

# Administrative Review Report

St. Joseph Academy, Inc.

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	12/10/2019	02/13/2020
On-Site Review	02/25/2020	02/26/2020
Site Selection Worksheet	12/10/2019	12/10/2019
Entrance Conference	02/25/2020	02/25/2020
Exit Conference	02/26/2020	02/26/2020

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

### General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.usda.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.usda.gov/healthierschoolday).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

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Thank you to the staff at St. Joseph Academy for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive and open to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questionnaire and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the staff for their willingness to make changes to meet school nutrition program regulations. The DPI review team is confident that the staff at the academy will continue to improve their knowledge and operation of child nutrition programs.

## **From the Public Health Nutritionist:**

Thank you to the Food Service Director for their organization and communication prior to the onsite review. The completeness of the submitted materials helped expedite the Administrative Review process and allows more time to be spent on technical assistance.

The Food Service Director attends SNSDC on a regular basis and it shows; the planned menu meets meal pattern and the Public Health Nutritionist found no errors during the week of review.

The time spent with kitchen staff during the distribution of the Fresh Fruit and Vegetable (FFVP) snack was a wonderful experience; staff at St. Joseph Academy take great pride in the variety of foods they serve to their students. Previous FFVP selections include green onion, cabbage, quince, and grapefruit.

Thank you again to the FSD and all staff for their time and efforts; your work results in a positive environment for the students at St. Joseph Academy.

## **Recommendations:**

When reviewing the production records, it is noted that the portion sizes for fruits and vegetables are at times listed in ounces, instead of cups. Both the fruit and vegetable component should be recorded and measured in volume, not weight. One finding from the Public Health Nutritionist will be found later in this report regarding this common issue. It is recommended to utilize the Food Buying Guide when determining portion sizes of fresh fruits and vegetables; the 2-hour course at School Nutrition Skills Development Courses (SNSDC) this summer entitled "Crediting Using the Food Buying Guide" will assist the menu planner in mastering this aspect of food production.

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## Findings and Corrective Action:

Site Name		
Form Name	Revenue From Non-Program Foods (709 - 711)	
Question #	710	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/25/2020 12:54 PM	<b>Finding:</b> SFA is not tracking non-program foods revenue and expenditures. All cold lunch milks are considered non-program foods and must have the full cost covered by funds other than the nonprofit school food service account. <b>CA: Provide a plan</b> on how non-program food (cold lunch milk) expenditures will be tracked and reimbursed to the nonprofit school food service account moving forward.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/19/2020 09:10 AM	<b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). <b>CA: Provide a timeline</b> for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/19/2020 09:04 AM	<b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content (missing clear definition of the policy leadership) (7 CFR 210.31). <b>CA: Submit a timeline</b> for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
Site Name		
Form Name	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)	
Question #	1601	
TA Log #	TA Log# exists	

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Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 02/25/2020 05:27 PM</p> <p><b>Finding:</b> The SFA did not adequately inform households about the availability and location of free meals for students via the Summer Food Service Program (SFSP). <b>CA: Provide a statement</b> describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
Site Name	
Form Name	Civil Rights (809 - 810)
Question #	810
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 02/19/2020 10:11 AM</p> <p><b>Finding:</b> The full USDA non-discrimination statement is not included on all required program materials (missing from website regarding School Meal Information and from meal information in the Parent Handbook). <b>CA: Provide a timeline</b> for adding the non-discrimination statement to required program materials.</p>
Site Name	
Form Name	Professional Standards (1210 - 1219)
Question #	1217
TA Log #	No TA Log# found
Due Date	
Corrective Action Status	Flagged
Corrective Action History	<p>Flagged 02/20/2020 02:54 PM</p> <p><b>Finding:</b> Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. <b>CA: Include all training hours completed</b> this school year for each school food service employee <b>onto the USDA or DPI professional standards training tracking tool and upload</b> into SNACS.</p>
Site Name	St Joseph Academy
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	318
TA Log #	TA Log# exists
Due Date	
Corrective Action Status	Flagged

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Corrective Action History	Flagged 02/25/2020 04:50 PM	<p><b>Finding:</b> The meal counting and claiming system - Point of Service - results in the potential for inaccurate meal counts (7 CFR 210.7). School is using student rosters and marking each student as s/he passes checker. Students rush past POS, do not identify themselves and POS checker does not always know the student.</p> <p><b>CA: Provide a statement</b> of how this process will be changed to require each student to identify his or herself to verify check marks for a meal.</p>
Site Name	St Joseph Academy	
Form Name	Meal Counting and Claiming - Day of Review (317-321)	
Question #	320	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/26/2020 02:28 PM	<p><b>Finding:</b> The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Day of review meal counts are not combined and recorded correctly.</p> <p><b>CA: Correct</b> the meal counting process to ensure meal counts are correctly counted. Submit a statement describing the corrected system along with a timeline for implementation.</p>
Site Name	St Joseph Academy	
Form Name	Meal Counting and Claiming - Review Period (322-325)	
Question #	325	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 02/27/2020 08:30 AM	<p><b>Finding:</b> SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim.</p> <p><b>CA: (Systemic) Upload monthly edit checks and count sheets for lunch for months of September thru February</b> into SNACS. Fiscal action will be applied to the number of ineligible meals.</p>
Site Name	St Joseph Academy	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	

