Recommended Policy

Tina Thomas
Policy Analyst

Date September 2021
Recommended Policy

• There are many areas related to food service management that are not covered by a Federal or State regulation or policy.

• The Mississippi Department of Education (MDE) strongly recommends that local districts adopt policies as outlined in this section.
Each school district should have a handbook for school food service that outlines all policies and procedures related to personnel, operations and procurement. The handbook should be adopted by the School Board
Eligible Employee Benefits & Handbook

• Each school district should have uniform salary schedules for all food service employees in the district. It is recommended that the salary schedule allow for the size of the operation as well as the length of service when managers are involved.

• Food service employees should be accorded the same benefits as other employees in the district.

• In order for the food service operation to present a professional appearance to the student customer, it is strongly recommended that the district make some allowance for purchasing or offering as a fringe benefit, the purchase of uniforms for school cooks.
Meal Service Schedules

• Students should be allowed adequate time for eating. The Mississippi Healthy Students Act of 2007 states that schools shall schedule at least 24 minutes for school lunch to ensure adequate eating time. Factors influencing the lunch period are wait time, consumption time, and social time. Moving recess before lunch, through a simple schedule change, may provide benefits for students.

• Since school breakfast is not factored into the regular school day, schools should take into consideration the recommended time of 10 minutes for children to eat school breakfast after they have received the meal.
Meal Service Schedules

• Students should not be required to eat lunch before 10:00 a.m. or after 2:00 p.m. Schools may request an exemption from these times only from FNS
Closed Campus

• Well-documented research indicates that nutrient consumption is higher among students who eat in the school cafeteria; therefore, it is strongly recommended that schools operate via the closed campus concept

• **Definition of Closed Campus:** Student attending the school are not permitted to leave campus
Adult Charge Policy

• All adults will pay cash on a daily basis. Adults may deposit monies into their personal food service account and maintain a positive balance to debit from.

• Adults will not be allowed to charge meals. This is considered an advance in pay and is not allowed.

• Adults will not solicit food from students. This use of *institutional privilege for personal gain* is a clear violation of the Mississippi Educator Code of Ethics and Standards of Conduct
Student Charge Policies

• SFAs are required to have a written and clear communicated local meal charge policy in place no later than July 1, 2017.

• The difficulty in this policy is how to ensure a child receives a meal due to the infrequent lack of available monies. Such a policy should be empathetic, compassionate and accountable. Consideration should be given to eliminate embarrassment to the student and disruption in the meal line (SP 29-2017)

• This may also be an instance when the district must approve a student for free meals based on the knowledge of the child’s household economic status. (Refer to the Eligibility Manual)
Student Charge Policies

- Overcoming the Unpaid Meal Challenge, Guidance Manual
- SP 23-2017 Unpaid Meal Charges: Guidance Q & As

• The PTA, PTO or a Civic Club could place a loan fund in the school office for use by students in emergencies when parents do not send lunch/breakfast money. The group establishing the fund should establish rules as to how any unpaid loans will be allowed to accumulate.
Refund and Student Payment

• Normally, only when a student withdraws from the school district or graduates. All requests for cash refunds shall be in writing addressed to the Food Service Administrator and Office of the Superintendent. The transfer of monies to siblings' foodservice accounts within the district should be allowed.

• The school foodservice cashiers shall accept checks only for the amount of the foodservice account balance. Parents shall not be allowed to combine payments for their child’s foodservice account with other school activity expenses. (ie . . split deposit). A separate check must be drawn for other funding.
Suspected Food-Borne Illness Outbreak

• Local districts should adopt policies for personnel to follow in the case of suspected food-borne illness

• Develop a written plan outlining procedures to be followed in the event of a suspected food-borne illness (managers and food service employees should be trained in these procedures)

• Name a person in central administration who would be responsible for handling the press and contacting the local health department
Suspect Food-borne Illness outbreak

- Keep the name and phone number of the environmentalist at the local health department in a location known by all staff members.
- If food-borne illness is suspected, retain a sample of all food served on the day of the incident for possible testing by the State Board of Health or an independent lab.

- **Sample Food Tray**: Only implement a sample tray procedures under the instruction and advice of your environmentalist.
Suspect Food-borne Illness Outbreak

- At the time of the suspected food-borne illness, record (while it is fresh on everyone's mind) the names of students and anyone else affected, time of day they ate, and what they ate. Record the symptoms of the illness and outline the events of the day. Record the food preparation and handling methods of any foods involved, particularly any advanced preparation done the day before.

- If the suspected food is a commercial product, keep the container for reference. Cans, cardboard boxes, and other containers are ESSENTIAL to determine factors about the product. All products give the manufacturer's name and address. On meat and poultry products, look at the USDA Inspection Stamp for the official stamp or establishment number.
Suspected Food-borne Illness Outbreak

• This establishment number identifies the processing plant where the product was made. Many products also show a lot or batch number. This is a code indicating the day and factory shift the item was produced. This information can be vital in determining the cause of the food-borne illness.

• Record names of employees present on the day of the outbreak and employees involved with the potentially contaminated food.

• Notify the Office of Child Nutrition.
It is strongly recommended that the following reports be submitted to the School Board each month:

1. Statement of Profit and Loss;
2. Balance Sheet;
3. Participation Reports.
Disposal of Garbage

• The Mississippi Department of Agriculture and Commerce maintains very stringent regulations related to the disposal of garbage from food service operations. School districts should check with the Department of Agriculture as to the current regulations and adopt local policies consistent with those of the Department of Agriculture.
Beginning of the School Year

• The prior year roster or list of students qualifying for free and reduced price meals may be used until the new applications for free and reduced price meals have been returned and acted upon. This should be accomplished within 10 school days after the beginning of the school year. The prior year roster cannot be used more than 30 days from the first day of school.
Verification

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. The school district may require that applicants submit income documentation or proof of participation in the food stamp or TANF programs at the time of reapplication. To enforce this stipulation, School Districts must have a policy approved by the school board prior to implementation.
Offer vs. Serve For Elementary and Middle Schools

“Offer vs. Serve” is required at lunch for high school students, but it is a local option for elementary and middle schools at lunch and breakfast. It is usually a district wide decision made by the School Board with the Food Service Administrator’s recommendation. The main advantages are the reduction in food waste and costs.
Canned Drinks and Outside Foods

• Some local school districts have adopted the policy that canned drinks cannot be brought into the school in the original container. Local school districts should encourage parents to send lunches which are nutritionally well balanced and to either pack fruit juice or allow the child to purchase milk at school. Additionally, the safety of a pop-top can, when used by young students, might be a factor in the formulation of a local school policy.
Employee Code of Conduct

In order to protect the reputation of the school food service personnel, the Mississippi Department of Education recommends the implementation of the following preventive management policies:

• Foodservice employees shall not purchase food or other items from vendors who deliver to the food service program.
• Food scraps shall not be taken from the school premises by school employees.
• Food service employees are discouraged from using large purses and from carrying large bags and packages from the premises.
This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:
Tina Thomas
Policy Analyst
tthomas@mdek12.org
Benefit Issuance Direct Certification

New Administration Orientation (NAO)

Jimmy May
Program Specialist

September 15-16, 2021
Benefit Issuance

Subtitle
Statutory authority for the Child Nutrition Programs includes the Richard B. Russell National School Lunch Act (NSLA) and the Child Nutrition Act of 1966 (CNA). The statutory citations are, respectively, 42 United States Code 1751 et seq. and 42 United States Code 1771 et seq.
Regulatory authority is found, as follows, in the Code of Federal Regulations (CFR):

- 7 CFR Part 210, National School Lunch Program (NSLP)
- 7 CFR Part 215, Special Milk Program for Children (SMP)
- 7 CFR Part 220, School Breakfast Program (SBP)
- 7 CFR Part 225, Summer Food Service Program (SFSP)
- 7 CFR Part 226, Child and Adult Care Food Program (CACFP)
- 7 CFR Part 245, Determining Eligibility for Free and Reduced-Price Meals and Free Milk in Schools
Benefit Issuance

There are 3 ways to issue free and reduced-price benefits:

1. Household indicates Categorical Eligibility based on Assistance Programs (i.e. SNAP, TANF, FDPIR). Substantiated by a case number on approved household application, DC list matching OR DC List Extension Statement

2. Household indicates household size and income within IEG’s. Substantiated by approved household application

3. Household indicates Categorical Eligibility based on Other Source (i.e. Foster, Homeless, Runaway, etc.). Substantiated by a household application indicating the Other Source
Benefit Prior To Processing

• Carry over for 30 operating days.
• Household sharing of benefits.
• LEA’s *may* share benefit issuance data to extend benefits at the new LEA for transfer students *without* incurring liability of accuracy of determination.
Household Application

- Households cannot be required to submit an application.
- Requesting citizenship is not allowed!!!
- May have child’s name prefilled ONLY! All other info must be entered by head of household.
- Not required for child listed on the Direct Certification (DC) list.
- Various media available: On-Line, Scannable and Paper. If not using prototype insure required content is met.
Determining Completion

1. Child's name and household members listed
2. Indication of Other Source Eligibility type benefit with a case number
   OR
   Income amount, frequency & source for each member
3. Adult signature
4. Last 4 digits of SSN or indication of not having an SSN
### Processing Applications

**2017-2018 Prototype Household Application for Free and Reduced Price School Meals**

Complete one application per household. Please use a pen (not a pencil).

