



SCHOOL NUTRITION PROGRAMS

Department of Elementary and Secondary Education
Food and Nutrition Services



Current Programs

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- National School Lunch Program (NSLP)
 - Afterschool Snack Program (ASP)
 - Seamless Summer Feeding Option (SSO)
- School Breakfast Program (SBP)
- Special Milk Program (SMP)
- Fresh Fruit and Vegetable Program (FFVP)
- Donated Foods Program



Topics of Discussion

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- Administrative Reviews and findings
- Procurement Reviews
- Direct Certification
- Flexibility Options
- Donated Foods Program



Administrative Reviews (ARs)

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- On-site compliance monitoring
- Previous 3-year cycle
- 5-year cycle
 - 2019-2020



Administrative Reviews

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- Public Access Report on web site:
<https://dese.mo.gov/financial-admin-services/food-nutrition-services/administrative-reviews>

- Finding
- Description of the finding
- Required corrective action



Missouri Food & Nutrition Services Regions



Administrative Reviews

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- Meal access and reimbursement
 - Certification and benefit issuance
 - Verification
 - Meal counting and claiming
- Meal pattern and nutritional quality
- Resource management
 - Maintenance of non-profit status
 - Paid Lunch Equity
 - Revenue from nonprogram foods
 - Indirect costs



Administrative Reviews

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- General program compliance
 - Civil rights
 - Local wellness policy
 - Smart Snacks
 - Professional standards
 - Water
 - Food Safety
 - Reporting and Recordkeeping
 - SBP and SFSP/SSO Outreach



Administrative Reviews

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- Other Federal Programs
 - Afterschool snacks
 - Seamless Summer Option
 - Fresh Fruit and Vegetable Program
 - Special Milk Program



Fiscal Action

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- \$600 disregard per program
 - NSLP (includes SSO, FFVP, and ASP)
 - SBP
 - SMP



Meal Access and reimbursement

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- **Performance Standard 1:** All free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals respectively, and are counted, recorded, consolidated and reported through a system that consistently yields correct claims.



Findings

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- Application errors
 - Fiscal action: Review period until month fixed
- Meal counting at the point of service
 - Fiscal action: Date corrected back to the beginning of the school year



Meal Charge Policy

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- Must have a Local Meal Charge Policy
- Must be communicated in writing to households
- Include, if applicable, availability of alternate meals
- Include policy regarding collection of delinquent meal charge debt



Delinquent Debt vs Bad Debt

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- Delinquent – considered collectable and efforts made to collect (allowable use of food service funds)
- Bad – when determined efforts to collect delinquent debt is useless or too costly (losses must be restored using non-federal funds)



Meal Pattern & Nutritional Quality

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- **Performance Standard 2:** Reimbursable lunches and breakfasts must meet the meal pattern requirements applicable to the age/grade group.



Findings

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- Missing meal components
 - Fiscal action: Day of review and review period
- Non-reimbursable meals
 - Fiscal action: Day of review



Findings – Repeat Violations

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- Fiscal action: Milk – if only one type of milk is offered or an unallowable milk type, meals must be reclaimed for the duration served.
 - skim and 1% : flavored and unflavored

- Fiscal action: Vegetable subgroups – If one vegetable subgroup is not offered over the course of the week reviewed, during the month of review, an average of the meals over the week must be reclaimed.



Findings

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- Quantity requirements not met
- Not meeting daily or weekly requirements
- Serving non-whole grain items without a wavier
 - All grains must be whole-grain rich (grain items must be at least 50% whole-grain)
- Pre-K serving flavored milk and not following the meal pattern when **not co-mingled**



Resource Management

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- To apply a systematic approach to ensure the overall financial health of the non-profit school food service.



Findings

20

- Paid Lunch Equity (PLE) tool not completed
 - Lunch prices not raised or
 - Funds not transferred to the food service account

For 2019-20 if charging less than \$3.09 for paid lunches in 2018-19, required to raise price or add funds to the food service account.

- free reimbursement (\$3.41) – paid (\$0.32) = \$3.09



Findings

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- Non-program revenue tool not completed

Revenue from the sale of non-program food generates at least the same proportion or more of revenue as contributed to total food costs.



Findings

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- Adult meals not priced sufficiently
 - Transfer of general funds to non-profit food service account to make up the difference
 - Example: Lunch

Highest paid student lunch	\$2.60
Value of commodities	+ .3625
Paid lunch reimbursement (severe need with 6 cents)	+ .32
Required adult lunch price	= \$3.2825 (round to \$3.30)



General Program Compliance

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- To ensure compliance in accordance with all laws, regulations, policies, and guidance.



Findings

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- Local Wellness Policies not sufficient
 - Missing specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness
 - Missing appropriate people on team
 - Assessments- First required by 2020
 - Not made public



Local Wellness Policies (LWP)

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- Triennial Assessment
 - Every 3 years at a minimum
 - Results must be made available to the public
 - Must complete the first assessment by June 30, 2020
 - Assessment should determine compliance with LWP and progress made to attain goals



Local Wellness Policies

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- Standards and nutrition goals for all foods and beverages sold to students during the school day must meet school meal nutrition standards and Smart Snack requirements.
- Standards for all foods and beverages provided, but not sold, to students during the school day (e.g. classroom parties, classroom snack provided by parents,).



