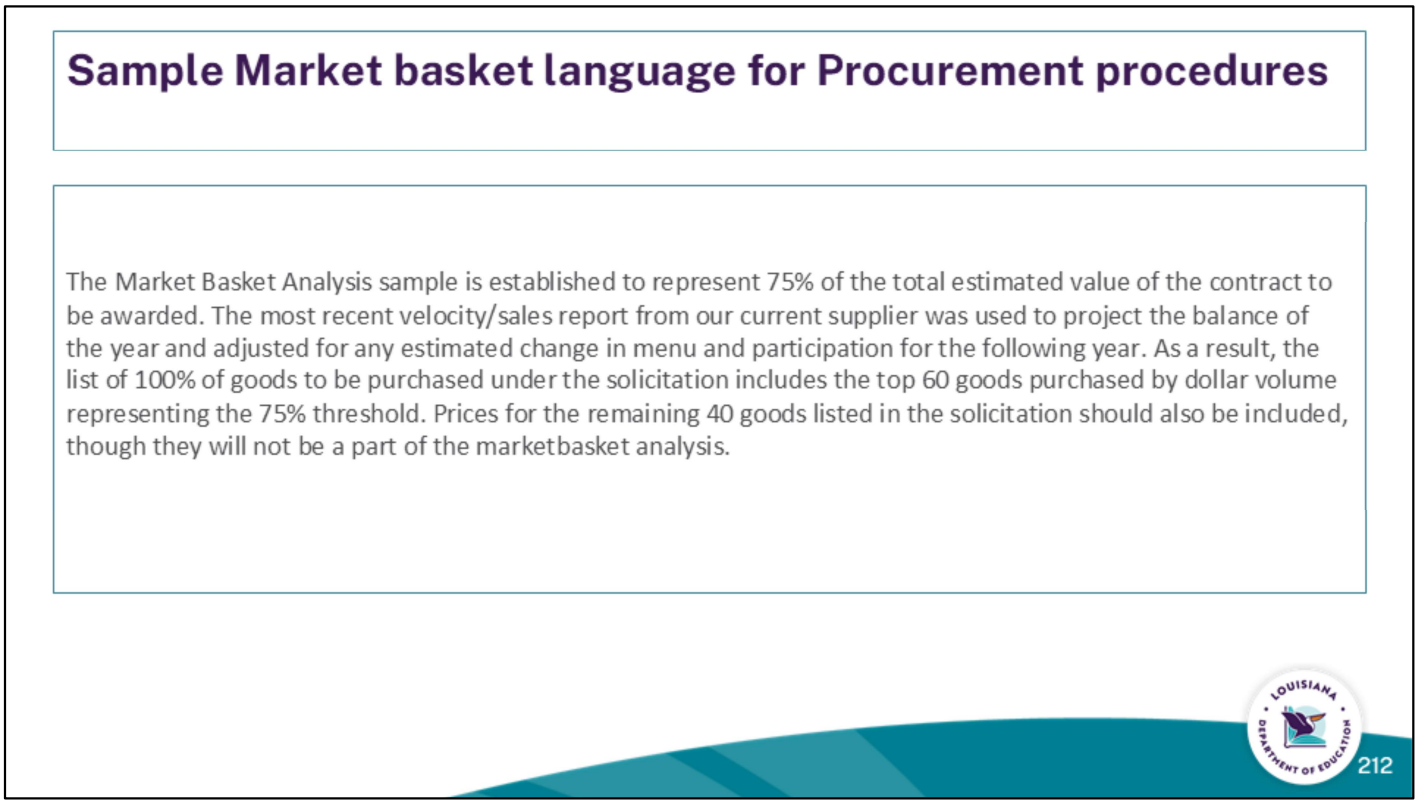
descriptions and estimated quantities are required for all goods and services listed in the solicitation per 2 CFR 200.319(c)(1).

3. If your SFA plans on doing market basket evaluation then this must be listed in the SFA procurement procedures. You must include the percentage of the estimated total purchase value used to determine the representative sample. USDA recommends a sample size of at least 75% of the value of the contract. Let's look at the next slide

Sample language for Market Basket within the Solicitation and Contract

During the term(s) of a contract awarded under this solicitation, additional purchases not included in this solicitation list and resulting awarded contract may become necessary and benefit the Program. Both parties agree that the aggregate value of added purchases during each year of the contract, if renewable, shall not exceed [10] % of the estimated total value of the contract. The total value of the contract must be agreed upon and the dollar value listed in every contract and contract renewal. Such additions may be included in the awarded contract list during the contract renewal through a contract amendment, and the total contract value adjusted accordingly. For each contract renewal, the total actual value of the contract in the preceding year and the additions made during the contract term, will be the basis for determining the maximum dollar amount (not to exceed [10]%) of additional goods that will be allowed during the next contract renewal year.

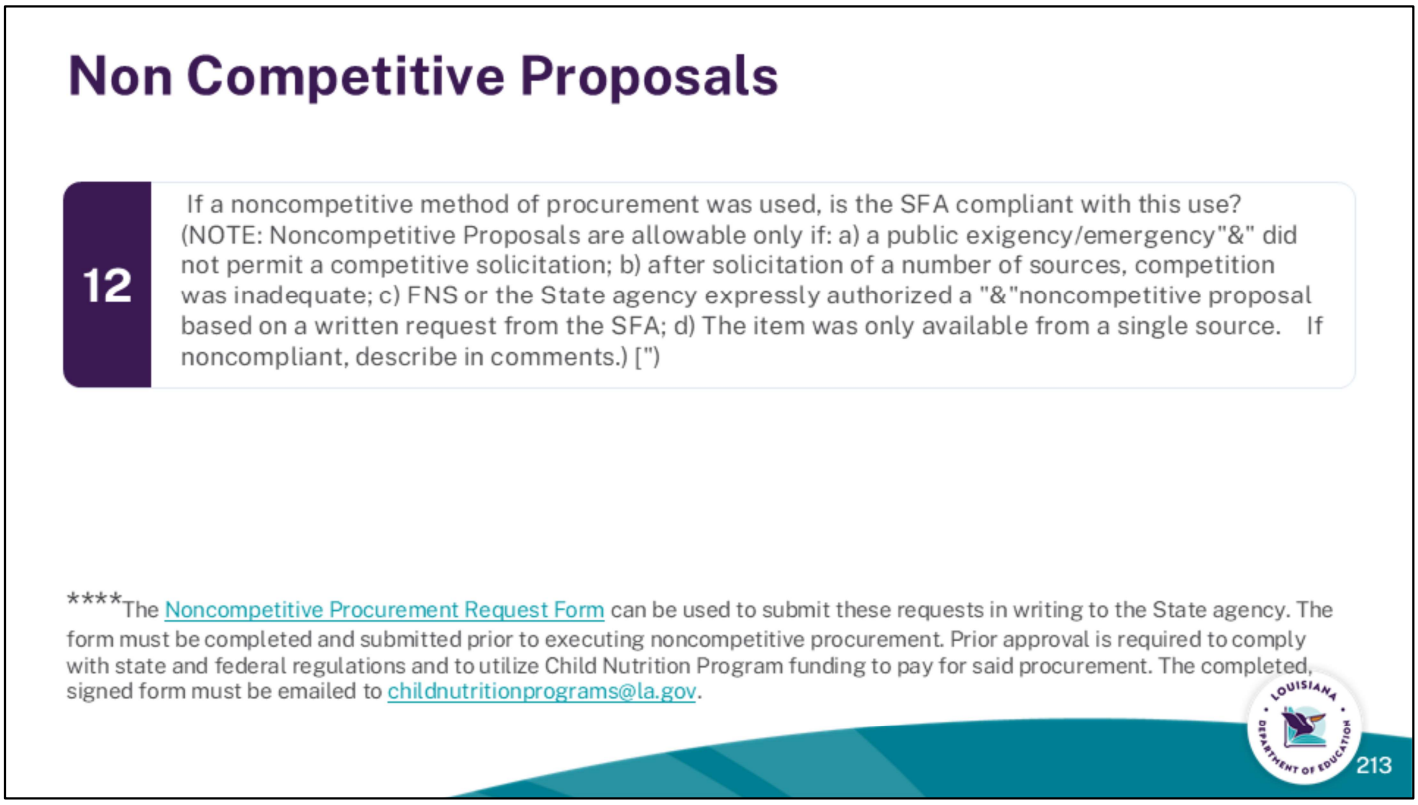
Here is a sample of language to include in your solicitation if Market Basket analysis is used. Read sample language on slide



This is some sample language that can be included in your Procurement plan.

Like I mentioned in the previous slide USDA recommends a 75% representative sample when using market basket analysis. Suppliers often provide velocity reports to notify Program operators of the value and volume of goods purchased for the prior year through an awarded contract.The program operator's written procurement procedures state they will use a sample representing 80% of the value of goods when using the market basket analysis. When looking at the products purchased from the prior school year, the Program operator determined that 35 goods represented 80% of the value of total purchases duringthat year. These 35 goods then become the representative sample for the market basket analysis. Program operators need to consider forecasted changes and usage for the upcoming contract period in determining the representative sample and value of total purchases. It should be noted that the number of goods in the sample will vary depending on purchase needs, purchase price, product quantities and total contract value.

HIf you are wanting to add additional goods to an existing contract, this would be limited to a total value established at the beginning of that contract period and at the beginning of renewal years and must be specified in the solicitation document and resulting contract. If any food or supply that was not part of the original solicitation or contract list is considered an addition. An example would be a new food available for purchase on themarket. An occasional, approved substitution a contractor may make to fulfil an order isnot considered an added product.

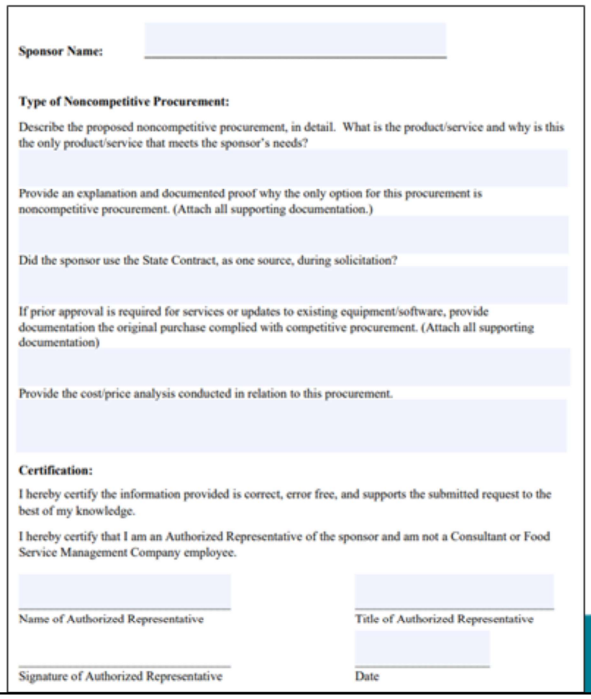


Now we are going to talk about Non competitive Procurement. The Division of Nutrition Support (DNS) requires sponsors to receive written approval prior to any noncompetitive procurement. The Noncompetitive Procurement Request Form can be used to submit these requests in writing to the State agency. The form must be completed and submitted prior to executing noncompetitive procurement. Prior approval is required to comply with state and federal regulations and to utilize Child Nutrition Program funding to pay for said procurement. The completed, signed form must be emailed to childnutritionprograms@la.gov. The noncompetitive procurement method may only be used if one of the following circumstances

applies:

- Noncompetitive The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold
- Sole Source The procurement transaction can only be fulfilled by a single source;
- Emergency The public exigency or emergency for the requirement will not permit a delay resulting from providing public notice of a competitive solicitation. In case you were wondering the difference between the two are a Public Exigency is an urgent demand created by a special situation. The delay from a competitive solicitation would result in serious injury or financial loss to the district. and a Public Emergency is an immediate, unforeseen threat to life, public health, safety, or property (e.g., a fire or flood).
- The SFA requests in writing to use a noncompetitive procurement method, and the SA provides written approval
- After soliciting several sources, competition is determined inadequate.

Noncompetitive Procurement Request Form



Sponsor Name: _____

Type of Noncompetitive Procurement:

Describe the proposed noncompetitive procurement, in detail. What is the product/service and why is this the only product/service that meets the sponsor's needs?

Provide an explanation and documented proof why the only option for this procurement is noncompetitive procurement. (Attach all supporting documentation.)

Did the sponsor use the State Contract, as one source, during solicitation?

If prior approval is required for services or updates to existing equipment/software, provide documentation the original purchase complied with competitive procurement. (Attach all supporting documentation)

Provide the cost/price analysis conducted in relation to this procurement.

Certification:

I hereby certify the information provided is correct, error free, and supports the submitted request to the best of my knowledge.

I hereby certify that I am an Authorized Representative of the sponsor and am not a Consultant or Food Service Management Company employee.

Name of Authorized Representative

Title of Authorized Representative

Signature of Authorized Representative

Date

This form can be pulled off our website and then send to the childnutritionprograms@la.gov email address

Noncompetitive Procurement

Non Competitive Procurment: One-time, small-dollar buys (typically under $15,000) where the district determines the price is "fair and reasonable" without a formal bid process.

