

## Compliance Review Checklist

The following checklist should be used as a self-review for compliance with USDA School Meals Programs Regulations.

A. Direct Certification:	YES	NO
1. Throughout the SY, the SFA should be adding new students to the Person ID system as they enroll in their school district. Person ID will establish a unique NDE ID that allows students to appear on the Match List and be directly certified for free or reduced priced meal benefits.		
2. On or after June 1 <sup>st</sup> , student records were updated either individually or by batch roster in the ADVISER/ Person ID system ( <a href="#">ADVISER Person ID link</a> ). The updated roster matches with the Department of Health and Human Services data bases for assistance programs overnight. The match list contained students automatically eligible for free or reduced meal benefits: SNAP, TANF, FDIR, Foster, Migrant, Medicaid Free, and Medicaid Reduced. The SFA (School Food Authority) has printed/saved this list.		
3. <b>**OPTIONAL**</b> On or after July 8 <sup>th</sup> , the uploaded Student Enrollment was entered into the CNP ( <a href="#">Child Nutrition Program -Direct Certification/Direct Verification link</a> ). The uploaded enrollment matches with the Department of Health and Human Services data bases for assistance programs overnight. The match list contained students automatically eligible for free or reduced meal benefits: SNAP, TANF, FDIR, Foster, Migrant, Medicaid Free, and Medicaid Reduced. The SFA (School Food Authority) has printed/saved this list.		
4. For households in which other student household members did not appear on the Direct Certification match list, the district documented meal benefits were extended to other students in the household of a student that was on the match list. The SFA maintained this list of students with extended direct certification benefits. Qualifying programs that can be extended are SNAP, TANF, FDIR, Medicaid Free, and Medicaid Reduced.		
5. The effective date of eligibility was the date the student appeared on the direct certification match list. This date also was applied for other household students. The household of directly matched students have received notification of meal benefits letters as soon as possible or within 10 operating days of the initial determination. Copies of eligibility letters sent to households are saved on-site.		
6. Public SFAs: The SFA has continued to update student records either individually or by batch roster in the ADVISER/ Person ID system ( <a href="#">ADVISER Person ID link</a> ) through September 15. Starting on September 15, the SFA's Student Information System will be approved with Adviser and manual uploads will not be required.		
Non-Public SFAs: The SFA has continued to update student records either individually or by batch roster in the ADVISER/ Person ID system ( <a href="#">ADVISER Person ID link</a> ) at least three times throughout the school year.		
7. <b>**REQUIRED**</b> Non-Public SFAs: The SFA has continued to upload data for new students into the CNP ( <a href="#">Child Nutrition Program -Direct Certification/Direct Verification link</a> ) throughout the remainder of the school year.		
<b>**OPTIONAL**</b> Public SFAs: The SFA has continued to upload data for new students into the CNP ( <a href="#">Child Nutrition Program -Direct Certification/Direct Verification link</a> ) through September 15. Starting on September 15, the SFA's Student Information System will be approved with Adviser and manual uploads will not be required.		
8. The SFA has continued to save their direct certification lists throughout the SY.		

9. The SFA has regularly reviewed matches in the Possible Match List throughout the SY.		
<b>B. FREE and REDUCED-PRICE MEAL APPLICATIONS</b>		
1. After July 1, the letter to households informing them of the availability of free and reduced-price meals have been distributed to household of children attending the school. The letter may be distributed by the postal service, emailed to the parent or guardian, or included in the information packets provided to students.		
2. The household meal application for the current school year is used.		
3. If SFA is using an on-line meal application it must be submitted to Nutrition Services for approval prior to being utilized.		
<b>Approving Income/Household Size Applications:</b>		
1. If a student's name appeared on the Direct Certification list and the school also received an application that qualifies the student for the same benefit, the application was pulled and filed separately. Direct certification takes precedence over a household application.		
2. Each participating child's name is listed at the top of the application		
3. All household members are listed on the application with income and frequency of income reported for each wage earner. Household size is indicated, and the last four digits of the social security number are listed for the person signing the form OR the "No SSN" box has been checked.		
4. An adult household member signed and dated the application.		
5. For a "foster child only" application with no personal income to report, an adult household member signed and dated the application.		
6. If a student appears on the Direct Certification List and the school also received a household application, the student was approved for the greater meal benefit. For example, the student was approved for Medicaid Reduced but the household application indicated the student qualified for free meal benefits based on household size and income.		
<b>For SNAP, TANF or FDPIR Applications:</b>		
1. Each participating child's name is listed at the top of the application.		
2. Household has reported their Master Case Number (5 - 9 digits only). An 8-digit number starts out "00;" a 9-digit number starts out "000." A Medicaid number listed on an application does not qualify a student for meal benefits. Direct Certification Medicaid is the only Medicaid that qualifies a student for meal benefits.		
3. An adult household member signed and dated the application.		
<b>Other Application Information:</b>		
1. Households on carryover from the previous school year have the same meal benefits for the first 30 operating days OR until a new application is received, or the children's names appear on the Direct Certification list, whichever occurs first.		
2. The SFA has date stamped the applications for when households submitted the application to the SFA. This date may be used for the establishing meal eligibility to a student.		
3. Missing information on an application that is <b>critical</b> in determining meal benefit eligibility is obtained and documented on the application before eligibility is determined. Examples of this would be not reporting the frequency of income received, not listing all children in school/household members, or missing the signature of the adult household member completing the application.		
4. Missing information on an application that is <b>not critical</b> for determining meal benefit eligibility does not delay approval of the application. Examples of this would be not listing the street address/zip/phone.		
5. When calculating income, household applications reporting multiple frequencies of income (for example, weekly, monthly) are converted to annual income using the conversion formulas listed on the application.		

