COMMON COMPLIANCE CONCERNS

Noted in ARs Conducted School Year 2025-2026

School Nutrition Programs
Area Meetings
Spring, 2026

Areas of Review

Performance Standard 1:
Meal Access and Reimbursement

Performance Standard 2:
Meal Pattern and Nutritional Quality

General Program Compliance:

- Civil Rights
- On-Site Monitoring
- Wellness Policy
- Smart Snacks
- Food Safety and Storage
- Buy American
- Record Keeping
- Afterschool Snack
- FFVP

General Resource Management:

- Correct Coding
- Non-Program Revenue Tool
- Net Cash Resources
- Allowable Costs
- Equipment Purchases
- Paid Lunch Equity
- Revenue from Non-Program Foods
- Indirect Costs

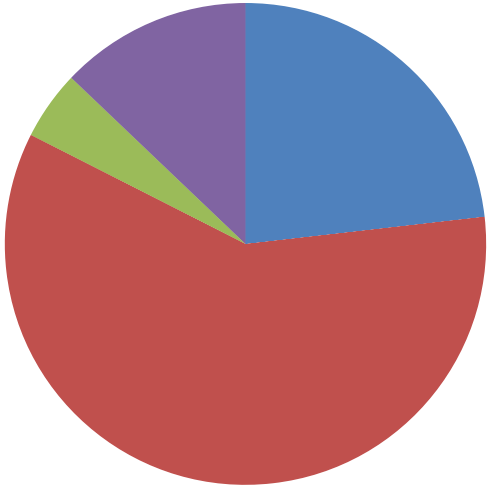
Procurement Review:

- Procurement Plan
- Compliant Purchasing Procedures

By the Numbers

Total ARs Conducted as of April 1, 2026: 32
Total Findings Reported: 194
On Average: 6 Findings per SFA

FINDINGS BY CATEGORY



- Resource Management: 45
- General Program Compliance: 115
- Performance Standard 1: 9
- Performance Standard 2: 25

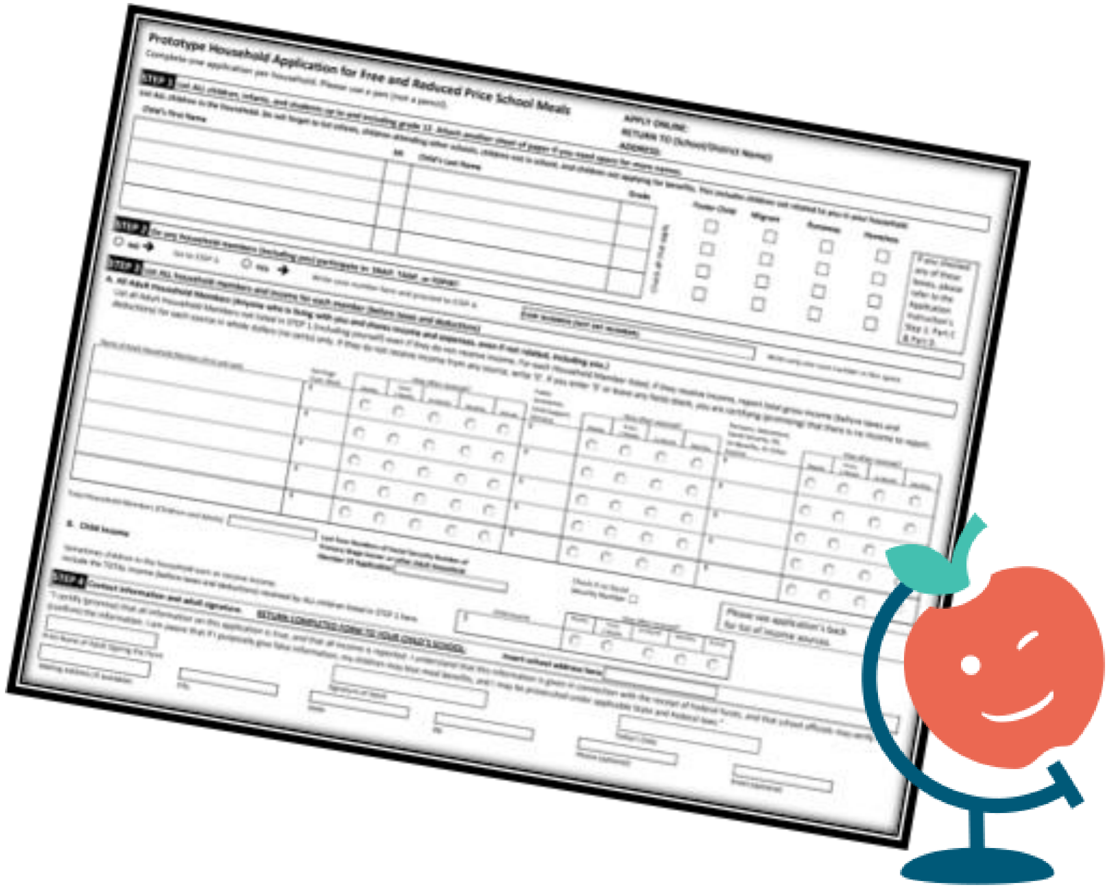
Top Subcategories	Count
Food Safety	35
Financial Management	22
Procurement	22
Wellness Policy	18
Meal Pattern	14
Civil Rights	12
Afterschool Snack Program	11
Smart Snacks	10

PS1: Meal Access and Reimbursement

Module: Certification and Benefit Issuance
Most Common Error: Free and Reduced Meal Applications approved, but not completed correctly

