



COMMON CORRECTIVE ACTIONS FOUND DURING THE ADMINISTRATIVE REVIEW

*Claudia Vincent,
Nutrition Program Specialist*

What are Corrective Actions?

- **Corrective actions** are any violations of Child Nutrition Programs, including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), Afterschool Snack Service Program (ASSP), and Special Milk program (SMP), made by the School Food Authority (SFA) that are found by the State Agency (SA) during the SFA's Administrative Review.
- Corrective actions must be completed by the SFA after the on-site portion of the Administrative Review is finished and the SFA receives a review letter from the SA.
- The SFA has 30 days to complete corrective actions.
- After the corrective actions are approved by the SA, the Administrative Review is then closed.



School Nutrition Programs

Applications | Claims | Compliance | Reports | Security | Search
Programs | Year | Help | Log Out

Review Tracking > Dashboard > Corrective Action Documents - Findings >
School Year: 2019 - 202

SNP Review Findings

PERFORMANCE BASED REIMBURSEMENT
Status: Active

Corrective Action Documents

Total CADs Required

Not Started	0
Pending Action	0
Pending Submission	0
Pending Approval	0
Returned	0
Accepted	10

CAD Counts

Total Number of CADs:	12
Number of LEA CADs:	9
Number of Building CADs:	3
CAD Due Date:	2/3/2020
LEA Access Start Date:	1/3/2020
LEA Access End Date:	2/3/2020

Review ID:

Review Findings and Corrective Action Documents

Update All Open and Returned Corrective Action Due Dates:

LEA Findings

Not Started	Pending Action	Pending Submission	Pending Approval	Returned	Accepted	Total
0	0	0	0	0	0	9

Action	Area	Question	CAD?	Status	Due Date
View	100 - Certification and Benefit Issuance	126 - a. Certification and Benefit Issuance Review Method:	Y	Closed	2/03/2020
View	100 - Certification and Benefit Issuance	108 - Who is the hearing official? (Name and/or position title)	Y	Closed	2/03/2020

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Review Findings and Corrective Action Documents **Review ID:**

Form: 1200 - Professional Standards

Question: 1217
a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. (i.e. entered into a tracking mec...

Finding ID: V-1200
Professional Standards requirements are not met.

Finding Description
Add Standard Comment:

Finding Tracking

Current Status: Closed

Corrective Action Required: Action Required

Due Date:

Reviewer Response to CAD:

<https://dese.mo.gov/financial-admin-services/food-nutrition-services/newsletters-webinars-workshops>

LEA Corrective Action Response:
An excel document was started as suggested with all of the required criteria to track Food Service Employee training hours. This will be kept up throughout the school year. Please see the attached document.

Document Attachments
A lea may submit supplemental information related to their Corrective Action by selecting the 'Add an attachment' link.

Action	File Name	Description	Date	User
View	KITCHEN STAFF TRAINING RECORDS 19-20.xlsx	Staff Training Hours 19-20	01/06/2020	

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- The district-wide process of certification and benefit issuance covers the certification of a student's eligibility for free and reduced priced meals.

- Corrective action is district-wide.

100 Series: Certification and Benefit Issuance

6

105. How long does the application's approval take from the date the SFA receives the application from the household?

Corrective Action will result if:

1. The SFA is not date stamping applications upon receipt from households.
2. The SFA is not approving applications within 10 operating days of receipt.



100 Series: Certification and Benefit Issuance

11

To respond to this finding, the SFA must:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
 3. Provide a statement that the staff approving applications understands the requirements.
 4. Describe how all applications will be determined correctly moving forward.
 5. Provide copies of the letters to the household(s) if there is a change in eligibility status.
- The SFA is also encouraged to take and provide a certificate upon completion of the Approving Applications webinar, found here: <https://www.surveymonkey.com/r/FNSapprovingaapplications>

Review Findings and Corrective Action Documents

Review ID:

Form: 100 - Certification and Benefit Issuance

Question: 126
a. Certification and Benefit Issuance Review Method:

Finding ID: V-0100
Certification and Benefit Issuance requirements are not met.

Finding Description

Add Standard Comment:

Not all selected applications were approved correctly. One application was reduced, but should have been denied due to income. One application was free, but should have been reduced due to income. Two applications were missing adult signatures, and four applications were missing the last four numbers of the adult's social security numbers.

Required Corrective Action:

Add Standard Comment:

1. Provide the date that the finding was brought into compliance or the planned date of completion.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Provide a statement that the staff approving applications understand the requirements.
4. Describe how all applications will be determined correctly moving forward.
5. Provide copies of the letters to the household(s) if there is a change in eligibility status.



100 Series: Certification and Benefit Issuance

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Fiscal action is taken for the following errors:

- Missing information
 - Excluding applications that do not report zero income
 - If an application is missing the last four Social Security digits and/or an adult signature, fiscal action is not required if it is fixed within a specified time frame
- Miscategorized applications
- Benefit issuance errors
- Failure to update a change in status resulting from Verification



100 Series: Certification and Benefit Issuance

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133. Were all direct certifications (SNAP, TANF, FDPIR, foster, homeless, runaway, migrant, and/or Head Start) correctly certified?

Corrective action will result if:

- The SFA has listed a student on the direct certification list as foster, homeless, runaway, or migrant without documentation to corroborate.
- Students that should have been on the direct certification list are missing.
- There is incorrect categorization of eligibility.