6. To determine eligibility on an income application, the SFA's determining official calculated the household's current income and compares the amount to the Income Eligibility Guideline chart.		
7. The determining official completed, signed, and dated each application indicating the benefit level for each approved child.		
8. Applications reporting zero income are approved for free meal benefits for the remainder of the school year.		
9. Households are notified in writing of their eligibility determination as soon as possible or within 10 operating days of receipt of the application.		
10. Applications for households that have withdrawn from the district have the withdrawal date recorded and are filed separately.		
11. A change in a student's eligibility is made within 3 calendar days if benefits are increased and on the 10 <sup>th</sup> calendar day from the date of the household notification for a reduction or termination of meal benefits.		
<b>C. Verification - Oct. 1<sup>st</sup> start process. Must be completed with online report submitted to NDE by November 15<sup>th</sup></b>		
1. Any applications for students that are directly certified for meal benefits, except for Medicaid Reduced students, who based on household application are eligible for free meals, are not counted in the total number of applications on file.		
2. The correct verification method (Standard-Error Prone OR Alternate One) was used. Standard Error Prone was determined based on a 20% or more non-response rate of applications selected for verification in the prior year. The SFA has checked their non-response rate from the prior year. If the SFA had a non-response rate of less than 20% then the SFA conducted Alternate One.		
3. The correct number of household applications to verify was selected. (3% for Alternate One or 3% of error prone applications for Standard-Error Prone)		
4. The confirming official reviewed and signed each household application selected for verification prior to beginning the verification process. <i>The confirming official must be someone different than the determining official.</i>		
5. Only self-employed income (not regular wages) was verified using an IRS 1040 form from the previous year. Use <a href="#">Attachment E</a> for the specific lines of the tax form to be used.		
6. Households were notified in writing they were selected for verification; selected households were also notified in writing of the results.		
7. The Tracker form ( <a href="#">Attachment H-2</a> ) was completed for each selected household. Copies of all required documents are on file for each household that responded to verification.		
<b>D. A CURRENT MASTER LIST of STUDENT MEAL ELIGIBILITY</b>		
1. Be maintained and updated with student eligibility changes.		
2. Match the meal benefit eligibility from the direct certification match list and the approval reported on meal benefit applications. .		
<b>E. The MEAL COUNTING PROCEDURE</b>		
1. Protect students receiving free and reduced price meals from being overtly identified:• Rosters/computer screens are not coded in such a way that it is obvious to others which students are receiving free or reduced-price meals. •		
2. Provide a Point of Service meal count by meal category (free, reduced, and paid):		
3. The meal count is taken at the <b>end</b> of all serving lines/self-serve food bars where it can be accurately determined that a reimbursable meal has been served.		
4. Meal counts are NOT based on morning counts in classrooms, tray counts, back-out counts where the number of paid meals is obtained by subtracting the free and reduced price count from the total meal count.		
5. If sack lunch meals are provided for field trips or if meals are sent to alternative classrooms,		

