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TO: SFAs Selected for an Administrative Review in SY 2026-2027

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FROM: Andrea Theilen, CANS SNP Assistant Director
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RE: Recommended Review Preparation: Summary and Self Evaluation Checklist

This letter is notification that your School Food Authority is scheduled to receive a School Nutrition Program Administrative Review (AR) in school year 2026-2027.

The AR looks at your school nutrition program compliance with federal rules. One of our many roles in administering the Federal Child Nutrition Programs is to provide assistance to South Dakota School Food Authorities (SFAs) on how program rules apply to them and how those rules must be implemented. The stress associated with an AR is greatly reduced when the SFA is running a program that follows the rules. We're excited to announce that this summer, during our annual Pathways to Child Nutrition Success conference, we'll be offering specialized training in the AR. The conference is scheduled for June 9-11, 2026, and will take place at Pierre High School, in Pierre, SD. We highly recommend that SFAs with ARs in the upcoming school year attend this valuable and informative training session.

Included in this packet is the *Summary and Self Evaluation Checklist*. **This checklist should be used at least a few months before your review is scheduled as a mini internal review that will help you check on your program.** Your review begins as soon as you receive access to the "Off-Site Assessment" in the fall. The schools that run the best School Nutrition Programs will have this self evaluation checklist completed over the summer and all issues identified resolved just after school starts in August.

Over the past several years, the School Nutrition Program review team has noticed there are several program requirement areas that can cause serious problems during the review. The following is a list of those areas and suggestions to ensure program compliance. We suggest reviewing these areas first and then moving onto the Summary and Self Evaluation Checklist.

Meal Counts
Establish an accurate meal count at the Point of Sale (or an APPROVED alternate POS) for ALL places meals are served (cafeteria, in-school suspension, breakfast in the classroom, etc.).
Ensure that manual meal counts are clear and legible.
Ensure that all paper and electronic meal count sheets at the point of sale and throughout the claim consolidation process are retained on file and not thrown away.
Menu Review
Ensure that planned menus meet both daily and weekly component and vegetable subgroup requirements.
Review labels to ensure that all grain products served meet the whole grain rich requirement.
Ensure that daily production records for all reimbursable meals and snacks claimed are completed properly each day. Watch the 4 production record webinars in the The Department of Education's professional learning platform . (https://sded.sd.gov/)
Resource Management
Track non-program food revenue . Non-program foods are: adult meals, extra milk, food sales like a la carte, etc.
Track non-program food cost . Non-program foods are: adult meals, extra milk, food sales like a la carte, etc.
Ensure revenue from non-program foods goes into the food service account.
Ensure that non-program food revenue is greater or at least equal to total non-program food cost .
SFA-Wide Compliance
Ensure that all sites within the SFA are in compliance with all areas identified in the Self-Evaluation Checklist including:
All sites listed in your iCAN School Nutrition Program agreement.
Any colony schools operating the School Nutrition Program within your SFA.
Any other sites that receive vended meals that the SFA claims for reimbursement.
Special Areas
Ensure that ALL students participating in the Special Milk Program do not have access to breakfast or lunch program meals.
Ensure proper contract management and oversight of the Food Service Management Contract if used (<i>see attached FSMC Monitoring form for additional checklist items</i>).

The AR will include all program requirements. Below is a list of suggestions to make sure your SFA is following the rules. The full checklist contains a more thorough review of these areas.

Professional Standards
Retain documentation for all staff members that fall under Professional Standards requirements: all kitchen staff, POS meal count person, person that determines free/reduced eligibility, etc.
Ensure the hiring standards are met.
Smart Snacks
Retain documentation of all smart snack compliant foods sold in the school, including foods sold as a la carte.
Ensure that vending and drink machines that are on during the school day are stocked with Smart Snack approved items. Retain documentation on file.
Procurement
Establish a procurement method that follows the most restrictive of state and local requirements.
SFA must establish a Code of Conduct.
SFA must comply with Buy American clause.
Procurement methods must promote fair and open competition.
Documentation of all procurements must be retained on file as required.

Please review the attached *Summary and Self Evaluation Checklist* for a closer look at all program areas to determine whether your SFA is following the requirements. The School Nutrition Programs are big and have a lot of rules. A proper self evaluation will take time. There is great value in doing your own evaluation before the official review begins - it will likely save you some corrective action and possible fiscal action. Once you receive notice that you have access to the review forms in iCAN at the beginning of SY2026-2027, your review officially starts.