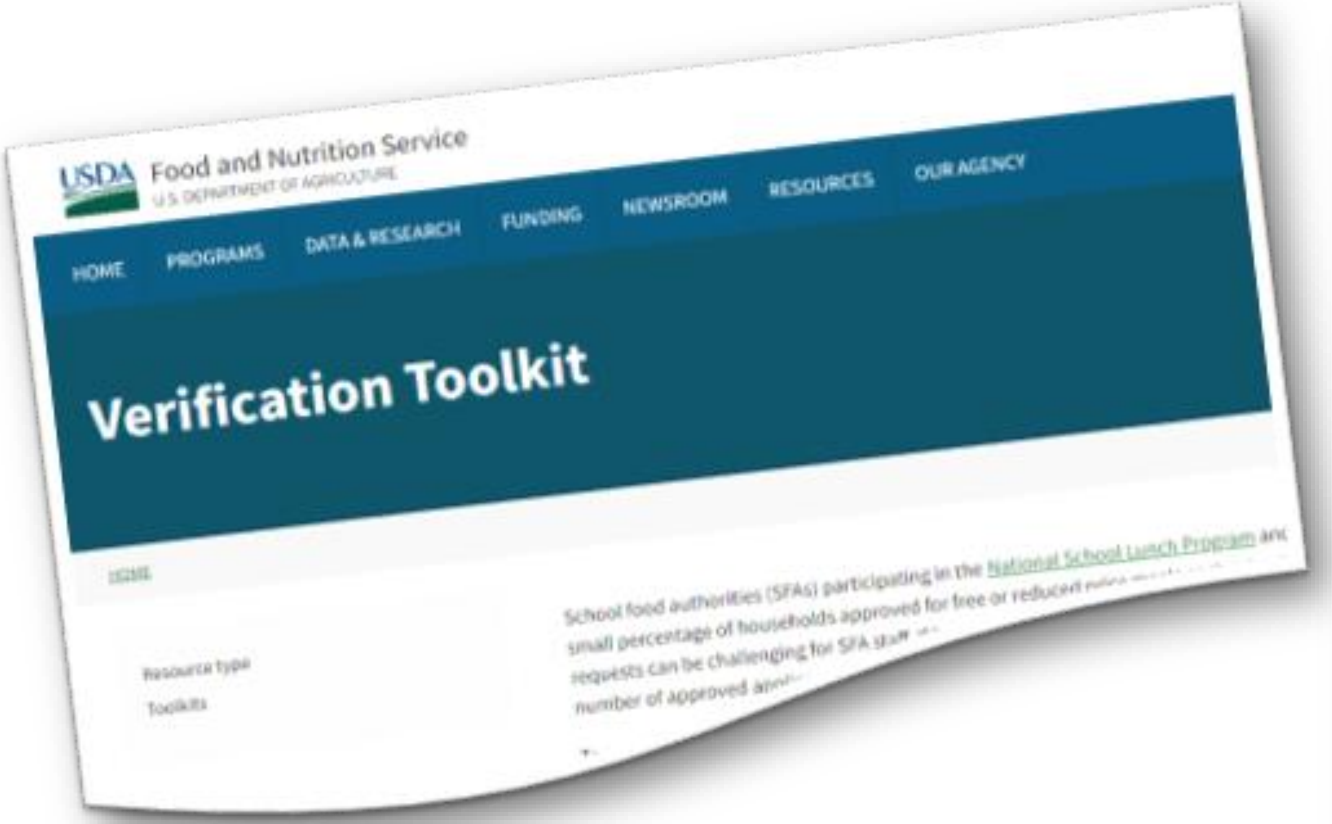
Applications must contain:

- Signature of an adult household member
- Last four digits of a required social security number (Note: Applications that indicate “none” for the adult household member are not considered an error)
- Names of all household members, including children
- SNAP, TANF, or FDPIR case number for each child, as applicable.
- Blank income fields should be processed by the school district as complete


Prototype Household Application for Free and Reduced Price School Meals

PS1: Meal Access and Reimbursement

Module: Verification
Most Common Error: Verification process being performed incorrectly



- SY 2025-2026 Annual Verification Webinar
- SY 25-26 Annual Verification Presentation
- Verification Result List
- SY 2025-2026 Alternate Sample Size
- USDA Eligibility Manual for School Meals
- USDA Verification Toolkit

PS1: Meal Access and Reimbursement

Module: Meal Counting and Claiming (Highest Number of PS1 Findings)
Most Common Error: Meal counting discrepancies

Examples:

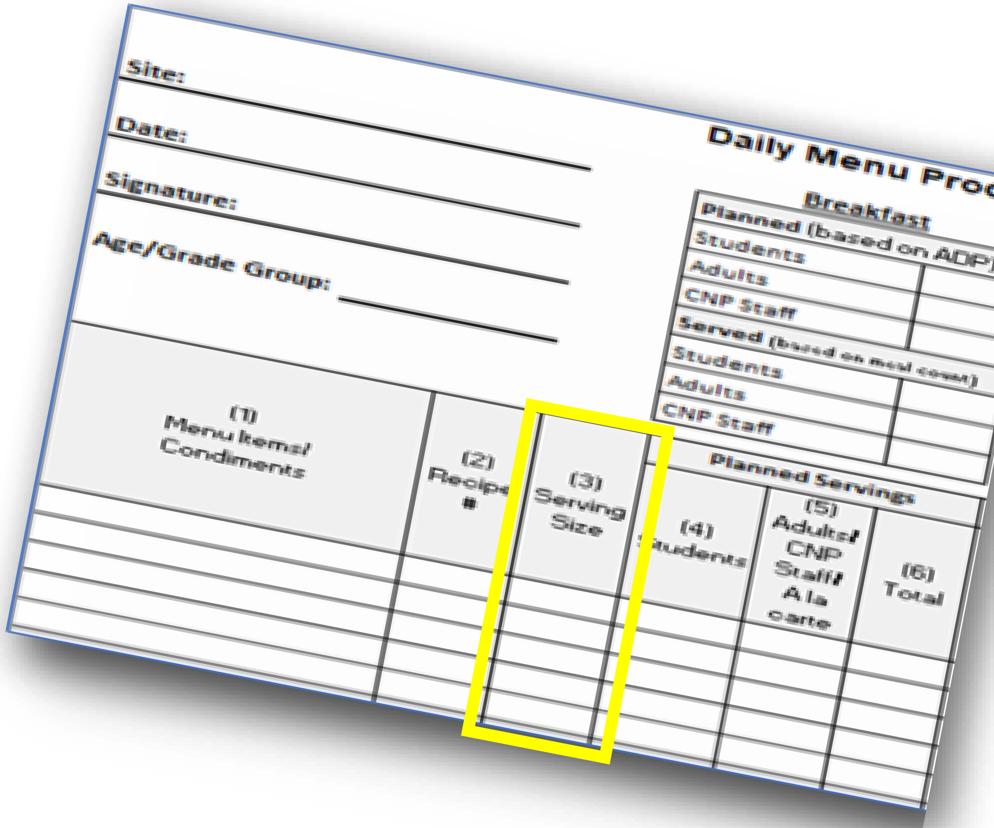
- Meals not counted at the point of service
- Consolidation errors (errors in manual data transfer from POS to Claim for Reimbursement)
- Claiming non-reimbursable meals for reimbursement