100 Series: Certification and Benefit Issuance

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To respond to this finding, the SFA must:

1. Provide a corrective action plan that includes the following information:
 - The individual(s) involved.
 - The correction date.
 - How directly certified students will be documented in the future.
- The SFA is also encouraged to take and provide a certificate upon completion of the webinar for Benefit Issuance: Eligibility Basics and Direct Certification, found here:
<https://www.surveymonkey.com/r/FoodandNutrition-BenefitIssuance>



100 Series: Certification and Benefit Issuance

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- Acceptable methods for identifying Assistance Program (SNAP, TANF, FDPIR) or Head Start eligible students:
 - A household application including a case number for any household member.
 - A letter from an Assistance Program agency official or a letter from an Assistance Program agency provided to the household, which in turn, the household provides to the school.
 - A list of eligible children provide by local Assistance Program officials, including a signature and the date.
 - Completion of an application by a local school official with direct knowledge of the child's status
- Acceptable methods for identifying homeless, runaway, or migrant students:
 - A list of names of participating children;
 - The effective dates and the signature of a Homeless/ Runaway and Homeless Youth Act/ Migrant Education Program liaison; or
 - A letter from a Homeless/ Runaway and Homeless Youth Act/ Migrant Education Program liaison official or homeless liaison provided by the household to the school confirming the child currently participates in a aforementioned programs.
- Acceptable methods for identifying foster students:
 - An electronic or computer match provided directly to the LEA indicating the status of the child as a foster child without further application;
 - A letter from the State or local welfare agency or court confirming the child's status as a foster child;
 - Documentation from the welfare agency or court stating that the courts have taken legal custody of a child who has been placed in the foster care system;
 - A list of children in foster care from the welfare agency or court; or
 - An application that indicates the child's status as a foster child.
- Guidance on documenting Other Source Categorical Eligibility, including homeless students, may be found in the Eligibility Manual, here: <https://dese.mo.gov/sites/default/files/FNS-2017-2018EligibilityManualINSLPandSBP.pdf> on pages 38 - 41.



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200 Series: Verification

- The verification process confirms the benefits received by free and reduced students are correctly distributed by using a random sample school-wide.

200 Series: Verification

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201. Who serves as the SFA's confirming official? (Name and/or position, title, or software used is acceptable.)

- Corrective action will result if:
 - The SFA does not appoint three separate individuals to carry out the following titles and responsibilities:
 - **Determining Official:** Individual who reviews applications.
 - **Confirming (Verifying) Official:** Individual who confirms the original approval of benefits, made by the Determining Official, are correct during the Confirmation review. A Student Information System (SIS) may preform these duties with approval from the State Agency (SA).
 - **Hearing Official:** Individual (usually the Superintendent or Board member) who hears appeals.



- The confirming official must be an individual other than the determining official.
- The verifying official may be either the determining official, the confirming official, or another individual.
- The hearing official must be an individual who did not participate in making the decision that is under appeal, so the hearing official cannot also be the determining official, verifying official, or confirming official.



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200 Series: Verification

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To respond to this finding, the SFA must:

- Provide the names of the three individuals who will practice as the confirming, determining, and hearing officials.

- The SFA is also encouraged to take and provide a certificate upon completion of the E-Learning Module Serving with Success - Verification training found on the DESE website:
<https://dese.mo.gov/serving-success/meal-access-and-reimbursement/serving-success-verification>

Review Findings and Corrective Action Documents

Review ID:

Form: 200 - Verification

Question: 202
Who serves as the confirming official? (Name and/or position title or software used is acceptable)

Finding ID: V-0200
Verification requirements are not met.

Finding Description

Add Standard Comment:

Upon review, it was found that two individuals conduct the duties of the confirming, determining, and verifying officials. It is required that three separate individuals perform the duties of the confirming, determining, and verifying officials.

Required Corrective Action:

Add Standard Comment:

Please provide the names of the three individuals who will practice as the confirming, determining, and verifying officials.



200 Series: Verification

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203. Describe the SFA's verification process (including SFA's verification for cause process, deadlines, due dates, selection procedures, etc).

- Corrective action will result if:
 - The SFA has not kept documentation of verification for three years, plus the current school year.
 - The description the SFA has provided is not accurate or does not follow proper verification protocol.



200 Series: Verification

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If the SFA is not keeping verification documentation, the SFA must respond to this finding by:

- Provide a corrective action plan that includes the following information:
 - The individual(s) involved.
 - The correction date.
 - Provide written assurance that the SFA will keep verification documentation for three years, plus the current school year.
- The SFA is also encouraged to take and provide certification upon completion of the Verification e-learning module located on the DESE website, here:
<https://dese.mo.gov/serving-success/meal-access-and-reimbursement/serving-success-verification>.

If the description the SFA has provided is not accurate or does not follow proper verification protocol, the SFA must respond to this finding by:

- Provide a corrective action plan that includes the following information:
 - The individual(s) involved.
 - The correction date.
 - Provide a detailed description of the verification process that ensures that applications for verification will be selected randomly, that households will be notified in writing that they were selected for verification, that the verification process will be completed by November 15th, and that the verification report will be submitted by December 15th.



Example of Verification Process

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- On October 1st, the SFA counts the total number of approved applications on file and makes a random selection of the correct number of applications to be verified based on the appropriate sample size method. Applications in which the school has reason to verify for cause are also chosen to go through the verification process.
- The applications randomly selected for verification, and those verified for cause, undergo a confirmation review. The confirming (or verifying official) confirms the original approval of benefits, made by the determining official, are correct.
 - A Student Information System (SIS) may perform these duties with approval from the State Agency (SA).
- The SFA sends letters notifying the households that they have been selected for verification is mailed, along with the appropriate paperwork to complete and return to the school. Households are given a two week deadline to respond with income information.
 - If the SFA has not received income information after two weeks, households are sent a second notice letter requesting the information again, with another two week deadline. If households do not respond in the next two weeks, a personal phone call is made to the parent. If at the end of four weeks the SFA has not received the requested information, the students are changed from free/reduced to full paid. This change takes place 10 days from the date of the letter.
- On November 15th, the SFA completes verification.
 - The process of verification is complete when the last letter to the household is sent via mail concerning the conclusion of the process.
- On December 15th, the SFA submits the verification report.



200 Series: Verification

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211. Does the SFA's verification letter include all required information?

- Corrective action will result if:
 - The verification letter is not sent to the household(s) selected for verification.
 - The verification letter is missing required information.
 - The complete list of required information on the verification letter can be found in the Eligibility Manual for School Meals on pages 105-106.
 - <https://dese.mo.gov/sites/default/files/FNS-2017-2018EligibilityManualINSLPandSBP.pdf>



Letter to Households
Notification of Selection for Verification of Eligibility

(Information follows to the reverse side.)