Please keep in mind that this review covers many areas of your program and should involve all parties including Administration, Business Office, and Food Service. We strongly encourage you to work together throughout the process to ensure all facets of the review are covered.

If you have questions about this letter, the self evaluation checklist, or the Administrative Review please email DOE.SchoolLunch@state.sd.us or call CANS at (605)-773-3413 and ask to speak to a School Nutrition Program Specialist.

Summary and Self Evaluation Checklist

Administrative Review 2026-2027

Certification and Benefit Issuance

Benefit issuance document (also known as the eligibility roster) is a list of all students eligible for free or reduced-price meals at your school district/agency (not to include paid students) from your **point of service system**. The list should contain the student's name, school name, benefit status (eligibility), method of certification (application, direct certification, etc.), date of certification, and total number of eligible students in the school. There should be no duplication of names on the list.

Meal Benefit Applications and Direct Certification

Free, reduced price, and denied applications will be checked. Direct certification will be reviewed and checked. These documents will be checked against the benefit issuance document (eligibility roster) to ensure accuracy. Either all applications and certifications or a statistically valid sample of applications and certifications will be reviewed at the School Food Authority (SFA) level.

Verification

Verification procedures begin October 1 (or the next business day if October 1 falls on a weekend) and completion is required by November 15 of each year. The "Verification Summary Report 742" will be reviewed to ensure proper verification procedures were followed. Any changes in meal status eligibility as a result of verification will be checked. Copies of verification documents submitted to and by households should be available during this review.

Meal Counting and Claiming Procedures – Participation Records

Methods of collection and meal counting used by the school will be observed and compared to the procedure described to the State Agency on the annual agreement with CANS. Appropriate source documentation, for example, daily meal counts, and actual point of service meal count sheets per district sites will be reviewed with monthly claims. Documentation of monthly claim edit checks made before claim submission to the State Agency/CANS will also be examined.

Meal Pattern and Nutritional Quality

Meal components and quantities, offer vs. serve, production records, menus, documentation of food crediting – such as CN labels, product formulation statements, recipes, and food receipts will be evaluated. Meal service lines will be observed on the day of review for breakfast (if applicable) and lunch. Other programs may also be observed on the day of review.

Resource Management

Maintenance of Nonprofit School Food Service Account, Paid Lunch Equity (PLE), revenue from Non-Program Foods, and Indirect Costs will be evaluated.

Civil Rights

Proper location of Civil Rights Poster (in view of program participants) will be noted. Use of current nondiscrimination statement on program materials will be verified. Civil Rights Training is required annually and will be reviewed. The [Civil Rights PowerPoint training](#) is in the [DOE Professional Learning Platform](#) and is located here.

Onsite Monitoring (IF APPLICABLE)

In SFAs with more than one feeding site, SFA On-site Monitoring must take place at least once a year prior to Feb 1. Lunch and breakfast programs must both receive an onsite monitoring visit. Onsite monitoring forms will be reviewed.

Local School Wellness Policy

The following items will be reviewed and discussed:

- The Local School Wellness Policy
- Documentation demonstrating the Local School Wellness Policy has been made available to the public
- Documentation of the SFA's efforts to review and update the Local School Wellness Policy, including an indication of who is involved in the update and methods the SFA uses to make stakeholders aware of their ability to participate
- Solicitation of the Local School Wellness Policy to stakeholders (Parents, Students, PE Teachers, SFA Representatives, School Health Professionals, School Administration, School Board members, and General Public)
- The SFA's most recent assessment on the implementation of the Local School Wellness Policy and its availability to the public

More information, templates, and checklists related to the Local School Wellness Policy requirements can be found on the CANS/SNP webpage: <https://doe.sd.gov/cans/snp.aspx> under the School Meal Programs Requirements section/Wellness Policy heading.

Smart Snacks

Breakfast and Lunch periods will be observed to ensure that foods of minimal nutritional value are not being sold during the school day (midnight thru 30 minutes after end-of-day bell). An assessment will be made to ensure that Smart Snack rules are being properly implemented and the State policy on exempt fundraiser standards is met. Documentation of foods sold will be requested.

Food Safety

The written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) will be reviewed. The two most recent food safety inspections will be reviewed, and the most recent report should be in a visible location to the public. Temperature logs and food storage areas will be observed.

Professional Standards

Documentation demonstrating hiring and annual training requirements will be evaluated, including tracking of training hours for employees.