PS2: Meal Pattern and Nutritional Quality

Module: Meal Components and Quantities (Highest Number of PS2 Findings)
Meal pattern was not met correctly on the production record

Examples:

- Serving sizes were insufficient or missing from the <u>production record</u>.
- Planned meals were compliant, but school level changes caused non-compliance (substitutions, manager's choice).
- Insufficient quantity of food prepared.
- Insufficient quantity of food served.
- PreK programs that are <u>not comingled</u> are being served according to the K-8 meal pattern, rather than the required CACFP ages 3-5 meal pattern.

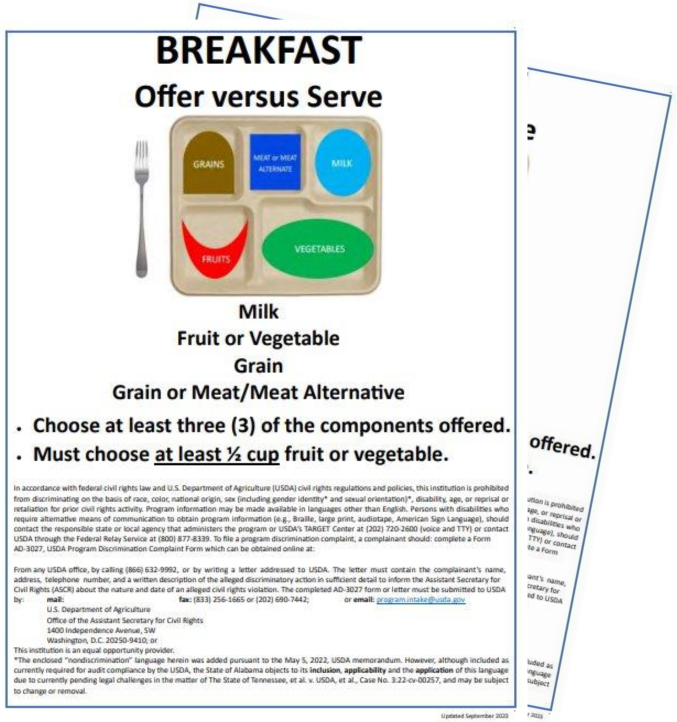


PS2: Meal Pattern and Nutritional Quality

Module: Offer vs. Serve and Dietary Specifications
OVS incorrectly implemented, missing signage, dietary specifications not completed

Examples:

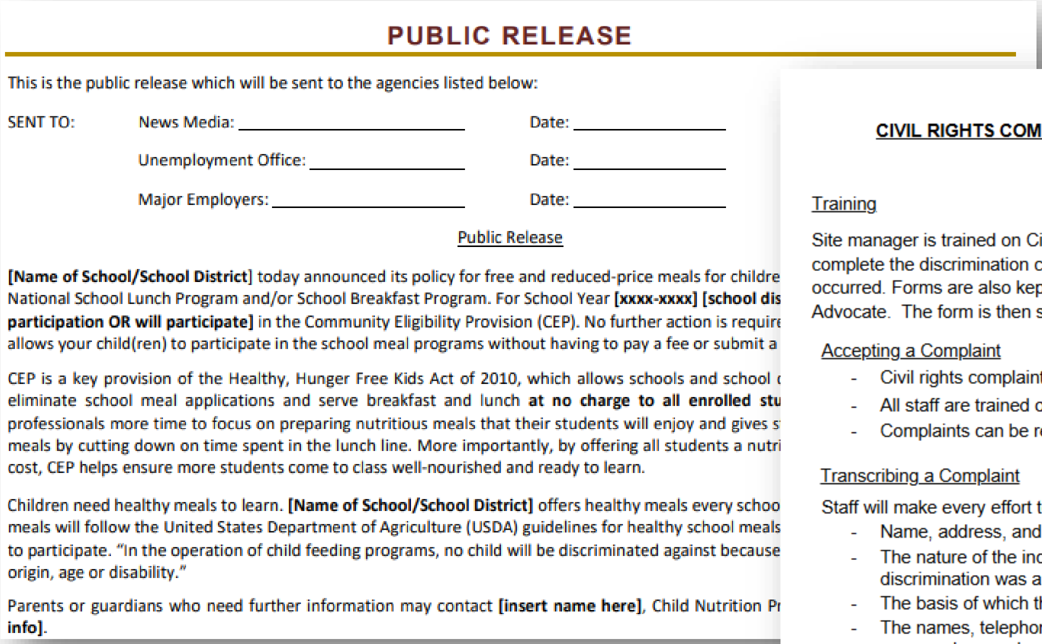
- Staff do not have a firm understanding of OVS
  - Differentiating between amounts we offer on the line vs. what students can take through the register
  - Not requiring students to take a fruit/vegetable
- Missing OVS Signage
- Menu planners were not conducting a full meal pattern and nutrient analysis for their menus



General Compliance: Civil Rights

Top Three Areas of Non-Compliance:

1. Public Release not distributed
2. Incorrect or missing Non-Discrimination Statement
3. Incomplete or missing Complaint Procedures



PUBLIC RELEASE

This is the public release which will be sent to the agencies listed below:

