

# Food Service Program Accountability

Heather Holland – Program Compliance  
Stacey Lamper-McFall – Fiscal Compliance  
Jasmine Stinson – Procurement Compliance

Office of Nutrition Services  
Michigan Department of Education





# Objective and Agenda for Today

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## Objective

Following this presentation, you will be able to review food service operations in your school district to assess compliance with state and federal regulations.

## Agenda

1. Program Compliance
  - Critical Areas of the Administrative Review
  - General Areas of the Administrative Review
2. Fiscal Compliance
  - Resource Management Review
3. Procurement Compliance
  - Procurement Review

# Food Service Program Accountability

## Program Compliance

Heather Holland  
Office of Nutrition Services

Michigan Department of Education  
MSBO Conference 2024





# Administrative Review

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## Critical Areas

- Meal Access and Reimbursement
  - Certification and Benefit Issuance
  - Verification
  - Meal Counting and Claiming
- Meal Pattern and Nutritional Quality
  - Meal components and quantities
  - Offer verse Serve (OVS)
  - Dietary specification

## General Areas

- Civil Rights
- SFA On-Site Monitoring
- Local School Wellness Policy
- Smart Snacks
- Professional Standards
- Water
- Food Safety
- Reporting and Recordkeeping
- Outreach
- Buy American
- Resource Management





# Critical Areas

Program Compliance: Administrative Review

# Meal Access and Reimbursement

## Certification and Benefit Issuance

- Overview of [Free and Reduced Meal Applications](#)
- Income guidelines
- Carryover
- Household notification
- Denied applications
- Benefit issuance list
- [Eligibility Manual](#)

### 2023-2024 Application for Summer EBT and Education Benefits with the Michigan School Meals Program

Apply online: \_\_\_\_\_

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

#### STEP 1: List ALL children, infants, and students up to and including grade 12. Attach another sheet of paper if you need space for more names.

List ALL children in the household. Do not forget to list infants, children attending other schools, children not in school, and children not applying for benefits. This includes children not related to you in your household.

Child's First Name	MI	Child's Last Name	Student?		School	Grade	Foster Child	Homeless Migrant, Refugee
			Yes	No				
1) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
2) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
3) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
4) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
5) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>

#### STEP 2: Do any Household Members (including you) currently participate in: SNAP, TANF, or FDIPIR?

IF NO > Go to STEP 3. IF YES > Write a case number here, then go to STEP 4 (Do not complete STEP 3).

Case Number: \_\_\_\_\_

(Write only one case number in this space)

#### STEP 3: List ALL household members and income for each member (before taxes and deductions). Skip this step if you answered "YES" to STEP 2.

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

##### A. Child Income

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

Child Income \_\_\_\_\_ How Often? Please put an     
 Weekly Bi-Weekly 2x Month  
 \$ \_\_\_\_\_

##### B. All Adult Household Members (including yourself)

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

#### PLEASE PRINT

Name of Adult Household Members (First and Last)	Earnings from Work	How often received?					Public Assistance/Alimony/Child Support	How often received?					Pensions/Retirement/ All Other Income	How often received?		
		Weekly	Bi-Weekly	2x Month	Monthly	Annual		Weekly	Bi-Weekly	2x Month	Monthly	Annual		Weekly	Bi-Weekly	2x Month
1) _____	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) _____	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) _____	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) _____	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) _____	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Total Household Members \_\_\_\_\_

Last Four Digits of Social Security Number (SSN) of \_\_\_\_\_

(Children and Adults) \_\_\_\_\_

Primary Wage Earner or Other Adult Household Member (if Applicable) \_\_\_\_\_

Check if no SSN

#### STEP 4: Contact information and adult signature. RETURN COMPLETED FORM TO:

I certify (promise) that all information on this application is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal Funds, and that school officials (confirm) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws.

Street Address (if available) \_\_\_\_\_ Apt # \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_ Phone (Optional) \_\_\_\_\_ Email (Optional) \_\_\_\_\_

www.michigan.gov/mde

Printed Name of Adult Signing Form \_\_\_\_\_

Signature of Adult \_\_\_\_\_

Today's Date \_\_\_\_\_



# Meal Access and Reimbursement

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## Certification and Benefit Issuance

- [Direct certification](#) list
- SNAP/TANF/Medicaid/Foster
- Medicaid free and reduced
- FDP/IR/Head Start/Migrant/Homeless
- Pull list a minimum of 3 times per year
- [CEPI Master Calendar](#)
- Extended Eligibility

UIC	EligCat	LastName	FirstName	MiddleInitial	DOB	Gender	StudentNumber	DateExited	EligibilityDate
	S						10141008		7/25/2018
	M						803268		7/25/2018
	S						803283		11/29/2018
	M						774052		11/29/2018
	S						768960		7/25/2018
	M						770195		7/25/2018
	M						10166256		11/29/2018
	M						741788		7/25/2018
	S						753522		7/25/2018
	S						10166257		11/29/2018
	M						10150109		7/25/2018
	S						765978		11/29/2018
	R						759263		11/29/2018
	M						10141019		7/25/2018
	M						763960		7/25/2018
	M						789741		12/28/2018
	S						766080		11/29/2018
	R						770469		11/29/2018
	M						749939		7/25/2018
	M						10141021		2/27/2019
	M						773402		2/27/2019



