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GOVERNOR

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STATE SUPERINTENDENT

FOOD SERVICE

ADMINISTRATIVE MEMO NO. 7
SCHOOL YEAR 2017-2018

SUBJECT: School Food Authority Self-Monitoring for the National School Lunch Program, School Breakfast Program, and Afterschool Snack Program

DATE: September 22, 2017

School Food Authority (SFA) Self-Monitoring is completed to ensure child nutrition programs are in compliance with the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program regulations.

National School Lunch Program regulations 7 CFR 210.8(a)(1) require SFAs with more than one building, including Residential Child Care Institutions (RCCIs) with day programs, to conduct an annual Self-Monitoring Review in each building before February 1. In addition, the USDA published the final rule, Administrative Reviews in the School Nutrition Programs effective September 26, 2016. This rule adds a review requirement for the School Breakfast Program (SBP) at 7 CFR Part 220.11 (d)(1). Annually, SFAs are required to complete a Breakfast Self-Monitoring Review at 50% of the schools approved to participate in the SBP. Each school approved to participate must be reviewed at least once every two years.

SFAs with only one school are not required to conduct on-site reviews for their approved school. However, as a best practice, the Michigan Department of Education (MDE) School Nutrition Programs encourages SFAs with only one building to conduct a self-monitoring review.

If the SFA participates in the Afterschool Snack Program, reviews must be completed two times per year [7 CFR 210.9(c)(7)]. The first review must be during the first four weeks that the snack program is in operation. The second review must be conducted during the second half of the school year.

MDE has developed four documents that should be used to conduct self-monitoring reviews.

- SFA Level Self-Monitoring Review (One per SFA)
- School Lunch Program Self-Monitoring Review (One per Site)
- School Breakfast Program Self-Monitoring Review (50% of Breakfast Sites)
- Afterschool Snack Self-Monitoring Review (Two per Site) Administrative Policy No. 7.

NSLP and SBP Self-Monitoring Reviews must assess:

- Application Approval/Direct Certification/Benefit Issuance – SFAs must review all free, reduced-price, and denied applications to ensure they have been accurately certified and students are receiving the correct benefits in compliance with the Eligibility Manual for School Meals.

- Meal Count Systems – Monthly claims for reimbursement must be supported by an accurate counting system for free, reduced-price, and paid meals in each building. Systems that are not allowable include tray counts, attendance counts, and "back out" counts (i.e., dividing cash box total by lunch price to arrive at paid count, and subtracting that number from daily total of meals served to arrive at the free count). Overt identification of students is not permitted. An actual count of meals served at the point of service is acceptable.

- Edit Checks – Daily count of free, reduced-price, and paid meals for each school are checked against: (1) the number of children in school currently eligible for free, reduced-price, and paid meals, and (2) the number of attendance adjusted eligible.

  The annual SFA Self-Monitoring Reviews must include a review of the claim forms for one month. The claims for the review month must be checked for the following:

  - Meals claimed by category (free, reduced-price, and paid) that exceed the number of approved free, reduced-price, and paid eligible students.
  - Any day during the review month that the number of meals claimed by category (free, reduced-price, and paid) exceeds the number of attendance adjusted eligible.
  - Evaluation, explanation, and documentation of any days during the review period that exceed attendance adjusted eligible or total number of eligible students (free, reduced-price, and paid).
  - Records of accurately totaled daily meal counts.
  - Internal controls for monitoring and edit checks to ensure claims for reimbursement are based on accurate daily meal count consolidation for all schools.

- Meal Planning/Food Production
  - Menus and meals served must be checked at each site for availability of all meal components, offer versus serve, and required portion sizes.
  - Signage that identifies components that make up a reimbursable meal is located near or at the beginning of the meal service lines for both breakfast and lunch.
  - Free potable water is available to all students for lunch in each location where lunches are served, and for breakfast when breakfast is served in the cafeteria. The location of the free potable water must be in the meal service area or immediately adjacent to the meal service area.