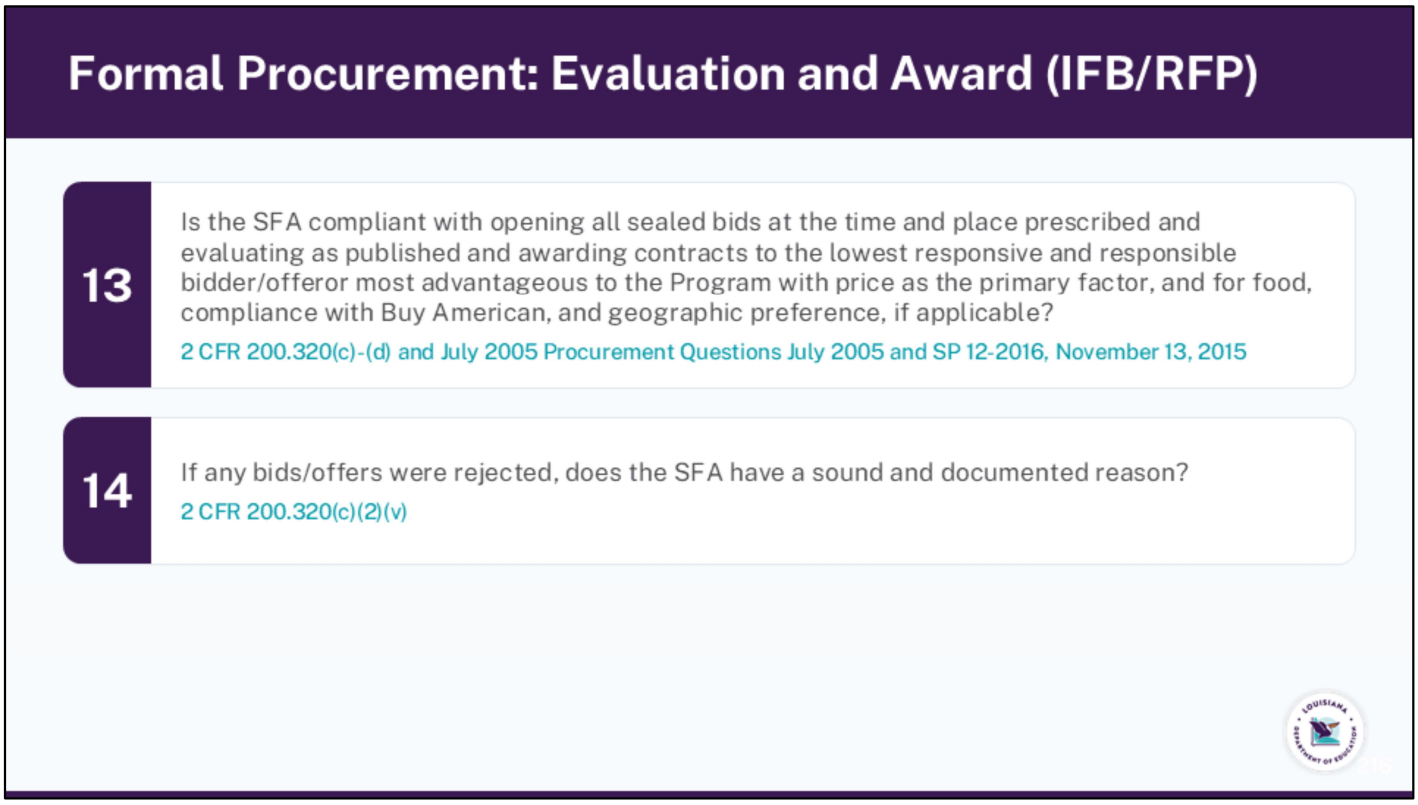
Sole Source Procurement: The buyer determines only one supplier is able to fulfil all the requirements of the contract due to proprietary information, subject matter expertise, or other factors. (Example: Annual Software Fees)

Exigency: An urgent demand created by a special situation. The delay from a competitive solicitation would result in serious injury or financial loss to the district.

Emergency Procurement: Circumstances that do not allow time for competitive processes. (Examples: Power outages and food spoilage so you need to quickly purchase refrigerated food to resume service; the cooling unit in the freezer goes down and you need to replace it to prevent food loss.)

Inadequate Competition: All competitive procedures were completed. However, the results were inadequate. (Examples: Only one vendor responds to the bid released for food; no vendors respond)

Here are some key terms that you will hear when talking about non competitive procurement



In all formal procurements, the SFA must specify the date and time all bids/proposals will be opened and evaluated by the evaluation committee. For IFBs, the location of the bid opening must be mentioned with the date and time of the bid opening since it open to the public and any one who wish to attend is able to. For RFPs, the proposal openings are not open to the public. Only members of the evaluation/scoring committee of the SFA are allowed to attend proposal openings.

In all formal procurements price must be the primary factor in the evaluation process. In the RFP, other evaluation factors are considered in the scoring of proposals, however price must be the highest weighted factor.

If an SFA has to reject any bids/proposals, documentation to justify why the bid/proposal was rejected by the SFA must be maintained to justify the procurment and awarding of the winning vendor for the good or service solicited. A clause that stipulates that the SFA has the right to reject any bids must be included in the solicitation to be able to reject bids.

Example of Bid Opening Details

PUBLIC NOTICE
LEGAL NOTICE OF BID
THE [redacted] SCHOOL BOARD, [redacted] SUPERINTENDENT, [redacted] LOUISIANA [redacted], WILL RECEIVE SEALED BIDS UNTIL TUESDAY, JUNE 24, 2025 @ 12:00 P.M. FOR THE FOLLOWING: "PAPER & CLEANING PRODUCTS"; "SMALL EQUIPMENT"; "PEST CONTROL"; "GARBAGE COLLECTION";"CHEMICAL SUPPLIES"; "FRESH MEAT PRODUCTS"; "FRESH PRODUCE";
BIDS WILL BE PUBLICLY OPENED AND READ ALOUD ON TUESDAY, JUNE 24, 2025, 2025 @ 1:00 P.M.
BIDS SHALL BE SEALED AND PLAINLY MARKED ON THE OUTSIDE INDICATING WHICH BID SUCH AS:
"BID ON PAPER & CLEANING PRODUCTS, 6/24/2025:
OR "BID ON SMALL EQUIPMENT, 6/24/2025"
OR "BID ON CHEMICAL SUPPLIES, 6/24/2025"
OR "BID ON FRESH MEAT PRODUCTS, 6/24//2025"
OR "BID ON FRESH PRODUCE, 6/24/2025"
OR "BID ON GARBAGE/WASTE DISPOSAL, 6/25/2025"
OR "BID ON PEST CONTROL, 6/24/2025"
IN ACCORDANCE WITH LOUISIANA RS 38:2212, VENDORS MAY SUBMIT THEIR BID ELECTRONICALLY AT www.centralbidding.com. SPECIFICATIONS ARE AVAILABLE BY ELECTRONIC MEANS. VENDORS SUBMITTING BIDS ELECTRONICALLY ARE REQUIRED TO PROVIDE THE SAME DOCUMENTS AS VENDORS SUBMITTING THROUGH THE MAIL OR BY HAND DELIVERY.
BIDS SHALL BE AWARDED ON QUALITY AND PRICE AND THE BOARD WILL NOT NECESSARILY AWARD ON THE LOWEST PRICE ON ANY ITEM. THE BOARD RESERVES THE RIGHT TO REJECT ANY AND ALL BIDS AND TO WAIVE ANY INFORMALITY.
SPECIFICATIONS CAN BE OBTAINED FROM [redacted] IN THE CHILD NUTRITION DEPARTMENT OR [redacted] IN THE PURCHASING DEPARTMENT.

[redacted]
SUPERINTENDENT
[redacted] SCHOOL BOARD
(PUBLISH: JUNE 5 & 12, 2025) 2T COST: $60.00

DATE: August 1, 2024

TO: **LAMM Food Service**

FROM: [redacted]

RE: Bid Award for **Frozen Food & Grocery**

This letter is in reference to the bid submitted by your company for **Frozen Food & Grocery**. I would like to inform you that your company has been selected and approved by the Board for the provision of the highlighted items.

If you have any questions, please contact [redacted] Thank you for taking part in the bidding process.

Regards,

[redacted]
Supervisor of Child Nutrition

Here is an example, I pulled an award letter and a public notice that don't match, but I wanted show you the dates pretend they match. The public notice says bids will be awarded on JUne 24th and the bid award letter says August 1. Bid or proposal awards and award letters should be dated the same. The bid or proposal should be awarded as the public notice says.

Example of Evaluation Factors for an RFP

Criteria	Possible Points	Points Received	Justification for Scoring
Cost	50	50	Bid Value: 190311.53 lowest
Service reliability and History, Provider References, Business Practices, Financial, History	30	30	
Online Access to Manage Invoices, GPS, Truck Tracking and Temperature monitoring, online ordering	15	15	
References (Provide 2 references- if you have done business with us in the past 5 years, only one is required) Company, Address, Vendor Company Contact Person, Contact Person's Phone, Business Relationship with Company	15	15	1. 2.
Total Points	100	100	

Complete the maximum points for category. Price must be primary factor. Score each vendor and provide detailed justification for scoring each category. Score cards without justification are NOT allowed.

Bid #2024 Farm to School Bid Award Rubric (for RFP only)

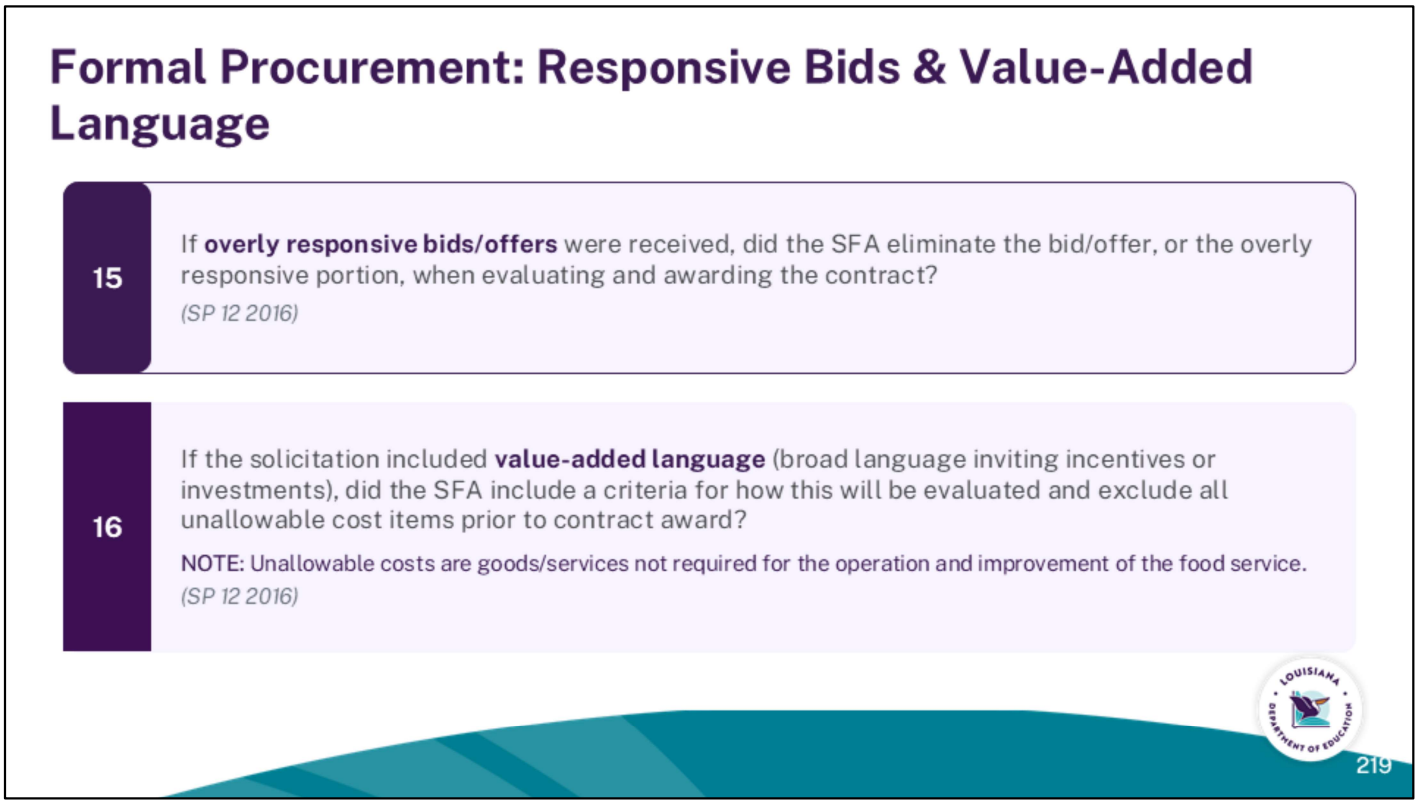
Company Name	Proposed Pricing (Max Points: 50)	Geographic Preference (Max Points: 10)	Evidence of Food Safety Plan (Max Points: 10)	Delivery Fee (Max Points: 10)	Delivery Minimums (Max Points: 10)	CDA Certified CO Proud Member (Max Points: 10)	Self-Identified HUFR (no points) YES or NO	Total Points Awarded (total/100)

There are a couple of examples of evaluation factors on this slide. If your solicitation is an RFP then the SFA must included evaluation criteria in the solicitation and notify potential bidders of the factors the SFA will evaluate all proposals submission on. The evaluation factors and possible points may vary depending on the needs and what is important to the SFA to maintain program integrity. However, all SFAs must include price/cost as an evaluation factor and it must be the highest weighted factor. Keep in mind in an RFP, you will have evaluation factors like the example listed on the screen and in an IFB it is usually only based on price and there will not be evaluation factors.

SFAs must not change or by-pass the published evaluation and scoring criteria to circumvent full and open competition. For an RFP, the school must include a point-based award rubric where price is the highest-weighted factor. Common factors used to evaluate bidders

If the SFA rejected the proposal submission, the SFA would document the grounds for rejection in the justification for Scoring column and supporting documentation to support the rejection. For example, if the bidder had done business with the SFA in the past and the SFA has documentation to support the vendor was frequently providing them rotten produce or other spoiled goods, or frequently deviating from the delivery schedule in the contract, the SFA can reject the vendors proposal and provide the details for the rejection in the Justification for Scoring column with the

supporting documentation. Another example is if the vendor did not respond to the specifications in the bid/proposal or could not fulfill all of the specifications in the bid/proposal, or follow the bid/proposal submission requirements.



Example of salad bar being gifted by a FSMC

USDA Memo SP 12-2016 talks about value added language

Management evaluations conducted in fiscal year 2015 revealed a number of issues, primarily that State agencies have been approving contracts for awards that contained unallowable cost provisions (i.e., incentives, investments, and value-added or overly responsive bids/offers) and/or failed to consider cost as the primary evaluation factor. In these instances, FNS required State agencies to review all existing contracts to determine whether or not the contracts were in compliance with applicable requirements. Contracts found to be noncompliant with unallowable cost provisions were required to be amended. Contracts that failed to include cost as the primary factor were required to be rebid.

