

WHAT AUDITORS REALLY LOOK FOR

AR Findings Demystified

July 12, 2026 @ 8:00 am ET

Caroline Olson &
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Speakers



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School Nutrition Consultant

LunchAssist



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Founder & CEO

My School RD

Agenda

1. Defining Child Nutrition Program Audits
2. Who are the auditors?
3. What to expect from an audit
4. Examples of findings
5. Pro tips for getting ahead

Disclosures & Affiliations

Caroline Olson, RDN, LN

- School Nutrition Consultant at LunchAssist

Melissa Manning, RDN

- Founder & CEO at My School RD



What is the point of an audit?

Spending Taxpayer Dollars Wisely





Spending Taxpayer Dollars Wisely

Program integrity measures

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Making sure rules & regulations are followed!

"Audit" vs. "Review"





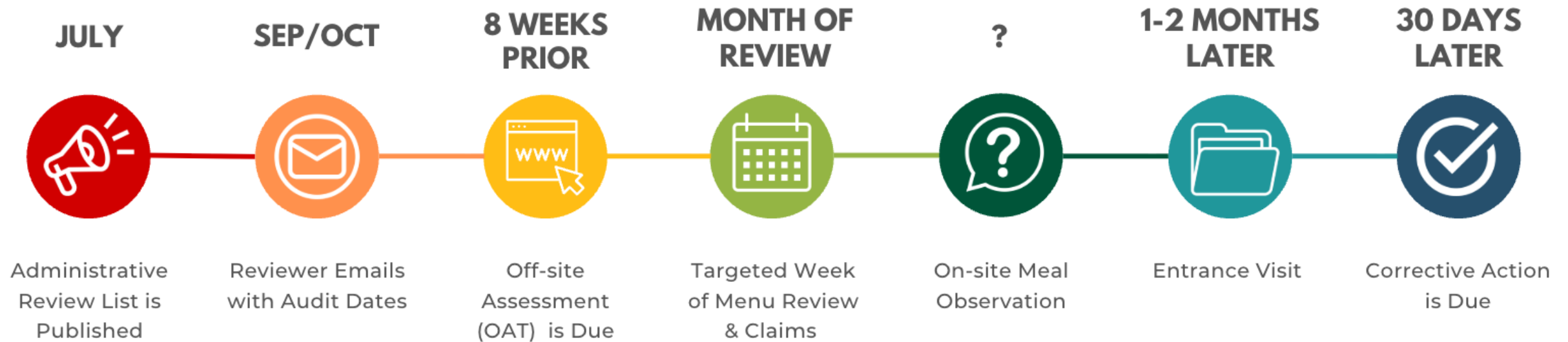
What are the different audits that sponsors must undergo?



3 Different Audits

1. SNP AR
2. LAPR
3. CACFP AR

SNP Administrative Review Timeline - CA





Who are the auditors (& what are they looking for)?

In CA, there are many State Agency staff involved in the SNP AR...

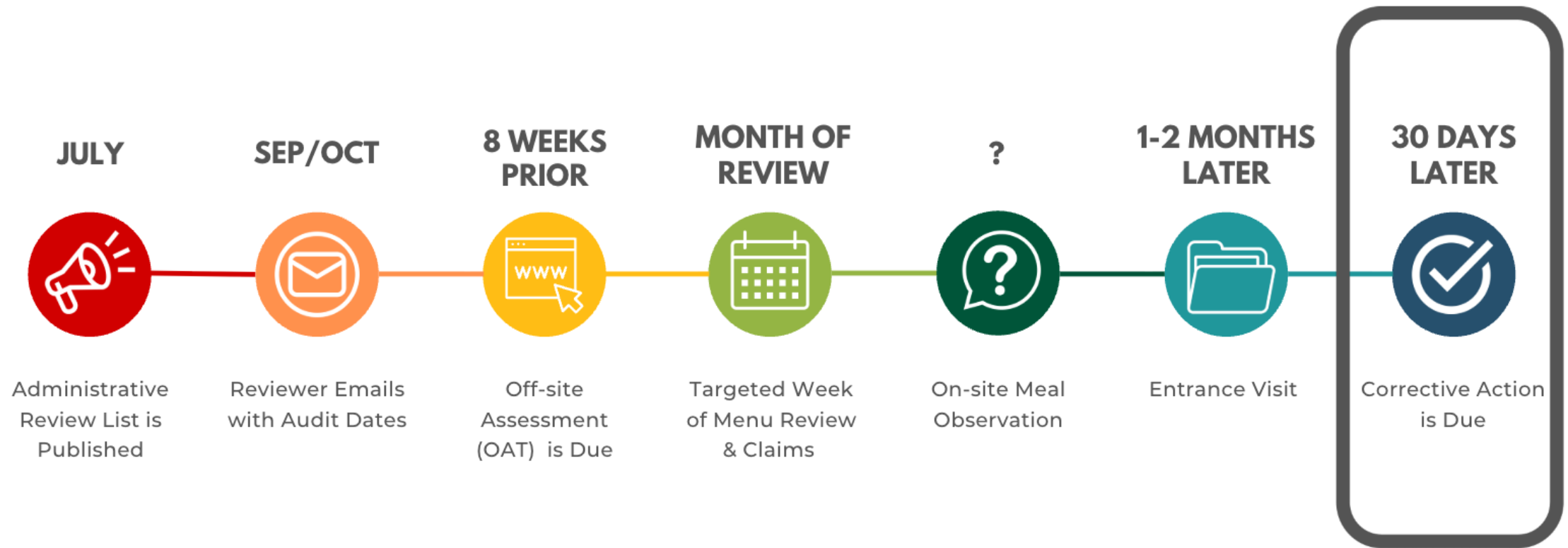
- OAT Analyst: Reviews off-site questions submitted in CNIPS
- Resource Management Auditor: Reviews OAT Section 700 compliance areas
- Main Auditor: Visits selected sites. Observes meal service and reviews all remaining documentation and review areas