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<b>Corrective Action History</b>	Flagged	<p><b>Finding:</b> Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to work with staff to record fruits and vegetables in volume measurements instead of weight (ounces) measurements. Hands on technical assistance was given during on-site review to record portion sizes of sliced peppers in volume units instead of ounces. Based on data from the Food Buying Guide, it was determined that 1/4 cup of peppers should weigh 1.65 ounces. Based on the size of sliced peppers used in this operation, it was determined that 1.65 ounces of peppers is 11 strips. It is appropriate to record "11 strips" as the planned portion size of sliced peppers as opposed to "2 oz." Please continue to make these changes when fresh fruits and vegetables are included on the menu.</p> <p><b>Corrective Action :</b> Please submit <b>one week of completed production records</b> into SNACS documents tab.</p>
	02/25/2020 02:18 PM	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
03/06/2020	1892	1217	Administrative Review		FSD			

### Comments

## Training Requirements

Annual Professional Standards Training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program. A summary of the training requirement is provided in this ["In A Nutshell- Training"](#) document. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.). SFAs must record training hours on a training tracker, which includes the name of staff person, title/position, brief list of core duties/responsibilities, and hours scheduled. [The DPI Professional Standards Tracking Tool](#) or the USDA Professional Standards Tracking Tool are encouraged but not required.

03/06/2020	1891	325	Administrative Review	St Joseph Academy	FSD			
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### Comments

**MEAL COUNTING AND CLAIMING** • Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item. • Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance. Meals must be offered to all students each day school is in session a full day, so DPI has created [Field Trip meal resources](#) to assist schools in providing meals for field trips. An edit check must be completed before submitting a claim of reimbursable meals. • SFAs may claim visiting students in the paid category or the individual's category with documentation (unless they are from a CEP school).

Schools participating in CEP must provide access to both breakfast and lunch for all students during each school day. During meal service, schools are required to keep accurate meal counts and maintain a POS system that ensures Federal reimbursements are claimed only once for each student served a reimbursable. Schools may not claim reimbursement for additional meals served to students, or for meals that do not meet the meal pattern requirements. To meet this requirement, schools must: • Count total meals served daily; • Not collect school meal applications from households;

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and • Cover with non-Federal funds any operating costs (i.e., costs for providing meals to all students at no cost) that exceed Federal reimbursements. An accurate meal count may be achieved through a variety of methods and FNS does not require the use of any specific POS system. However, in recent years, many school districts have chosen to implement POS systems which incorporate technologies such as personal identification numbers (PIN), biometrics, and other individual student identifiers. When implementing CEP, FNS encourages school systems to maintain an accurate POS system that has a proven track record of reliability and security; including, accounting for adult meals and a la carte sales, while taking advantage of CEP's elimination of meal categories to streamline operations at the POS. DPI offers a [counting and claiming form](https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision) on its website to easily and accurately track total meals. ([https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision.](https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision))

02/26/2020	1796	810	Administrative Review		FSD			
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## Comments

**Nondiscrimination Statement (NDS)** • When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the [current statement](#) which was updated in 2015. • When space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the main text in the document and the format cannot be altered

02/25/2020	1795	1601	Administrative Review	ALL	FSD			
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## Comments

### Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods: • Promotion of the summer meals locator on the DPI Summer Meals webpage • Promotion of calling 211 to locate meals in the area • Promotion of the ability to text 'food' to 877-877 to locate meals in the area • Promotion of the [Summer Food Service Program webpage](#) Resources: • For more information on the SFSP contact: Amy J. Kolano, RD, CD, SFSP Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov.

02/25/2020	1794	711	Administrative Review	ALL	FSD			
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## Comments

**Adult Meals** • Food service programs must price adult meals above the overall cost of the student meals. Adult meal pricing must follow the minimum pricing guidelines in Food Nutrition Services Instruction 782-5. • A [Wisconsin Adult Meal Pricing Worksheet](#) has been developed to assist the SFA in pricing adult meals.