Water Availability

Free water must be made available to students.

Reporting and Recordkeeping

SFAs must maintain Program records for a period of three years after submission of the final Claim for Reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. This includes all documentation related to the program(s).

Other Federal Programs

When applicable, the review will include an assessment of Afterschool Snacks, Fresh Fruit and Vegetable Program (FFVP) and Special Milk Program (SMP).

Self-Evaluation Checklist

The following checklist can be used as a self-review for compliance with USDA program regulations prior to the Administrative Review.

YES NO

A. FREE AND REDUCED-PRICE APPLICATIONS AND VERIFICATION

1. The current household application for free and reduced-price meals is used.

For Income Applications:

2. Each participating child’s name, plus any other children in the household are 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. For those without income, 0 is entered into the income boxes.
4. An adult household member signed the application.
5. They reported the last four digits of their Social Security Number or marked the box stating they don’t have one.
6. If applying for a foster child only, the last four digits of a Social Security Number are not required.

For SNAP, TANF, or FDPIR Applications:

7. Each participating child’s name is listed at the top of the application.
8. Household has reported their case number.
SNAP and TANF case numbers are 9 digits starting with zeros (000123456 or 000001234). *SNAP card numbers are not acceptable for SNAP documentation.*
FDPIR case number format is a Social Security Number (123-45-6789).
9. An adult household member signed and dated the application.

Other Application Information:

10. Missing information on an application is obtained and documented before eligibility is determined.
11. Before determining eligibility, household applications reporting multiple frequencies of income (weekly, monthly) are converted to annual income using the conversion formulas listed on the Income Eligibility Guideline chart (applications reporting the same or only one frequency do not need any conversions).
12. To determine eligibility on an income application, the school’s determining official calculates the household’s current income and compares the amount to the current Income Eligibility Guideline chart.
13. The determining official completed, signed, and dated each application indicating the benefit level for each approved child.
14. Applications reporting zero income are approved for free meal benefits for the remainder of the school year. Temporary approval is **not** granted.
15. A change in a student’s eligibility is made within 3 calendar days if benefits increase or within 10 calendar days if benefits are reduced or terminated.

- 16. Households are notified in writing of their eligibility determination within 10 working days of receipt of the application. YES NO
- 17. Household applications are maintained at a central location rather than by feeding site. YES NO
- 18. For purposes of the review, household applications are separated by category: Free, Reduced, and Denied. YES NO
- 19. Applications for households that have withdrawn from the district have the withdrawal date recorded and are filed separately. YES NO
- 20. Households on carryover from the previous school year have the same meal benefit for the first 30 school days OR until a new application is processed, whichever occurs first. YES NO
- 21. Alphabetized list(s) of students automatically eligible for free meals: migrant, homeless, runaway, or a Direct Certification List from CANS/iMATCH are on file. YES NO
- 22. For districts with multiple feeding sites, the list of directly certified students is available by feeding site. YES NO
- 23. For households in which all children’s names did not appear on the Direct Certification list from CANS/iMATCH, the district documented this by adding their names to the list. YES NO
- 24. Direct Certification benefits supersede all other methods of application, and SNAP Direct Certification supersedes all other methods of Direct Certification. YES NO
- 25. If a student appears on the Direct Certification List and the school also received an application for the child(ren), the application has been pulled and filed separately. YES NO

Verification – Process and Report must be Complete by November 15:

- 26. The correct verification method was used. YES NO
- 27. The correct number of household applications to verify was selected. YES NO
- 28. The confirming official reviewed and signed each household application selected for verification. YES NO
- 29. Only self-employed income (not regular wages) was verified using the IRS 1040 form from the previous school year. YES NO
- 30. Households were notified in writing they were selected for verification; selected households were also notified in writing of the results. YES NO
- 31. A tracker form was completed for each selected household. Copies of all required documents are on file for each household selected. YES NO

B. BENEFIT ISSUANCE DOCUMENT AKA MASTER LIST OF FREE AND REDUCED-PRICE ELIGIBLE STUDENTS

- 1. Be alphabetized by household name and separated by category; a list of free students and a list of reduced-price students. YES NO
- 2. Be available by feeding site. YES NO
- 3. Be maintained in the office where applications are kept and updated as student eligibility changes. YES NO
- 4. Be used to issue benefits to students eligible for free or reduced-price meals. YES NO

- 5. Match the approval reported on the application or Direct Certification List. YES NO