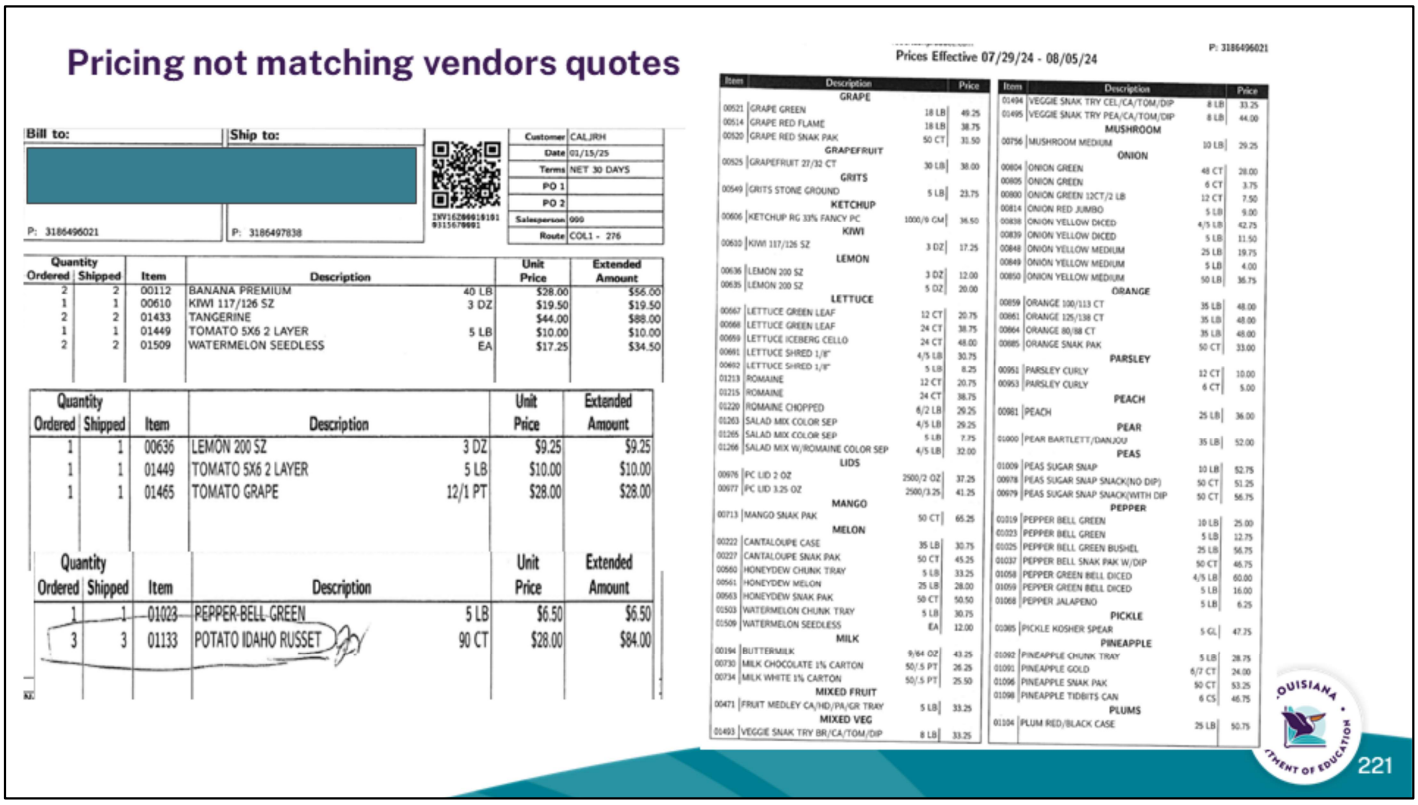
SFAs must ensure their contract language does not solicit or allow the following prohibited incentives, as they are considered unallowable costs and potential conflicts of interest:

- Cash donations, grants, or scholarships.
- Free kitchen equipment or small wares not included in the base unit price.
- Personal incentives like employee prizes, "golfing expeditions", or other gratuities

For question 17: As part of the procurement review we look at 3 invoices per vendor and bid quotes not matching invoices the SFA receives. You should be looking at invoice prices as well to ensure you are not being charged more than the vendor quoted. This is part of monitoring you contract. I have some examples on the next slide.

For question 18 that is asked is if the SFA is compliant with contract renewals. If you have a multi year contract with a vendor there should be language in the contract that talks about price increases using a standard index. The Consumer price index " Food away from home" is the most common indicator of inflation in the US economy. The Consumer price index is a measure of the average change over time in the prices that consumers pay for goods and services.

School districts use the Consumer Price Index (CPI) primarily to manage financial risk in multi-year agreements by including **escalation clauses**. These clauses allow for periodic price or wage adjustments based on inflation, ensuring that the "real value" of a contract remains stable over several years.



This slide are some examples of invoices and how important it is to monitoring your vendor contracts. Remember like we mentioned thatprices to a contract cannot increase or decrease without a deescalation clause or if you renew you contract there would be a CPI Increase. On the slide you will see some examples on the right side of the screen of what the vendor bid and on the left is the prices that the vendor is charging the SFA.

Do you notice any discrepancies?

Look at Bellpeppers for example. The vendor quoted $12.75 for a 5 lb pack of Bell peppers and on the invoice the vendor gave the SFA it was $6.50. So this was a case of the vendor charging less than was quoted. Now lets look at Kiwi's, the vendor quoted $17.25 for 3 dozen and the invoice shows the SFA got charged $19.50.

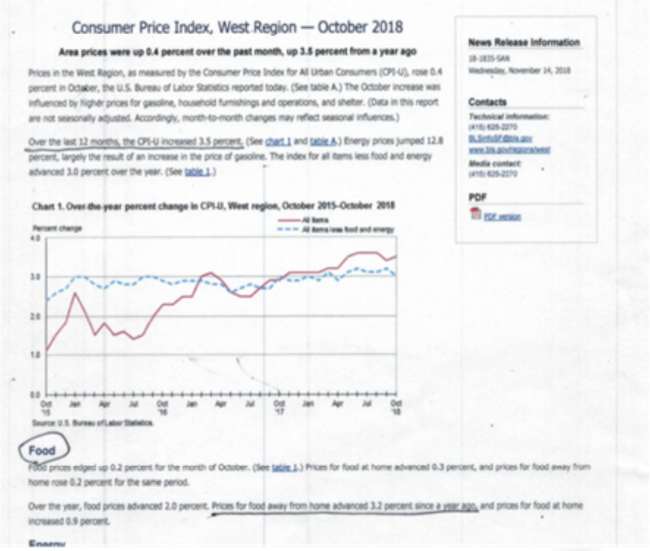
There is one more, what about Lemons, the vendor quoted $12.00 and is selling 3 dz lemons for $9.25. this is another case of the vendor quoting more than they are charging.

Price Increase Documentation

To:
RE: Request of new cost in 2019

Dear Sirs.
Thank you very much for your review of our extension request of 2019 new cost. I had chance to look into the most recent consumer price index for Hawaii (West region) which was released Oct 2018. It showed CPI-U increased 3.5 percent over the last 12 months. Attached is the copy of the report.
Currently, We are experiencing large price increase of some of food items that is affected by the Trade war tariff since Oct. of this year which does not show on the index report. The list of such items are attached herein.
would like to request for your approval of following price change effective from Jan of 2019.
The following is the breakdown of its costs and the differences.

Breakfast: New cost $5.61 increase of 26(5 %) cents from 5.35
Lunch: New Cost $7.08 increase of 33(5 %)cents from 6.75
Dinner: New cost $8.29 increase of 39(5 %) cents from 7.90
. Total one day meal per student shall be $20.98 (5% increase) from $20.00



Consumer Price Index, West Region — October 2018

Area prices were up 0.4 percent over the past month, up 3.5 percent from a year ago

Prices in the West Region, as measured by the Consumer Price Index for All Urban Consumers (CPI-U), rose 0.4 percent in October, the U.S. Bureau of Labor Statistics reported today. (See table A.) The October increase was influenced by higher prices for gasoline, household furnishings and operations, and shelter. (Data in this report are not seasonally adjusted. Accordingly, month-to-month changes may reflect seasonal influences.)

Over the last 12 months, the CPI-U increased 3.5 percent. (See chart 1 and table A.) Energy prices jumped 12.8 percent, largely the result of an increase in the price of gasoline. The index for all items less food and energy advanced 3.0 percent over the year. (See table 1.)

Chart 1. Over-the-year percent change in CPI-U, West region, October 2015-October 2018

Food

Food prices edged up 0.2 percent for the month of October. (See table 1.) Prices for food at home advanced 0.3 percent, and prices for food away from home rose 0.2 percent for the same period.

Over the year, food prices advanced 2.0 percent. Prices for food away from home advanced 3.2 percent since a year ago, and prices for food at home increased 0.9 percent.

News Release Information

Contacts

PDF

Reviewers will be looking at contract amendments and renewals if you have a multi year contract. It is quite common for fixed price contracts to include terms and conditions regarding price increases from year to year. On the screen is an example of documentation provided during the contract amendment process.
During a procurement review, the State agency reviewed the SFA's fixed price contract ($720,600). As part of the review, SA staff reviewed a contract amendment that implemented a price increase. Supporting documentation was provided to illustrate the price increases per product as well as CPI data to illustrate overall trends related to higher food costs.

Price Escalations: in general contract terms, an escalator/de-escalator clause or market-based pricing is a predetermined provision in a contract stipulating specific conditions for an increase or decrease in price. If such provisions are used they must tie price changes to an external, market accepted verifier (ie index)

Language that is often included in renewals

Renewal language example: "The SFA and [Vendor Name] mutually agree to renew the original contract for a term of one year, commencing on July 1, 20XX and ending on June 30, 20XX. This is the [2nd, 3rd, 4th, or 5th] year of the contract."

Price adjustment clauses example: *"Renewals often allow for fee increases based on the Consumer Price Index (CPI), specifically the "Food Away from Home" index. This must be the only financial change allowed; any other price hike is often considered a "material change".*

No material change attestation: "The SFA and Vendor agree that no material changes have been made to the original contract terms. Minor non-financial adjustments, if any, are described herein: [Space for Description]."

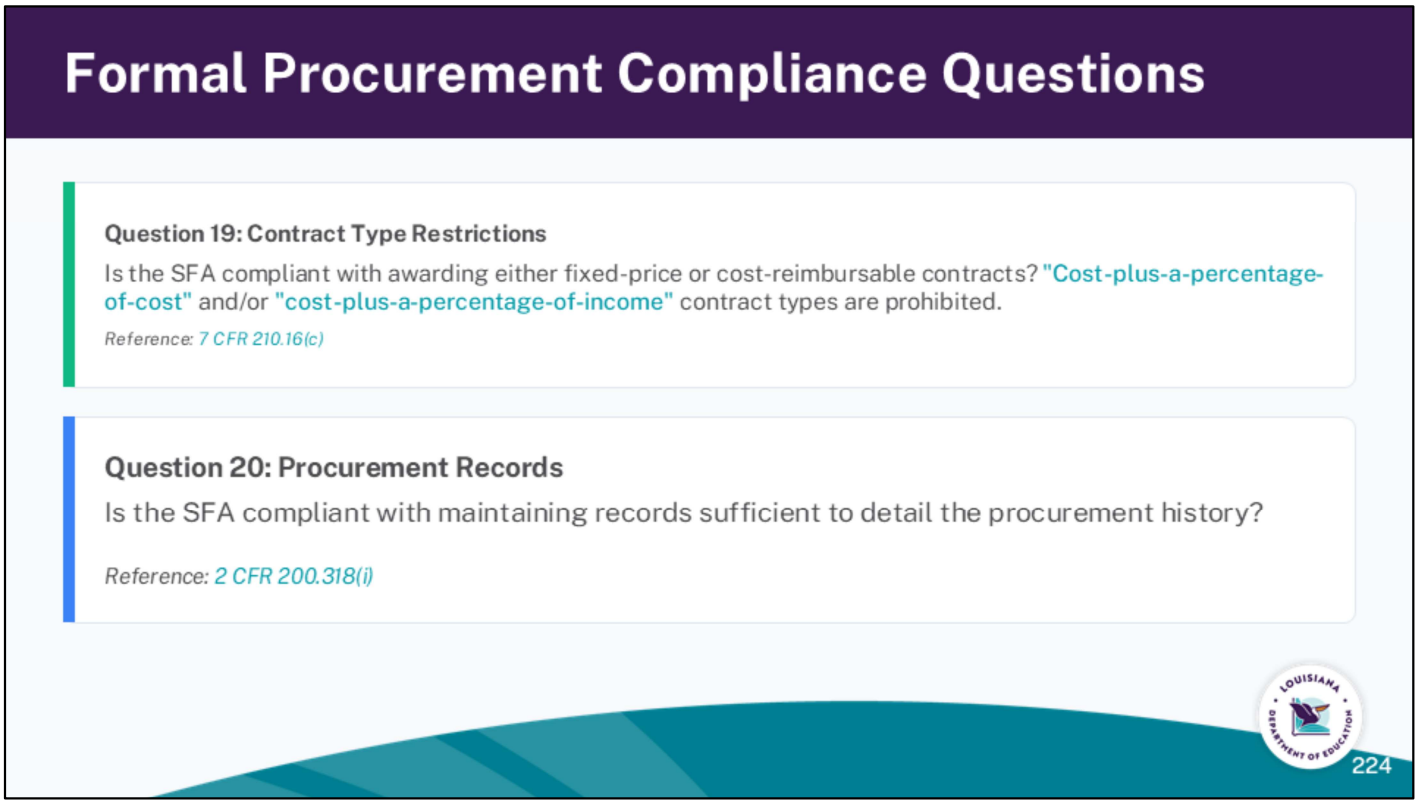
Termination for convenience sample language: *"Either party may terminate this contract for cause as allowed in the original contract. The contract may also be terminated for convenience if both parties mutually agree in writing."*

SFA contracts are typically awarded for one year with the option to renew a specific amount of times. Alot of times we see 5 year terms. The renewal should specify terms such as this is renewal 3 of 5 for example.

Renewals often allow for fee increases based on the Consumer Price Index (CPI), specifically the "Food Away from Home" index. This must be the only financial change allowed; any other price hike is often considered a "material change"

To keep a renewal legal under federal law, the SFA must certify that the core duties and responsibilities of the contract haven't shifted significantly to ensure no material chage has taken place.

Even if a contract is renewed, the SFA must retain the right to cancel.



Question 19 asked is the SFA compliant with awarding either a fixed price contract or a cost reimbursable contract specifically prohibiting percentage-based markups on costs or revenue. The contract should state that it is either a Fixed price or Cost reimbursable contract.

Within a Fixed price contract the price must remain constant regardless of the contractor's actual costs and may only be adjusted using a measure of index such as the CPI rate if it is stated in the contract. If the contract doesn't allow for this this the price remains firm for the life of the contract.

For cost reimbursable contracts the SFA must only pay for "allowable" costs. The contractor is required to identify these costs and exclude unallowable ones from billings.The contract must explicitly state that all discounts, rebates, and credits must be returned to the SFA's Nonprofit School Food Service Account. With a cost reimbursable contract the SFA is responsible for a higher level of monitoring to verify that costs incurred are necessary and reasonable.