SENT TO: News Media: ____________ Date: ____________

Unemployment Office: ____________ Date: ____________

Major Employers: ____________ Date: ____________

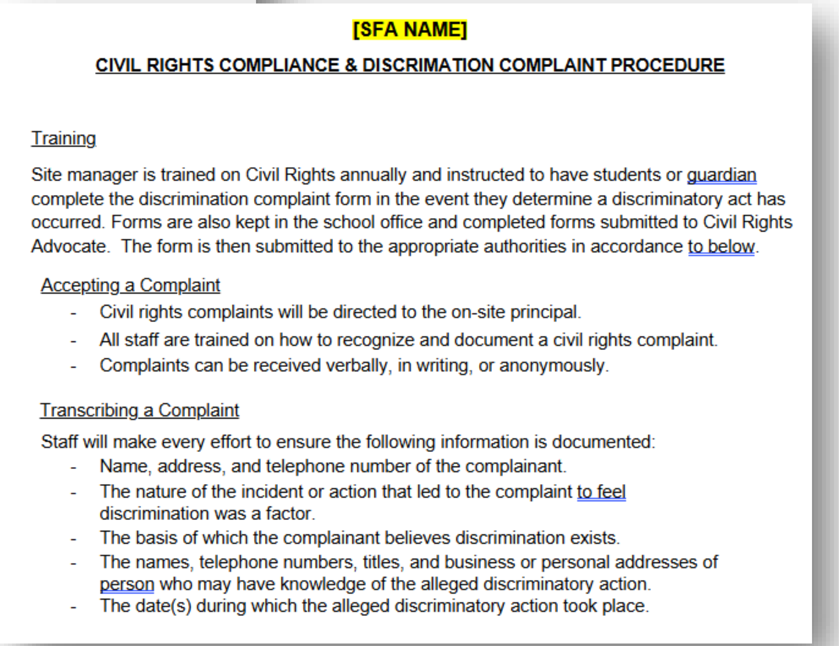
Public Release

[Name of School/School District] today announced its policy for free and reduced-price meals for childre
National School Lunch Program and/or School Breakfast Program. For School Year **[xxxx-xxxx] [school dis
participation OR will participate]** in the Community Eligibility Provision (CEP). No further action is require
allows your child(ren) to participate in the school meal programs without having to pay a fee or submit a

CEP is a key provision of the Healthy, Hunger Free Kids Act of 2010, which allows schools and school
eliminate school meal applications and serve breakfast and lunch **at no charge to all enrolled stu**
professionals more time to focus on preparing nutritious meals that their students will enjoy and gives s
meals by cutting down on time spent in the lunch line. More importantly, by offering all students a nutri
cost, CEP helps ensure more students come to class well-nourished and ready to learn.

Children need healthy meals to learn. **[Name of School/School District]** offers healthy meals every schoo
meals will follow the United States Department of Agriculture (USDA) guidelines for healthy school meals
to participate. "In the operation of child feeding programs, no child will be discriminated against because
origin, age or disability."

Parents or guardians who need further information may contact **[insert name here]**, Child Nutrition Pr
info].



[SFA NAME]

CIVIL RIGHTS COMPLIANCE & DISCRIMATION COMPLAINT PROCEDURE

Training

Site manager is trained on Civil Rights annually and instructed to have students or guardian complete the discrimination complaint form in the event they determine a discriminatory act has occurred. Forms are also kept in the school office and completed forms submitted to Civil Rights Advocate. The form is then submitted to the appropriate authorities in accordance to below.

Accepting a Complaint

- Civil rights complaints will be directed to the on-site principal.
- All staff are trained on how to recognize and document a civil rights complaint.
- Complaints can be received verbally, in writing, or anonymously.

Transcribing a Complaint

Staff will make every effort to ensure the following information is documented:

- Name, address, and telephone number of the complainant.
- The nature of the incident or action that led to the complaint to feel discrimination was a factor.
- The basis of which the complainant believes discrimination exists.
- The names, telephone numbers, titles, and business or personal addresses of person who may have knowledge of the alleged discriminatory action.
- The date(s) during which the alleged discriminatory action took place.

[FNS Nondiscrimination Statements (NDS) | Food and Nutrition Service](https://www.fns.usda.gov/civil-rights/nds)

https://www.fns.usda.gov/civil-rights/nds

And Justice for All Poster Link

General Compliance: On-Site Monitoring

Errors Noted this Year:

Monitoring Form Incomplete

- Health Scores
- Temperatures
- Required Signatures

Incorrect Timeframe

- Original Completion Date
  - NSLP/SBP
  - Snack
- Corrective Actions

Alabama Department of Education
Child Nutrition Program

NATIONAL SCHOOL BREAKFAST AND LUNCH PROGRAMS

On-Site School Review for LEAs

According to 7CFR 210.8(a)(1), every school year, **prior to February 1**, each School Food Authority (SFA) with more than one school (as defined 7 CFR Part 210.2 to include Residential Child Care Institutions (RCCIs)) must perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction.

Each on-site review must ensure the school's claim is based on the counting system, as implemented, and yields the actual number or reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.

If the review discloses problems with a school's meal counting or claiming procedures, the SFA must ensure that the school implements corrective action and within 45 days of the review conduct a follow-up on-site review to determine that the corrective action resolved the problems.

The Alabama Department of Education Child Nutrition Program State Agency encourages schools to begin reviews in a timely manner in order to meet the required deadline of February 1st. The goal is to review SBP and NSLP in the same day .