#### STEP 1

List ALL Household Members who are infants, children, and students up to and including grade 12 (if more spaces are required for additional names, attach another sheet of paper).

<table>
<thead>
<tr>
<th>Child’s First Name</th>
<th>MI</th>
<th>Child’s Last Name</th>
<th>Grade</th>
</tr>
</thead>
<tbody>
<tr>
<td>GWENDOLYN</td>
<td></td>
<td>McGILLICUDDY</td>
<td></td>
</tr>
</tbody>
</table>

#### STEP 2

Do any Household Members (including you) currently participate in one or more of the following assistance programs: SNAP, TANF, or FDA program?

If **NO** ➔ Go to STEP 3.

If **YES** ➔ Write a case number here then go to STEP 4 (Do not complete STEP 3)

**Case Number:** 681073542

Write only one case number in this space.

#### STEP 3

Report Income for ALL Household Members (Skip this step if you answered “Yes” to STEP 2)

**A. Child Income**

Sometimes children in the household earn or receive income. Please include the TOTAL income received by all Household Members listed in STEP 1 here.

**B. All Adult Household Members (Including yourself)**

List all Household Members not listed in STEP 1 (including yourself) even if they do not receive income. For each Household Member listed, if they do receive income, report total gross income (before taxes) for each source in whole dollars (no cents) only. If they do not receive income from any source, write ‘0.’ If you enter ‘0’ or leave any fields blank, you are certifying (promising) that there is no income to report.

<table>
<thead>
<tr>
<th>Name of Adult Household Members (First and Last)</th>
<th>Barnings/Net Weekly Income</th>
<th>How Often?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frances McGillicuddy</td>
<td>$2500</td>
<td></td>
</tr>
</tbody>
</table>

#### STEP 4

Contact information and adult signature.

**Return Completed Form to:** [Insert District Name]

**Printed name of adult signing the form**

**Signature of adult**

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**Important Note:** I certify (promise) that all information on this application is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (check) the information. I am aware that if I purposely give false information, any children may lose meal benefit, and I may be penalized under applicable State and Federal laws.
Processing Timeframe

- Determination made, household notified, status implemented within 10 days of receipt of application.
- Notify household immediately when benefit is reduced or denied, particularly for children who do not have approved applications on file from the previous year.
- LEA must not delay approval for failure to provide information that is not required.
Extending Benefits In A Household

• LEAs must ensure that all children in a household that indicate an Assistance Program case number on an application, for any household member, are extended free meal benefits.

• This extension of categorical eligibility also applies to the Direct Certification (DC) listed recipients.

• LEA’s must document the extension of benefit to other household children.
Ok, What if…..

- Application indicates zero income?
- Multiple incomes at different frequencies?
- A child is known to be eligible for benefits, however household refuses to apply?
- Visiting students?
QUESTIONS ON BENEFIT ISSUANCE USING AN APPLICATION?
Direct Certification

DC Matching
Direct Certification (DC) Matching

DC matching is the process under which LEAs certify children who are members of households receiving assistance under the Assistance Programs (SNAP, TANF or FDPIR) as eligible for free school meals, without further application, based on information provided by the State and/or local agency administering those programs.
DC Matching Frequency

- LEAs must conduct direct certification matching with SNAP at least three times during the school year. More frequent direct certification efforts are permissible and encouraged. These efforts must be made at a minimum:
  - At or around the beginning of the school year (i.e., July 1)
  - Three months after the beginning of the school year
  - Six months after the beginning of the school year
  - More frequent matching is recommended . . . Highly recommended!
DC Matching Documentation

Documentation to establish children’s eligibility for free meals under DC for Assistance Programs, and to substantiate claims for reimbursement, must include one or more of the following:

• Names of children or any household member currently certified to receive benefits from Assistance Programs.

• A statement certifying that each child is a member of a household where someone receives Assistance Program benefits.

• At least one form of identifying information matching each child with a child attending a particular school. Some examples of identifiers are included on the next slide.
DC Matching Documentation – Identifiers

- Childs Birth Date
- Addresses
- Parents’ Names
- Child’s SSN #
- Gender
- Other (Ex: MSIS #)
- Last 4 Of Parents’ SSN #
DC Matching Notification

• The LEA must notify the household about eligibility established through direct certification. The notification must include the following information:

• The child is eligible for free meal benefits

• No further application is necessary

• If applicable, an explanation of extended eligibility and how to notify the LEA of any additional children in the household

• How to notify the LEA if free meal benefits for directly certified children are not wanted
Determining Eligibility

IDENTIFIED STUDENT, SNAP

• Mississippi Department of Human Services (MDHS) places a file on the 20th of every month in the ITS mainframe directory which lists all students that receive snap benefits

• MSIS identifies/matches the student information

DIRECT CERTIFICATION DATA

• Districts are provided a current monthly file (SNAP) in MSIS that has been matched to “all” current Student MSIS number in each District
DC Reports

And How to Run Them
Direct Certification Reports

There are four (4) Direct Certification reports

1. **Full Match SNAP** - Provides information for children ages 5-17, all key identifiers match

2. **No Match SNAP** – If students are identified on this report, the MSIS Primary user should correct the Date of Birth and/or Social Security Number in MSIS so that the child will be added to the Full Match file on the next DHS report
3. **Zero to 4 Match SNAP** – Students under the age of 5 that have a MSIS ID and have been matched to your district

4. **Over 18 Match Snap** – students over the age of 17 that have a MSIS ID and have been matched to your district *(NOTE: if your numbers double it could be due to the local community college, they accept SNAP benefits also)*
Selecting a Report

- From the MSIS main screen
- Select REPORTS
- Select FREE LUNCH ELIGIBILITY
- Select the SNAP report that best suits your need
Running the Report

• School District automatically populates with your associated district, a list of schools pops up

• Highlight a school and click OK to run the report for a specific school

• Click CANCEL to run the report for all schools in the district
Running the Report (cont.)

- ALL SCHOOLS appears in the School Name field and the checkbox automatically populates when Cancel is selected on the Schools popup.
- Click the traffic light icon to run the report.
Running the Report (cont.)

Click on “Run Report”
Report Formats

• **PDF** – The report automatically opens in your internet browser, save the file if needed for future reference

• **Spreadsheet** – The report is automatically downloaded to your computer as an .xml file and requires the extension to be changed to a spreadsheet file (e.g., .xls for an excel spreadsheet)

• **Comma Separated Value (CSV)** – the report is automatically downloaded as a .CSV or .TXT file and requires importing into a spreadsheet before using
Questions
Non-Discrimination

This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:
Jimmy May
Program Specialist
jmay@medk12.org
Wellness Policy

Mary Burks
Division of School Support, Director
Law Required

• Local educational agencies (LEA) participating in the National School Lunch Program and/or School Breakfast Program are required to develop a local school wellness policy that promotes:
  • The health of students and addresses the problem of childhood obesity.
  • Wellness policies are tailored to the unique needs of each LEA and present an opportunity to improve the health of each community.
Content of the Wellness Policy

- Nutrition promotion and
- Education,
- Physical activity, and
- Other school-based activities that are designed to promote student wellness (7 CFR 210.31(c)(1));
Content of the Wellness Policy

• Standards and nutrition guidelines for all foods and beverages available on the school campus during the school day.