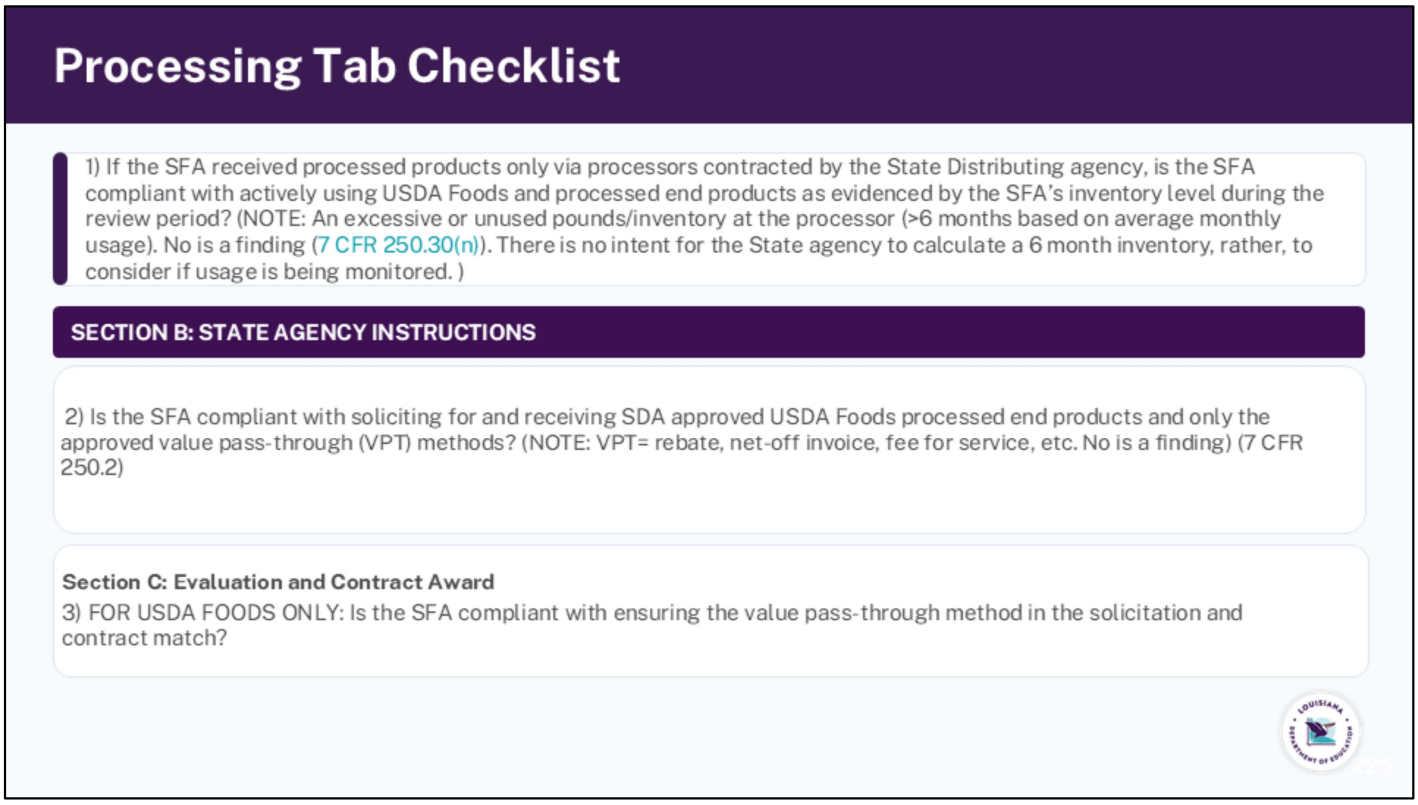
An example is an FSMC contract that is a Fixed Price Per Meal: The SFA pays a set price per meal served (e.g., $3.00), which includes all labor, food, and overhead. The profit is built into this price, not calculated as a percentage of the total costs. this is allowed.
An example of what is not allowed is a contract that pays a vendor $100,000 for food +

10% of that cost as profit ($10,000). If food costs rise to $120,000, the profit automatically increases to $12,000.

Then Question 20 asked about record retention and detailing the history of procurement. What does that mean? According to federal regulations (2 CFR 200.318(i)), "sufficient" records mean you must be able to reconstruct the history of a purchase, including:

- Rationale for the method: Why you chose to use a specific method (e.g., small purchase, competitive bid/RFP).
- Contract type selection: Why you chose a particular contract type (e.g., fixed-price vs. cost-reimbursable).
- Contractor selection/rejection: Documentation on why a vendor was chosen (like bid tabulations) or why others were rejected.
- Basis for the contract price: Evidence justifying that the price paid was fair and reasonable (e.g., cost/price analysis).

Why is this important? We are checking for this to ensure taxpayer dollars are used efficiently and legally and that contracts weren't given to a friend, but that everyone had a fair chance to bid. If an SFA fails to maintain these records, the expenditures may be considered unallowable, and they may have to repay the funds.



When reviewers are looking at an SFA that procures processors they would complete the processing tab as well as which type of procurement method tab was used, So for example if the SFA conducted Formal procurement to Procure a vendor to make Chicken nuggets or Hamburger patties, and they expended over $60,000 then the reviewers would look at all the things we just talked about for the formal procurement process as well as this processing tab that we are going to go over.

The State agency conducting the review of processing needs to know: 1) Which State agency oversees USDA Foods distribution (the State Distributing Agency (SDA)); 2) Does the SDA conduct the procurement of processors on behalf of SFAs; 3) Are there exceptions to SDA procurement of processors (i.e., SFAs that conduct their own procurement such as large SFAs within the State. If yes, answer Q1 only.) 4) What oversight does the SDA have in place to adjust inventory levels throughout the year; 5) Does the SDA implement a "sweeps" process; (NOTE: sweeps is an annual adjustment to an SFAs planned assistance and diverted USDA Foods if SFAs do not use their inventory); and 6) Does the SDA periodically adjust orders due to inventory levels?)

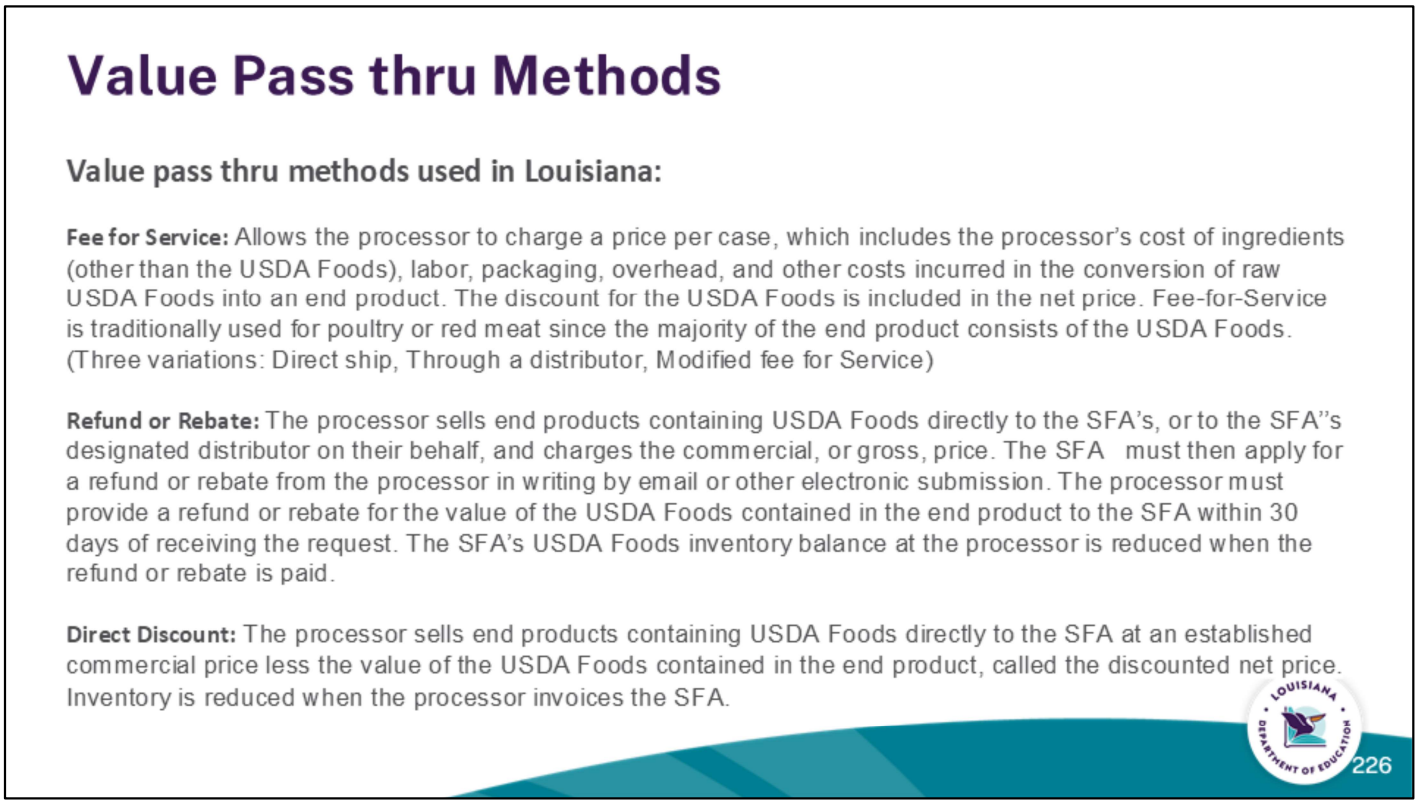
Because Louisiana Department of Agriculture does not procure processors on your behalf then reviewers would look at the State template processing contract/agreement, the State-approved list of foods for processing and the value pass-through amount for each food. We will talk about value pass thru methods a little bit latter.

We also look at each SFAs planned assistance or entitlement level for the prior school year and/or current school year. It depends on which year we are looking at for the review.

Usually we are looking at the previous year but on occasion we would look at current practices if the way the SFA is operating is completely different from the last year or if you are a new SFA coming on the progrm. If you have diverted any pounds to be processed, we will be looking at the dollar amount and making sure you receive your full value.

Now let's look at the questions, The first question,is not applicable for Louisina becuase LDOA doesn't contract with processors on your behalf. This is your responsibility.

We move to Question 2, It is asking if the SFA has conducted a competitive process when procuring a processor. You would use the same process of procurement just like you do for any of your other vendors like we mentioned in the previous slides. It also asked if the approved value pass thru method is used. Let's talk about the value pass thru methods.



First of all what is a value pass thru method? It is a regulatory mechanisms designed to ensure that SFA receive the full credit for the value of USDA Foods used in processed end products.

Louisiana allows 3 methods: Fee for service, refund or rebate and Direct Discount

Fee-for-Service

The Fee-for-Service method allows the processor to charge a price per case, which includes the processor's cost of ingredients (other than the USDA Foods), labor, packaging, overhead, and other costs incurred in the conversion of raw USDA Foods into an end product. The discount for the USDA Foods is included in the net price. Fee-for-Service is traditionally used for poultry or red meat since the majority of the end product consists of the USDA Foods.

There are three variations of Fee-for-Service:

- Direct ship: the processor ships to and invoices the SFA directly for the case price and the delivery fee as separate line items.
- Through a distributor: the processor ships designated end products to a distributor for delivery on behalf of the SFA. The processor may invoice the SFA for the case price and the delivery fee as a separate line item, or the distributor may invoice the

SFA separately for the delivery fee.
- Modified Fee-for-Service: the SFA has an authorized agent, such as a distributor, order end products from the processor on their behalf. The authorized agent invoices the SFA directly for the case price and delivery fee.

Inventory is reduced when the processor has delivered the end product to the SFA or the distributor has notified the processor of any sales.

Refund or Rebate

Under the Refund or Rebate method, the processor sells end products containing USDA Foods directly to the SFA, or to the SFA's designated distributor on their behalf, and charges the commercial, or gross, price. **The SFA must then apply for a refund or rebate from the processor in writing by email or other electronic submission**. The processor must provide a refund or rebate for the value of the USDA Foods contained in the end product to the SFA **within 30 days** of receiving the request.

The SFA's USDA Foods inventory balance at the processor is reduced when the refund or rebate is paid.

Direct Discount

When using the Direct Discount method, the processor sells end products containing USDA Foods directly to the SFA at an established commercial price less the value of the USDA Foods contained in the end product, called the discounted net price.

Inventory is reduced when the processor invoices the SFA.

Whichever value pass thru method your SFA uses, we are looking at the solicitation and making sure the value pass thru method and the solicitation match.

Section D: Contract Performance Management Process

4) SFA Compliance with USDA Foods Valuation
Is the SFA compliant with receiving the value of USDA foods as stated on the State-approved SEPDS? (Note: SEPDS is the contract value; USDA established value for tax year).

5) Yield Discrepancy Reconciliation
If SFA received less than the full value of USDA foods, is the SFA compliant with pursuing the processor and coming to a reasonable conclusion?

6) Contractor Performance Monitoring
Is the SFA monitoring contractor performance (periodic reports—quarterly, semi-annual, annual—programmatic, financial, or both)?

7) Food Recall Procedures
Is the SFA compliant with having food recall procedures? This includes notification requirements, identifying affected products, and conducting an inventory assessment within 48 hours.

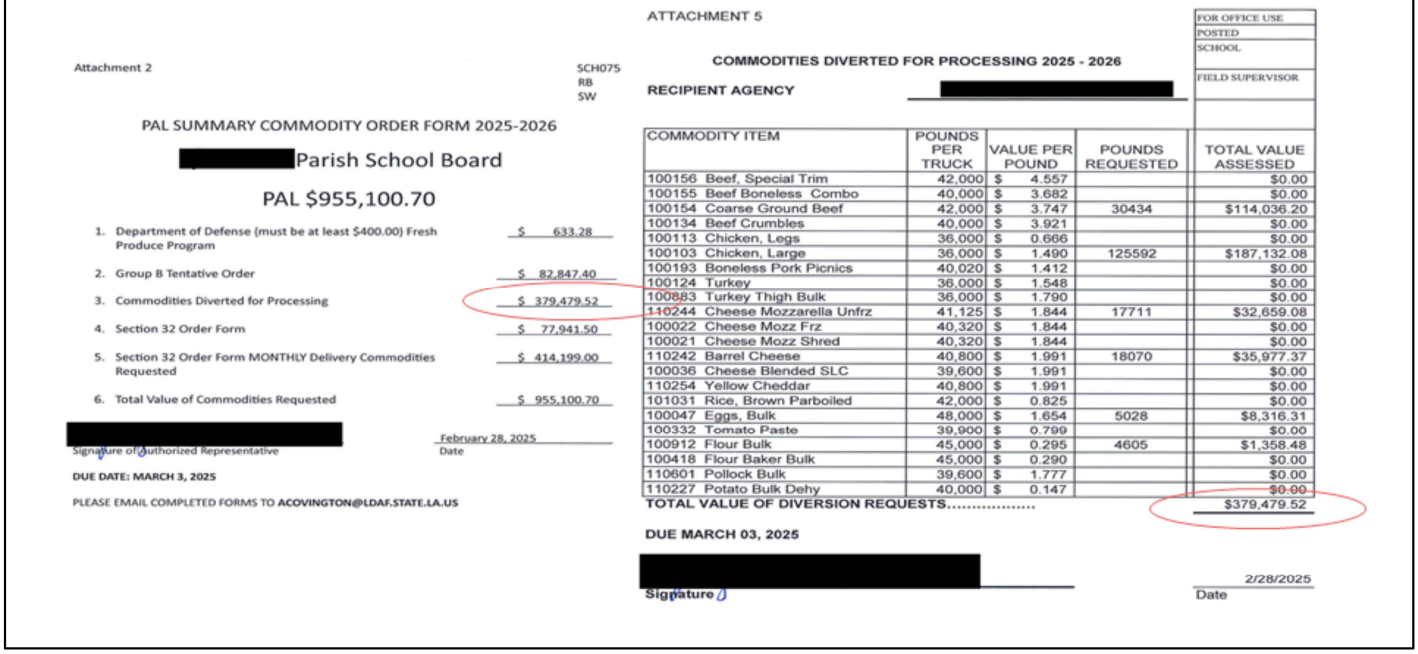
8)If yes, are the food recall procedures in compliance with 7 CFR 250?