[Date]

[student name], [school name]

Dear [parent/guardian name]:

This letter requires that you send information or contact [school official name] by [date].

Your child's application has been selected as part of a review to make sure only eligible students receive free or reduced price meal benefits.

You must send: (1) papers that show you receive, or received at any point in time between the month prior to application and the date above, Food Stamps or Temporary Assistance for your child or (2) papers that show your household's income from any point in time between the month prior to application and the time income documentation is required.

We have enclosed information that shows the kinds of papers that you may use to prove that you receive(d) Food Stamps or Temporary Assistance for your child or to show your household's income. If possible, do not send original papers. If you do send original documents, they will be sent back to you only if you ask.

The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children's eligibility for free or reduced price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced price meals.

If you do not send information that proves your child is eligible to receive free or reduced price meal benefits by [the date above], these meal benefits will be stopped.

If you have any questions, or if you need any help, please call [school official name and phone number].

If you do not hear from us by [date], free or reduced price meals will continue without change.

Thank you for your cooperation in this matter.

Sincerely,

[signature of school official]

Enclosure (Verification Information for Free and Reduced Price Meals)

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

200 Series: Verification

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If the SFA has is not sending a verification letter to selected households or the letter is missing required information, the SFA must respond to this finding by:

1. Providing the date that the finding was brought into compliance or the planned date of completion.
2. Providing the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
3. Providing a statement of understanding that the SFA must send out a written verification letter, and that the SFA's verification notification letter must include the information outlined in the Eligibility Manual for School Meals.
4. Providing a copy of a written verification letter which includes the information outlined in the Eligibility Manual for School Meals.



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300 Series: Meal Counting and Claiming

- Monitoring Meal Counting and Claiming ensures the SFA is submitting an accurate monthly claim by accurately counting free, reduced, and full priced reimbursable meals.

300 Series: Meal Counting and Claiming

27

305 m. What are the SFA's meal counting and claiming policies and procedures for the Local Charge Policy and Unpaid Meal Policy?

- Corrective action will result if:
 - The Local Education Agency (LEA) does not have a Local/Unpaid Meal Charge Policy on file; or
 - The LEA's Local/Unpaid Meal Charge Policy does not include the USDA non-discrimination statement; and/or
 - The LEA does not distribute the Local/Unpaid Meal Charge Policy in writing to households.



300 Series: Meal Counting and Claiming

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If the LEA does not have a Local/Unpaid Meal Charge Policy, the SFA must respond to this finding by:

1. Uploading the LEA's Local Meal Charge Policy.
2. Providing assurance that the LEA's Local Meal Charge Policy was communicated to all households in writing.
3. Stating when the finding was brought into compliance.
4. Providing the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.

If the LEA's Local/Unpaid Meal Charge Policy does not include the USDA non-discrimination statement, the SFA must respond to this finding by:

1. Uploading the updated LEA's Local Meal Charge Policy.
2. Stating when the finding was brought into compliance.
3. Providing the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.



300 Series: Meal Counting and Claiming

29

If the LEA does not distribute the Local/Unpaid Meal Charge Policy in writing to households, the SFA must respond to this finding by:

1. Stating the method of delivering the Local Meal Charge Policy in writing to households,
2. Stating when the finding was brought into compliance or planned date of completion, and
3. Providing the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.



300 Series: Meal Counting and Claiming

30

306. What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?

- Corrective action will result if:
 - The SFA is not completing edit checks regularly before their monthly claim submission



300 Series: Meal Counting and Claiming

31

To respond to this finding, the SFA must:

1. Describe the process adopted to complete daily edit checks.
2. State when the finding was brought into compliance or planned date of completion.
3. State the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.

Review Findings and Corrective Action Documents

Review ID:

Form: 300 - Meal Counting and Claiming

Question: 306
What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?

Finding ID: V-0300
Meal Counting and Claiming requirements are not met.

Finding Description

Add Standard Comment:

The School Food Authority (SFA) is not completing edit checks to ensure meal counts do not exceed enrollment or attendance adjusted enrollment.

Required Corrective Action:

Add Standard Comment:

To correct this finding please describe the process adopted to complete daily edit checks, state when the finding was brought into compliance or planned date of completion, and state the names(s) and title(s) of the persons responsible at the SFA for ensuring compliance.



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400 Series: Meal Components and Quantities

- Monitoring meal components and quantities ensures the SFA is serving reimbursable meals with all components are correct quantities for each grade group for the NSLP and SBP.

400 Series: Meal Components and Quantities

33

404a. Is there signage explaining what constitutes a reimbursable breakfast/lunch to students for all applicable age groups?

- Corrective action will result if:
 - The SFA has not displayed signage indicating what constitutes as a reimbursable meal



400 Series: Meal Components and Quantities

34

To respond to this finding for lunch, the SFA must:

1. Submit written assurance that signage will be displayed, indicating what constitutes a reimbursable meal to students.
2. Include a photocopy of the signage that will be displayed in the meal service area.



400 Series: Meal Components and Quantities

35

To respond to this finding for breakfast, the SFA must:

1. Submit written assurance that signage will be displayed, indicating what constitutes a reimbursable meal to students.
2. Include a photocopy of the signage that will be displayed in the meal service area.



400 Series: Meal Components and Quantities

36

410a. Do planned menu quantities meet meal pattern requirements for the review period of breakfast/ lunch?

- Corrective action will result if:
 - The planned menu for the week of review did not meet the minimum meal pattern requirements.