- Food Safety Practices
  - The most recent food safety inspection report is posted in a publicly visible location.
  - Temperature logs are being used and available for review.
  - A copy of the SFA food safety plan is available at each meal service site. Administrative Policy No. 7.

- Compliance with Civil Rights requirements
  - The "And Justice for All" poster is posted in a prominent location and visible to all program participants.

  More information is available at the Michigan Department of Education School Nutrition Programs website[i] and the United States Department of Agriculture Food and Nutrition school-meals/child-nutrition programs website.[ii]

Afterschool Snack Program SFA Self-Monitoring Review must assess

- Area Eligibility Meal Count System – A site is "area eligible" if it is located at a school or in the attendance area of a school where at least 50% of enrolled children are eligible for free or reduced-price meals. The site must record and report total number of snacks served each day.

- Non-Area Eligibility Meal Count System - Monthly claim for reimbursement must be supported by an accurate counting system that provides an accurate count of free, reduced-price, and paid snacks.

- General Operations - Eligible programs must include education or enrichment activities in organized, structured, and supervised environments. Program must operate at the end of the normal school day.

- Meal Patterns/Food Production - Menus and meals served must be checked at each site for availability of all meal components and required portion sizes.

- Compliance with Civil Rights requirements:
  - The "And Justice for All" poster is posted in a prominent location and visible to all program participants.

Review findings discovered during the SFA Self-Monitoring Review for National School Lunch, School Breakfast, and/or Afterschool Snack Programs must be discussed with the person overseeing meal service at the school building. A corrective action plan must be developed and implemented for the school building by the SFA.

Any building requiring corrective action must have a SFA Self-Monitoring Follow-up Review within 45 calendar days of the initial review. The SFA must identify and document that all finding(s) has/have been corrected.

All SFA Self-Monitoring Review forms must be maintained by the SFA. Forms will be reviewed as part of the Administrative Review. United States Department of Agriculture (USDA) regulations require SFAs to retain all records for three years plus the current year or until a pending audit is closed.

Food Service Management Company (FSMC) personnel *may not* perform SFA Self-Monitoring Reviews. Only SFA employees may perform SFA Self-Monitoring Reviews.

Questions regarding this Administrative Policy should be directed to the School Nutrition Programs Unit by e-mail to MDE-SchoolNutrition@michigan.gov.

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[i] http://www.michigan.gov/mde/0,4615,7-140-66254_50144---,00.html
[ii] http://www.fns.usda.gov/school-meals/child-nutrition-programs

SCHOOL FOOD AUTHORITY (SFA) LEVEL SELF-MONITORING REVIEW (ONE PER SFA)

Complete one SFA General Area review, per SFA, by <u>FEBRUARY 1</u>. As a best practice, the Michigan Department of Education (MDE) School Nutrition Programs encourages SFAs with only one building to conduct a self-monitoring review.

SFA Name	Agreement #
SFA Employee & Title	Review Date

APPLICATION APPROVAL/DIRECT CERTIFICATION/MASTER ROSTER	Yes	No	N/A
1a. Applications: Are all free and reduced-price applications on file correctly approved or denied?			
1b. Applications: Were all households informed of their right to apply for free or reduced meal benefits in accordance with Federal Standards? (7 CFR Part 245)			
2. Direct Certification: Is correct direct certification documentation maintained?			
3. Benefit Issuance List: Do names listed on the Benefit Issuance List match approved applications on file and names on the direct certification list?			
4a. Verification Process: Was the verification process completed on-time?			
4b. Verification Process: Was the most recent Verification Collection Report (FNS-742) timely and accurate?			