In order for reviewers to determine compliance we first start off with your SFA PAL packet that you receive (this must be kept of file, it is part of maintaining records), complete, and submit to LDAF. Within the packet PAL packet it will show us what you diverted to the processor.
Only approved processors with an agreement with LDAF will receive bulk materials. SFAs also send in the end product by truckload form to verify their request which is to be signed and dated. .

Within your PAL packet it states how many pounds you will be diverting and the codes of each item. Bids are compared to the end product by truckload form. The end product code should match what was bid.

You should be monitoring contractor performancejust like you do with other vendors, are they performing like the contract says they would? We look to see if you are monitoring them thru (periodic reports—quarterly, semi-annual, annual—programmatic, financial, or both)?

Example of PAL Summary



Attachment 2

SCH075
RB
SW

PAL SUMMARY COMMODITY ORDER FORM 2025-2026

[redacted] Parish School Board

PAL $955,100.70

1. Department of Defense (must be at least $400.00) Fresh Produce Program — $ 633.28
2. Group B Tentative Order — $ 82,847.40
3. Commodities Diverted for Processing — $ 379,479.52
4. Section 32 Order Form — $ 77,941.50
5. Section 32 Order Form MONTHLY Delivery Commodities Requested — $ 414,199.00
6. Total Value of Commodities Requested — $ 955,100.70

[redacted]
Signature of Authorized Representative

February 28, 2025
Date

DUE DATE: MARCH 3, 2025

PLEASE EMAIL COMPLETED FORMS TO ACOVINGTON@LDAF.STATE.LA.US

ATTACHMENT 5

FOR OFFICE USE
POSTED
SCHOOL
FIELD SUPERVISOR

COMMODITIES DIVERTED FOR PROCESSING 2025 - 2026

RECIPIENT AGENCY [redacted]

COMMODITY ITEM	POUNDS PER TRUCK	VALUE PER POUND	POUNDS REQUESTED	TOTAL VALUE ASSESSED
100156 Beef, Special Trim	42,000	$ 4.557		$0.00
100155 Beef Boneless Combo	40,000	$ 3.682		$0.00
100154 Coarse Ground Beef	42,000	$ 3.747	30434	$114,036.20
100134 Beef Crumbles	40,000	$ 3.921		$0.00
100113 Chicken, Legs	36,000	$ 0.666		$0.00
100103 Chicken, Large	36,000	$ 1.490	125592	$187,132.08
100193 Boneless Pork Picnics	40,020	$ 1.412		$0.00
100124 Turkey	36,000	$ 1.548		$0.00
100883 Turkey Thigh Bulk	36,000	$ 1.790		$0.00
110244 Cheese Mozzarella Unfrz	41,125	$ 1.844	17711	$32,659.08
100022 Cheese Mozz Frz	40,320	$ 1.844		$0.00
100021 Cheese Mozz Shred	40,320	$ 1.844		$0.00
110242 Barrel Cheese	40,800	$ 1.991	18070	$35,977.37
100036 Cheese Blended SLC	39,600	$ 1.991		$0.00
110254 Yellow Cheddar	40,800	$ 1.991		$0.00
101031 Rice, Brown Parboiled	42,000	$ 0.825		$0.00
100047 Eggs, Bulk	48,000	$ 1.654	5028	$8,316.31
100332 Tomato Paste	39,900	$ 0.799		$0.00
100912 Flour Bulk	45,000	$ 0.295	4605	$1,358.48
100418 Flour Baker Bulk	45,000	$ 0.290		$0.00
110601 Pollock Bulk	39,600	$ 1.777		$0.00
110227 Potato Bulk Dehy	40,000	$ 0.147		$0.00
TOTAL VALUE OF DIVERSION REQUESTS.....				$379,479.52

DUE MARCH 03, 2025

[redacted]
Signature

2/28/2025
Date

Here is an example of a Planned assistance level summary shee and the amount that is sent to each processor. The numbers should match

We are looking to make sure that what you diverted to the processor 4) SFA Compliance with USDA Foods Valuation
Is the SFA compliant with receiving the value of USDA foods as stated on the State-approved SEPDS? (Note: SEPDS is the contract value; USDA established value for tax year).

5) Yield Discrepancy Reconciliation
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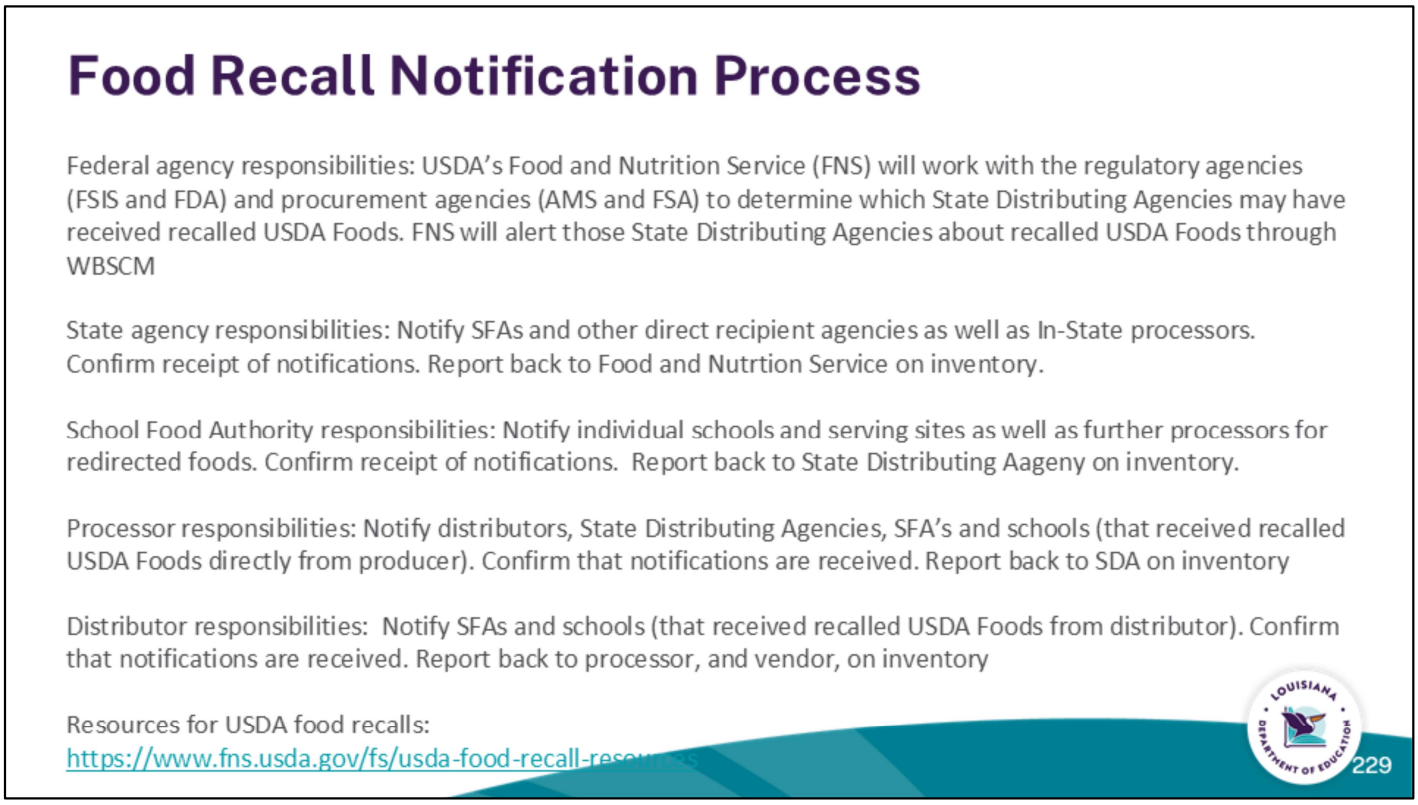
Is the SFA monitoring contractor performance (periodic reports—quarterly, semi-annual, annual—programmatic, financial, or both)?



Question 8 asked about Food recall procedures and do you have them.

Food recalls are almost always voluntary actions initiated by the manufacturer. But when this happens the word needs to be spread to ensure everyone is notified. USDA works with regulatory agencies, Food and Safety Inspection, and the Food and Drug administration are notified. Then they will alert the appropriate State distributing agency.

Federal agency responsibilities: USDA's Food and Nutrition service will work with the regulatory agencies (FSIS and FDA) and procurement agencies (AMS and FSA) to determine which SDAs may have received recalled USDA Foods. FNS will alert those State Distributing Agencies about recalled USDA Foods through the Web based supply chain management system or many people know by the acronym, WBSCM

Once the State distributing agency has been lotified then it is their responsibility to notify SFAs and other direct recipient agencies as well as In-State processors. They must confirm receipt of notifications. Report back to Food and Nutrtion Service on inventory.

School Food Authority responsibilities: Notify individual schools and serving sites as well as further processors for redirected foods. Confirm receipt of notifications. Report back to State Distributing Aageny on inventory.

Processor responsibilities: Notify distributors, State Distributing Agencies, SFA's and schools (that received recalled USDA Foods directly from producer). Confirm that

notifications are received. Report back to SDA on inventory

Distributor responsibilities: Notify SFAs and schools (that received recalled USDA Foods from distributor). Confirm that notifications are received. Report back to processor, and vendor, on inventory

As you can see everyone has a part in making sure the word gets out to pull any stock that is contaminated so no contaminated food gets eaten.

Administrative and Procurement Review Summary of Findings Report and Review Closure

Slide 230

8 @stacie.griffin@la.gov
You present the AR/PR Summary of Findings Report and Review Closure slides
Misty Woods, 4/13/2026

Summary of Findings Report

Within 30 days of the exit conference, the reviewer will send the Administrative Review and Procurement Review Summary of Findings Report to the Superintendent Contact and SFA Contact via email.

The Administrative Review and Procurement Review Summary of Findings Report is a detailed record of any review findings and technical assistance that occurred during the AR and PR.

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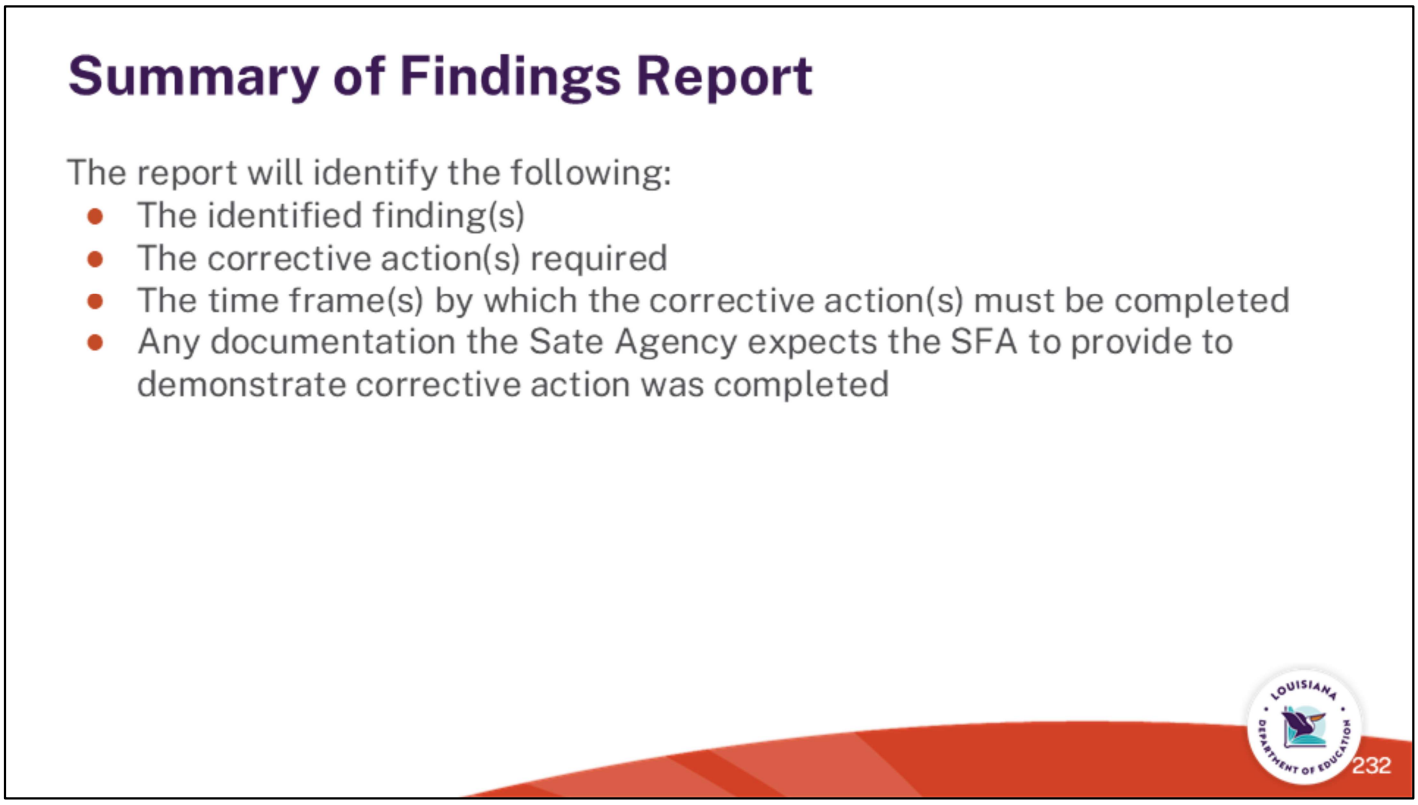
The Administrative Review and Procurement Review Summary of Findings Report is a detailed record of any review findings and technical assistance that occurred during the AR and PR.