• Local school wellness policies are required to address foods and beverages that are both sold and made available at no cost to students.
Triennial Assessment

- Conduct an assessment of the Local Wellness Policy (LWP), at a minimum, every 3 years.

- The results of the assessment would be made available to the public. (annually notify the public about the content of the local school wellness policy and any updates to the policy as stated in 7 CFR 210.31(d)(2)).
Assessment should determine:

- Compliance with the LWP
- How the LWP compares to model LWPs
- Progress made in attaining the goals of the LWP
• Required to annually notify the public about the content of the local school wellness policy and any updates to the policy as stated in 7 CFR 210.31(d)(2).

• Made available to the public, such as a copy of the LEA/school webpage and/or the school newsletter or local newspaper where the local school wellness policy and assessment results have been posted;
Public Notification

Best practices include:

• School websites,

• Linking to the policy on individual school social media accounts, sending updates in a parent or school newsletter,

• Posted on school bulletin boards.

• Placing a blurb in a local community newsletter or newspaper.
Who is responsible for conducting the assessments?

- LEAs must designate at least one LEA or school official(s) as responsible for determining the extent to which each school under their jurisdiction is in compliance with their wellness policies (7 CFR 210.31(e)(1)).
- Report must be made available to the public (7 CFR 210.31(d)(3)).
• Address foods and beverages that are both **sold** and made available at **no** cost to students.
Administrative Review

• Review the written local school wellness policy

• Compliance with community involvement requirements

• Annual updates [LEAs are also required to annually notify the public about the content of the local school wellness policy and any updates to the policy as stated in 7 CFR 210.31(d)(2)].

• Copy of the LEA/school webpage and/or the school newsletter or local newspaper where the local school wellness policy and assessment results have been posted;
Administrative Review

• How the policy compares to model policies; and

• That a triennial assessment of the local school wellness policy was conducted for each school under its jurisdiction.
Resources

• Child Nutrition Sharing Site: https://theicn.org/cnss/
• https://www.healthiergeneration.org/app/resources
• https://www.fns.usda.gov/tn/local-school-wellness-policy
Questions
Mary Burks
School Support Division
mburks@mdek12.org;
Provisional Programs
CEP Pro 2 & 3

Mary Burks
School Support Division, Director

September 15 & 16, 2021
CEP Deadlines in the NSLP & SBP - Waiver

LEAs that intend to elect CEP for SY 2021-2022 must submit ISP documentation to the State agency by September 30, 2021.

• COVID–19: Child Nutrition Response Memo # 82
Community Eligibility Provision (CEP)

Requirements

• LEA may participate in CEP, as long as the school or group meets the 40 percent ISP threshold – using MSIS data or and other eligibility criteria included at 7 CFR 245.9(f)(3).

• SNAP;
• Homeless students;
• Migrant
• Foster
Community Eligibility Provision (CEP)

Eligibility

• Must provide both Breakfast and Lunch to students at no cost.

• Reimbursements are made at the free and paid levels only.

• Must not take household applications.

• Establish ISP through DC matching and other sources.
CEP cont’d

- May establish groups of sites or select entire district.
- Conduct DC matching at least once annually.
- LEAs operating under standard counting and claiming are required to run direct certification matches at least three times per year.
- PLE and Charge policy is not required.
- Lessens administration workload (i.e., applications & verification).
- May combine with Provision 2 to offer free meals to all students.
Why are you not participating?

➢ “All schools or no schools”
➢ ISP is not high enough
➢ Not enough information
### Establishing Identified Student Percentage (ISP)

<table>
<thead>
<tr>
<th>NAME OF INDIVIDUAL SCHOOL SITE</th>
<th>IDENTIFIED STUDENTS</th>
<th>ENROLLMENT</th>
<th>ISP</th>
<th>EST. FREE%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington School</td>
<td>388</td>
<td>585</td>
<td>66.32%</td>
<td>106.12%</td>
</tr>
<tr>
<td>Jefferson School</td>
<td>303</td>
<td>461</td>
<td>65.73%</td>
<td>105.16%</td>
</tr>
<tr>
<td>Armstrong School</td>
<td>237</td>
<td>394</td>
<td>60.15%</td>
<td>96.24%</td>
</tr>
<tr>
<td>Roosevelt School</td>
<td>232</td>
<td>479</td>
<td>48.43%</td>
<td>77.49%</td>
</tr>
<tr>
<td>Jackson School</td>
<td>149</td>
<td>524</td>
<td>28.44%</td>
<td>45.50%</td>
</tr>
<tr>
<td>Marshall School</td>
<td>189</td>
<td>408</td>
<td>46.32</td>
<td>74.12</td>
</tr>
<tr>
<td>Total Aggregate</td>
<td>1498</td>
<td>2851</td>
<td>52.54%</td>
<td>86.07%</td>
</tr>
</tbody>
</table>
# Maximizing Your ISP

## Most favorable in yellow

<table>
<thead>
<tr>
<th>GROUP NUMBER (ex. 1,2,3)</th>
<th>NAME OF GROUP SITES</th>
<th>IDENTIFIED STUDENTS</th>
<th>ENROLLMENT</th>
<th>ISP</th>
<th>EST. FREE %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Washington School</td>
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<tr>
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<td>Roosevelt School</td>
<td>232</td>
<td>479</td>
<td>48.43%</td>
<td>77.49%</td>
</tr>
<tr>
<td><strong>Group 1 Aggregate</strong></td>
<td></td>
<td><strong>1160</strong></td>
<td><strong>1919</strong></td>
<td><strong>60.45%</strong></td>
<td><strong>96.72%</strong></td>
</tr>
</tbody>
</table>

## Less favorable in orange

<table>
<thead>
<tr>
<th>GROUP NUMBER (ex. 1,2,3)</th>
<th>NAME OF GROUP SITES</th>
<th>IDENTIFIED STUDENTS</th>
<th>ENROLLMENT</th>
<th>ISP</th>
<th>EST. FREE %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Jackson School</td>
<td>149</td>
<td>524</td>
<td>28.44%</td>
<td>45.50%</td>
</tr>
<tr>
<td>2</td>
<td>Marshall School</td>
<td>189</td>
<td>408</td>
<td>46.32%</td>
<td>74.12%</td>
</tr>
<tr>
<td><strong>Group 2 Aggregate</strong></td>
<td></td>
<td><strong>338</strong></td>
<td><strong>932</strong></td>
<td><strong>36.27%</strong></td>
<td><strong>58.03%</strong></td>
</tr>
</tbody>
</table>
What is a “grace year”?  

- When an LEA, group of schools, or individual school in Year 4 of a CEP cycle with an ISP of < 40% but at least 30% as of April 1.

- Grace year (fifth year) gives an LEA the opportunity to restore their eligibility status without immediately resuming standard counting and claiming procedures or disrupting the CEP meal service.

- Reimbursement for schools participating in a grace year is based on the ISP as of April 1 in Year 4 of the current four-year cycle.
Grace year cont’d…

Claiming percentages for participating schools in a grace year:

- Year 4 ISP as of April 1, 2018: 35%
- ISP x 1.6 multiplier (35% x 1.6): 56%
- Free claiming percentage: 56%
- Paid claiming percentage: 44%
Grace Year cont’d…

• If the ISP of 40% threshold (as of April 1 of the grace year) is regained, the State Agency may approve a new four-year cycle beginning the following school year.
Provide Meals to Students at No Cost

So...... What about The Jackson & Marshall Schools?
Can the goal be achieved in another way?

YES!