400 Series: Meal Components and Quantities

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Meal Pattern	Breakfast Meal Pattern			Lunch Meal Pattern		
	Grades K-5	Grades 6-8	Grades 9-12	Grades K-5	Grades 6-8	Grades 9-12
Amount of Food Per Week (Minimum Per Day)						
Fruit (cups)	5 (1)	5 (1)	5 (1)	2 1/2 (1/2)	2 1/2 (1/2)	5 (1)
Vegetables (cups)	0	0	0	3 3/4 (3/4)	3 3/4 (3/4)	5 (1)
Dark Green	0	0	0	1/2	1/2	1/2
Red/Orange	0	0	0	3/4	3/4	1 1/4
Bean/Peas/Legumes	0	0	0	1/2	1/2	1/2
Starchy	0	0	0	1/2	1/2	1/2
Other	0	0	0	1/2	1/2	3/4
Additional Vegetables to Reach Total	0	0	0	1	1	1 1/2
Grains (oz eq)	7-10 (1)	8-10 (1)	9-10 (1)	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alternates (oz eq)	0	0	0	8-10 (1)	9-10 (1)	10-12 (2)
Fluid Milk (cups)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amounts Based on the Average for a 5-Day Week						
Min-Max Calories (kcal)	350-500	400-550	450-600	550-650	600-700	750-850
Saturated Fat (% of total calories)	<10	<10	<10	<10	<10	<10
Sodium Target 2 (mg)	≤485	≤535	≤570	≤935	≤1,035	≤1,080
Trans fats	Nutrition label or manufacturer specifications must indicate zero grams of trans fat					

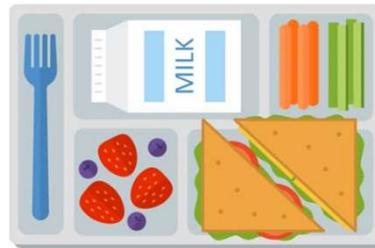


400 Series: Meal Components and Quantities

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4-day School Week- Lunch	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)
Fruits (cups)	2 (0.5)	2 (0.5)	4 (1)
Vegetables (cups)	3 (0.75)	3 (0.75)	4 (1)
Dark Green	0.5	0.5	0.5
Red/Orange	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5
Starchy	0.5	0.5	0.5
Other	0.5	0.5	0.75
Additional Veg to Reach Total	0.25	0.25	0.5
Grains (oz eq)	6.5 (1)	6.5 (1)	8 (2)
Meats/Meat Alts (oz eq)	6.5 (1)	7 (1)	8 (2)
Fluid Milk (cups)	4 (1)	4 (1)	4 (1)

4-day School Week- Breakfast	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)
Fruits (cups)	4 (1)	4 (1)	4 (1)
Grains (oz eq)	5.5 (1)	6.5 (1)	7 (1)
Fluid Milk (cups)	4 (1)	4 (1)	4 (1)

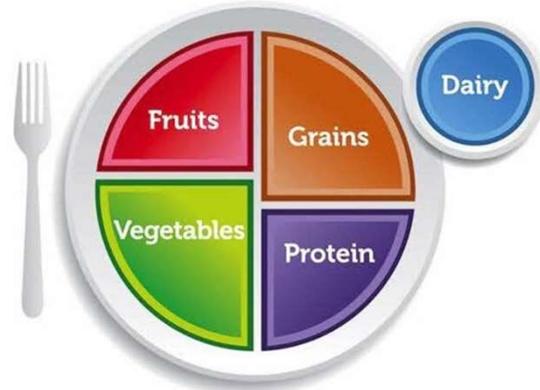


400 Series: Meal Components and Quantities

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To respond to this finding, the SFA must:

1. Submit written assurance that the minimum component requirements will be met.
2. As proof of compliance, submit a planned menu with production records that indicates that meal pattern requirements will be met.
3. In addition, please view the Serving with Success e-Learning Module – Meal Components and Quantities (Breakfast/Lunch) in order to obtain training on the meal pattern requirements, and attach the certificate to the finding.
 - Breakfast: <https://dese.mo.gov/serving-success/nutritional-quality-and-meal-pattern/serving-success-meal-components-and-0>
 - Lunch: <https://dese.mo.gov/serving-success/nutritional-quality-and-meal-pattern/serving-success-meal-components-and-quantities>



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500 Series: Offer vs. Serve

- Offer vs. Serve allows students to decline unwanted items.
- If the student declines an item, the price of the reimbursable meal stays the same.
- The full amount of each component must be available for each student.
- **Mandatory** for grades 9-12 in NSLP.
- **Optional** for grades K-8 in NSLP and grades K-12 in SBP.

500 Series: Offer vs. Serve

41

502. Is there signage explaining what constitutes as a reimbursable meal to students including the requirement to select at least ½ cup fruit or vegetable?

- Corrective action will result if:
 - The SFA does not have Offer vs. Serve Signage.
 - The Offer vs. Serve signage is missing the requirement to select at least ½ cup of fruit or vegetable.



500 Series: Offer vs. Serve

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The 5 Components of a School Lunch



Offer Vs. Serve

Choose **1/2 cup fruit**,
or **1/2 cup vegetable**,
or **1/2 cup combination**,
and **at least 2 other**
components. Choose all 5 for the best nutrition!

This institution is an equal opportunity provider.

What Makes a School Breakfast



Offer Vs. Serve

Choose at least 3 items
from the four offered,
One must be a 1/2 cup
of **fruit (or vegetable)**.

The fourth
item offered
may be another
grain, another
fruit or veggie,
or a meat or
meat alternate.

This institution is an equal opportunity provider.



500 Series: Offer vs. Serve

43

To respond to this finding, the SFA must:

1. Post signage for what constitutes a reimbursable meal under Offer vs. Serve.
2. Upload a photo to demonstrate compliance.



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700 Series: Maintenance of the Nonprofit School Food Service Account

- ❑ Risk assessment for Resource Management covers program compliance of the maintenance of the Nonprofit School Food Service Account to ensure funds are used to improve the food service program.

700 Series: Maintenance of the Nonprofit School Food Service Account

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705. Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account?

- Corrective action will result if:
 - The SFA does not have procedures in place for bad or delinquent debt in the nonprofit school food service account.