02/25/2020	1793	901	Administrative Review	St Joseph Academy	FSD			
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## Comments

**On-site monitoring** is a self-assessment of the counting and claiming system and general areas to ensure program integrity and accountability. On-site monitoring is required for all School Food Authorities (SFAs) with more than one school site operating the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program (ASP). On-site monitoring forms are site and program specific (i.e. NSLP, SBP, ASP). Therefore, SFAs with more than one meal service location will need to complete a form for each meal service location per program per school year. If a school building has two meal service locations, a minimum of one of those locations must be monitored. On-site monitoring forms are not submitted to DPI, but instead maintained at the SFA.

02/25/2020	1792	317	Administrative Review	St Joseph Academy	FSD			
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Comments						
<p><b>Schools participating in CEP</b> are only required to collect the total number of reimbursable breakfasts and lunches served daily. For SFAs who utilize a software system at the POS, DPI encourages SFAs to continue using the software for accountability, as well as preventing the claiming of second meals, etc. A tally or check-off list would also be allowable, as long as it is taken at the POS and only reimbursable student meals are included. If a student chooses not to select a reimbursable meal, he or she can still purchase these items at the established a la carte price. CEP allows students to be eligible for a free reimbursable breakfast or lunch; this eligibility does not extend to à la carte milk. If a student is interested in milk only, this is treated as a non-program food and the net cost of the milk needs to be covered either by charging students or a transfer of nonfederal funds to the nonprofit school food service account.</p>						
02/25/2020	1789	709	Administrative Review	ALL	FSD, Authorized Representative	
Comments						
<p><b>Non-program Food Revenue Rule</b> • All costs associated with non-program foods, including food, labor, equipment, and purchased services, must be covered by revenues received from the sale of those foods. This ensures non-program foods are not supported by reimbursable meals. Non-program foods include adult meals, a la carte, extra entrees (sold and/or overproduced to allow extra entrees to be available), extra milks, vended meals, catering, and food service operated vending machines. • SFAs that sell only non-program milk and adult meals are exempt from completing the <a href="#">DPI Non-program Food Revenue Tool</a> or the USDA Non-program Food Revenue Tool. The DPI tool is recommended since it aids in calculating prices of non-program foods to ensure USDA revenue requirements are met as found in Non-program Foods Revenue Rule SP-20-2016 • A non-program foods deficit must receive a transfer of non-federal funds into the nonprofit food service account.</p>						
02/25/2020	1780	801	Administrative Review	ALL	FSD	
Comments						
<p><b>Public Release</b> All SFAs are required to distribute a Public Release before the start of the school year. The purpose is to inform the public that free and reduced-price meals (and where appropriate, free milk) are available. SFAs must annually distribute the Public Release to at least 3 of the following: • Local news media o Grassroots organizations (local organizations providing services to populations in need (e.g., food pantry, public library, post office, local church, etc. ) • Local employment office • Major employers contemplating or experiencing large layoffs • SFAs are allowed to, but not required to pay to have the public release published but must maintain documentation of to whom it was sent, along with the specific materials distributed. The prototype CEP Public Release can be found online (<a href="https://dpi.wi.gov/schoolnutrition/special-provision-options/community-eligibility-provision">https://dpi.wi.gov/schoolnutrition/special-provision-options/community-eligibility-provision</a>). At the SFA, maintain a copy of the materials sent and a list of to whom the materials were sent.</p>						
02/25/2020	1775	1400	Administrative Review	ALL	FSD	
Comments						
<p><b>Food Safety Plans</b> SFAs are required to implement food safety programs based on Hazard Analysis Critical Control Point (HACCP) principles to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures (SOP) for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria. All schools must have a comprehensive, site-specific food safety plan on-site, which includes: HACCP process 1, 2, and 3 items (<b>convenience items should be defined, some could be process 1, some process 2</b>); applicable SOPs; a list of equipment; and a list of food service staff at that site. The food safety plan must be reviewed annually. A prototype food safety plan template as well as template SOPs may be found on the <a href="#">SNT Food Safety webpage</a>. All food service staff, student workers, volunteers, and other staff involved in the Child Nutrition Programs should follow the procedures detailed in the SOPs included in the site-specific food safety plan. <a href="#">A Flash of Food Safety</a> is a video series designed to</p>						



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help school nutrition professionals understand and apply safe food practices. The Office of Food Safety website includes additional food safety resources.

02/25/2020	1774	25	Administrative Review	St Joseph Academy	FSD				
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### Comments

Based on discussion with kitchen staff, **portions** exceeding the planned portion sizes are at times served. This is due to students serving themselves certain entrees, such as spaghetti noodles or chicken nuggets and students either accidentally or purposely exceeding the posted portion size. While the School Nutrition Team supports the decision to teach students to serve themselves food items, more diligence should be paid to the actual portion size being selected.