By participating in Provision 2
Provision 2 & 3
Provision 2 & 3

• Year 1 – Base Year
  ➢ Make eligibility determinations using applications, DC matching etc.
  ➢ Offer meals to students at no cost.
  ➢ Submit claim for reimbursement of free, reduced & paid meals served.
  ➢ Actual served percentages are developed each month of the base year.
• Year 1 – Base Year
  - State agencies are required to conduct a review of base year certification and benefit issuance documentation.
  - OCN must review base year eligibility determination prior to final approval of claiming percentages.
Provision 2 & 3 cont’d…

• Years 2-4
  ➢ May not make any eligibility determinations.
  ➢ Offer meals to students at no cost.
  ➢ Submit claim for reimbursement of total meals served to students.
  ➢ Reimbursement calculated from base year developed percentages.
Provision 2 & 3 cont’d…

• Year 5

- At the end of the 4th year, the district can request a 4 year extension – if the socioeconomic status of the community is unchanged (remained the same or improved only slightly)
- Re-establish base year by making new application determinations.
- Return to pricing program.
Other considerations

- May provide Breakfast only, Lunch only, or combination of both Breakfast & Lunch to students at no cost.
- Issue benefits in accordance with Eligibility Manual.
- Verify applications in first year only.
- Conduct DC matching at least once annually.
What is current participation rate of free approved students?
What is prior years “plate” cost?
What if participation “tanks” during base year? Other Years?
Submitting Documents of District Intent

• Due each year by June 30, for the upcoming school year
Amendment to the policy statement?

What must we include in the amendment to the policy statement?

- The name of the school;
- The program(s) (NSLP, SBP or both) operating under the Provision;
- The initial year and month of implementation;
Amendment to the policy statement

What must we include in the amendment to the policy statement?

• The years the cycle is expected to remain in effect;
• The year the Provision must be reconsidered;
• The socioeconomic data that will be used to support any extension of Provision 2; and
• Certification that the school(s) meet the criteria outlined in 7 CFR 245.9(b).
Amendment to the Free and Reduced Price Policy Statement

Provision 2

District Name: ____________________________
Address: __________________________________
Program: ____________________________
Phone Number: ____________________________
School Food Service Administrator: ____________________________

The following schools are Provision 2:

<table>
<thead>
<tr>
<th>School Name</th>
<th>Base Year</th>
<th>Cycle Exempt or Effect Until</th>
<th>Year of Reconsideration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Provision 2:

The (hereafter referred to as School Food Authority) will certify children for free and reduced price meals for up to 4 consecutive school years in the schools which serve meals at no charge to all enrolled children; we will make public notifications and eligibility determinations in accordance with § 245.3 and § 245.5, respectively, during the late year. The provision 2 base year in the first year applications are taken, and is included in the 4-year cycle. The following requirements apply:

Page 1 of 3
Amendment to the Free and Reduced Price Policy Statement

Provision 2

District Name: Any Where District
Address: 2021 Success Street
Program: Breakfast only - Lunch only or Breakfast and Lunch both
Phone Number: 601-980-9999
School Food Service Administrator: Hattie Wonderful

The following schools are Provision 2:

<table>
<thead>
<tr>
<th>School Name</th>
<th>Base Year</th>
<th>Cycle Remain in Effect Until</th>
<th>Year of Reconsideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grand Elementary</td>
<td>2021-2022</td>
<td>2024-2025</td>
<td>2025-2026</td>
</tr>
</tbody>
</table>

Provision 2:

The (hereafter referred to as School Food Authority) will certify children for free and reduced price meals for up to 4 consecutive school years in the schools which serve meals at no charge to all enrolled children; we will make public notification and eligibility determinations in accordance with § 245.5 and § 245.9, respectively, during the base year. The provision 2 base year in the first year applications are taken, and is included in the 4-year cycle. The following requirements apply.
• Retain specified base year records for the entire period that the school operates, for both the base year and for non-base years.

• Under Provision 2 (base year plus all extensions), plus three years, or longer if

• There are audit findings and until resolution of the findings.
Resources

Non-Discrimination Statement

This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:
Mary Burks
Director of School Support Division
mburks@mdek12.org
Procurement Cycles
New Administrators Orientation

Charles Crawford
Division Director II

September 15-16, 2021
Procurement 101 Topics

- Sources of Funds
- Allowable Expenses
- Types of procurement transactions
- Procurement tips
- Financial Audit tips
## Sources of Funds

<table>
<thead>
<tr>
<th>Type of Funds</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Funds</td>
<td>Meal Reimbursements, USDA Grants, FFVP</td>
</tr>
<tr>
<td>State Funds</td>
<td>State Matching Grants and Rebates</td>
</tr>
<tr>
<td>Local (District) Funds</td>
<td>Extra Food Items, Adult Sales, Catering, Special Functions</td>
</tr>
<tr>
<td>Miscellaneous Funds</td>
<td>Donations</td>
</tr>
</tbody>
</table>
Procurement 101

What rules Apply?

In Child Nutrition, three sources govern procurement decisions:

• Federal Regulations
• State Law
• Local Rules (Board Policy)
What can I buy?

All expenditures made with federal funds (including USDA reimbursements) must be “allowable.” Is the cost:

Reasonable?  "Prudent person" standard

Necessary?  Generally recognized as ordinary/necessary for program operation

Allocable?  (If applicable)
What is a threshold?

• The dollar amount at which the requirements change for how you make a purchase

There are state thresholds and federal thresholds. Child Nutrition is subject to both.
What is a threshold?

STATE:

State procurement thresholds:

- Apply to purchases of commodities (goods, equipment)
- Perishable food/supplies for use in the National School Lunch Program are exempt from State guidelines
  - Purchases up to $5,000.00 – No quotes required
  - Purchases $5,000.01-$50,000.00 – Two written quotes (“quote bids”)
  - Purchases $50,000.01+ -- RFP/IFB (publicly advertised)
State Laws Miscellaneous

- Construction
- Reverse auction
  - $50,000+
  - Exemptions may be available
- Sole source
- Emergency

Resource: State Purchase Law Summary

- Additional information on quotes/bids, construction, sole source, emergencies
- Does not take into account federal requirements

What is a threshold?

FEDERAL

Apply to all purchases, including services

Micro-purchasing - under $10,000.00
Small purchasing procedures - $10,000 - $249,999.99 Quotes
Formal purchasing procedures - $250,000+ RFP/sealed bids
What is a Micro-Purchase?

• Aggregate total cannot exceed threshold.
  • What does “aggregate total” mean?
  • Purchase over a period of time (e.g. spending $2000 each school month on a service would exceed the threshold) or
  • Purchase of an item made in multiple sellers (e.g. buying fresh blueberries from two farmers market vendors)

• Equitably distribute among suppliers.
  • Do I have to drive 50 miles, pay more, etc. in order to equitably distribute” our purchases?
  • No; only reasonable efforts must be made. Document your process.

• Price must be reasonable”. 
Micro-Purchase Example

- $500 for 10 pints of blueberries

Allowable?

Under $10,000.00 ✓

Not allowable because NOT REASONABLE.
Micro-Purchase Example 2

- Buy 100 aprons at $10/apron from Restaurant Supply in March.
- Buy 100 aprons at $10/apron from Restaurant Supply in August.

Allowable?

Under $5,000.00 (state threshold for commodities) ✅

Reasonable ✅

May be allowable. Are other vendors available?
Micro-Purchase considerations

- For repetitive purchases, consider whether micro-purchasing is getting the best pricing.
- If near the threshold, consider getting quotes.
- Resource: Decision Tree
Q. What to do when federal and state guidelines conflict?

A. Utilize the more restrictive

Local rules can be stricter, but not weaker than state/federal requirements.

Ex. Local rule may require 3 quotes instead of 2
What threshold do I follow?

For commodities except perishable food/supplies:

State thresholds are more restrictive than federal

Up to $5,000 – Micro purchase

$5,000.01 - $50,000.00 - Quotes

Over $50,000.01 – RFP / IFB / Reverse Auction
What threshold do I follow?

For services and perishable food/supplies:
Under $10,000.00 – Micro-purchase
$10,000.00 - $249,999.99 – Quotes
$250,000.00+ - RFP / IFB

REMINDER: Your District may impose stricter thresholds
• You may choose to use more competitive means of procurement for any purchase (e.g. you may get quotes on a $1,000 item).

• Your District may impose more restrictive thresholds/requirements.

• Always follow your Procurement Plan!!!
What’s in a Quote?

- Request contains specifications
- Response can be on vendor’s letterhead or School District’s form
- Signed by vendor

“Lowest and best” prevails.
What is a Procurement Plan?

- State templates available
- Can modify template so long as minimum standards are met
- Example- Your district may require formal procurement on anything above $25,000
- Check with your district on your Bid Protest Policy
- Recommendation: review annually
Capital Expenditures

• Purchases of equipment exceeding $5,000 require State Agency pre-approval.