What sort of feedback might we receive from an audit?

AR Timeline: What to Expect



Types of Feedback

Technical Assistance
(Advice)



Findings w/
Corrective Action



What is Technical Assistance?

- Guidance and resources the auditor provides to help us understand the regulations
- Often "best practices" but not always



SNP Reviews Review Dashboard

12345-SN-00-ABC
LUNCHASSIST UNIFIED SCHOOL DISTRICT
123 Sunnyside Lane
Sunnyville, CA 12345
CD: 1234567
Vendor #: ABC123

Review Year: 2019 - 2020
CAD Due Date: 3/27/2020 ✓
Final Closed Date: 9/17/2020 ✓
Entrance Date: 1/21/2020 ✓
Original Submitted Date: 7/1/2019 ✓

Review Progress



Review Details

Review Type: Administrative **Lead Reviewer:** James Jones **Review ID:** 54321
Review Form Set: Administrative Review v4 **Status:** Closed

Review Tools

Action	Description
View	Sponsor Contact Information
Detail	Review Forms
View	Corrective Action Documents (12)
View	Commendations (0)
View	Technical Assistance (9)

Technical Assistance

Form: 1000 - Local School Wellness Policy ▾

Question: 1000 Provide a copy or appropriate web address of the current Loc... ▾

Date: 12/11/2024 Reviewer: OAT Analyst ▾

Method: Email ▾ Other:

Recipient: Bill Smith

Follow-up Needed? ☐

Add Standard Comment: ▾

Comments:

Reviewer verified. SFA did not meet requirements. See finding. DBran. 3/28/25.

This is out of compliance because your Local School Wellness Policy is missing any mention of Smart Snacks in Schools standards, which may result in a finding. This will be reviewed on site.

- At a minimum, your LSWP is required to include (7 CFR, Section 210.31[c]):
 - o Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness
 - o Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with federal regulations for school meal nutrition standards and the Smart Snacks in School nutrition standards
 - o Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives)



What is a "finding"?

What are Review Findings?

- Violations of state and/or federal regulation
- Corrective action is required to resolve review findings

Fiscal Impact: Some findings may require funds be returned to the State, or impact future reviews.





What are some examples of findings?

What is Fiscal Action?

- Errors totaling < \$600 per program per fiscal year should be disregarded.
- Errors totaling \$600 or more: Claim(s) adjustment to remove meals not eligible for reimbursement due to finding, and/or Fund Transfer to cover fiscal noncompliance.
- We also have the right to appeal fiscal action.



What Findings are Subject to Fiscal Action?

Area Subject to FA

- Meal Counting & Claiming
- Certification & Benefit Issuance
- Meal Pattern/Menu (Repeat)
- Resource Management (Repeat)
- **Egregious or uncorrected errors*

Repeat Menu Findings

- Food quantities
- Whole grain-rich foods
- Milk types
- Vegetable subgroups
- Dietary specifications

Form: 1700 - Afterschool Snack

Question: 1704
a. Are snacks being properly counted and claimed?

Finding ID: V-1700
Afterschool Snacks requirements are not met. [Regulation 7 CFR 210]

**Finding w/
Fiscal Action**

Finding Description

Add Standard Comment:

Afterschool snack meal count consolidation errors were identified during the review. This finding will result in the disallowance of 255 meals for the month of review. 255 free meals will be disallowed.

Required Corrective Action:

Add Standard Comment:

1. Develop and implement written policies and procedures to ensure that meal count consolidations are completed accurately. Provide the reviewer with a copy of the policies and procedures developed.
2. Provide the CDE with the name and title of the person responsible for monthly meal count consolidation of all claiming sites and the name of a different person responsible for performing a review for accuracy.
3. Train all responsible staff on meal count consolidation and provide the reviewer with a copy of the training agenda including topics covered, trainer, date, location, start and end times, and the printed names and signatures of all trainees.



What are some examples of findings?

Form: 1000 - Local School Wellness Policy

Question: 1000
Provide a copy or appropriate web address of the current Local School Wellness Policy.

Finding ID: V-1000
1000 - Local School Wellness Policy requirements are not met.