a point of service meal count was taken at the time the students received their reimbursable meal. This documentation is kept on file for each claim month.		
6. Allow a maximum of one breakfast and one lunch per student per day to be claimed for reimbursement. Additional items are considered a la carte purchases.		
7. School districts with more than one meal service site must complete the On-Site Review form ( <a href="#">Attachment I</a> ) for each lunch site and 50% of all breakfast sites by February 1. This documentation must be retained on-site.		
<b>F. The DAILY RECORD of MEALS SERVED and EDIT CHECK WORKSHEET</b>		
1. Be completed for each meal service site using <a href="#">Attachment J</a> from NDE or a computer-generated report that provides the same information.		
2. Record correct meal counts by category on a daily basis.		
3. Report the highest number of students eligible for free, reduced price, and paid meals each month.		
4. Compare the attendance adjusted eligible figures by category to daily meal counts for each meal service site before submitting the monthly claim.		
6. Provide a valid explanation for any days in which the number of meals claimed exceeds the attendance adjusted eligible figures before submitting the monthly claim.		
7. Be kept on file along with a copy of the claim and other school food service records for three years plus the current school year.		
<b>G. MEALS may be CLAIMED for REIMBURSEMENT</b>		
1. All serving lines offering reimbursable meals are available to all students.		
2. Meals are priced as a unit.		
3. Menus meet USDA meal pattern requirements. All menus must meet daily/weekly requirements in terms of components and portion sizes.		
4. Meals offer a choice of two kinds of milk: low-fat (1%) or fat-free (skim) unflavored or flavored varieties can be served. One choice must be an unflavored variety.		
5. Offer Versus Serve has been properly implemented when:		
<ul style="list-style-type: none"> <li>Required for 9-12 grades except in certain situations (Juvenile Justice Facilities).</li> </ul>		
<ul style="list-style-type: none"> <li>All required meal components are offered. Breakfast can be claimed if three food <u>items</u> are selected. Lunch can be claimed if three <b>different components</b> are selected. At breakfast and lunch, one of the three must be 1/2 cup of fruit, vegetable or a combination of the two.</li> </ul>		
<ul style="list-style-type: none"> <li>Students decide which food items/components they will take; again, they must select a 1/2 cup of fruit, vegetable or a combination of the two.</li> </ul>		
<ul style="list-style-type: none"> <li>The meal price is the same whether 3, 4, or 5 food components are taken.</li> </ul>		
<ul style="list-style-type: none"> <li>The person responsible for the Point of Service meal count has been trained to evaluate student trays to ensure all claimed meals are reimbursable.</li> </ul>		
<ul style="list-style-type: none"> <li>Menus reflect compliance with USDA's required nutrient standards.</li> </ul>		
<ul style="list-style-type: none"> <li>Unflavored drinking water is available to all students free of charge in the area where breakfast, lunch and snack are served.</li> </ul>		
<ul style="list-style-type: none"> <li>Reimbursable Meal Signage is posted for both breakfast and lunch in a visible area near the meals service line that shows students how to select a reimbursable meal.</li> </ul>		
<b>H. CIVIL RIGHTS REQUIREMENTS</b>		
1. USDA's current nondiscrimination poster "And Justice for All" (dated 2019) is displayed in each area that students eat. It must be visible and easy to read for program participants.		
2. There is no separation of students by race, color, national origin, gender, age or disability during meal service.		
3. Special diets, with correct documentation on file, are provided at no extra charge to students as prescribed by regulation.		
4. Foreign language translations of program materials are made available as needed.		

5. USDA’s current nondiscrimination statement is included in appropriate program materials such as the student handbook in the section that addresses the School Meals Program.		
6. Menus made available to the public may contain the statement “This institution is an equal opportunity provider;” however, it is not required if no other nutrition message is provided to households.		
7. The Civil Rights Summary ( <a href="#">Attachment H-1</a> ) is completed and on file at school. Complete this form at the same time as conducting verification (Oct. 1-Nov. 15). Completed form is retained on-site.		
8. Annual Civil Rights training documentation is available for staff involved in all levels of administration of the School Meals Programs. This would also include any individuals volunteering in the food service program that interact with students/household. Documentation must include the training attended, date, and signature of person attending. If a certificate is provided, print, complete, and file.		
<b>I. USDA’S SMART SNACK RULE &amp; NEBRASKA’S COMPETITIVE FOOD RULE</b>		
1. Food items/snacks are not sold on the school premises by anyone except the school food service program from one-half hour before meal service to one-half hour after meal service (includes breakfast and lunch). This also applies to vending machines, school stores, snack/coffee bars, and concessions stands not operated by the school food service program		
2. A la carte food and beverages sold in schools meet both the Smart Snack Guidelines. The SFA has documentation of compliance for smart snack items.		
3. Vending machines are off during the school day unless items sold comply with the Smart Snack Guidelines. The “school day” is defined as 12:00 am through 30 minutes after the end of the school day.		
4. Fundraising activities held during the school day comply with USDA’s Smart Snack Guidelines.		
<b>J. FOOD PRODUCTION RECORDS</b>		
1. Be completed daily for each site by the production kitchen and kept on file at the school.		
2. Be completed using the current forms on the Nutrition Services website or alternate form approved by NDE on an annual basis.		
3. Document that daily/weekly meal pattern requirements are met:		
▪ Standardized recipes are on file.		
▪ Nutrition Fact labels and Ingredient Statements are on file.		
▪ Child Nutrition (CN) labels or Product Specification Sheets are on file, if applicable.		
4. Delivery Tickets accompany meals sent to be served at another location.		
5. Reflect changes and substitutions made to menus.		
<b>K. Preschool Meal Pattern</b>		
1. Preschool meal pattern is utilized for students eating in the classroom or served separately in the lunchroom.		
2. A point of service meal count is taken in the classroom for preschool students.		
<b>L. HACCP (Hazard Analysis and Critical Control Point) FOOD SAFETY PROGRAM</b>		
1. The district has a written HACCP Plan. Copies of the plan have been distributed to each feeding site.		
2. The HACCP Plan is reviewed annually and revised as necessary.		
3. Appropriate HACCP logs are used and current Food Safety checklist is completed at least once per month. Food Safety Inspections are publicly posted. Production records/delivery tickets may be used for recording temperatures.		
4. A copy of the most recent health inspection report is posted in a visible location in the kitchen.		