1. Check the pre-approved equipment list on the MDE/OCN website (under “Child Nutrition Resources”)

2. If the equipment is not listed, send a request via e-mail to Schools Support with the following information:
   • The equipment and approximate cost; whether the equipment will be used in a shared space (for example, tables that will also be used for after-school tutoring)
More Procurement Tips

- Buying from “State Contract” vendors (DFA)
  - Competitive contracts- OK
  - Other contracts – get 2nd quote
- If on Statewide Purchasing, buying items “off bid” (must procure)
- Geographic preference for locally-grown products
This institution is an equal opportunity provider.

Full Statement
Charles Crawford
Division Director II
ccrawford@mdek12.org
Preparing for An Administrative Review in the SSO (SY 21-22)

Marianna Chauvin
Division Director II

NAO – September 2021
This Presentation will Cover…

- Administrative Review Basics and Statutory Authority (PR briefly mentioned)
- Compiling Required Documentation
- Common Findings
- Self Assessment (to set you up for success!)
AR Basics and Statutory Authority

Procurement Reviews briefly mentioned
SSO Administrative Reviews in SY 2021-2022

AR Basics

• SA will be conducting ARs
• SFAs will be notified in advance
• This will be a “Hybrid” Review
  • Majority conducted off-site through desk review
  • SA will conduct in-person site reviews which will be scheduled in advance
  • Entrance and Exit conferences with your superintendent or his/her designee will all be virtual and will be scheduled in advance
PR Basics

• SA will be conducting PRs
• SFAs will be notified in advance
• Reviews will be conducted entirely off-site in a desk review format.
• If you have both a Procurement Review and an Administrative Review, they will be conducted at the same time.

  • Note: You may have a different person conducting your AR and your PR, but it will be done at the same time.
## Separate Review Processes

<table>
<thead>
<tr>
<th>Procurement Reviews</th>
<th>Office of Healthy Schools Monitoring Instrument</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Conducted by OCN, Office of School Support</td>
<td>• Conducted by OCN, Office of Healthy Schools</td>
</tr>
<tr>
<td>• 6-Year Cycle (different from 3-year AR cycle)</td>
<td>• May be conducted concurrently with AR of NSLP/SBP/SSO</td>
</tr>
<tr>
<td>• For more info or TA, contact Deborah Newton (<a href="mailto:dnewton@mdek12.org">dnewton@mdek12.org</a>)</td>
<td>• For more info or TA, contact the Louis King (<a href="mailto:lking@mdek12.org">lking@mdek12.org</a>)</td>
</tr>
</tbody>
</table>
Statutory Authority for Administrative Reviews (AR)

• Healthy Hunger-Free Kids Act of 2010 (HHFKA)

• The Act also requires an accountability system that conducts Administrative Reviews to evaluate Program requirements for NSLP and SBP and SSO during a 3-year cycle.

  • USDA has confirmed that an AR conducted during SY 21-22 of SFAs implementing the SSO program will count toward the 3-year cycle.
Federal Regulations

• 7 CFR 210.18 (NSLP)
• 7 CFR 220.13 (f) (2) (SBP)
• FNS – 113-1 (Civil Rights)
State Regulations

- MDE Board Policies, Chapter 17 (Child Nutrition)
- MDE Board Policies, Chapter 38, Rule 11 (Healthy and Safe Schools Nutrition Standards)
- MSDH Food Safety Policies (FDA Food Code 2017)
Resources

Where to find additional resources

• AR Manual
• Eligibility Manual
• FFVP Manual
• OVS Manual
• USDA Policy Memos (Partner Web)

SSOs reviews can count toward your 3-year AR cycle

SA must review the following during an SSO AR:
  • the same number of sites as required in the NSLP/SBP AR
  • Nutrient analysis

SA is **not required** to review the following during an SSO AR:
  • Meal Applications
  • Verification
  • Paid Lunch Equity
Scope of Administrative Review

**Performance Standard 1**: Meal Access and Reimbursement

**Performance Standard 2**: Meal Pattern and Nutritional Quality

**General Areas of Review**
## Scope of Review (SSO ARs SY 2021-2022)

<table>
<thead>
<tr>
<th>Meal Access &amp; Reimbursement</th>
<th>Meal Pattern &amp; Nutritional Quality</th>
<th>Resource Management</th>
<th>General Program Compliance</th>
<th>Other Federal Program Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Meal Counting and Claiming</td>
<td>• Meal Components and Quantities</td>
<td>• Risk Assessment</td>
<td>• Civil Rights</td>
<td>• Afterschool Snacks</td>
</tr>
<tr>
<td></td>
<td>• Infant and Pre-K Meal Pattern</td>
<td>• Nonprofit School</td>
<td>• SFA On-Site Monitoring</td>
<td>• Fresh Fruit &amp; Vegetable</td>
</tr>
<tr>
<td></td>
<td>• Offer Versus Serve</td>
<td>Food Service Account</td>
<td>• Local Wellness Policy</td>
<td>Program</td>
</tr>
<tr>
<td></td>
<td>• Dietary Specs &amp; Nutrient Analysis</td>
<td>Revenue from Non-Program Foods</td>
<td>• Competitive Foods</td>
<td>• Special Milk Program</td>
</tr>
</tbody>
</table>

Critical Areas of Review: **Performance Standard 1** and **Performance Standard 2**
SSO Review will include applicable waivers!

- If you have a **Parent Pick Up Waiver**, we will be checking to make sure you implement it properly
- If you have a **Meal Pattern Waiver**, we will be checking to make sure you implement it properly
  - Utilized only to the extent necessary?
  - For example, you may have a veg subgroup waiver for your meals served on a bus, but your reviewer will need to see you are serving all subgroups on your hot line for congregate feeding in the cafeteria!
- If you are doing **Door-to-door Bus Deliveries**, you MUST have a system in place to validate eligible children in the household.
Possibility of Fiscal Action

• Take Note of Findings that Can have a Monetary Penalty!
  • Performance Standard 1 (Meal Access and Reimbursement)
  • Performance Standard 2 (Meal Pattern and Nutritional Quality)
  • Repeat Findings in General Areas of Review
    • Findings or TA given to you on your last review which were not corrected can result in monetary penalties

• If fiscal action is assessed, funds may be recouped from future payments through a Claim Adjustment
<table>
<thead>
<tr>
<th>Technical Assistance (TA)</th>
<th>Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Corrective Action not required but suggested</td>
<td>• Requires Corrective Action</td>
</tr>
<tr>
<td>• No Fiscal Action</td>
<td>• Potential for Fiscal Action</td>
</tr>
<tr>
<td>• Not listed in Public Report</td>
<td>• Listed in Public Report</td>
</tr>
<tr>
<td>• Issued to improve program operations</td>
<td>• Issued to Correct Non-Compliance</td>
</tr>
</tbody>
</table>
Issuing TA or Findings

Whenever possible, the SA Review will issue TA instead of a finding. However, if this is a repeat issue of noncompliance, or TA was previously issued and no action was taken, it is automatically a Finding.

The SA Review will also, whenever possible, allow the SFA to perform an on-site correction in response to a finding. On-Site corrections will be noted in the Public Report.
MS Application and Reimbursement System (MARS)

- You must Complete the Off-site Assessment in MARS (this year we are aiming to have it completed in September. Please provide as much documentation as possible in MARS as part of off-site assessment)

- Your reviewer will use MARS to document all sections of the AR, including any TA or Findings issued

- You must respond to corrective Action in MARS
General Timeline for SSO Review, SY 21-22

What to expect over the course of the “Hybrid” SSO Review

1. Notification by SA
2. Completion of Off-Site Assessment in MARS
3. Follow up and communication from Lead Review
4. Virtual Entrance Conference
5. On-Site Review of Selected Sites (scheduled in advance)
6. Virtual Exit Conference
7. Findings or No Findings Letter
8. (if applicable) Corrective Action Plan
9. (if applicable) Closing Letter
10. Public report posted on SA website
General Timeline for Procurement Review, SY 21-22

What to expect over the course of the Virtual Review

1. Notification by SA
2. Submission of Documentation and Completion of Procurement Tool (excel file)
3. Follow up and communication from Lead Review, additional information will be requested at this time
4. SA Reviewer reviews all documents
5. Virtual Exit Conference (should coincide with AR)
6. Findings or No Findings Letter
7. (if applicable) Corrective Action Plan
8. (if applicable) Closing Letter
Compiling Required Documentation

A complete guide to getting all your documentation in order
General Documentation You Will Need

Organization and Preparation are key!