RESOURCE MANAGEMENT	Yes	No	N/A
5. Nonprofit School Food Service Account: Does the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account? (7 CFR 210.2, 201.14, 210.19(a), 210.21)			
6. Paid Lunch Equity (PLE): Was the USDA Paid Lunch Equity Tool used to evaluate the need to raise the paid lunch prices for this school year? If not, does the SFA charge the weighted minimum average paid lunch price at all sites? (7 CFR 210.14(e))			
7. Nonprogram Foods Revenue: Do nonprogram foods (ala carte foods, smart snacks, catering, adult meals, etc.) generate sufficient revenues to cover all associated expenses? (7 CFR 210.14(f))			
8. Indirect Costs: If indirect costs were charged to the program, was it done so in accordance with the Federal standards? (2 CFR Part 200 and 7 CFR 210.14(g)) (FNS/USDA Policy Memo SP-41-2011)			

OTHER GENERAL AREAS	Yes	No	N/A
9. Reporting and Recordkeeping: Does the SFA have procedures for consolidating daily meal counts by category for each site to process an accurate claim for reimbursement? (7 CFR Parts 210, 220, and 245)			
10. Professional Standards: Is all training being documented for School Nutrition Program staff and are Professional Standards Federal regulations being upheld by the SFA? (7 CFR 210.31)			
11a. School Breakfast Program and Summer Food Service Program Outreach: Did the SFA inform families regarding the availability of breakfast prior to the start of the school year and two additional times during the school year?			
11b. School Breakfast Program and Summer Food Service Program Outreach: Were families also informed of the Summer Food Service Programs prior to the end of the school year? (7 CFR 210.12(d))			
12a. Local School Wellness Policies: Has the SFA established a local wellness policy that promotes student wellness and provides assurance that school meals and other food and beverages sold and otherwise made available during the school day are consistent with the minimum Federal standards? (7 CFR 210.30)			
12b. Local School Wellness Policies: Is the policy made available to the public along with annual updates, and has an assessment been completed within the last three years indicating if wellness goals have been met?			

School Nutrition Program — SFA Level Corrective

Is a Corrective Action Plan Required? (for any "No" answers above): _____ Yes _____No

What is the Corrective Action Plan due date? _____

Who will implement the Action Plan? _____

Required Corrective Action Plan as discussed with school representative:

_X_____   _X_____
(SFA Reviewer Signature, Title, Date)   (School Site Representative Signature, Title, Date)

Follow-Up Visit (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up: _____

Observations of corrective action implementation:

_X_____   _X_____
(SFA Reviewer Signature, Title, Date)   (School Site Representative Signature, Title, Date)

NATIONAL SCHOOL LUNCH PROGRAM SELF-MONITORING REVIEW (ONE PER SITE)

One lunch review, per building, MUST be completed by FEBRUARY 1. As a best practice, the Michigan Department of Education (MDE) School Nutrition Programs encourages SFAs with only one building to conduct a self-monitoring review.

School Name	Agreement #
SFA Employee & Title	Date:

Meal Counting and Claiming	Yes	No	N/A
1. Is the method used for counting reimbursable lunches in compliance with the approved Point of Service requirement? (Lunch counts *must* be taken at the location(s) where complete meals are served to children.)			
2. Is the Point of Service lunch count used to determine the school's claim for reimbursement?			
3. Is the person responsible for monitoring lunches correctly identifying reimbursable lunches for the menu planning option selected by the School Food Authority?			
4. Are only lunches that meet meal pattern requirements counted and claimed for reimbursement?			
5. Does the meal count system prevent overt identification of children receiving free or reduced-price lunches?			
6. Is the school correctly implementing policies for handling the following (as applicable):			
a. Ala carte?			
b. Adult and non-student lunches (and identifying program vs. non-program)?			
c. Charged and/or prepaid lunches?			
d. Field trips?			
e. Incomplete lunches?			
f. Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs?			
g. Offer vs. Serve?			
h. Second lunches?			
i. Student worker lunches?			
j. Unpaid meal charges?			
k. Visiting student lunches?			
7. Is there a method of identifying non-reimbursable lunches (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.), distinguishing them from reimbursable lunches?			
8. Is someone trained as a backup for the monitor and the meal counter?			
9. Backup System: a. Does the school have a backup counting system in case of mechanical failure of an automated system?			
b. Do staff know when and how to implement it?			
10. Are daily lunch counts correctly totaled and recorded?			
11. If lunch claims are aggregated, are the meal counts correctly totaled and consolidated?			
12. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?			