Program(s) Observed: ☐ NSLP ☐ SBP

SFA Name ____________ **Agreement Number** ____________

School Name ____________ **School Enrollment** ____________ **Date of Review** ____________

ADA NSLP: ____________ **ADA SBP:** ____________

NSLP Participation %: ____________ **SBP Participation %:** ____________

(NOTE: NSLP% and SBP% is the average of the last 3 months percent participation)

	Yes	No	N/A
I. Application Approval			
1. Are applications approved at the central office of Child Nutrition? Name of approving official: ____________	☐	☐	☐
2. Are all applications on file correctly approved or denied?	☐	☐	☐
II. Direct Certification			
1. Does the school correctly utilize direct certification?	☐	☐	☐
If YES, is required documentation maintained at district level?	☐	☐	☐
III. Master Roster			
1. Is a Point of Sale (POS) roster used in the meal count system?	☐	☐	☐
2. Do names listed on the master roster match approved applications on file and on the direct certification list?	☐	☐	☐
3. If more than one roster is used (i.e. master roster/ticket issuance roster/ food service line roster/ paper rosters),are all rosters the same format?	☐	☐	☐

General Compliance: Wellness Policy

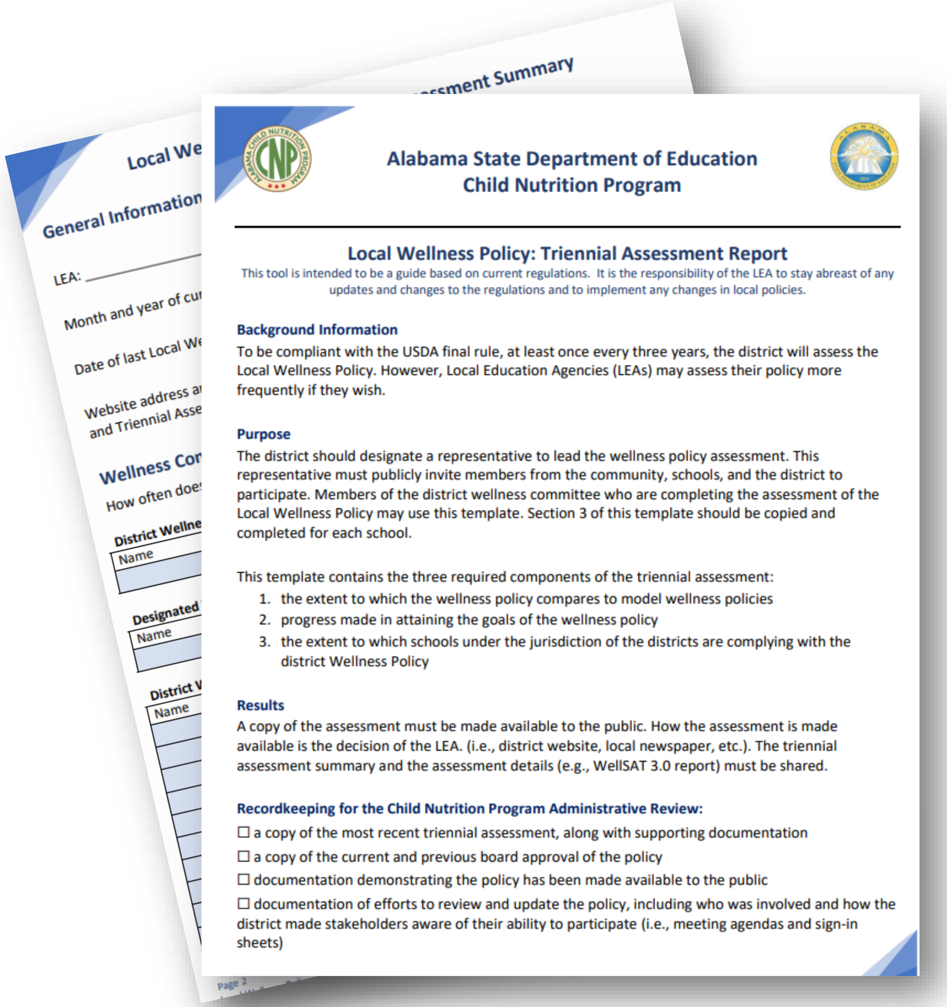
Common Error #1:
Public notification of wellness policy, triennial assessment, and ability of public to participate if interested.

https://www.fns.usda.gov/tn/wellness-policy/outreach-toolkit

Sample Statement:
"Parents & Stakeholders – If you would like to participate in the development, review, update and/or implementation of the local school wellness policy, please contact XXXXXX at (000) 000-0000 or via email at cnpdirector@yourk12.com."

Wellness Policy

Common Error #2:
Triennial assessment was late or did not have all required sections completed.


Alabama State Department of Education
Child Nutrition Program

Local Wellness Policy: Triennial Assessment Report

This tool is intended to be a guide based on current regulations. It is the responsibility of the LEA to stay abreast of any updates and changes to the regulations and to implement any changes in local policies.

Background Information

To be compliant with the USDA final rule, at least once every three years, the district will assess the Local Wellness Policy. However, Local Education Agencies (LEAs) may assess their policy more frequently if they wish.

Purpose

The district should designate a representative to lead the wellness policy assessment. This representative must publicly invite members from the community, schools, and the district to participate. Members of the district wellness committee who are completing the assessment of the Local Wellness Policy may use this template. Section 3 of this template should be copied and completed for each school.

This template contains the three required components of the triennial assessment:

1. the extent to which the wellness policy compares to model wellness policies
2. progress made in attaining the goals of the wellness policy
3. the extent to which schools under the jurisdiction of the districts are complying with the district Wellness Policy

Results

A copy of the assessment must be made available to the public. How the assessment is made available is the decision of the LEA. (i.e., district website, local newspaper, etc.). The triennial assessment summary and the assessment details (e.g., WellSAT 3.0 report) must be shared.