Findings

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- Smart Snack Violations
 - Serving foods not meeting the guidelines
 - School stores
 - Vending
 - A maximum of 5 fundraisers, per school building, with a duration of one day, per school year are allowed



Findings

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- No documentation for products not meeting the Buy American requirements

All products purchased must be of domestic origin to the maximum extent practicable. If purchase a non-domestic food product justification is required.



Buy American

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- Domestic commodity or product means an agricultural commodity that is produced in the United States and a food product that is processed in the United States substantially using agricultural commodities produced in the United States.
- Over 51% of the final processed product, by weight or volume, must consist of agricultural commodities that were grown domestically.



Buy American

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- Very limited, but an alternative or exception must be approved by the Local Education Agency
 - Vendor must submit the request in writing in advance of delivery and prior approval must be given
 - Reason due to limited/lack of availability or price



Other Federal Programs

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- Ensure compliance with program regulations for Afterschool Snack Program, Seamless Summer Option, Fresh Fruit and Vegetable Program and Special Milk Program.



Findings

32

- No production records for the Afterschool Snack Program
- No monitoring of Afterschool Snack Program within first 4 weeks and completion of the Afterschool Snack Program monitoring form
 - DESE Food and Nutrition Services website-Guidance and Resources-Forms



Procurement Reviews

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- New in the 2016-17 School Year
- 6 year cycle – unless contract with a Food Service Management Company – 3 year cycle
- Reviews conducted by contractor: CNResource – offsite
- DESE, Nutrition Procurement Specialist, oversees and communicates with LEA and CNResources
- Review within web application system under “Compliance”



Procurement Reviews

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- Fiscal Action
 - No fiscal action during the first procurement review cycle
- Corrective Action
 - Procurement plan and procedures (including code of conduct)
- Technical Assistance
 - All other aspects of review



Procurement Tool

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- The “SFA Procurement Table” must be completed by the Local Education Agency
- All other tabs within the tool are completed by the reviewer



Procurement Tool, con't.

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- Three types of purchases
 - Micro Purchases
 - Less than \$10,000 (previously \$3,500)
 - Small Purchases/Informal Contracts
 - Purchases from vendors valued at \$250,000 (previously \$150,00) or below, or most restrictive threshold
 - Formal Contracts: Sealed Bids/Competitive Proposals
 - Vendor contracts valued above \$250,000 (previously \$150,000) or most restrictive threshold



Review of Micro Purchases

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- Maximum number to review:
 - 2 vendors
- Review of one invoice a month for a period of three months
 - Individual purchases below micro threshold
 - Reasonable and spread equitably among qualified suppliers



Review of Small Purchases

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- Maximum to review:
 - 4 vendors
- Price or rate quotations from an adequate number of qualified sources
- Review of one invoice a month for a period of three months



Review of Formal Purchases

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- Maximum to review:
 - 6 vendors
- Invitation for Bid (IFB)
- Request for Proposal (RFP)



FSMC Contracts

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- Base Year Review and Renewal Years
 - Review of solicitation
 - Review of contract to ensure terms set forth in the contract are being followed
 - Review of three FSMC invoices to ensure the LEA is paying the FSMC as contracted



Direct Certification

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- Free meal eligible
 - SNAP (Supplemental Nutrition Assistance Program)
 - TANF (Temporary Assistance for Needy Families)
 - Foster



Direct Certification

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- File available weekly
 - Direct Match – NEW – PLEASE USE
 - MOSIS file
 - ZIP code file



Direct Certification

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- Mandatory 3 times yearly
 - July/August, October and January

- Mandatory 1 time yearly for Community Eligibility Provision (CEP)
 - April



- Must have an Identified Student Percentage of at least 40%
- Identified students
 - Certified for free meals without an application
 - Must upload Identified Student data into tiered monitoring
 - Retain all documentation

Keep Source Documentation



Child Nutrition Reauthorization

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- Healthy, Hunger-Free Kids Act of 2010 (HHFKA) was enacted by the President on December 13, 2010
- Child Nutrition Programs reauthorized every 5 years



Flexibility Options

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- Milk – (2017-18)
 - Demonstrate hardship (ex: decreased student consumption, increase in waste)
 - Waiver to serve flavored low-fat milk
- Milk – (2018-19) – Interim final rule
 - Waiver not needed to serve flavored low-fat milk
 - SMP- allows flavored low-fat milk six years of age and older



Flexibility Options

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- Whole Grains – (2019-2020)
 - Whole grain rich exemption form no longer required
 - Must comply with at least half of the grains offered as whole grain-rich

- Sodium – (2019-20)
 - Retain Target 1 levels



Donated Foods Program

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- July/August – Entitlement Letters
- January – USDA Foods packet
- February – USDA Foods packet due
- August/September – Value of USDA Foods Distributed Letter
- August to April – Monthly deliveries





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Contact Us

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