Finding Description

Add Standard Comment:

The reviewer verified that the LSWP did not meet the minimum elements. It is missing the mention of Smart Snacks in Schools standards. As per 7 CFR 210.31(c) at a minimum, local school wellness policies must contain: standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency.

Required Corrective Action:

Add Standard Comment:

Provide the reviewer with a plan on how the LSWP will be updated to include the language on competitive food and beverage standards known as smart snacks. Provide the reviewer a timeline of when the LSWP will be updated.

Form: 400 - Meal Components and Quantities - Lunch

Question: 410
a. Do planned menu quantities meet meal pattern requirements for the review period?

Finding ID: V-0400
400 - Meal Components and Quantities - Lunch requirements are not met.

Finding Description

Add Standard Comment:

The planned menu quantities did not meet the meal pattern requirement for the week of review. Although all meal pattern components were offered daily, on 2 of the 5 days, some meals did not meet the minimum grain requirements. This resulted in the site not meeting the minimum daily and weekly grain requirement. On 1/27/25 breaded chicken drumstick with dinner roll was served. The chicken drumstick was .75 oz grain and with dinner roll was a 1 oz eq grain. On 1/29/25, vegan chick'n nuggets were served with a dinner roll. The vegan chick'n nuggets did not contain any grains, the dinner roll was a 1 oz eq grain. High School students are required 2oz eq grain daily and 10-12 oz eq grain weekly. Over the week, the SFA served a minimum of 8.75 oz eq grain.

7 *CFR* 210.10(b)(1)(i) Meals offered to each age/grade group must include the food components and food quantities specified in the meal pattern in paragraph (c) of this section;

7 *CFR* 210.10(c)(2) **Food components.** Schools must offer students in each age/grade group the food components specified in [paragraph \(c\)](#) of this section.

This is a shortage in the grain requirement. Since this is a shortage, no fiscal action is required

Finding ID:

V-0900

SFA On-site Monitoring requirements are not met. [Regulation 7 CFR 210.8]

Finding Description

Add Standard Comment:

Sunnyside High was not monitored for lunch prior to February 1, 2019. The SFA only monitored Apple ES for breakfast and is required to monitor at least 50% of their sites each school year. SFA has 4 sites and should be monitoring at least 2 sites per school year.

7 CFR 210.8(a)(1) Claims for Reimbursement - Internal controls - On-site reviews Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.

Every school year, prior to February 1, each School Food Authority [SFA] with more than one school must perform no less than one on-site review of the meal counting and claiming and the readily observable general areas in each school operating the National School Lunch Program [NSLP] and 50% of schools operating the School Breakfast Program [SBP] under its jurisdiction

Required Corrective Action:

Add Standard Comment:

1. Provide a copy of the procedures developed to ensure compliance with the site monitoring requirement for breakfast and lunch. Document the specific steps and identify which staff is responsible for each task.

2. Complete the lunch monitoring for Sunnyside High and monitor any site for breakfast. Provide a copy as part of your corrective action.



Do the number – or type – of findings matter more?

Spectrum of TA and Findings:

Technical Assistance
(General Feedback)



Corrective Action
(CA)



CA with
Fiscal Action



Reimbursement
Adjusted

CA with
General Fund Transfer



Money repaid to
Fund 13/Cafe Fund
from General Fund

The type of finding matters more!

Finding: Forgetting to add the updated Non-discrimination Statement to the Local School Wellness Policy



Result: Get told to add the new NDS to your LSWP

Finding: Your Alternative Point of Sale in the Classroom lacks a Meal Count



Result: Potential to withhold of *all of your claims* back to the beginning of the year

Know your Rights!



- You have time. You don't need to respond to questions immediately
- Train your staff “I’ll get that for you”
- Make it a TA teachable moment - Fix anything you can right away (put up poster in front of reviewer)
- Corrective Action? *You have 30 days to respond*
- Fiscal Action finding? *You have the right to appeal*



PRO Tips: Prepare in Advance

- Update Wellness Policy & Complete Triennial Assessment
- Update Non-Discrimination Statement
- Afterschool Snack Program onsite monitoring within first 4 weeks
- Required Cafeteria Signage
- Review your previous AR to avoid potential repeat findings



PRO Tips: Focus up!

- File organization is key
- Focus on Requirements. Only provide required documents.
 - Nutrient Analysis vs DSAT
 - Specs to prove Food Based Components and Sugar Limits
- Plan simple menus with a cushion.
 - It's OK to offer extra fruit, veg, grain, meat. Don't fall short.

PRO Tips: Help your future self!

- Train outside staff (Snack, BIC, Special Diets, etc.)
- Buy American:
 - Fill out exemption forms
 - Utilize a tracking system for non-domestic foods
 - Scan storage areas wearing your “auditor glasses”
- Visualize having a great review!



Key Takeaways



1. Audits are about program integrity, not perfection!
2. Not all audit feedback is the same.
3. The type of finding typically matters more than the quantity.
4. Preparation reduces stress and repeat findings.

Questions?

Send follow-up questions to:

Caroline Olson: caroline@lunchassist.org

Melissa Manning: melissa@myschoolrd.com

We want to hear from *you*!

Please add this session
on the ANC App to
evaluate your experience.



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