5. Completed Temperature logs and Food Safety Checklists are kept on file for one year.		
<b>M. RESOURCE MANAGEMENT:</b>		
1. The Paid Lunch Equity (PLE) Tool is completed annually to determine “paid” student lunch prices for the next school year. A copy of the PLE Report is on file at school. <i>This was waived for SY24-25 for SFAs with a zero or positive balance in their school meals account as of June 30, 2023.</i>		
2. Non-program foods such as “seconds” or other a la carte items sold are priced appropriately to ensure there is no loss of revenue to the school meals program.		
3. Adult meal prices reflect NDE’s annual recommendation, or the general fund provides funds to the food service account if the adult meal price is less than the requirement.		
<b>N. SCHOOL WELLNESS POLICY:</b>		
1. The SFA has updated its School Wellness Policy to include USDA’s required elements and is available for review.		
2. The SFA ensures appropriate parties are included on the wellness committee. Attendance and minutes of the meetings are documented.		
3. The SFA has completed the Triennial Assessment of its Local Wellness Policy. The Wellness Policy and the most current Triennial Assessment of its Wellness Policy has been made available on the SFA’s website.		
<b>O. CHARGE POLICY</b>		
1. For pricing programs, the SFA has a written charge policy that is distributed to all households at the beginning of the year and to households transferring to the school during the school year. The charge policy is included in the student handbook.		
2. The SFA follows their written charge policy to ensure there is not excess unpaid meal debt.		
3. Unpaid meal charges are considered “delinquent debt” when payment is overdue. A debt owed to the non-profit school foodservice remains on the accounting documents until it is either collected or is determined to be uncollectable and written off. When the SFA determines the delinquent debt is uncollectable it must be reclassified as “bad debt”.		
<b>P. PROFESSIONAL STANDARDS</b>		
1. If a new food service director was hired, he/she meets the USDA hiring standards.		
2. The food service director has completed the ServSafe Manager course within the last 5 years or within 30 days of hire.		
3. Training hours are being tracked with documentation on file for all food service employees.		
4. Non-food service employees, who have school lunch responsibilities, receive training related to their duties. Names, training topics, and date of training are documented.		
5. Food service employees are on track to earn their required number of training hours for the year.		
<b>Q. FRESH FRUIT and VEGETABLE PROGRAM</b>		
1. Required documentation, including fresh fruit/vegetable invoices, non-food purchases and labor hour records are maintained on a monthly basis by meal service site.		
2. Nutrition Education activities for the FFVP are reported on the monthly claim for reimbursement.		

<b>R. AFTER SCHOOL SNACK PROGRAM</b>		
1. Annual on-site review is completed within the first four weeks of the program's operation and a second review is completed before the end of the school year.		
2. Meal count sheets and production records are available for each participating site.		
3. Snacks are claimed for reimbursement only when the student takes the entire snack (two different components) offered.		
4. Snacks are claimed on school days only.		
<b>S. FOOD SERVICE MANAGEMENT COMPANY (FSMC)</b>		
1. The SFA is responsible for ensuring the accuracy of the monthly FSMC invoice which includes verifying the correct fixed meal price is applied to meal counts, 2) the correct meal equivalency factor is used, and 3) the SFA receives USDA Foods credit. Documentation from the FSMC to substantiate meals counts, cost data used for meal equivalency, and USDA Foods/DoD Fruit and Vegetable invoices have been submitted to the SFA in support of each cost and credit on the monthly invoice.		
2. The SFA's Advisory Committee, composed of administration/faculty, students, parents, and on-site FSMC director, has met at a minimum of once per semester. Documentation of these meetings includes members in attendance, agenda items, and meeting minutes.		
3. The SFA at a minimum is completing the FSMC Monitoring Form once per semester. Documentation of monitoring is retained on-site.		