The following two questions are for all SFAs except for SFAs on CEP or RCCIs without day students.	Yes	No	N/A
13. Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals by category (free, reduced price, paid)?			
14. Are edit checks completed and documented which compare the daily counts of free, reduced price, and paid meals against the product of the number of children currently eligible for free, reduced price, and paid meals respectively, times an attendance factor (and any discrepancies accounted for)?			

Meal Planning / Food Production	Yes	No	N/A
15. Does the lunch menu for the review month meet meal planning system requirements?			
16. Is there signage that identifies components that make up a reimbursable lunch located near or at the beginning of all lunch service lines?			
17a. Potable Water Is free potable water available to all students for lunch in each location where lunches are served?			
17b. Is the location of the free potable water in the meal service area or immediately adjacent to the meal service area?			
18. Are production records completed daily for lunch?			
19. Do production records document that enough food is prepared to meet the requirements for reimbursable meals for number of lunches claimed?			

Food Safety	Yes	No	N/A
20. Is the most recent food safety inspection report posted in a publicly visible location?			
21. Are temperature logs being used and available for review?			
22. Is a copy of the SFA food safety plan available at each meal service site?			

Compliance with Civil Rights Requirement	Yes	No	N/A
23. Is the "And Justice for All" poster posted in a prominent location and visible to all program participants?			

National School Lunch Program Corrective Action Plan

Is a Corrective Action Plan Required? (for any "No" answers above):   _____Yes _____No

What is the Corrective Action Plan due date? _____

Who will implement the Action Plan? _____

Required Corrective Action Plan as discussed with school representative:

X

(SFA Reviewer Signature, Title, Date)

X

(School Site Representative Signature, Title, Date)

NSLP Follow-Up Visit (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up:_____

Observations of corrective action implementation:

X

(SFA Reviewer Signature, Title, Date)

X

(*School Site Representative Signature, Title, Date)*

AFTERSCHOOL SNACK PROGRAM SELF- MONITORING REVIEW

One review per building MUST be completed TWO TIMES per school year. The first review must be completed within the first four weeks of the school year. The second review must be completed in the second half of the school year.

School Name	Agreement #
SFA Employee & Title	Review date

Area Eligible Meal Count System

		Yes	No	N/A
1	Is the site area eligible?			
2	Are children receiving snacks at no charge?			
3	Are snacks served to children being counted and claimed as free?			
4	Are snacks served to children being counted at the Point of Service?			

Non–Area Eligible Meal Count System

5	Is the site non-area eligible?			
6	Does the meal count system produce an accurate count of reimbursable snacks by category (free, reduced price, and paid) served to eligible children at the Point of Service?			
7	Are snacks that meet meal pattern requirements counted and claimed for reimbursement?			
8	Does the meal count system prevent overt identification?			

General Operation

9	Times(s) of operation for the snack program ( ) p.m.			
10	Is the program operated after the end of the normal school day?			
11	Is there a sign-in sheet or roster of students who participate in the Afterschool Snack Program?			
12	Does program provide care for children?			
13	Is there an educational and /or enrichment element in the program?			
14	Are care and activities supervised?			

Meal Patterns /Food Production

15	Does the menu for the review month meet snack meal pattern requirements?			
16	Does the menu on the day of review meet snack meal pattern requirements?			
17	Are production records completed daily for the Afterschool Snack Program?			
18	Do production records document that enough food is prepared to meet the requirements for reimbursable snacks for the number of snacks claimed?			
19	Is a copy of the food safety plan available on site?			

Civil Right Compliance

20	Is the correct non-discrimination poster "And Justice for All" displayed in an area where the afterschool snack meal is held?			

