Self-Monitoring

August 15, 2023

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RIDE | Child Nutrition Programs

RIDE | Rhode Island Department of Education

Monitoring for Compliance

The self-monitoring requirement helps to ensure sites are operating within regulatory compliance and allows SFAs to address issues prior to being found in an administrative review.

Who is subject to monitoring?
- Only SFAs with more than one site are required to conduct monitoring, but RIDE strongly encourages all SFAs to use the monitoring form as a self-check for regulatory compliance.

Who can conduct monitoring?
- Only staff employed by the SFA (NOT the Food Service Management Company) may conduct monitoring.
- Staff conducting monitoring need to be trained on monitoring responsibilities and requirements and must also have completed Civil Rights training.

Monitoring Deadlines
- Monitoring must be conducted at every site for lunch and 50% of sites for breakfast by February 1st.
- RIDE strongly encourages all SFAs to complete monitoring ASAP to catch operational errors as early as possible.

Site-Level Monitoring

Monitoring Counting and Claiming

Collection Procedures

- Is the site counting meals in accordance with the approved collection procedure on file with RIDE?
- Has the process changed (roster vs POS)
- Have additional locations been added?

Meal Counting and Claiming

- How are point of service meal counts being transferred to the claim?
- Is point of service meal count documentation being saved?

Reimbursable Breakfast

- Determine if site is utilizing straight service or OVS
- For straight serve, does the meal have at least one fruit/fruit juice and 3 other food items?
- For OVS, does the meal have at least one fruit/fruit juice and 2 other food items?

Monitoring Counting and Claiming

Reimbursable Lunch

- Determine if site is utilizing straight service or OVS
- For straight serve, does the meal contain all 5 food components (fruit, veg, grain, meat/meat alternate, milk?
- For OVS, does the meal contain at least one full ½ cup fruit or veg and at least 2 other different components?

Non-Reimbursable Meals

- How are non-reimbursable meals tracked and counted?

Staff Knowledge of District Policies

- Does the person counting meals/operating POS know the districts policies for handling: incomplete meals, second meals, lost/stolen IDs, visiting student meals, adult meals, a la carte sales, field trips, charged/pre-paid meals, OVS, unpaid meal charges?

Monitoring Counting and Claiming

Sufficient Trained Staff

- Is there more than one person trained on meal counting?
- What would happen if the cashier was out sick?

Back-Up Meal Counting Process

- What would staff do if the POS computer was not working for the day or the roster was unavailable?

Reasonable Meal Counts

- Are there internal controls in place to ensure daily meal counts do no exceed eligibility or attendance?
- Do counts by category (free/reduced/paid) on the day of review seem reasonable when compared to eligibility and attendance information?

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Monitoring Counting and Claiming

Overt Identification

- Is there a different counting system in place based on a child's eligibility?

- Does a child's meal choice differ based on eligibility?

- Can other students identify which students qualify for free or reduced-price meals based on the process used?

Monitoring Eligibility

Meal Benefit Applications (Not applicable for CEP and Non-Base Year Provision 2 Schools)

- Does a review of a sample of applications show that eligibility has been determined correctly for each category (free/reduced/paid)?
- Are families being consistently notified of eligibility determinations?
  - Within 10 days of submitting application
  - Regardless of determination
  - Direct Certification
- Are program communications up to date with all required components?

Monitoring: General Areas

Civil Rights

- Have ALL staff associated with the SNP received Civil Rights training?
- Is the "And Justice For All" poster displayed in a prominent, customer-facing location?
- Do all program communications that specifically reference NSLP or SBP contain the full and up to date non-discrimination statement?
- Are any barriers to participation identified at the time of review?
- Are meal accommodations being made as necessary for children with disabilities?

Reporting and Recordkeeping

- Is the site maintaining all program documents for at least 3 years plus the current including all rosters, production records, etc? (Note that storage of records may be done off-site.)

Monitoring: General Areas

Food Safety

- Is the most recent health inspection report posted in a visible location?
- Has the school had at least 2 health inspections completed in the current school year or are there plans to have 2 completed before the end of the school year?

Water

- Is free drinking water available to all students at the time of service either through water fountains or other dispensers in or directly adjacent to the cafeteria?
- If water fountains are used to meet the free water requirement, do they work?

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Monitoring: General Areas

Competitive Food Services

- Is the school selling any food during the school day outside of it's school meal program (i.e. food-based fundraisers, vending machines, school stores)?
- Is the school cafeteria selling a la carte items to students during meal periods, and if so, are the items in compliance with Smart Snacks nutrition standards?

Revenue from Non-Program Foods

- Are catering events provided by the school cafeteria to other parties (teachers, principals, PTO, etc) billed for?
- Are all adults (outside of food service staff) charged for meals purchased from the school cafeteria?

Monitoring: General Areas

Wellness Policy

- Does the district have a wellness policy in place?
- If so, is the school aware of the policy and implementing it?
- If the school imposes a local wellness policy, is it at least as strict as the district policy?

Professional Standards

- Are all nutrition program staff formally trained on their responsibilities on an on-going basis?
- District staff
- FSMC staff
- Are training activities documented?

Sponsor-Level Monitoring

Monitoring: Resource Management

Maintenance of School Food Service Account

- What is the process for making deposits?
- How is the account reconciled?

Paid Lunch Equity

- Is there a negative balance in the school food service account?
- Is the paid meal price at least as much as the difference between the federal reimbursement for a free meal and a paid meal?

Monitoring: Resource Management

Revenue from Non-Program Foods

- Is the Non-Program Revenue tool being utilized?
- Is the revenue from non-program foods sufficient to cover the cost of non-program foods?

Indirect Costs

- Are indirect costs being charged to the school food service account, and if so, are they allowable?

Monitoring: Other

Verification

- Has all documentation to support the verification process been saved?
- Was verification completed by November 15?
- Was the verification report submitted to RIDE on time?

SBP and SFSP Outreach

- Did the district make all families aware of the availability of the School Breakfast Program?
- Did the district make all families aware of the availability of the Summer Food Service Program?

Monitoring: Other

Wellness Policy

- Is there a wellness policy in place and is it easily accessible to the public?
- Has the policy been updated in the last 3 years?

Professional Standards

- Is training being tracked at the district level?
- Are staff on track to meet the required level of training hours for their position?

Post-Monitoring

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Follow-Up

What Did the Review Identify?

- Areas of opportunity for additional training
- Opportunities for additional communication across stakeholders (foodservice staff, principals, etc.)
- Systemic issues with program operations
- Need for corrective action/ follow up reviews
- Remember, follow-up reviews must occur within 45 days of the initial monitoring visit and must be documented!

Contact Information

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Thank You!

Questions?