700 Series: Maintenance of the Nonprofit School Food Service Account

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To respond to this finding, the SFA must:

- Provide the procedures that will be put in place to assure that general school funds will be transferred into the food service account to pay for any meal balances written off as bad debt.
- Please note that bad or delinquent debt is allowed to remain in the non-profit school food service account. Any unpaid meal balances determined to be uncollectible should be written off as bad debt and repaid to the food service account from nonfederal sources. Bad debt is not an allowable cost to the food service account.



700 Series: Maintenance of the Nonprofit School Food Service Account

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711. If the SFA charged for adult meals, were the meal prices sufficient to cover the overall cost of the meals in compliance with FNS instruction 782-5, Rev. 1?

- Corrective action will result if:
 - The SFA priced adult lunches below the requirement outlined in FNS instruction 782-5.



700 Series: Maintenance of the Nonprofit School Food Service Account

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To respond to this finding, the SFA must:

1. Decide whether adults cover the difference by increasing the adult lunch price, or the SFA may make a transfer of nonfederal funds to cover the difference.
 2. Provide proof of increased prices (board minutes are sufficient) or a transfer of nonfederal funds (school board or school official approval or a general ledger showing a movement of funds is sufficient) to cover the difference for each adult lunch served during the school year.
 3. Report the adjustment to balance if a transfer is made with an explanation in the comments section on the financial report.
- Pricing LEAs may use the following formulas to calculate adult lunch prices:
 - Highest paid student lunch price (in compliance with the Paid Lunch Equity tool)
 - + Value of donated foods
 - + Paid lunch reimbursement;
 - Actual meal cost (including food, labor, supplies, etc.)
 - + Value of donated foods;
 - Free Student Reimbursement
 - + Value of donated foods; or
 - If the LEA has a fixed price contract with a Food Service Management Company (FSMC) and is credited back the full value of donated foods (including adult meals), then the LEA can charge the fixed price adult lunch amount.



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- Assessment of the Civil Rights series is to ensure the SFA is in compliance with the Child Nutrition Programs requirements.
- This is a general area of monitoring, and fiscal action is not applicable.
- The SFA is required to complete Civil Rights training annually, found here: <https://dese.mo.gov/sites/default/files/FNS-CivilRightsPresentation.pdf>

<h2>800 Series: Civil Rights</h2>	
50	
<p>801. Did the SFA publish a public release as required for the school year being reviewed?</p>	
<ul style="list-style-type: none">□ Corrective action will result if:<ul style="list-style-type: none">■ The SFA did not publish a public release.■ The public release published is not for the school year being reviewed.■ The public release was not published publicly.■ The public release is missing required information.	
	

800 Series: Civil Rights

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- The SFA must publish a public release annually, which provides information on free and reduced meals.
- The public release should be provided to the local news media, on the district website, or in other publicly viewed areas.
- A template public release is available on the DESE FNS website, here:
<https://dese.mo.gov/sites/default/files/FNS-AttachmentF-PublicRelease.doc>
- The public release must include the following information:
 - Free and reduced price Income Eligibility Guidelines
 - Once known to the LEA, households will be notified of student's eligibility for free meals for households receiving the following assistance:
 - SNAP, FDIPIR, TANF
 - Any child's eligibility for free meals based as Other Source Categorically eligible (ie. homeless, foster, migrant)
 - No further application is required for free meal benefits, if the household was notified by the LEA that all students in the household were directly certified.
 - A student in the household receiving benefits from an Assistance Program (SNAP, FDIPIR, TANF) extends free benefits to other students in the household.



PUBLIC RELEASE

Attachment F

[Date]

[Local Education Agency] announced its revised free and reduced price policy for school children unable to pay the full price of meals served in schools under the National School Lunch Program and the School Breakfast Program.

Local education officials have adopted the following family-size income criteria for determining eligibility:

Household Size	Maximum Household Income Eligible for Free Meals			Maximum Household Income Eligible for Reduced Price Meals		
	Annually	Monthly	Weekly	Annually	Monthly	Weekly
1	\$16,598	\$1,383	\$319	\$23,606	\$1,968	\$454
2	22,412	1,868	431	31,894	2,658	614
3	28,236	2,353	543	40,182	3,349	773
4	34,060	2,839	655	48,470	4,040	933
5	39,884	3,324	767	56,758	4,730	1,092
6	45,708	3,809	879	65,046	5,421	1,251
7	51,532	4,295	991	73,334	6,112	1,411
8	57,356	4,780	1,103	81,622	6,802	1,570
Each add'l member	+5,824	+486	+112	+8,288	+691	+160

Children from families whose current income is at or below those shown are eligible for free or reduced price meals. Applications are available at the school office. To apply, fill out a Free and Reduced Price School Meals Family Application and return it to the school. The information provided on the application is confidential and will be used only for the purpose of determining eligibility. Applications may be submitted any time during the school year. A complete application is required as a condition of eligibility. A complete application includes: (1) household income from all sources or Food Stamp/TANF case number, (2) names of all household members, and (3) the signature and last four digits of social security number or indication of no social security number of adult household member signing the application. School officials may verify current income at any time during the school year.

Foster children may be eligible regardless of the income of the household with whom they reside.

If a family member becomes unemployed or if family size changes, the family should contact the school to file a new application. Such changes may make the children of the family eligible for these benefits.

Households will be notified of their children's eligibility status for free or reduced price meals. If any children were not listed on the eligibility notice for families receiving SNAP, TANF or FDIPIR, the household should contact the school to have free meal benefits extended to those children.

If any child(ren) was not listed on the eligibility notice, the household should contact the LEA or school to have free meal benefits extended to that child(ren).

Under the provisions of the policy, the [Title of Determining Official] will review the applications and determine eligibility. If a parent is dissatisfied with the ruling of the determining official, they may wish to discuss the decision with the hearing official on an informal basis or he/she may make a request either orally or in writing to the [Title of Hearing Official].

Hearing procedures are outlined in the policy. A complete copy of the policy is on file in each school and in the central office where any interested party may review it.

(Information follows on the reverse side.)