• Hint: If you really want your reviewer to be in a good mood, having everything extremely well organized and electronic documents clearly labeled!

• Before your AR, you should get a list of all the documentation you will need for the AR from your Lead Reviewer or Program Specialist.

• If you don’t get it, ask for it!

See Handout
General Documentation You Will Need

Document Checklist

To aid in the review process, the following information should be provided to your State Agency (SA) Reviewer. All documentation must be uploaded in the appropriate sections in WARE. If you need help uploading documentation, please contact your assigned SA Reviewer.

- Non-Profit School Food Service Account General Ledger for the Prior SY
- Documentation of Indirect Costs charged to the Non-Profit School Food Service Account
- Copy of the student/attendance calendar indicating the days on which lunch was served
- Data used in re-estimating the Claim for Reimbursement for your designated review month (please check with your Lead Reviewer)
- Daily reconciliation sheets for your designated review month (please check with your Lead Reviewer)
- Copy of documentation of the edit check (claims review) process for your designated review month
- Documentation of on-site reviews conducted by the SFA and any corrective action taken by sites.
- Civil Rights data, including:
  - A copy of the nondiscrimination statement used by the SFA
  - Written procedures for receiving & processing complaints alleging discrimination within SNAPs
  - Documentation of Civil Rights training for staff (agenda, sign-in sheets, topics covered, etc.)
  - Public Release or general public announcement regarding the availability of CR programs
- Documentation of School Health Council (SHC) activity:
  - Copy of most current Local School Wellness Policy (LSWP)
  - List of SHC members, including titles
  - Documentation verifying the SHC plans to meet three times per year (meeting minutes, agendas, and sign-in sheets)
  - Documentation of the most recent assessment to assist with the development of the LSWP (a Summary Report may be provided instead of the full report)
- Professional Standards documentation of yearly accrued training hours for each CN employee. This should include a professional standards tracking tool.
- Food Safety Documentation including District Wide HACCP plans and Site-Specific Temperature Logs for all relevant equipment and areas.
- District Meal Charge Policies (If Applicable)
- Planned menus for the designated review month (please check with your Lead Reviewer)
- Production Records for specified sites and dates (please check with your Lead Reviewer)
- Copies of any recipes used in the MS Recipes for Success (MRS) or any modified MRS recipes
- Portrait of Nutrient Analysis, if available (If using NutriSOS, the SA will need a copy of the Weekly Certification Information for the Targeted Review Window as well as the Base Menu Spreadsheet for the Targeted Review Window. The SA Lead Reviewer can provide instructions on which week its select)
- Complete nutrition information for any items served not from State Purchasing Program

Additional information may be requested as needed, if applicable.

- Fresh Fruit & Vegetable Program
- After School Care Program

SEARLESS SUMMER OPTION PROGRAM
DOCUMENTATION NEEDED AT TIME OF ADMINISTRATIVE REVIEW

Revised: 6/28/21

MISDOE/OSE
IMPORTANT NOTE!

DO NOT send any sensitive information (including student names, eligibility status, or other personally identifiable information) over email or upload this information in MARS!

We should be able to complete the review without this type of information, but if you think you have something we need to see that is sensitive in nature, contact your Lead Reviewer.
Conducting a Nutrient Analysis

• If you have an approved meal pattern waiver in place, your reviewer will take that into account.

• You will be held accountable for all portions of the Meal Pattern that have not been waived specifically by the SA in your Meal Pattern Waiver.

• Remember! You should only be utilizing meal pattern waivers to the extent that they are necessary!
Conducting a Nutrient Analysis

• The SA will need to validate the nutrient analysis of your menus as part of the AR

• If your District uses Nutrikids software, there are two reports the SA needs to see:

1. Base Menu Spreadsheet
   (Week of the Targeted Review for Breakfast & Lunch for all age groups)

2. Weekly Certification Worksheet
   (Week of the Targeted Review for Breakfast & Lunch for all age groups)

• If you have a different menu for your cafeteria and for your Grab&Go or bus deliveries, we need to see both menus analyzed!

• Your Lead Reviewer or Program Specialist can provide you with instructions on how to pull reports correctly from Nutrikids prior to the AR.

• Note: having a specific type of Nutrient Analysis software is NOT necessary. However, we have used Nutrikids as an example because we know that many of our schools utilize this software.
Example of a Base Menu Spreadsheet

### MS Department of Education

**Planned Menu Spreadsheet**

**Weighted Values - Detailed**

<table>
<thead>
<tr>
<th>Portion Size</th>
<th>Plan Qty</th>
<th>Cals (kcal)</th>
<th>Sodm (mg)</th>
<th>Sugars (g)</th>
<th>Carb (g)</th>
<th>S-Fat (g)</th>
<th>Tr-Fat* (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lunch 9-12</td>
<td>500</td>
<td>244</td>
<td>539</td>
<td>1</td>
<td>26.7</td>
<td>3.07</td>
<td>0.00</td>
</tr>
<tr>
<td>Chicken &amp; Sausage Gumbo MI800</td>
<td>2/3 cup w/rice</td>
<td>400</td>
<td>7.25</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bacon Burger 2 oz Pattie MI702</td>
<td>1 each</td>
<td>50</td>
<td>3.34</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chef Salad, MI800</td>
<td>1 salad</td>
<td>50</td>
<td>1.68</td>
<td>0.39</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baked Ranch Fries MI1097</td>
<td>1/2 cup</td>
<td>170</td>
<td>7.25</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baked Beans MS918</td>
<td>1/2 cup</td>
<td>170</td>
<td>12.43</td>
<td>0.04</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tomato/Cucumber Salad MI134.3</td>
<td>1/2 cup</td>
<td>170</td>
<td>3.35</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fresh Blueberries MI1222</td>
<td>1 cup</td>
<td>170</td>
<td>4.47</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fresh Apple MI1226</td>
<td>1 each</td>
<td>150</td>
<td>5.72</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cornbread W/G MI1301</td>
<td>1 piece</td>
<td>250</td>
<td>17.71</td>
<td>0.91</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Milk, FF Choc 1/2 pt Br MI1700</td>
<td>1/2 pint</td>
<td>150</td>
<td>6.6</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Milk, FF Choc 1/2 pt BM1700</td>
<td>1/2 pint</td>
<td>150</td>
<td>8.7</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Milk, LF White 1/2 pt BM1700</td>
<td>1/2 pint</td>
<td>100</td>
<td>4.2</td>
<td>0.30</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Weighted Daily Average**

<table>
<thead>
<tr>
<th>% of Calories</th>
<th>Nutrient Guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>23.4%</td>
<td>5.8%</td>
</tr>
<tr>
<td>61.5%</td>
<td>12%</td>
</tr>
<tr>
<td>6.1%</td>
<td>0.6%</td>
</tr>
</tbody>
</table>

**Weighted Average**

| 603 | 1180 | 90.17 | 6.63 | 0.00 |

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>Menu AVG</th>
<th>% of Cals</th>
<th>Weekly Target</th>
<th>% of Target</th>
<th>Error</th>
<th>Error Messages (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calories</td>
<td>603</td>
<td>80%</td>
<td>80%</td>
<td>147</td>
<td>100</td>
<td>Correction Required - Calories too Low</td>
</tr>
<tr>
<td>Sodium 1 (mg)</td>
<td>1150</td>
<td>143%</td>
<td>143%</td>
<td>Missing</td>
<td>100</td>
<td>Correction Required - Sodium too High</td>
</tr>
<tr>
<td>Sodium 2 (mg)</td>
<td>1180</td>
<td>1080</td>
<td>108%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sugars (g)</td>
<td>33</td>
<td>21.9%</td>
<td>21.9%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbohydrate (g)</td>
<td>80.17</td>
<td>53.19%</td>
<td>53.19%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saturated Fat (g)</td>
<td>6.63</td>
<td>9.69%</td>
<td>9.69%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trans Fat (g)</td>
<td>0.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Example of Weekly Certification Worksheet