C. MEAL COUNTING AND CLAIMING PROCEDURES

- 1. Match what the district reported on their current agreement (iCAN application) approved by CANS. YES NO
- 2. Protect students receiving free and reduced-price meals from being overtly identified:
 - a. Rosters/computer screens are not coded in such a way that it is obvious to others which students are receiving free, reduced price, or paid meals. YES NO
 - b. Color coding by category and single-symbol codes using obvious identifiers such as F, R, and P are NOT used on tickets or cash register/computer screens. YES NO
 - c. Tickets issued to students receiving free, reduced, or paid meals are identical except for the coding. YES NO
 - d. The same procedures for collecting money apply to all students receiving free, reduced or paid meals. YES NO
- 3. Provide a Point of Service meal count by category:
 - a. The meal count is taken at the end of all serving lines/self-serve food bars where it can be accurately determined that a reimbursable meal has been served. YES NO
 - b. If the meal count is taken at the beginning of the line, a written waiver is approved and on file with your current agreement with CANS. YES NO
 - c. Meal counts are NOT based on tray counts, classroom counts, or back-out counts where the number of paid meals is obtained by subtracting the free and reduced price count from the total meal count. YES NO
 - d. Allow a maximum of one breakfast and one lunch per student per day to be claimed or reimbursement. YES NO
- 4. If meal count is combination manual/electronic (count taken on sheet and later entered in computer system, ensure that original meal count sheets are kept for 3 years plus the current year. YES NO
- 5. School districts with more than one feeding site must complete the On-Site Review form (CANS NSLP memo #52.1) for each site by February 1 each year. YES NO

D. DAILY MEAL COUNTS AND EDIT CHECKS

- 1. Be completed for each feeding site that includes student name, type of meal, meal date, and eligibility. It will later be linked to this paper worksheet, or a computer-generated report that provides the same information. YES NO
- 2. Record correct meal counts by category on a daily basis. YES NO
- 3. Reflect meal counts that are based on actual Point of Service meal counts. YES NO
- 4. Report the highest number of students eligible for free, reduced price, and paid meals each month. YES NO
- 5. Compare the attendance adjusted eligible figures by category to daily meal counts for each feeding site before submitting the monthly claim. YES NO
- 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. YES NO

- 7. Be kept on file, along with other school food service records, for three years plus the current school year. YES NO

E. RESOURCE MANAGEMENT

- 1. All revenues to and expenses from the Nonprofit School Food Service Account are allowable (reasonable, necessary, and allocable). YES NO
- 2. The SFA has complied with the requirements for pricing paid lunches and completed the Paid Lunch Equity (PLE) tool (if applicable). YES NO
- 3. SFA has complied with the requirement that revenues from the sale of Nonprogram Foods are more than the cost of the Nonprogram Foods being sold (if applicable). YES NO
- 4. SFA has completed the USDA Nonprogram Food Revenue Tool (if applicable). YES NO
- 5. The SFA follows fair and consistent methodologies to identify and allocate allowable indirect costs to school food service accounts (if applicable). YES NO

F. CIVIL RIGHTS

- 1. USDA’s current nondiscrimination poster is displayed in the kitchen/dining area where it is visible to all students. YES NO
- 2. There is no separation of students by race, color, national origin, gender, age, or disability during meal service. YES NO
- 3. Special diets, with correct medical documentation on file, are provided at no extra charge to disabled students as prescribed by regulation. YES NO
- 4. Foreign language translations of program materials are made available as needed. YES NO
- 5. USDA’s current nondiscrimination statement is included in appropriate program materials, such as the student handbook in the section that addresses the School Nutrition Programs. YES NO
- 6. The school has a process for accepting and filing complaints alleging discrimination with the School Nutrition Programs. YES NO
- 7. The Civil Rights Training is completed annually.
A summary of training date and topics is on file along with a signed training certificate with all attendee names. YES NO

G. SMART SNACKS IN SCHOOLS

- 1. Vending machines are off during meal service times unless sale times comply with Smart Snack guidelines and if machines are located in the meal service area funds accrue to the foodservice account. YES NO
- 2. Food/snacks are not sold by other groups/programs in competition with the school breakfast program or school lunch program. YES NO
- 3. Fundraising activities comply with Smart Snack guidelines or the state Policy on Exempt Fundraisers. Proper documentation is maintained as required. YES NO