The Summary of Findings report will identify the following:

- The identified finding(s)
- The corrective action(s) required
- The time frame(s) by which the corrective action(s) must be completed
- Any documentation the State agency expects the SFA to provide to demonstrate corrective action was completed

State Agency Administrative Review Summary Report

- The State agency is responsible for ensuring that information regarding Administrative Reviews is made easily accessible to all members of the public.
- State agency must publicly post State Agency Administrative Review Summary Report for each SFA on the State agency publicly available website.
- State Agency Administrative Review Summary must be posted no later than 30 days after the State agency provides the final results of the Administrative Review to the SFA.
- The State agency must also make a copy of the final Administrative Review Report available to the public upon request.

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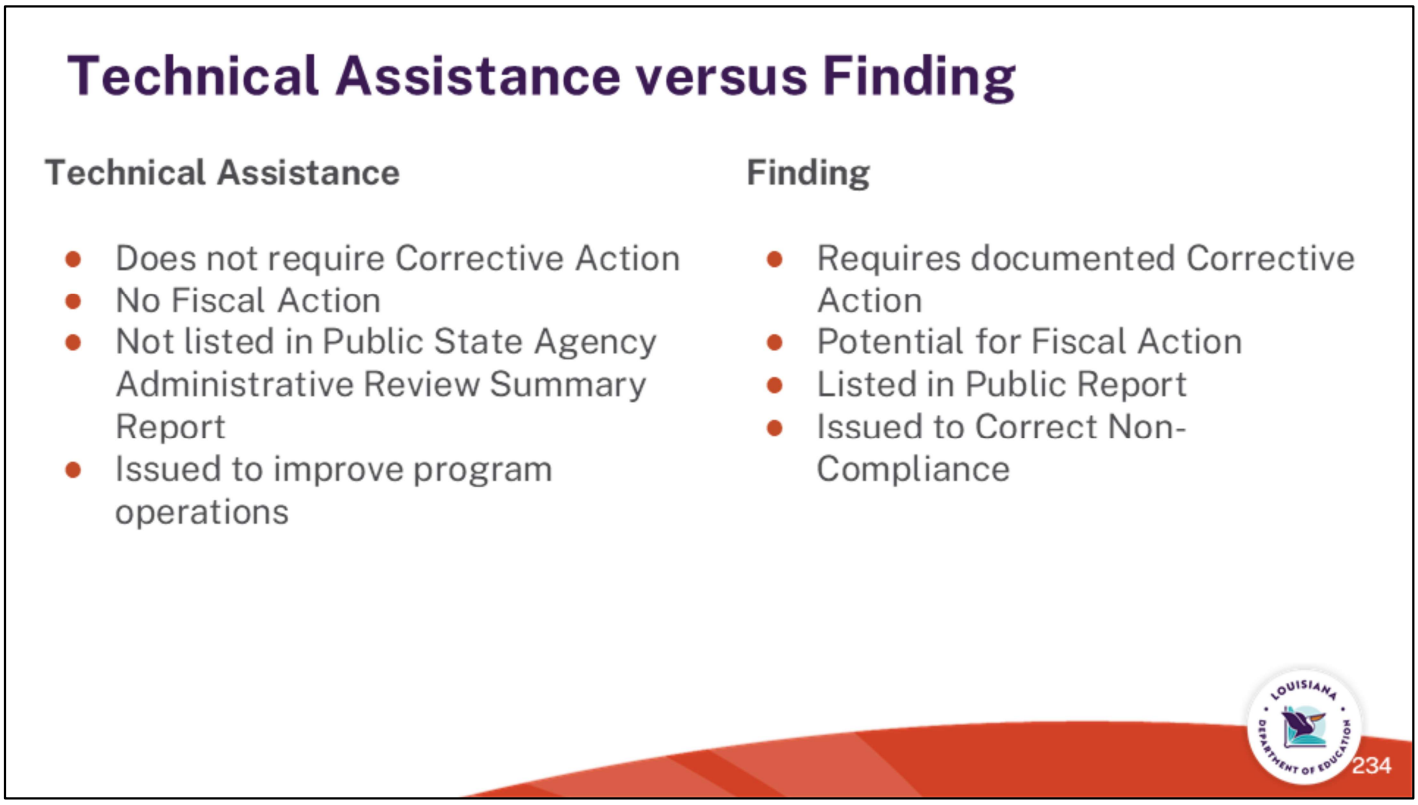
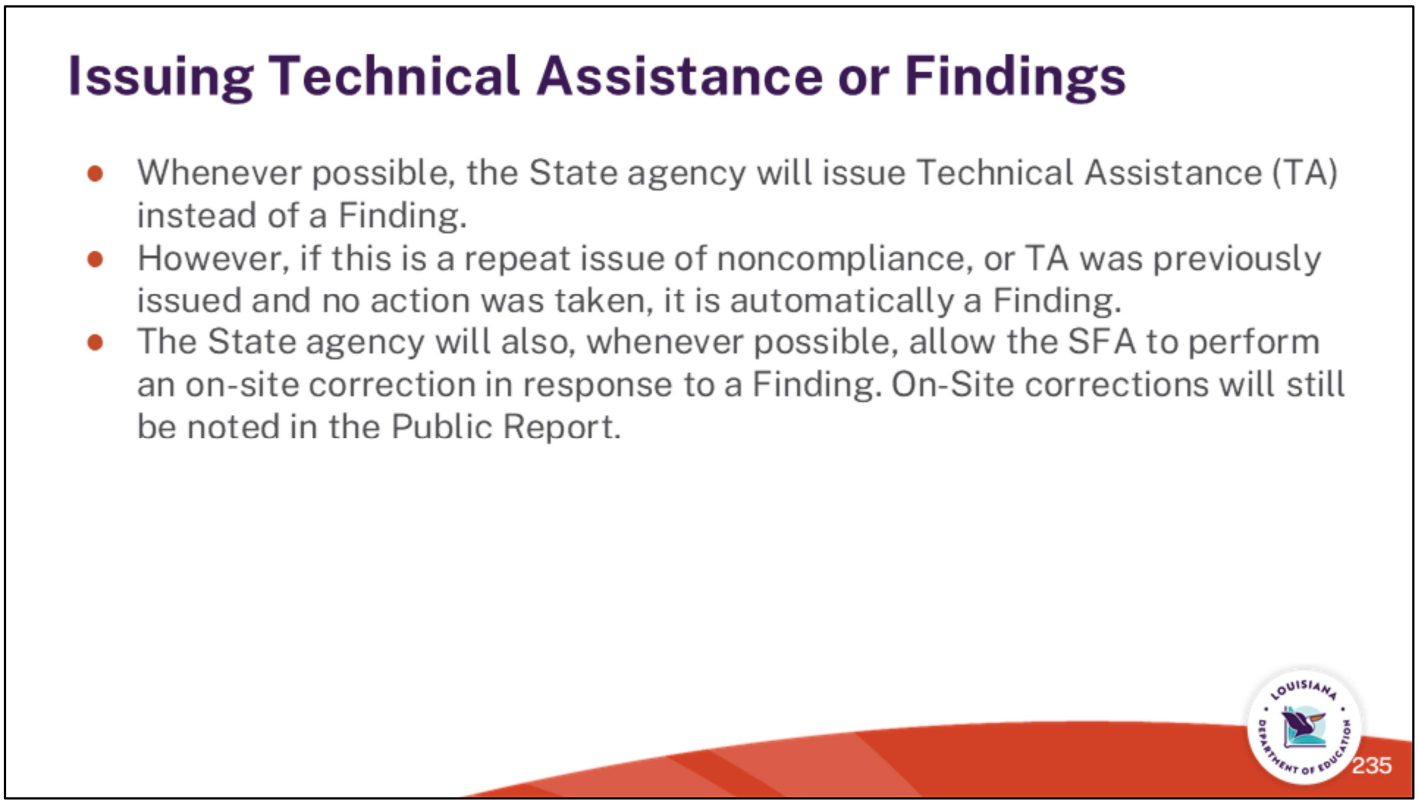


What is the difference between Technical Assistance and a Finding on the Summary of Finidngs Report.

Technical Assiatance does not require Corrective Action.
There is no Fiscal Action for technical assistance.
Technical Assistnace is not listed in public State Agency Administrative Review Summary Report.
Technical Assistance is Issued to improve program operations.

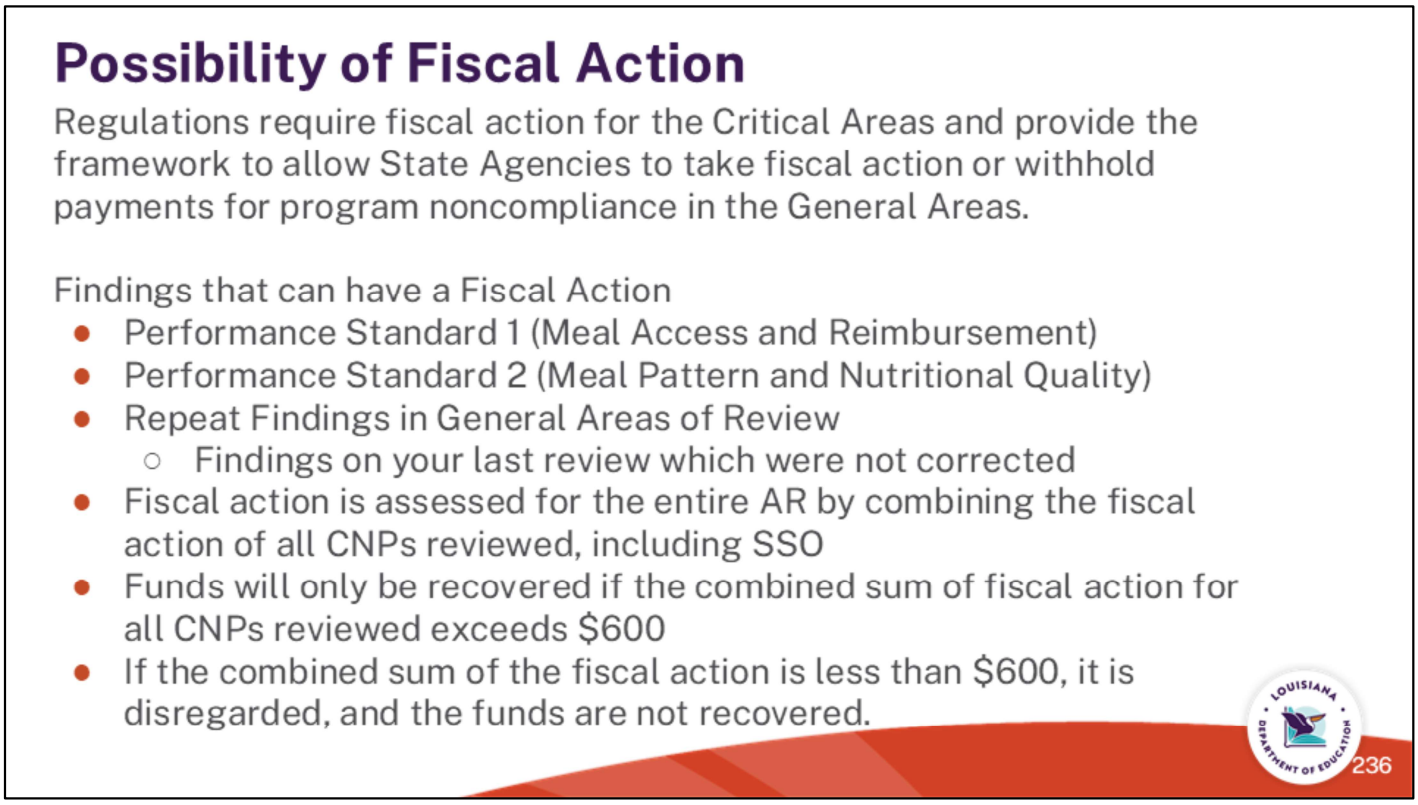
A review finding requires documented Corrective Action.
There is potential for Fiscal Action for some findings.
Review findings are listed in the public State Agency Administrative Review Summary Report.
Review findings are Issued to correct Non-Compliance.



Whenever possible, the State agency will issue Technical Assistance (TA) instead of a review finding.

However, if this is a repeat issue of noncompliance, or technical assistance (TA) was previously issued and no action was taken, it is automatically a Finding.

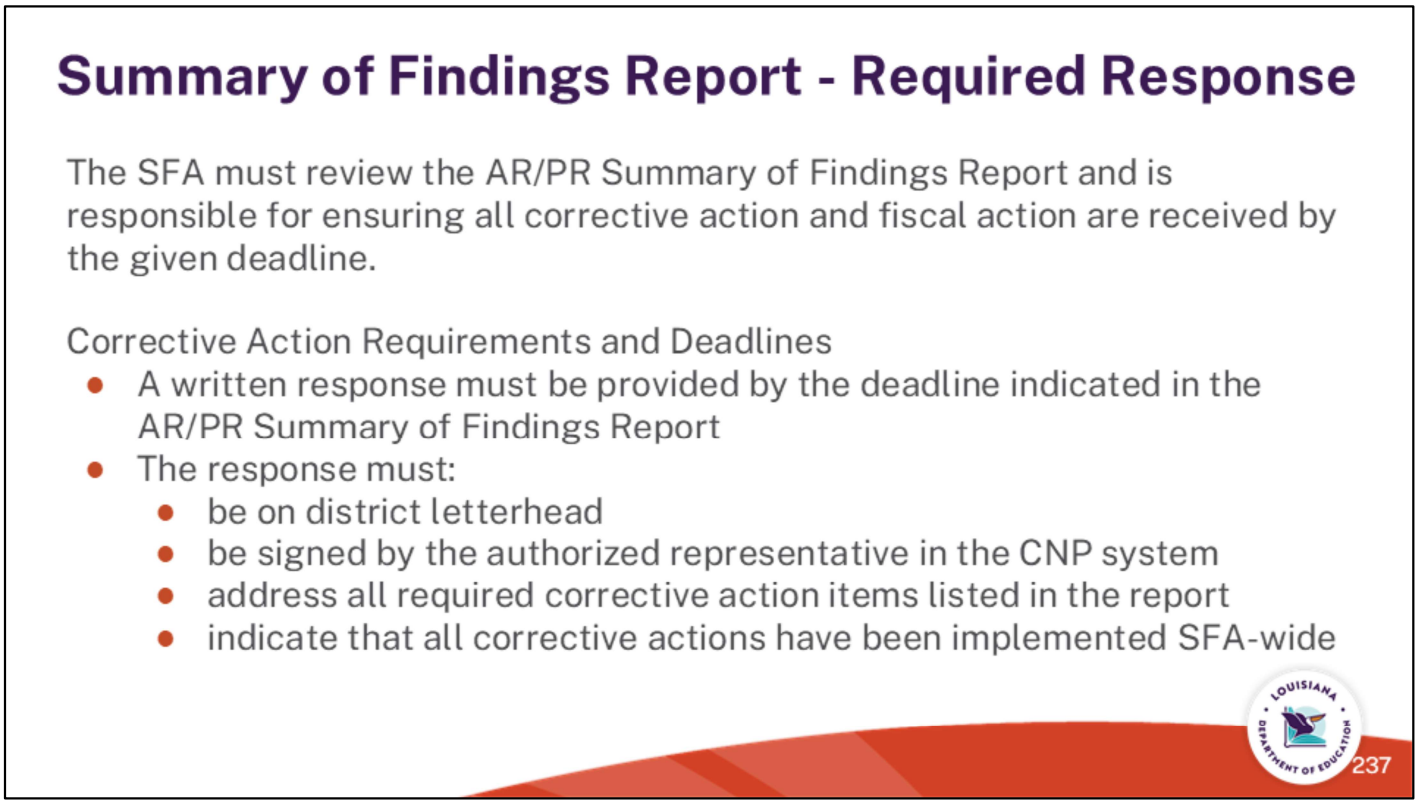
The State agency will also, whenever possible, allow the SFA to perform an on-site correction in response to a finding. On-Site corrections will still be noted in the Public State Agency Administrative Review Summary Report.