Recordkeeping for the Child Nutrition Program Administrative Review:

☐ a copy of the most recent triennial assessment, along with supporting documentation
☐ a copy of the current and previous board approval of the policy
☐ documentation demonstrating the policy has been made available to the public
☐ documentation of efforts to review and update the policy, including who was involved and how the district made stakeholders aware of their ability to participate (i.e., meeting agendas and sign-in sheets)

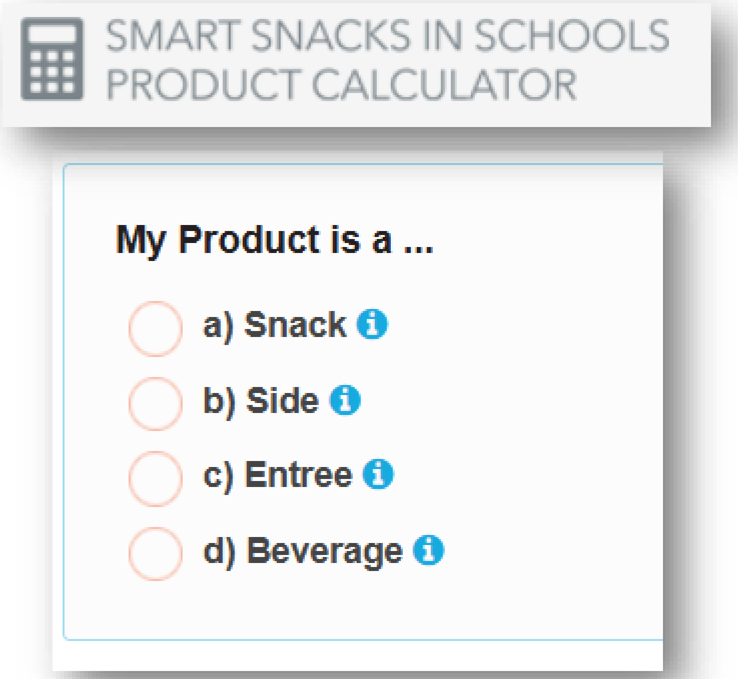
- Section 1: The extent to which the local school wellness policy compares to a model Local School Wellness Policy. (ex: WellSAT 3.0)
- Section 2: The progress made by the district toward attaining the goals of the local school wellness policy
- Section 3: The extent to which schools are in compliance with the local school wellness policy.

Local-Wellness-Policy-Triennial-Assessment-Report-Template.pdf

General Compliance: Smart Snacks

Most Common Finding:

Selling non-compliant food items as a la carte or in vending machines.



[Smart Snacks Product Calculator]

Suggested preventative measures:

- Train your kitchen managers on how to use the Alliance for a Healthier Kid Smart Snack Product Calculator.
- Keep files of all a la carte items sold current.
- Communicate with school administrators about allowable items at school stores and in vending machines.

Food Safety and Storage

Food Safety findings accounted for almost 20% of all findings this school year.

Top Three Findings for Food Safety:

1. Incomplete, Inconsistent, or Missing Logs
   - Temperature Logs
   - Manager's Checklist
   - Calibration Logs (even with digital thermometers)
2. Inconsistent or Missing Date Marking Practices (FIFO)
3. Outdated Food Code Referenced in HACCP Plan

Standard Operating Procedure	Record
Receiving Deliveries	Receiving Log
Reheating Time/Temperature Control for Safety Foods	Cooking and Reheating Temperature Log
Serving Food	Food Safety Checklist
Storing and Using Toxic Chemicals	Food Safety Checklist Damaged or Discarded Product Log
Transporting Foods to Remote Sites	Food Safety Checklist Hot and Cold Holding Temperature Log Receiving Log
Using and Calibrating a Food Thermometer	Food Safety Checklist Thermometer Calibration Log

All standards are based on the 2013 FDA Food Code adopted by the State of Alabama (effective October 2016)

Buy American

Beginning school year 2026-2027, to be compliant with the Buy American Standards, SFAs must provide documentation from SY2025-2026 to demonstrate that non-domestic food purchases did not exceed 10% of total food costs.

Important Notes:

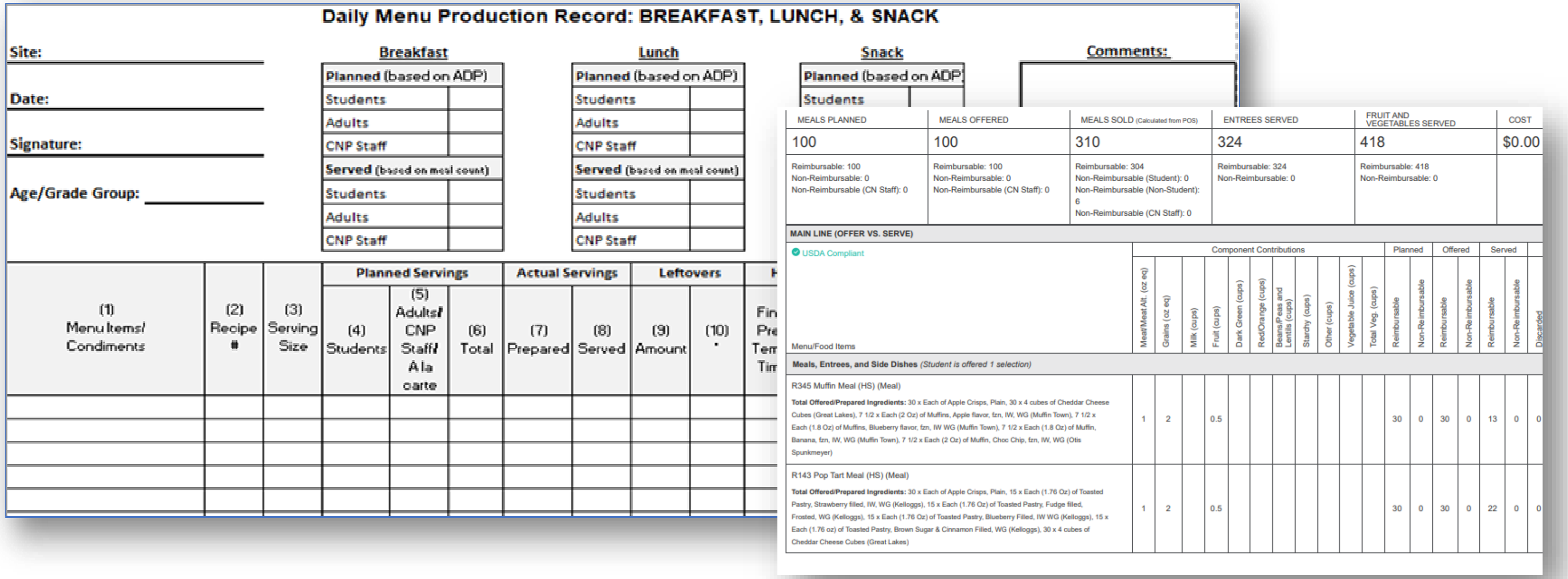
- Being under 10% does not automatically mean compliance.
- Records must still be kept regarding price and availability exceptions made.
- If necessary, accommodations for exceeding the 10% threshold should be approved and on file.