02/19/2020	1715	807	Administrative Review	ALL	FSD				
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### Comments

**The Civil Rights Self-Evaluation Compliance** (<https://dpi.wi.gov/sites/default/files/imce/forms/doc/f1441.doc>) form is required to be completed by October 31 annually.

02/19/2020	1714	803	Administrative Review	ALL	FSD				
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### Comments

All SFAs must have procedures in place for handling **civil rights complaints** in regards to discrimination in the National School Lunch Program and School Breakfast Program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service or State Agency within 5 days. A template for creating a policy is available on the DPI School Nutrition website: <https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights>.

02/19/2020	1713	1000	Administrative Review	ALL	FSD				
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### Comments

#### Local Wellness Policy

SFAs are required to have language in their LWP that relates to all the content areas listed in the LWP Checklist found on the Local Wellness Policy section of the DPI SNT website. This checklist includes sample policy statements (italicized) under each content area. • Sample Language: **Policy Leadership:** The superintendent shall implement and ensure compliance with the policy by leading the review, update, and evaluation of the policy. **Public Involvement:** The district will invite a diverse group of stakeholders to participate in the development, implementation, and periodic review and update of the policy. **School Meals:** All meals meet or exceed current nutrition requirements established under the Healthy Hunger-free Kids Act of 2010. Foods sold outside of school meals program: **All food and beverages sold outside of the school meal programs** shall meet the standards established in USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. **Foods provided but not sold** (e.g., class parties, class snacks, rewards): The district encourages foods offered on the school campus meet or exceed the USDA Smart Snacks in School nutrition standards including those provided at celebrations and parties and classroom snacks brought by staff or family members. Non-food celebrations will be promoted and a list of ideas is available to staff and family members. **Food and Beverage Marketing:** Schools will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools (Smart Snacks) rule. **Nutrition Education:** Teachers shall integrate nutrition education into other classroom subjects, such as math, science, language arts, social sciences, and elective subjects. **Nutrition Promotion:** School nutrition services shall use the Smarter Lunchroom Self-Assessment Scorecard to determine ways to improve the school meals environment. School nutrition services shall implement at least [Insert Number] Smarter Lunchroom techniques at each school. **Physical Activity:** The district shall provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The district shall also provide opportunities for students to participate in physical activity in addition to physical education. **Other School-Based**

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**Strategies for Wellness:** The district will offer [Insert Number] family-focused events supporting health promotion (e.g., health fair, nutrition/physical activity open house) each year. **Triennial Assessment:** The district will evaluate compliance with the Wellness Policy no less than once every three years. The assessment will include the extent to which each school is in compliance with the policy and how the policy compares to a model policy, as established by the U.S. Department of Agriculture. **Update/Inform the Public:** The district will actively inform families and the public about the content of and any updates to the policy through the school website and Board of Education meetings.

02/18/2020	1693	900	Administrative Review	ALL	FSD			
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## Comments

### On-site Monitoring

Every school year, SFAs with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP. This is due by February 1. ? The onsite monitoring forms for the NSLP and the SBP are on the Administrative Review section of the DPI SNT website. ? A CEP specific on-site monitoring NSLP and SBP form is available to compare total daily lunch meal counts against the attendance-adjusted enrollment. The forms are located on the Community Eligibility Provision (CEP) section of the DPI SNT website.

02/18/2020	1692	200	Administrative Review	ALL	FSD			
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## Comments

### Community Eligibility Provision

Section 104 (s) HHFKA, Understanding the Option CEP is a four-year reimbursement option for eligible local educational agencies (LEAs) and schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high-poverty schools without collecting household meal applications. Benefits: • Lunch and breakfast are served free to all students in participating schools. • No meal applications for free or reduced-price meal benefits collected from households. • Verification of meal applications is not required, but the Verification Collection Report (VCR) is. • Paid Lunch Equity is not required for CEP schools. • Meal participation rates generally increase, especially at breakfast. • Simplifies counting and claiming by tracking total reimbursable breakfasts and lunches. • Eliminates meal fees, so staff no longer need to collect unpaid meal fees from parents.

02/18/2020	1685	409	Administrative Review	St Joseph Academy	FSD			
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## Comments

The printed **menu should list all components included with the reimbursable meal**. Currently, grain is not specifically mentioned on the menu; the entree is listed as "breakfast items". The grain component may either be listed daily or may be listed in one place on the menu. Thank you for making this adjustment to the March menu.

02/12/2020	1633	306	Administrative Review	ALL	FSD			
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## Comments

SFAs are required to have **internal controls** to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement. This includes a monthly **edit check** which compares each school's daily counts of free, reduced & paid lunches against the number of children in that school currently eligible for free, reduced and paid lunches multiplied by the attendance factor (7 CFR 210.8).