Regulations require fiscal action for the Critical Areas and provide the framework to allow State Agencies to take fiscal action or withhold payments for program noncompliance in the General Areas.

Findings that can have a Fiscal Action

- Performance Standard 1 (Meal Access and Reimbursement)
- Performance Standard 2 (Meal Pattern and Nutritional Quality)
- Repeat Findings in General Areas of Review
- Findings on your last review which were not corrected
- Fiscal action is assessed for the entire AR by combining the fiscal action of all CNPs reviewed, including SSO
- Funds will only be recovered if the combined sum of fiscal action for all CNPs reviewed exceeds $600
- If the combined sum of the fiscal action is less than $600, it is disregarded, and the funds are not recovered

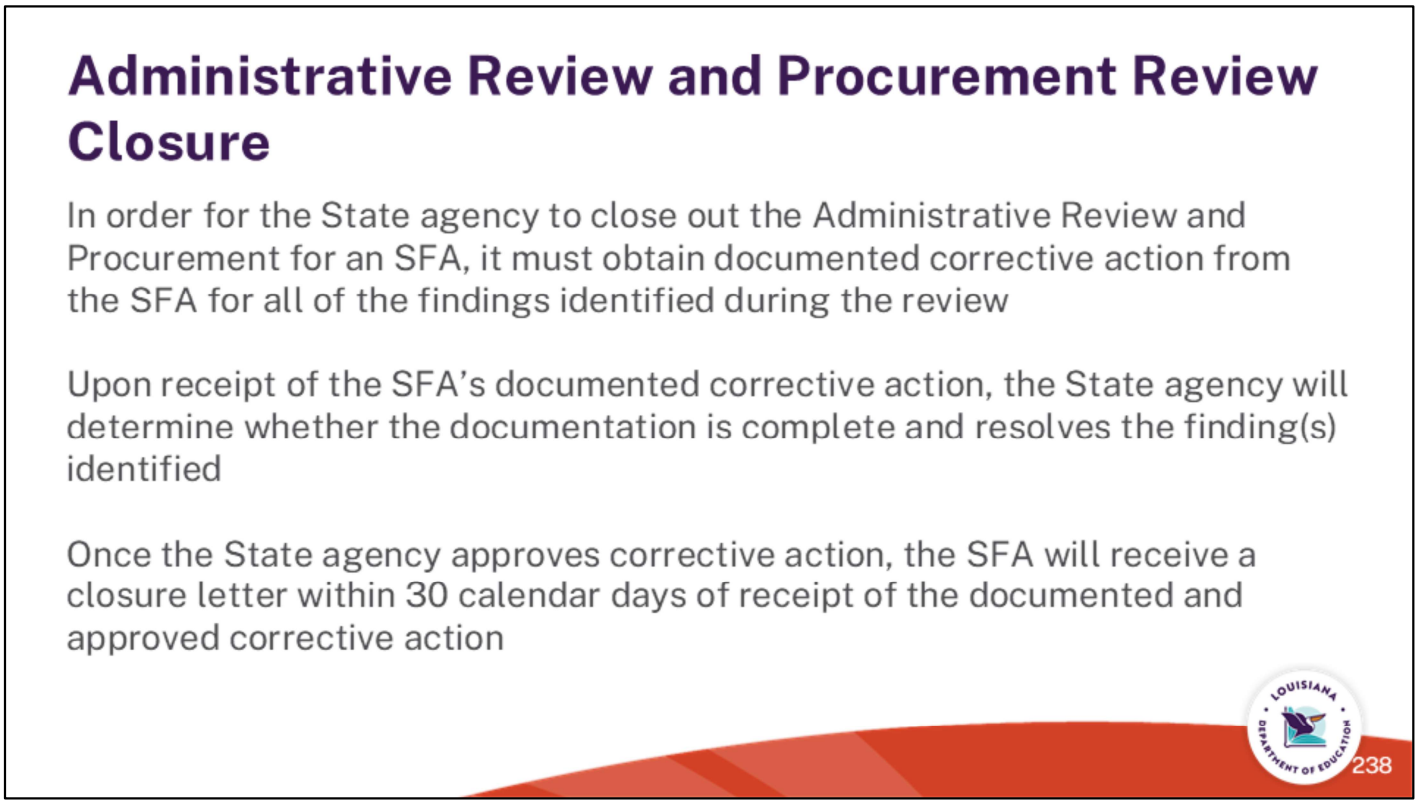


The SFA must review the AR/PR Summary of Findings Report and is responsible for ensuring all corrective action and fiscal action are received by the given deadline.

Corrective Action Requirements and Deadlines
A written response must be provided by the deadline indicated in the AR/PR Summary of Findings Report

The response must:

- be on district letterhead
- be signed by the authorized representative in the CNP system
- address all required corrective action items listed in the report
- indicate that all corrective actions have been implemented SFA-wide



In order for the State agency to close out the Administrative Review and Procurement for an SFA, it must obtain documented corrective action from the SFA for all of the findings identified during the review.

Upon receipt of the SFA's documented corrective action, the State agency will determine whether the documentation is complete and resolves the finding(s) identified.

Once the State agency approves corrective action, the SFA will receive a closure letter within 30 calendar days of receipt of the documented and approved corrective action.

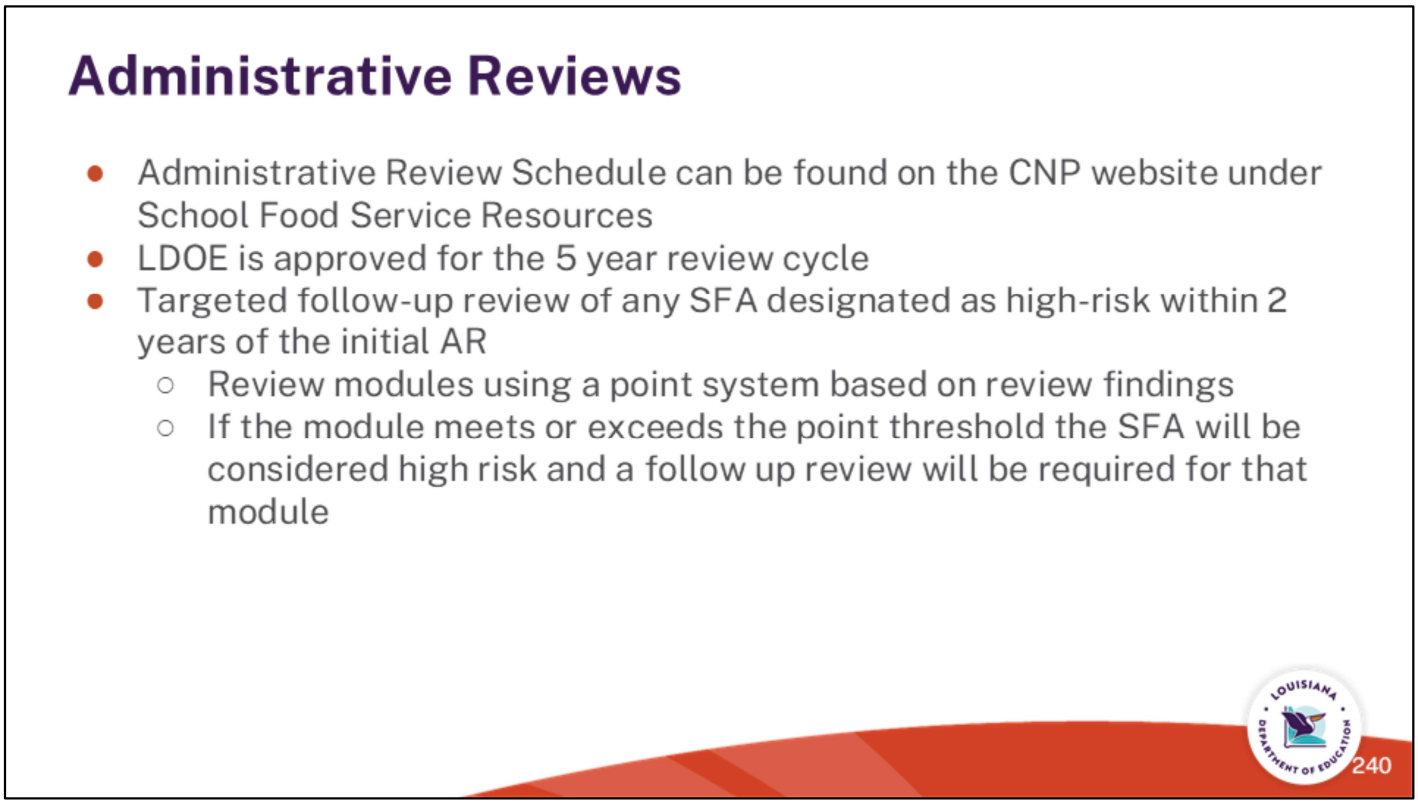
After the closure of the Administrative Review, LDOE will perform a risk assessment to determine if the School Food Authority is considered High-Risk.

High Risk Overview & Follow Up Reviews

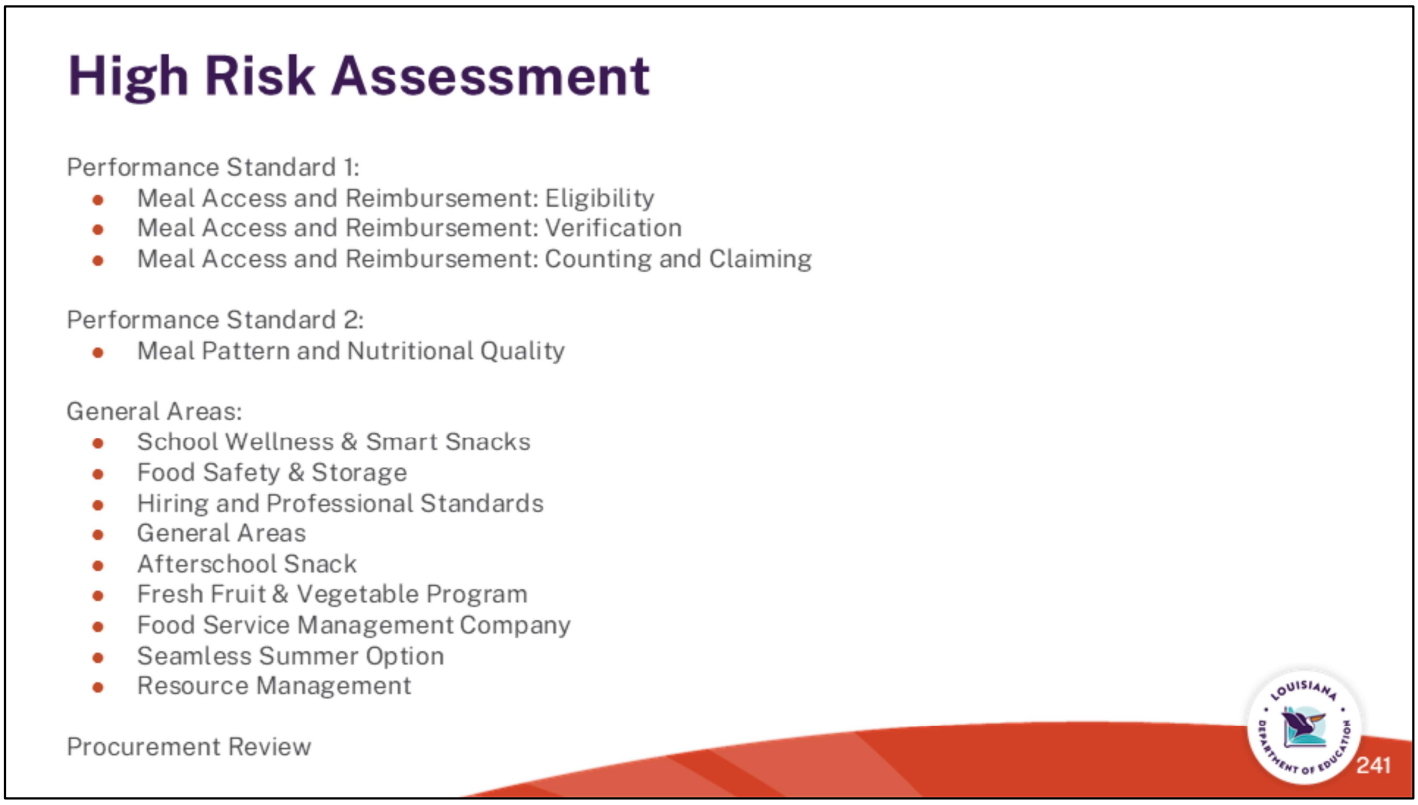
Slide 239

9 Misty will present High Risk Overview and Follow Up Reviews slides

Misty Woods, 4/13/2026



If you are unsure of what year you will be receive an Administrative Review, the Administrative Review Schedule can be found on the CNP website under School Food Service Resources.
LDOE has been approved for the 5 year review cycle.
It is required for State agencies who have been approved for the 5 year cycle to conduct a targeted follow-up review of any SFA designated as high-risk within 2 years of the initial Administrative Review.
LDOE will be using Administrative Review modules when determining if an SFA is considered High Risk.
Some findings will automatically identify an SFA as High-Risk. These findings will be given the maximum points required to ensure the SFA is identified as High-Risk in the module where the violation occurred.
Each module will have a high-risk point threshold. If a module meets or exceeds the point threshold, the SFA will be considered High-Risk and a follow up of the failed module will be completed by the LDOE within 2 years of the initial Administrative Review.