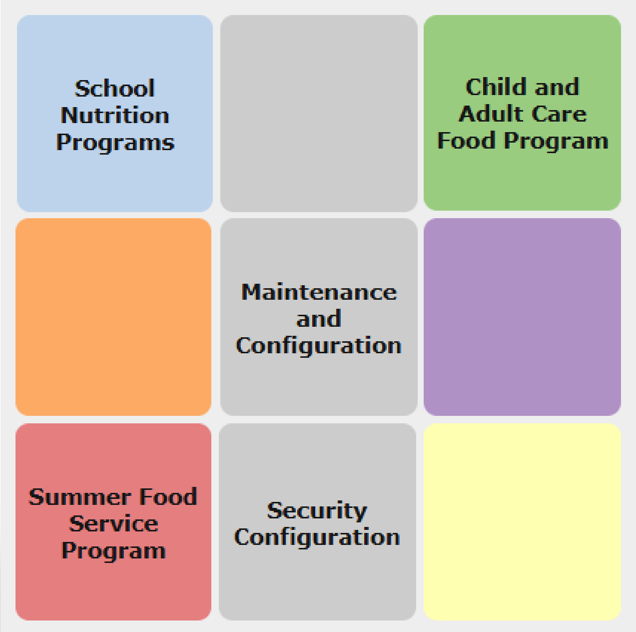
[Accommodation Request]   [Sample Tracking Tool]

Record Keeping

Most Common Findings:

- **Using an alternative production record that has not received ALSDE approval**
- **Completing a production record inaccurately or insufficiently**
- **Errors in LINQ Annual Agreement (adult meals, program operation)**





Afterschool Snack

- **Insufficient quantity of the fruit/vegetable component**
  - **During snack service, the minimum required quantity for the fruit/vegetable component is 3/4c or 6 oz.**

- **Allowing students to choose components instead of offering the snack as a unitized meal.**
  - **During snack service, OVS is not an allowable service model. Students must take all of the components or none of the components.**

- **Ensuring that an accurate point of sale snack counts is maintained**
  - **Daily attendance rosters are not a sufficient counting system. A separate column or sheet should be used to note which students elected to receive a snack each day.**

- **New to School Year 2025-2026**
  - **Grain based desserts no longer credit toward the grain component at snack.**
    - **See this helpful reference or check items in your LINQ School Nutrition Database: Items > Item Management > Select Item > Meal Components.**
  - **No more than half of the weekly fruit or vegetable offerings may be in the form of juice.**

Afterschool Snack

Sample Non-Compliant Menus, based on the Final Rule updates:

Monday	Tuesday	Wednesday	Thursday	Friday
CheezIts, 1 bag Juice, 6 oz.	Tiger Bites, 1 bag Milk 1%, 8 oz.	String Cheese, 1 stick Juice, 6 oz.	Cereal Bowl, 1 oz. Milk 1%, 8 oz.	Sun Chips, 1 bag Milk 1%, 8 oz.

The fruit component was offered twice. 100% of the time it was offered, it was in juice form.
To correct this, the percentage of fruit offered in the form of juice cannot exceed 50%.
Within the week, the number of times a juice is offered must (at least) be matched by a whole, canned, or dried fruit.

Monday	Tuesday	Wednesday	Thursday	Friday
Rice Krispie Bar, 1 ea. Milk 1%, 8 oz.	Banana Muffin, 1 ea. Milk 1%, 8 oz.	String Cheese, 1 stick Juice, 6 oz.	Nutrigrain Bar, 1 ea. Milk 1%, 8 oz.	Raisins, 2 boxes Milk 1%, 8 oz.

Grain based desserts are offered twice on the menu. What about the whole fruit to juice percentage?

Resource Management

Helpful Tips and Reminders:

- Ask your CSFO to run a "Fund Source Financial" report for your 5101 account through AIM's LEA Accounting program.
  - Check that all revenue is being reported correctly: 5110/5120, 5130/5135, Vending, Grants.
  - Check that all expenditure codes from this report are found in the CNP Financial Management Handbook.
- Review your program's Indirect Cost Workbook with your CFSO. Check for the direct billing of any items that have not been excluded. Pay particular attention to utilities and waste.
- Make sure that all program purchases are allowable by reviewing the Financial Management Handbook. Reach out to your area accountant or financial specialist for items needing clarification.
- Review your Pass Thru Workbook and Pass Thru Relief Request approval with your CFSO. Ensure that amounts agreed upon have been transferred to your account.
- Check that your POS prices are aligned with your annual application and that current contracted meals and a la carte items are priced to cover the full costs associated with preparing and selling.