Attachment F (Continued)

USDA Non-discrimination Statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (AD-3027) found online at http://www.ascr.usda.gov/complaint_filing_cust.html and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

800 Series: Civil Rights

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To respond to this finding, the SFA must:

- Provide a corrective action plan including the person in charge of uploading the most current public release form to a public venue (ie. district website, community center, local newspaper) and the date the most current public release will be posted.
- Upload documentation that shows requirements have been met.
 - District website address with directions on where to find the public release.
 - Invoice from the local newspaper.
 - Picture of public release posted in a public venue.



800 Series: Civil Rights

54

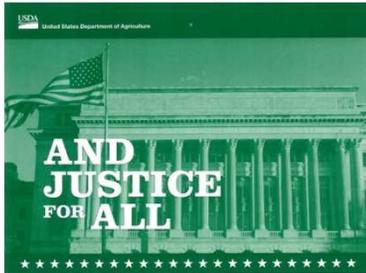
811. Is the USDA *And Justice for All* poster displayed in a prominent location and visible to recipients of benefits?

- Corrective action will result if:
 - The correct poster is not present in a publicly visible place in the meal service area.
 - The poster has been reproduced in the wrong size.



800 Series: Civil Rights

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U.S. Department of Agriculture

AND JUSTICE FOR ALL

In accordance with Federal and state U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, disability, and marital or marital status in any of its programs, activities, or services. This prohibition includes the provision of services to individuals with disabilities. For more information, contact the USDA National Center for Food Safety and Inspection Service at (800) 795-5869 or contact USDA through the Federal Relay Service at (800) 877-8339.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, accessible and automatic telephone dialing) should contact the responsible State or local Agency that administers the program in USDA National Center for Food Safety and Inspection Service at (800) 795-5869 or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form, which can be obtained online at www.usda.gov/oc/3027, from any USDA office, by calling (800) 877-8339, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a brief description of the alleged discriminatory action in sufficient detail to allow the Assistant Secretary for Civil Rights to locate the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

email: program.discrimination@usda.gov
 U.S. Department of Agriculture
 Office of the Assistant Secretary for Civil Rights
 1400 Independence Avenue, SW
 Washington, D.C. 20250-9410, or
 fax: (800) 284-1868 or (202) 690-7442.

This institution is an equal opportunity provider.

- ❑ New *And Justice for All* poster
- ❑ *And Justice for All* posters must be 11" wide x 17" height
- ❑ Posted publicly in the meal service area
 - Ex. Next to the cashier, at the beginning of the serving line, over the milk cooler, or entrance to cafeteria.
 - It's not required to have a poster for each Breakfast in the Classroom site.



800 Series: Civil Rights

56

If the SFA does not have the correct *And Justice For All* poster, the SFA must respond to this finding by:

- ❑ Obtaining the correct poster.
- ❑ Providing a picture showing the poster is in a publicly visible place in the meal service area.



900 Series: SFA On Site Monitoring

59

To respond to this finding, the SFA must:

1. Provide a corrective action plan including the person in charge of completing the On Site Monitoring form, and written assurance that this is completed each year by February 1st moving forward.
2. Complete the On Site Monitoring form and upload for compliance.

ON-SITE SCHOOL REVIEW MEAL COUNTING AND CLAIMING SYSTEM AND READILY OBSERVABLE GENERAL AREAS

Every school year, prior to February 1, each Local Education Agency (LEA) with more than one school must conduct at least one on-site review of the meal counting and claiming system and readily observable general areas of review. Although LEAs with only one school are not required to conduct on-site reviews, United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) highly encourages those LEAs to conduct a self-assessment in the form of an on-site review to ensure integrity and accountability of the Programs.

This must be completed in each school operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP). Each school operating the SBP must be reviewed at least once every two years.

LEA _____ School _____

LEA Reviewer _____ Date of Review _____

MEAL COUNTING AND CLAIMING SYSTEM	Breakfast			Lunch			Comments
	Yes	No	N/A	Yes	No	N/A	
1. Is the method used for counting reimbursable meals in compliance with the approved point of service (POS) requirement? (Meal counts must be taken at the location(s) where complete meals are served to students.)	<input type="checkbox"/>						
2. Is the point of service meal count used to determine the school's claim for reimbursement?	<input type="checkbox"/>						
3. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?	<input type="checkbox"/>						
4. Does the person responsible for monitoring and counting meals know policies for handling the following:							
a. Incomplete meals?	<input type="checkbox"/>						
b. Second Meals?	<input type="checkbox"/>						
c. Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?	<input type="checkbox"/>						
d. Visiting student meals?	<input type="checkbox"/>						
e. Adult and non-student meals?	<input type="checkbox"/>						



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1000 Series: Local School Wellness Policy

- ❑ The SFA must have a Local School Wellness Policy and committee.
- ❑ The following will be reviewed to assess compliance with policy requirements:
 - ❑ A copy of the current Local School Wellness Policy
 - ❑ Documentation demonstrating the local school wellness policy has been made available to the public
 - ❑ Documentation of review and revision of the policy
 - ❑ Committee members
 - ❑ How stakeholders are notified of their ability to participate in the policy
 - ❑ A copy of the most recent triennial assessment

1000 Series: Local School Wellness Policy

61

1000. Provide a copy of the current Local School Wellness Policy. Are the minimum required elements written into the Local School Wellness Policy?

Corrective action will result if:

- The minimum required elements of the Local School Wellness Policy are missing.



1000 Series: Local School Wellness Policy

62

The Local School Wellness Policy must include:

- Goals for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness.
 - Examples of other school-based activities, may include (but are not limited to) improving the dining environment, giving students more time to consume their meals, and/or ensuring food is not used as a reward.
- Nutrition guidelines for all foods available on the school campus.
- A plan for measuring local school wellness policy implementation.
- Designation of one or more officials in charge of the local school wellness policy.
- Standards for all foods and beverages provided, but not sold, to students during the school day
 - E.g. classroom parties, classroom snacks brought by parents, other foods given as incentives.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
 - Grandfathered scoreboards, coolers, vending machines, etc., must have been purchased prior to June 30, 2017).