#### MS Department of Education
Weekly Certification Worksheet

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruit: Minimum (cups)</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>5</td>
<td>Yes</td>
<td>5</td>
<td>0</td>
<td>0.00%</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vegetables: Minimum (cups)</td>
<td>1.375</td>
<td>1.125</td>
<td>1.25</td>
<td>1.5</td>
<td>1</td>
<td>6.25</td>
<td>5</td>
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<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>-Dark Green</td>
<td>0.5</td>
<td>0.5</td>
<td>0.25</td>
<td>0</td>
<td>0</td>
<td>1.75</td>
<td>0.5</td>
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<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>-Red/Orange</td>
<td>0.25</td>
<td>0.75</td>
<td>1</td>
<td>0.5</td>
<td>0.375</td>
<td>2.875</td>
<td>1.25</td>
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<td></td>
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<td>0.5</td>
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<td></td>
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<td>-Starchy</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meat/Meat Alt: Minimum (oz eq)</td>
<td>2</td>
<td>2</td>
<td>2.25</td>
<td>2</td>
<td>2</td>
<td>10.25</td>
<td>10</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meat/Meat Alt: Maximum (oz eq)</td>
<td>2.5</td>
<td>3</td>
<td>2.75</td>
<td>2</td>
<td>4.25</td>
<td>14.5</td>
<td>12</td>
<td>OVER</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain: Minimum (oz eq)</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td>10</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grain: Maximum (oz eq)</td>
<td>2.75</td>
<td>2.5</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>14.25</td>
<td>12</td>
<td>OVER</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Grain Based Dessert Total for all weekly meals**
0 No more than 2 oz Yes

### Whole Grain Rich Weekly Amount

<table>
<thead>
<tr>
<th>Weekly Grains Total</th>
<th>Weekly Whole Grain Rich Total</th>
<th>% of Whole Grain Rich</th>
<th>100% Whole grain rich</th>
<th>Weekly Rpt.</th>
<th>Weekly Rpt. Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>34.25</td>
<td>35.25</td>
<td></td>
<td>103%</td>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Milk: Minimum (cups)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>15</td>
<td>5</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Variety: Skim/Fat-free unflavored, Skim/Fat-free flavored, Low-fat (1% or less) unflavored

<table>
<thead>
<tr>
<th>Low-fat (1% or less), flavored</th>
<th>Reduced fat (2%) or whole, unflavored and flavored</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Conducting a Nutrient Analysis

• Make sure you have the most up to date version of MRS recipes!

• We still see a lot of MRS 2015 Recipes

• Make sure you are using the 2021 Recipes
  • Distribute the updated recipes to your Managers/Cooks
  • Use the 2021 recipes when running your reports in your Nutrient Analysis Software
Providing Financial Reports

• The SA will need to perform a Resource Management Review based on the results of your completed Risk Assessment (off-site assessment in MARS)

• You may be required to provide financial reports including:
  - General Ledger
  - FETS report for all fund codes used during the previous year (2110, 2121, 2131)

NOTE: you may need to get your business manager to provide you with these financial reports
Common Findings

During our Previous AR Cycle
Reviewed 37 Organizations (SFAs)

Identified 126 Total Findings

NOTE: several reviews cancelled due to COVID
Food Safety (storage) typically area with most violations
Self Assessment

Not required, but an effective tool to set yourself up for success!
Conducting a Self Assessment

• In order to prepare yourself and your staff for the best possible outcome with an AR, we suggest you conduct a self-assessment before MDE/OCN conducts the AR.

• The Self-Assessment is completely voluntary! It is only meant as a preparation tool.

• The following slides contain common errors/findings that are uncovered over the course of an AR. If you are able to identify and correct these errors before your review, you will decrease the number of findings and/or TA issued by the Reviewer.
District Level

Self Assessment
Prior ARs

District Level – Includes all Sites in the District

- Did you have any findings on last AR? Have they been corrected?
- Did you have any TA on last AR? Have all issues been corrected?
Resource Management

District Level – Includes all Sites in the District

- Is your **indirect cost** calculated correctly and applied evenly across all Federal Programs in your district?
- Do you have an **excess balance** in the school food service account? (must have less than 3 months operating expenses)
- Are you charging enough money for each “**extra sale**” item?
- Have you had a **General Financial Audit** Recently? Were there any findings, and if so have all issues been corrected?
- Have you analyzed **adult meal prices** to ensure you are charging enough? *(the SA will send a memo out every year)*
Do you have the CORRECT non-discrimination statement on all letters and program materials?
  - Do you have the LONG version on all eligibility letters?
  - Is the font size at least the size of the body of the letter?

- Have you conducted staff training on civil rights?
- Have you conducted outreach to inform families of availability of CN programs (this year will be SSO) and are copies on file?
- Have you received any civil rights complaints?
- Is the AJFA poster prominently displayed where meals are served?
Wrong AJFA Poster

Incorrect Versions of the Poster
This menu has the wrong statement

<table>
<thead>
<tr>
<th>MONDAY</th>
<th>TUESDAY</th>
<th>WEDNESDAY</th>
<th>THURSDAY</th>
<th>FRIDAY</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>EGROUY</td>
<td></td>
<td></td>
<td>Cheese Pie</td>
</tr>
<tr>
<td></td>
<td>Non-Discrimination Statement</td>
<td></td>
<td></td>
<td>Hot Dog</td>
</tr>
<tr>
<td></td>
<td>Wrong</td>
<td></td>
<td></td>
<td>Chef Salad</td>
</tr>
<tr>
<td></td>
<td>Statement</td>
<td></td>
<td></td>
<td>Succotash</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>WGE Chips</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Milk/Juice</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>WGE Rolls</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Fruit</td>
</tr>
</tbody>
</table>

|        |        |   |          | Cheese Pie |
|        |        |   |          | Hot Dog |
|        |        |   |          | Chef Salad |
|        |        |   |          | Succotash |
|        |        |   |          | WGE Chips |
|        |        |   |          | Milk/Juice |
|        |        |   |          | WGE Rolls |
|        |        |   |          | Fruit |

- **Monday**: Baked Chicken
  - WG Grilled
  - Cheese
  - Chef Salad
  - Brown Rice/Gravy
  - Kidney Beans
  - Fruit
  - Juice/Milk

- **Tuesday**: Chicken Spaghetti
  - Hamburger
  - Chef Salad
  - Sautéed Squash
  - Brown Sugar
  - Carrots
  - Rolls/Fruit
  - Milk/Juice

- **Wednesday**: Oven Fried Chicken
  - Baked Ham
  - Chef Salad
  - Black Eye Peas
  - Collard Greens
  - Mac & Cheese
  - Cornbread

- **Thursday**: Baked Spaghetti
  - Chicken Nuggets
  - Chef Salad
  - Corn
  - Steamed Broccoli
  - Fruit/WGE Rolls
  - Milk Juice

- **Friday**: Chili Cheese
  - Quesadilla
  - Baked Fries
  - Spinach Salsa
  - Juice/ Fruit

- **Weekend**: Crispy Chicken
  - Sandwich

- **Weekend**: Enchilada
  - Casserole

- **Weekend**: Baked Chicken
  - Ham & Swiss

- **Weekend**: Mini Corn Dogs
  - Baked Chicken

- **Weekend**: Pepperoni Pizza
On Site Monitoring

District Level – Includes all Sites in the District

- Have all sites been monitored by the SFA?
- Has the SFA used the SA-approved checklist for on-site monitoring?
Professional Development

District Level – Includes all Sites in the District

- Have all staff accrued the correct number of Hours?
  - 12 hours for CND
  - 10 hours for Managers
  - 6 hours for FT Staff / 4 hours for PT Staff

- Do you have an updated/current tracking tool for staff professional development?
  - Are all staff on one sheet, showing the total hours accrued for each person?
  - Does tracking tool have all USDA required elements: name/hire date/title/core duties/ FT or PT status

- Are Agendas, Sign-In Sheets, and Certificates of Completion maintained on file?
### Example of Professional Development Tracking Tool