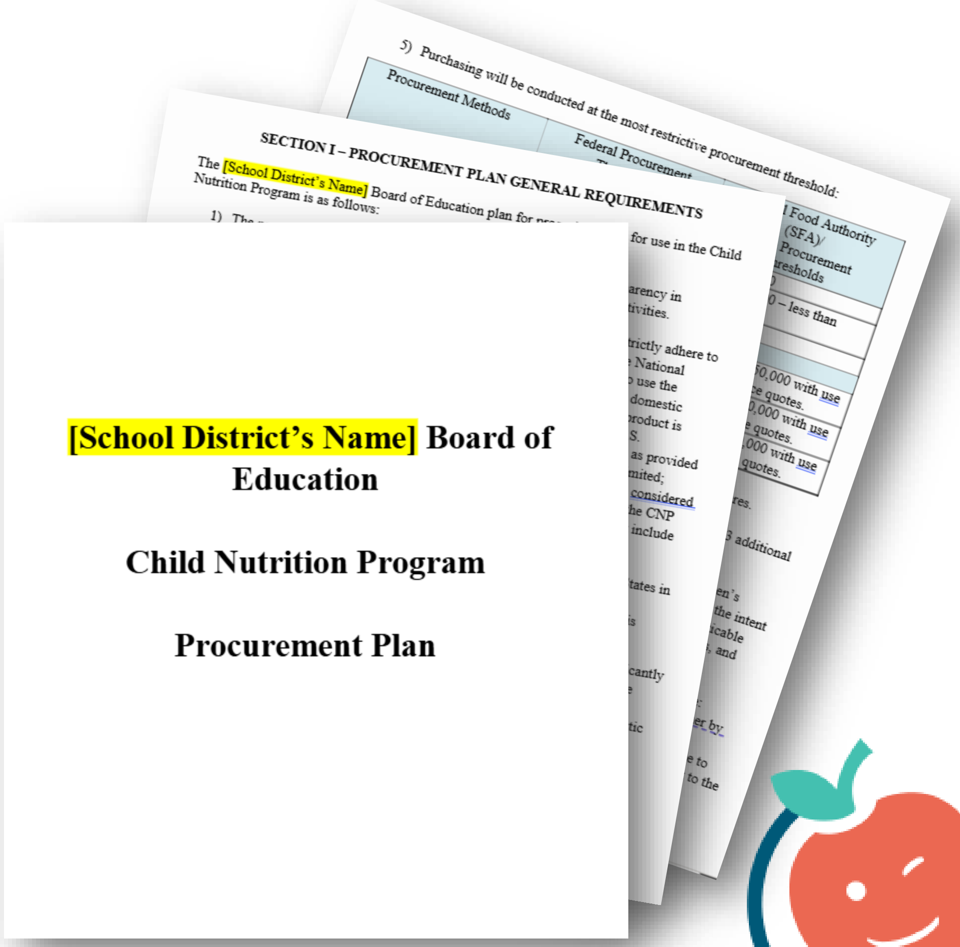
Procurement Review

Documents Required for the Procurement Review:

- SFA Procurement Procedures (written Procurement Plan):
  A document outlining the procurement procedures for the SFA
  [2 CFR 200.318(a) and 7 CFR 210.21(c)].

- Written Code of Conduct per the requirement of 2 CFR section 200.318. The Code of Conduct can be included in the SFA's written procurement plan and must include statements regarding:
  - Conflicts of Interest
  - Disciplinary Action
  - Gratuities, Favors, and Gifts

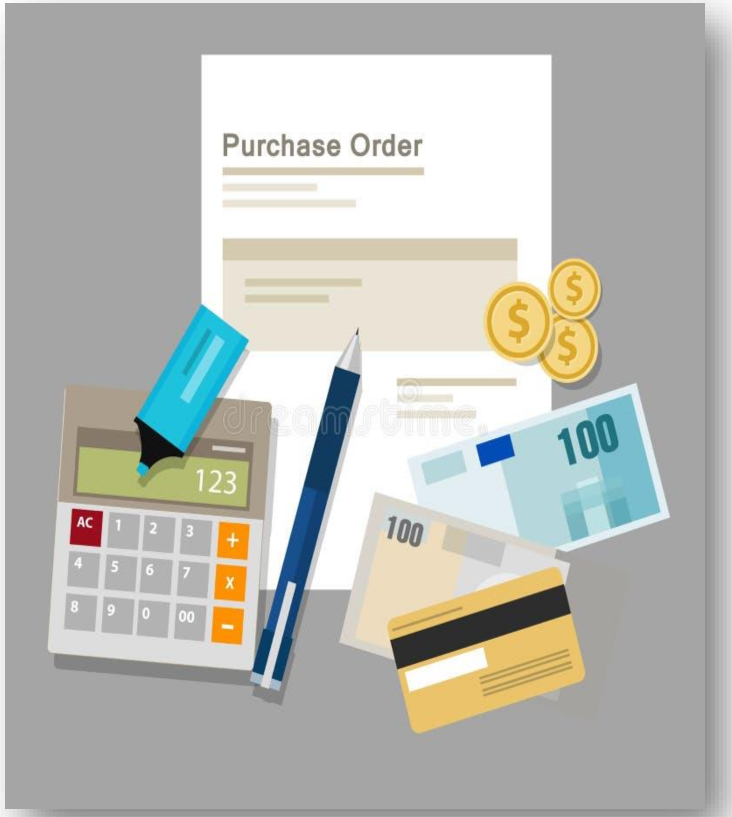
- Solicitation documentation for vendors using the appropriate method of procurement:
  - Micro Purchase
  - Small Purchase
  - Formal Bids



Procurement Review

Most Common Procurement Findings:

- Procurement plan missing or incomplete
- Threshold violations
- Insufficient quotes obtained
- Lack of documentation required based on threshold level
- Bid Noncompliance
  - No documented public advertisement
  - Missing required clauses
  - Allowing noncompliant bid extensions
  - Material changes evident on invoices (usually related to pricing)



School Year 2026-2027

Notifications:

- SFA's receiving an Administrative Review in SY 2026-2027 will be notified during the summer months.

Training:

- SFA's that receive notification will be invited to attend a two-day training in Montgomery August 18-19, 2026 that will review all expectations and timelines for the Administrative Review process.

Preparation:

- Pull your most recent Final Report from your last administrative review.
- Ensure that corrective actions are still in place to prevent any repeat findings.
- Share findings and corrective action with relevant administrators.

School Year 2026-2027

Meal Patterns, Nutritional Quality, & General Program Compliance:

- Area 1: Devin Williamson
- Area 2: Suzannah Yoder
- Area 3: Rachel Fowler
- Area 4 & 5: Chad Langston
- Area 6: Susanne Reeves
- Area 7: Justin Hope

Resource Management, Procurement, & Benefit Issuance:

- Accountants
    - Steven Rylant
    - Joe Clark
    - Christina Glover
- Financial Specialist
    - Ellen Watson (North Alabama)
    - Ashley Lankford (South Alabama)