H. REIMBURSABLE MEALS

- 1. All serving lines offering reimbursable meals are available to all students. YES NO
- 2. Meals are priced as a unit. YES NO

- 3. Menus meet USDA meal pattern requirements. All menus must meet daily/weekly requirements in terms of components and portion sizes. YES NO
- 4. Meals offer a choice of two kinds of pasteurized milk; at least one choice must be unflavored YES NO
- 5. Offer Versus Serve has been properly implemented when:
 - a. All secondary schools allow students to turn down food items. YES NO
 - b. All required meal components are offered. YES NO
 Breakfast can be claimed if three food items are selected.
 Lunch can be claimed if three different components are selected; and one of the three required components must be at least 1/2 cup serving of fruit, vegetable or a combination of the two.
 - c. At lunch, students decide which 3, 4, or 5 components they will take; again, they must select at least 1/2 cup fruit, vegetable, or a combination of the two. YES NO
 - d. The person responsible for the Point of Service meal count has been trained to evaluate student trays to ensure all meals claimed are reimbursable. YES NO
- 6. Meals planned reflect compliance with USDA's required nutrient analysis. YES NO
- 7. Drinking water is available to all students free of charge in the area where lunch and breakfast is served. YES NO

I. PRODUCTION RECORDS

- 1. Be completed **daily** by production kitchen and kept on file at the school. YES NO
- 2. Be completed using the correct forms distributed annually by CANS or an alternate form **approved** by CANS on an annual basis. YES NO
- 3. Document that enough food was prepared to meet meal pattern requirements:
 - a. Standardized recipes are followed and on file. YES NO
 - b. Food labels with ingredient and nutrient statement, Child Nutrition (CN) labels, or Product Formulation Statements (PFS) are on file, when applicable. YES NO
- 4. Accompany meals sent to be served at another satellite location. YES NO
- 5. Reflect all changes and substitutions made in menus. YES NO

J. HACCP (Hazard Analysis and Critical Control Point) FOOD SAFETY PROGRAM:

- 1. The district has a written HACCP Plan. Copies of the plan have been distributed to each feeding site and food preparation kitchen. YES NO
- 2. The HACCP Plan is reviewed (and signed) annually and revised as necessary. YES NO
- 3. Temperature logs, food safety checklists, and production records for each feeding site are available for review. YES NO
- 4. A copy of the most recent health inspection report is posted in a publicly visible location. YES NO
- 5. Completed temperature logs and food safety checklists are kept on file for a minimum YES NO

of 6 months.

K. SCHOOL WELLNESS POLICY:

- 1. The district has adopted a School Wellness Policy and is available for review. YES NO
- 2. Maintain documentation of policy reviews and Triennial Assessment YES NO
- 3. Solicit appropriate parties to be included on wellness committee. YES NO
- 4. Complete assessment of Local Wellness Policy and make available to public. YES NO

L. PROFESSIONAL STANDARDS

- 1. Ensure hiring requirements are met. YES NO
- 2. Ensure documentation is available to demonstrate annual training requirements are met for Food Service Director, Manager, and Food Service Employees. YES NO
- 3. Ensure training is tracked at SFA level. YES NO
- 4. Ensure Food Service Director has documentation of 8 hours of Food Safety Training within the last 5 years. YES NO

M. FRESH FRUIT and VEGETABLE PROGRAM, if applicable:

- 1. Required documentation, including fresh fruit/vegetable invoices, non-food purchases and labor hour records are maintained on a monthly basis by feeding site. YES NO

N. AFTER SCHOOL SNACK PROGRAM, if applicable:

- 1. Each year, an on-site review is completed and documented within the first four weeks of the program’s operation. YES NO
- 2. Each year, a second on-site review is completed and documented before the end of the school year. YES NO
- 3. Meal count sheets and production records are available for each participating site. Ensure that snack items are creditable and menu planner provides at least two items (not both liquids). YES NO

O. SPECIAL MILK PROGRAM, if applicable:

- 1. If pricing, ensure that milk from recent claim for reimbursement is consistent with invoices. YES NO
- 2. Ensure daily milk count records support recent claims for reimbursement. YES NO
- 3. Ensure counting procedures yield accurate milk counts (point of service). YES NO

P. FOOD SERVICE MANAGEMENT COMPANY (FSMC), if applicable

- 1. Reminder to observe the FSMC and complete the Monitoring form twice per year [FSMC Monitoring Form \(Fillable Word Document\)](#) YES NO