1000 Series: Local School Wellness Policy

65

- To respond to this finding, the SFA must:
 - Establish a wellness committee with the following individuals that must be permitted to contribute to the development, implementation, periodic review, and update of the local school wellness policy:
 - Parents and guardians, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public.
 - Provide individuals' names and their relationship to the school district.



1000 Series: Local School Wellness Policy

66

1002. When and how does the review and update of the Local School Wellness Policy occur?

Corrective action will result if:

- The triennial assessment of the Local School Wellness Policy has not been completed by June 30, 2020.



School Wellness Policy Building Annual Progress Report

School Name: _____ **Wellness Contact Name/E-mail:** _____

This tool is to document each school's progress in meeting the expectations of the district's wellness policy. Schools should document the steps that have or will be taken. The items that are completed at the district level should be pre-filled to inform all school staff of the implementation status of all goals.

Wellness Policy Language <i>(add more lines for goals as needed and change goal titles based on local policy language)</i>	Fully in Place	Partially in Place	Not in Place	List steps that have been taken to implement goal and list challenges and/or barriers of implementation.	List next steps that will be taken to fully implement and/or expand on goal.
Nutrition Education and Promotion Goals					
1. EXAMPLE: Nutrition education is offered at each grade level as part of a sequential, comprehensive, standards-based program designed to provide students with the knowledge and skills necessary to promote and protect their health.	X			Nutrition education is part of the science curriculum in each grade level.	Explore additional lessons and activities that incorporate nutrition education into math, reading and social studies.
2.					
3.					
4.					
Physical Education and Physical Activity Goals					
1.					
2.					
3.					
4.					
Nutrition Guidelines for All Foods Available to Students					
1.					
2.					
3.					
4.					
Other School Based Activities Goals					
<i>Integrating Physical Activity into the Classroom Settings</i>					
1.					
2.					
3.					
4.					
Communication with Parents					
1.					
2.					
3.					
4.					
Food Marketing in Schools					
1.					
2.					
3.					
Staff Wellness					
1.					
2.					

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1000 Series: Local School Wellness Policy

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To respond to this finding, the SFA must:

1. Provide a corrective action plan, including the names of individuals and their relationship to the policy that will ensure an assessment of the Local School Wellness Policy will be conducted at least every three years.
2. Conduct an assessment to determine compliance, progress, and to update and modify if necessary.
3. Upload the assessment.

1000 Series: Local School Wellness Policy

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COVID-19 Update:

- ☼ On April 23, 2020, the USDA awarded a nationwide waiver of Local School Wellness Policy Triennial Assessments.
- ☼ Under this waiver, FNS provides a new first triennial assessment deadline of June 30, 2021 instead of June 30, 2020.
- ☼ If the SFA has chosen to participate in this waiver to extend the triennial assessment due date to June 30 2021, then the waiver will be reviewed in its place during the Administrative Review.
- ☼ Please submit the following information via email to your regional Nutrition Program Specialist to participate in this waiver:
 - ☼ LEA Name
 - ☼ Agreement Number
 - ☼ Anticipated Completion Date of Local Wellness Policy Assessment
 - ☼ LWP Contact, email or phone
 - ☼ A description of how this waiver improved services to program participants



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1100 Series: Smart Snacks

- ☐ Foods and beverages sold to students during the school day (defined as 12am on a day of instruction to 30 minutes after the end of the official school day), including a la carte foods and beverages sold during meal services, must meet Smart Snack standards.
- ☐ The SFA may check items for Smart Snack compliance using the Smart Snack Calculator, found here:
<https://foodplanner.healthiergeneration.org/calculator/>

1100 Series: Smart Snacks

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1106. Does the school hold fundraisers during the school day where students may purchase food or beverages?

Corrective action will result if:

- The SFA is not tracking exempt food fund raisers and may or may not be in compliance with the Missouri limit of 5 one day food related fund raisers per year per building.
- The SFA is not following guidelines of 5 one day food related fundraisers per year per building or 5 consecutive days in a row.



1100 Series: Smart Snacks

72

Exempt Fundraiser Tracking Sheet Guidelines:

- Food and beverages are not Smart Snack compliant.
- Minimum of 5 fundraisers annually per building.
- Each exempt fundraiser may only last for one day.
- The SFA must keep documentation of the tracking sheet for three years, plus the current school year.

Exempt Fundraiser Tracking Sheet

School Name	Building Name
<small>The Healthy Hunger-Free Kids Act of 2010 directed the United States Department of Agriculture (USDA) to establish nutrition standards for all foods and beverages sold to students, in school during the school day, including foods sold through school fundraisers. The standards provide a special exemption for infrequent fundraisers that do not meet the nutrition standards. A maximum of five exempt fundraisers, per school building, per school year, with a duration of one day, will be allowed for schools participating in the National School Lunch Program in Missouri.</small>	
Exempt Fundraiser #1	Date:
Organization Name:	
Description of Event and Products Sold?	
Exempt Fundraiser #2	Date:
Organization Name:	
Description of Event and Products Sold?	
Exempt Fundraiser #3	Date:
Organization Name:	
Description of Event and Products Sold?	
Exempt Fundraiser #4	Date:
Organization Name:	
Description of Event and Products Sold?	
Exempt Fundraiser #5	Date:
Organization Name:	
Description of Event and Products Sold?	

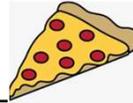


1100 Series: Smart Snacks

73

If the SFA is not tracking their Exempt Fundraisers, the SFA must respond to this finding by:

1. Providing the date that the finding was brought to compliance or the planned date of completion.
2. Providing a written statement that the SFA will track fundraisers and will not exceed the state defined limit on fundraisers.



If the SFA is not following Exempt Fundraiser guidelines, the SFA must respond to this finding by:

1. Providing the date that the finding was brought to compliance or the planned date of completion.
2. Providing a written statement that the LEA will start following USDA Smart Snack Standard guidelines, only hold fundraisers for one day, five annually per building, or hold one fundraiser for 5 consecutive days in a row.