Upon completion of the Administrative Review, LDOE will perform a risk assessment to determine if the School Food Authority is considered High-Risk. SFAs will receive a administrative review preliminary closure letter and then the SFA will receive a high risk letter if your SFA has been determined as High-Risk in one or more modules. The letter will list what module(s) were determined to be high risk. Analysis of risk will be based on the violations that occurred in the completed Administrative Review and Procurement Review. In order to be deemed high risk in a particular module, you must have a score of 5 or more points in that module.

The Administrative Review is broken down into 13 Modules:
Performance Standard 1:

- Meal Access and Reimbursement: Eligibility
- Meal Access and Reimbursement: Verification
- Meal Access and Reimbursement: Counting and Claiming

Performance Standard 2:

- Meal Pattern and Nutritional Quality

General Areas:

- School Wellness & Smart Snacks
- Food Safety & Storage
- Hiring and Professional Standards
- General Areas
- Afterschool Snack

- Fresh Fruit & Vegetable Program
- Food Service Management Company
- Seamless Summer Option
- Resource Management

Procurement Review

Meal Access and Reimbursement: Eligibility (High-Risk Threshold: 5 points)

5% or greater certification and benefit issuance error rate – 5 points.	
Fiscal action required due to certification and benefit issuance or claim consolidation errors – 5 points.	
One or more significant or systemic errors in Performance Standard 1, as defined at 210.18(g)(1) – 5 points.	
All other findings – 1 point.	
Repeat findings – 5 points	
Total Points	

Meal Access and Reimbursement: Verification (High-Risk Threshold: 3 points)

Incomplete Verification for review year - 3 points.	
All other verification findings – 1 point.	
Repeat findings – 3 points.	
Total Points	

Meal Access and Reimbursement: Counting & Claiming (High-Risk Threshold: 5 points)

Incorrect consolidation of meal counts for SBP and NSLP resulting in fiscal action for the review month – 3 points.	
Inaccurate Point of Service – 3 points.	
All other counting and claiming findings – 1 point.	
Repeat findings – 5 points.	
Total Points	

Meal Access and Reimbursement: Eligibility - In this module, the findings related to errors with eligibility or fiscal action are 5 points.

Meal Access and Reimbursement: Verification - In this module, if verification was not completed it will be 3 points and any other verification findings are 1 point.

Meal Access and Reimbursement: Counting and Claiming - In this module, if there was incorrect consolidation of meal counts resulting in fiscal action or if there is an inaccurate POS that is 3 points. All other findings are 1 point.

As stated previously, you need to have a total of 5 points in a module to be deemed high risk.

Meal Pattern and Nutritional Quality (High-Risk Threshold: 5 points)

Fiscal action required due to meal pattern or documentation/reporting errors – 5 points.	
One or more significant or systemic errors in Performance Standard 2, as defined at 210.18(g)(2) – 5 points.	
Meal Pattern violations related to components and food quantities – 2 points.	
Inconsistent and incorrect documentation and record keeping – 1 point.	
All other meal pattern findings – 1 point.	
Repeat findings – 5 points.	
Total Points	

Wellness & Smart Snacks (High-Risk Threshold: 5 points)

All findings – 1 point.	
Repeat findings. – 5 points.	
Total Points	

Food Safety & Storage (High-Risk Threshold: 5 points)

All findings – 1 point.	
Repeat findings – 5 points.	
Total Points	

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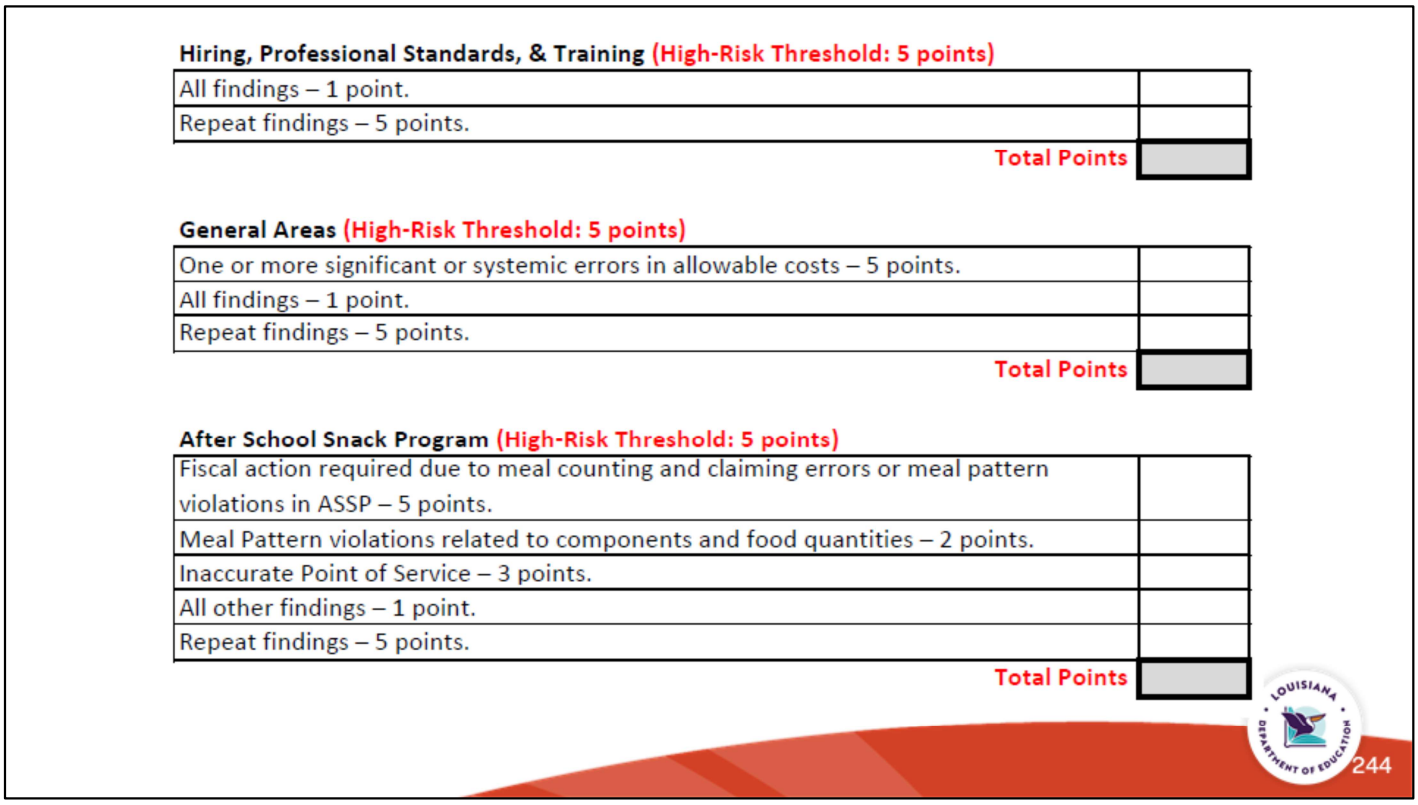
Meal Pattern and Nutritional Quality - In this module, the findings related to errors resulting in fiscal action are 5 points. Any meal pattern finding related to components and quantities are 2 points. Findings related to documentation and recordkeeping are 1 point.

Wellness and Smart Snacks - In this module, All findings related to the wellness policy are smart snacks are 1 point.

Food Safety and Storage - In this module, All findings related to food safety and storage are 1 point.

Again, you need to have a total of 5 points in a module to be deemed high risk.



Hiring, Professional Standards and Training - In this module, All findings related to professional standards are 1 point.

General Areas - In this module, All findings related to professional standards are 1 point except for significant errors relating to allowable cost.

Afterschool Snack Program - In this module, Any fiscal action due to meal counting and claiming errors are 5 points, Any meal pattern finding related to components and quantities are 2 points, Inaccurate POS is 3 points and all other findings are 1 point.

Again, you need to have a total of 5 points in a module to be deemed high risk.

Fresh Fruit & Vegetable Grant (High-Risk Threshold: 3 points)

All findings – 1 point.	
Repeat findings – 3 points.	
Total Points	

Food Service Management Company (High-Risk Threshold: 5 points)

Fiscal action required due to unallowable costs – 5 points.	
All other findings – 1 point.	
Repeat findings – 5 points.	
Total Points	

Seamless Summer Option (High-Risk Threshold: 5 points)

Fiscal action required due to meal counting and claiming errors or meal pattern violations – 5 points.	
One or more significant or systemic errors in Performance Standard 1, as defined at 210.18(g)(1) – 5 points.	
One or more significant or systemic errors in Performance Standard 2, as defined at 210.18(g)(2) – 5 points.	
Meal Pattern violations related to components and food quantities – 2 points.	
All other findings – 1 point.	
Repeat findings – 5 points.	
Total Points	

Fresh Fruit and Vegetable Grant - In this module, Any findings related to FFVP are 1 point.

Food Service Management Company - In this module, any finding that required fiscal action due to unallowable cost is 5 points and all other findings are 1 point.

Seamless Summer Option - In this module, Any findings requiring fiscal action, or significant errors in performance standard 1 or 2 are 5 points. Any findings related to meal pattern are 2 points and all other findings are 1 point.

Again, you need to have a total of 5 points in a module to be deemed high risk.

Resource Management (High-Risk Threshold: 5 points)

Fiscal action required due to inadequate coding system separating purchases from food service program to other general funds – 5 points.	
One or more significant or systemic errors in allowable costs – 5 points.	
All other findings – 1 point.	
Repeat findings – 5 points	
Total Points	

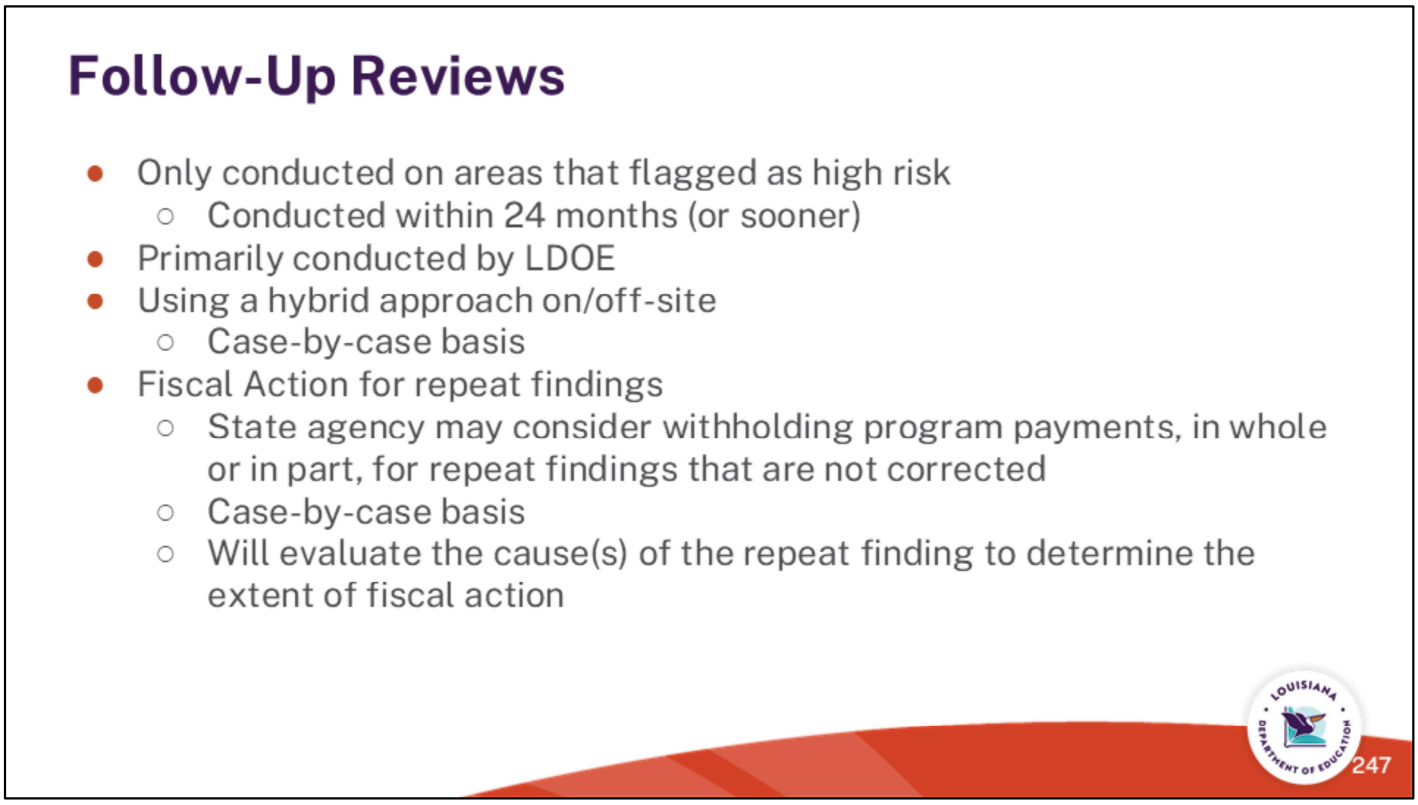
Procurement Review (High-Risk Threshold: 5 points)

Lack of record keeping of food service related purchases – 2 points.	
All other findings – 1 point.	
Repeat findings- 5 points.	
Total Points	

Resource Management - This another most common findings on all reviews so far this school year. Findings seen include Nonprogram Food Revenue, Adult Meals, Financial Management System oversight and control, Allocated Cost Methods.

Procurement Review - This another most common findings on all reviews so far this school year. Findings seen include incorrect procurement procedures and processes, Cost and/or Price analysis, Missing language or provisions.

Again, you need to have a total of 5 points in a module to be deemed high risk.



The follow up reviews will only be conduction on the areas that flagged as high risk. It must be conducted within 24 months (or sooner).
The follow up reviews will be primarily conducted by LDOE.
We are using a hybrid approach, for the follow up reviews, meaning it may be on and/or off site. It will be on a case by case basis.
For repeat findings, the State agency has discretion to apply fiscal action. The State agency may consider withholding program payments, in whole or in part, to any SFA for repeat findings that are not corrected.This will also be on a case by case basis. We will evaluate the cause(s) of the repeat finding to determine the extent of fiscal action.

Feedback Survey

Contact the
LDOE Division of Nutrition Support
(225) 342-9661
ChildNutritionPrograms@LA.GOV