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Site</th>
<th>Hire Date</th>
<th>Employee Position</th>
<th>Required Hours of Training</th>
<th>FT/PT</th>
<th>Avg. Hrs per week</th>
<th>Manager Recert July 3, 2021</th>
<th>NAO July 26, 2021</th>
<th>ICN Online Safety Training Aug 2, 2021</th>
<th>Back to School Prof Dev Aug 3, 2021</th>
<th>School Year Training Applied To</th>
<th>Completed Training Hours Year to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Helena Troy</td>
<td>Adm. Office</td>
<td>4/12/2018</td>
<td>Director</td>
<td>12</td>
<td>FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>2020-21</td>
<td>19</td>
</tr>
<tr>
<td>Jane Doe</td>
<td>High School</td>
<td>8/6/1997</td>
<td>Manager</td>
<td>10</td>
<td>FT</td>
<td>40</td>
<td>8</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>2020-21</td>
<td>19</td>
</tr>
<tr>
<td>Missy Sippy</td>
<td>High School</td>
<td>12/3/2012</td>
<td>Caf. Staff</td>
<td>6</td>
<td>FT</td>
<td>40</td>
<td>3</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>2020-21</td>
<td>11</td>
</tr>
<tr>
<td>John Deer*</td>
<td>High School</td>
<td>1/2/2022</td>
<td>Caf. Staff</td>
<td>6</td>
<td>PT</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2020-21</td>
<td>0</td>
</tr>
</tbody>
</table>

*PLEASE NOTE: John Deer is a newly hired employee who hasn’t received any training yet this SY. The SFA will have to submit a plan to the SA Reviewer for how he will receive training to reach his 6 required hours this SY.*
Implementation of Approved Waivers (COVID/SSO)

District Level – Includes all Sites in the District

- Is the continued use of the approved waiver appropriate? (ex. If all sites 100% traditional learning, might not be appropriate)

- If the District has an approved PPU Waiver, does the district have a procedure to verify the number of eligible children?

- If the District has an approved Meal Pattern Waiver, is it implemented only in situations for which it was approved? (ex. Trying to use a veg subgroup waiver for hot meals served in the cafeteria, when it was only approved for bus deliveries)

- If you are doing Door-to-door Bus Deliveries, you MUST have a system in place to validate eligible children in the household.
Record Keeping

District Level – Includes all Sites in the District

- Records maintained for 3 years plus the current year
- Far back as the base year for CEP and Prov 2
Site Level

Self Assessment
Vending and Smart Snacks

Site Level – Includes all Sites selected by the SA for Review

- Are all items sold (vending/cafeteria/school store) smart snack compliant?
- Do you have documentation of smart snack compliance on file for each item sold?
- Are all of your vending machines locked or timed to prohibit purchases within an hour prior to meal service?
- Do any of your vending machines “advertise” non-compliant products such as high calorie soft-drinks? (this is not allowable)
Snack sold is NOT Smart Snack Compliant

Tip: Use the Smart Snack Calculator from the Alliance for a Healthier Generation
Food Prep

Site Level – Includes all Sites selected by the SA for Review

- Recipes out and referenced?
- Hands washed?
- Hairnets/beard-nets on?
Site Level – Includes all Sites selected by the SA for Review

- Are 2 Most recent food inspections available to Reviewer
  - 2 Per Year or documentation of request to MSDH

- Equipment Works Properly
  - functioning coolers/warmers,
  - no ice build up in freezer

- HACCP manual on site and being followed?

- Are temperature logs maintained and available for review?
  - Freezers
  - Coolers (don’t forget milk coolers!)
  - Dry Storage
  - Prepped Food

Remember that Food Safety is our most common finding!
Food Safety - Storage

Site Level – Includes all Sites selected by the SA for Review

- Is FIFO implemented properly (rotating stock)?
- Are you over-stocked on products, especially Commodity Products?
- Are all food products correctly dated (visible, all 3 dates)?
- Are chemicals stored separately from food?

NOTE: Food Storage is considered part of Food Safety.

Remember that Food Safety is our most common finding!
Food Safety Issue

Significant Ice Build Up in the Freezer
FIFO not Implemented

No Visible Dates
Components and Quantities

Site Level – Includes all Sites selected by the SA for Review

- Proper size serving spoon/ladle/instrument used?
- All five components offered on each line?
- Each component available in the proper quantity according to Meal Pattern? (ex: need a full cup of fruit at HS level)
- Is denial of food used as a punishment? All students should have equal access to meals.

Remember that this section was our second most common finding!
Production Records

Site Level – Includes all Sites selected by the SA for Review

- Are production records maintained at each site?
- Do production records document all meals claimed?
- Are production records reviewed regularly by the CND?
- Are managers correctly documenting components and quantities?
- Are managers serving the PLANNED menu?
Offer Versus Serve (OVS)

Site Level – Includes all Sites selected by the SA for Review

- Is implementation of OVS appropriate to the service or meal distribution strategy?
- While it is not required during the 21-22 SY for HS to implement OVS, are they doing so whenever possible?
- Are any non-reimbursable meals getting past the POS?
- Does cashier understand what constitutes a reimbursable meal and can he/she verbalize that to the Reviewer?
- Is there OVS signage posted at each serving line?
- Are serving staff at OVS sites pre-plating all items on trays as students move through the line? (not allowed!)
Improper Implementation of OVS

Non-Reimbursable Lunch Tray
Improper Implementation of OVS

Lunch tray is NOT reimbursable at the HS level, but would be ok for Elementary
Site Level – Includes all Sites selected by the SA for Review

- (if applicable) Are you following what is in your meal pattern waiver? Is your waiver even applicable to this serving method?
- Are your calories and saturated fat on target for the Review Week?
- Are you including all menu items in your nutrient analysis? (don’t forget your condiments!)
- When conducting a nutrient analysis using nutrient analysis software, have you correctly entered planned/prepared quantities of each food item to give you correct weighted values? (example: are you really only serving 100 hamburgers? Check your production books!)
- Are your cafeteria managers/sites producing and serving the PLANNED menu?
Not in compliance with Meal Pattern

May have a waiver for sodium, but calories are too low!
AJFA poster at point of service delivery? *(may need to be in the classroom or on a cart)*

Are educational or enrichment activities offered directly before/during/after the distribution of snacks?

Is a system in place to provide ACCURATE meal counts?

Do you have a system in place to safely store food products? *(for example, you don’t want milk sitting outside of a cooler for too long)*
Fresh Fruit and Vegetable Program (FFVP)

Site Level – Includes all Sites selected by the SA for Review

- Are you purchasing only allowable products?
  - Remember that dips for fruits are not allowable
  - Remember that dips for veggies have to be no/low fat

- Have you limited your administrative costs for the program?

- Are you serving only to elementary students?
  - Remember that teachers who pass out fruit/vegetables are allowed to partake so as to model positive eating habits
**FFVP Unallowable Cost**

Cannot purchase any type of dip for fruits

<table>
<thead>
<tr>
<th>Item I.D./Desc.</th>
<th>Ordered</th>
<th>Shipped</th>
<th>Unit</th>
<th>Price</th>
<th>Net</th>
<th>TX</th>
</tr>
</thead>
<tbody>
<tr>
<td>PINEAPPLE CHUNKS 5</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>39.50</td>
<td>158.00</td>
<td>E</td>
</tr>
<tr>
<td>CANTALOPE CHUNKS</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>36.50</td>
<td>146.00</td>
<td>E</td>
</tr>
<tr>
<td>GRAPE GIGGLES 50'S</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>28.90</td>
<td>115.60</td>
<td>E</td>
</tr>
<tr>
<td>APPLE W/CARAMEL 50</td>
<td>4.00</td>
<td>4.00</td>
<td>EACH</td>
<td>42.50</td>
<td>170.00</td>
<td>E</td>
</tr>
<tr>
<td>BANANAS, CASE</td>
<td>2.00</td>
<td>2.00</td>
<td>EACH</td>
<td>22.90</td>
<td>45.80</td>
<td>E</td>
</tr>
<tr>
<td>TANGERINE 100'S</td>
<td>2.00</td>
<td>2.00</td>
<td>EACH</td>
<td>36.90</td>
<td>73.80</td>
<td>E</td>
</tr>
<tr>
<td>HONEYDEW CHUNKS 50</td>
<td>5.00</td>
<td>5.00</td>
<td>EACH</td>
<td>37.99</td>
<td>189.95</td>
<td>E</td>
</tr>
</tbody>
</table>
This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:
Questions?
Handouts that Should Accompany this Presentation

• AR Document Checklist

• Instructions on Pulling Reports from Nutrikids
  note – you may use a different type of Nutrient Analysis Software

• Simplified version of self-assessment