74

1200 Series: Professional Standards

- The SFA records of annual training completed by the food service directors, managers, and staff will be reviewed.
 - Appropriate training documentation:
 - Certificates
 - Sign-in sheets
 - Training tracker
 - Training must be completed by the end of the school year.
 - Training must be job-specific.
 - Training can be completed online (webinars, PowerPoints), or in person (workshops, meetings, conferences).
 - Training documentation must be kept for three years, plus the current school year.

1200 Series: Professional Standards

75

Annual Training Hourly Requirements:

- Food Service Directors - 12 hours
 - Food Service Directors hired after July 1, 2015 must have completed 8 hours of food safety training either 5 years before their start date, or within 30 days of the employees start date.
 - If the SFA does not have a director, the manager must complete 12 hours.
- Food Service Managers - 10 hours
- Full time staff (>20 hours per week) - 6 hours
- Part time staff (<20 hours per week) - 4 hours
- Non-nutrition program staff involved in Child Nutrition programs - 4 hours
- **Training is provided by DESE in person and online through Summer Workshops**
 - <https://dese.mo.gov/financial-admin-services/food-nutrition-services/newsletters-webinars-workshops>
- **Training is provided by DESE online through e-Learning Modules – Serving with Success**
 - <https://dese.mo.gov/financial-admin-services/food-nutrition-services/serving-success>
- **The DESE e-Learning Module CEU breakdown**
 - <https://dese.mo.gov/sites/default/files/ModelCurr/FNS-SERVINGWITHSUCCESSTRAININGMODULESCEU.pdf>
- **Professional Standards Training Topics with Codes**
 - https://dese.mo.gov/sites/default/files/ps_learningtopics.pdf
- **Food Safety Training**
 - Serve Safe: <https://www.servsafe.com/>
 - ICN Food Safety: <https://theicn.docebosaas.com/learn/course/external/view/elearning/21/FoodSafetyinSchools>



1200 Series: Professional Standards

76

1217a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked (i.e. entered into a tracking mechanism).

Corrective action will result if:

- The SFA is not tracking School Nutrition Program staff training hours and has no formal tracking mechanism for professional standards.
- The SFA's training tracker is missing the following required information:
 - Each employee's name, hiring date, position, required hours of training, training title/subject, training date, creditable time, school year training applied to, and completed training hours year to date.



1400 Series: Food Safety

79



COVID-19 Update:

- DESE – Food and Nutrition Services realizes that food safety in meal service and preparation areas have been heightened due to the COVID-19 outbreak.
- Now, more than ever, School Food Authorities (SFAs) need food safety protocols to keep our students and communities safe and healthy.
- We encourage SFAs to contact their local health departments for localized and specific meal preparation, food safety, and meal service area procedures.



Training for COVID-19 Food Handlers

<https://www.servsafe.com/Landing-Pages/Free-Courses>



Approved Disinfectants for Use Against COVID-19

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>



Community Safety and COVID-19 FAQ

https://www.cdc.gov/coronavirus/2019-ncov/faq.html#anchor_1584387482747



Lunch Assist

<http://www.lunchassist.org/covid-19.html>



COVID-19 Thought Starters for Reopening Schools for SY 2020-21

https://schoolnutrition.org/uploadedFiles/11COVID-19/3_Webinar_Series_and_Other_Resources/COVID-19-Thought-Starters-on-Reopening-Schools-for-SY2020-21.pdf



More resources can be found under the “Useful Links” tab on the DESE Safety Resources During COVID-19

<https://dese.mo.gov/financial-admin-services/food-nutrition-services/seamless-summer-option-meals-and-safety-resources>



1400 Series: Food Safety

80

1403a. Did a review of agricultural food components indicate violations of the Buy American provision (7 CFR 210.21(d)) either during review of products on-site at reviewed schools or at off-site storage facilities as applicable?

Corrective action will result if:

- The SFA does not have documentation for the Buy American exception.
- The SFA has documentation for the Buy American exception, but an item found on site has not yet been documented.



1400 Series: Food Safety

81

- SFAs are required to purchase, to the maximum extent practicable, food that is produced and processed in the US.
- Limited exceptions are allowable, but SFAs must keep documentation justifying the exceptions.
- Exceptions could include limited availability or significant price differences.
- A worksheet to document the exceptions is available on the DESE FNS website:
<https://dese.mo.gov/sites/default/files/FNS-BuyAmericanProvisionReferenceWorksheet.docx>

Buy American Documentation Worksheet:

If using one of the exceptions, the LEA must keep back-up documentation justifying the use of the exceptions. The LEA may also utilize this worksheet to indicate the exception used, however the LEA must still keep the back-up documentation for compliance with the Buy American Provision. The LEA must not automatically allow an exception just because the domestic product is not available. If the LEA is using one of the exceptions, there is no requirement to request a waiver or approval from the State Agency in order to purchase a non-domestic product.

Exceptions include:

1. The product is not produced or manufactures in the U.S in sufficient and reasonable available quantities of a satisfactory quality; or
2. Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

Sample 1

Date	Food Item Description	Country of Origin	Justification (justification for use of non-domestic product)
8/15/18 to 5/24/18	Oranges	Brazil	California weather conditions have impacted ability to get domestically grown oranges. Contacted three vendors and no product is available. Will serve non-domestic oranges during the dates indicates as planned on the menu and continue to search for a domestic alternative.

1400 Series: Food Safety

82

To respond to this finding, the SFA must:

1. Provide documentation of a Buy American Documentation tracking sheet that includes: date(s), description(s) of item(s), country of origin, and reason(s) for purchase for the items not produced or manufactured in the USA.



1400 Series: Food Safety

83

1406. Is the most recent food safety inspection report posted in a publicly visible location?

Corrective action will result if:

- The most recent health inspection was not publicly visible to program participants in the meal service area.



1400 Series: Food Safety

84

To respond to this finding, the SFA must:

1. Provide a photo showing the inspection has been posted publicly.





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Contact Us

FoodandNutritionServices@dese.mo.gov

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