Review Results

21	If a Corrective Action Plan is required, what is the Corrective Action Plan due date?	

Required Corrective Action Plan as discussed with school representative:

22	If a Corrective Action Plan is required, what is the follow—up review due date?	

Comments, Notes and Observations:

X *(SFA Reviewer Signature and Title)*	X *(School Site Representative and Title)*

SCHOOL BREAKFAST PROGRAM SELF-MONITORING REVIEW (50% of Breakfast Sites)

Each year, SFAs must review 50% of buildings operating school breakfast programs by FEBRUARY 1. The following year, the other 50% of buildings operating school breakfast programs must be reviewed. As a best practice, the Michigan Department of Education (MDE) School Nutrition Programs encourages SFAs with only one building to conduct a self-monitoring review.

School Name	Agreement #
SFA Employee & Title	Review Date

Meal Counting and Claiming	Yes	No	N/A
1. Is the method used for counting reimbursable breakfasts in compliance with the approved Point of Service requirement? (Meal counts *must* be taken at the location(s) where complete meals are served to children.)			
2. Is the Point of Service breakfast count used to determine the school's claim for reimbursement?			
3. Is the person responsible for monitoring meals correctly identifying reimbursable breakfasts for the menu planning option selected by the School Food Authority?			
4. Are only breakfasts that meet meal pattern requirements counted and claimed for reimbursement?			
5. Does the meal count system prevent overt identification of children receiving free or reduced-price breakfasts?			
6. Is the school correctly implementing policies for handling the following (as applicable):	Yes	No	N/A
a. Ala carte?			
b. Adult and non-student meals (and identifying program vs. non-program)?			
c. Charged and/or prepaid breakfasts?			
d. Field trips?			
e. Incomplete breakfasts?			
f. Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs?			
g. Offer vs. Serve?			
h. Second breakfasts?			
i. Student worker breakfasts?			
j. Unpaid meal charges?			
k. Visiting student breakfasts?			
7. Is there a method of identifying non-reimbursable breakfasts (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.), distinguishing them from reimbursable breakfasts?			
8. Is someone trained as a backup for the monitor and the meal counter?			
9. Backup System: a. Does the school have a backup counting system in case of mechanical failure of an automated system?			
b. Do staff know when and how to implement it?			
10. Are daily breakfast counts correctly totaled and recorded?			
11. If breakfast claims are aggregated, are the meal counts correctly totaled and consolidated?			
12. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?			

The following two questions are for all SFAs except for SFAs on CEP or RCCIs without day students.

		Yes	No	N/A
13.	Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals by category (free, reduced price, paid)?			
14.	Are edit checks completed and documented which compare the daily counts of free, reduced price, and paid meals against the product of the number of children currently eligible for free, reduced price, and paid meals respectively, times an attendance factor (and any discrepancies accounted for)?			

Meal Planning / Food Production

15.	Does the breakfast menu for the review month meet meal planning system requirements?			
16.	Is there signage that identifies components that make up a reimbursable breakfast located near or at the beginning of all breakfast service lines?			
17.	Potable Water: a. Is free potable water available to all students for breakfast in each location where breakfasts are served?			
	b. Is the location of the free potable water in the meal service area or immediately adjacent to the meal service area?			
18.	Are production records completed daily for breakfast?			
19.	Do production records document that enough food is prepared to meet the requirements for reimbursable breakfast for number of breakfasts claimed?			

Food Safety

20.	Is the most recent food safety inspection report posted in a publicly visible location?			
21.	Are temperature logs being used and available for review?			
22.	Is a copy of the SFA food safety plan available at each meal service site?			

Compliance with Civil Rights Requirement

23.	Is the "And Justice for All" poster posted in a prominent location and visible to all program participants?			

National School Breakfast Program Corrective Action Plan

Is a Corrective Action Plan Required? (for any "No" answers above):   _____Yes _____No

What is the Corrective Action Plan due date? _____

Who will implement the Action Plan? _____

Required Corrective Action Plan as discussed with school representative:

X

(SFA Reviewer Signature, Title, Date)

X

(School Site Representative Signature, Title, Date)

SBP Follow-Up Visit (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up:_____

Observations of corrective action implementation:

X

(SFA Reviewer Signature, Title, Date)

X

(School Site Representative Signature, Title, Date)