# Certification and Benefit Issuance Common Findings

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## Free & Reduced Meal Applications

- Incomplete income and frequency, calculation error
- Missing household members
- Missing last 4 digits of the Social Security Number
- Incorrect SNAP food assistance number
- Application is not signed

## Direct Certification

- Not pulling the list 3 times a year
- Pulling the wrong list
- Incorrect benefit transferred to benefit issuance list



# Meal Access and Reimbursement

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## Verification

- [Verification process](#)
- Pull applications on file as of October 1st
- Process occurs from October 1st – November 15th
- SFA-VCR Report- Due February 1st



# Meal Access and Reimbursement Common Findings

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## Verification

- Applications not verified correctly
- Not completing the process by November 15<sup>th</sup>
- Changes in benefits made incorrectly
- Verification letters do not contain the required information
- SFA-VCR was not completed on-time or is not correct
- Sponsor did not select the correct sample size
- Benefit issuance list was not updated with the verification results



# Meal Counting and Claiming

- Must have a meal counting and claiming system
- Meal Counting Procedure
- Acceptable point of service
- Observation at the school level
- Edit Checks
- Training requirements
- Overt identification
- Adult Meals
- Classroom meals





# Meal Access and Reimbursement Common Findings

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## Meal Counting and Claiming

- Breakfast in the classroom
- Meals not counted at the point of service
- Claiming adult meals or second meals
- Claiming meals based on attendance
- Claim does not match POS
- Overt identification of eligible students





# Meal Pattern and Nutritional Quality

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## Meal Components and Quantities

- [Meal Pattern Requirements](#) for age/grade group
- [Meal Component Tool](#)
- Supporting documentation
  - Child Nutrition Labels
  - Standardized Recipes
  - Product Formulation Statements
  - Nutrition Fact Labels

	Amount of Food Per Week (Minimum Per Day)		
	Grades K-5	Grades 6-8	Grades 9-12
<b>Fruits (cups)</b>	<b>5 (1)</b>	<b>5 (1)</b>	<b>5 (1)</b>
<b>Vegetables (cups)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Grains (oz eq)</b>	<b>7-10 (1)</b>	<b>8-10 (1)</b>	<b>9-10 (1)</b>
<b>Meats/Meat Alternates (oz eq)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Fluid milk (cups)</b>	<b>5 (1)</b>	<b>5 (1)</b>	<b>5 (1)</b>



# Meal Pattern and Nutritional Quality Common Findings

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## Meal Components and Quantities

- Insufficient quantities
- Vegetable subgroups
- Milk variety
- Whole grains
- Standardized recipes not followed
- Too much juice



# Meal Pattern and Nutritional Quality

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## Offer vs Serve (OVS)

### **Breakfast- OVS**

- Optional for all age/grade groups
- Offer at least four items
- Three items must be selected
- 1/2 cup fruit and/or vegetable required

### **Lunch-OVS**

- Required for high school
- Offer five food components
- Three components must be selected
- 1/2 cup fruit and/or vegetable required



# Meal Pattern and Nutritional Quality Common Findings

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## Offer Vs Serve (OVS)

- [Signage](#) not available at or near the beginning of the service line
- Signage does not include 1/2cup fruit and/or vegetable requirement
- OVS is not implemented correctly
- Staff has not been trained annually





# Meal Pattern and Nutritional Quality

## Dietary Specifications and Nutritional Quality

- Dietary Specifications Assessment Tool (DSAT)
- Determines risk status
- In depth nutrition analysis for high risk

	Grades K-5	Grades 6-8	Grades 9-12
Min-max calories (kcal) <sup>h</sup>	550-650	600-700	750-850
Saturated fat (% of total calories) <sup>h</sup>	<10	<10	<10
Sodium Interim Target 1 (mg) <sup>h</sup>	≤ 1,230	≤ 1,360	≤ 1,420
Sodium Interim Target 1A (mg) <sup>h</sup>	≤ 1,110	≤ 1,225	≤ 1,280
<i>Trans</i> fat <sup>h</sup>	Nutrition label or manufacturer specifications must indicate zero grams of <i>trans</i> fat per serving.		



# General Areas

Program Compliance: Administrative Review



# Civil Rights

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Civil Rights documents: [MDE - Civil Rights Guidance](#)

- Complaint procedure / log / form
- Current non-discrimination statement
- Special Dietary Needs Form: [Special Diet Form](#)
- Services provided for Limited English Proficiency Households
  - Welcome to [LEP.gov](#)
- Annual training requirement



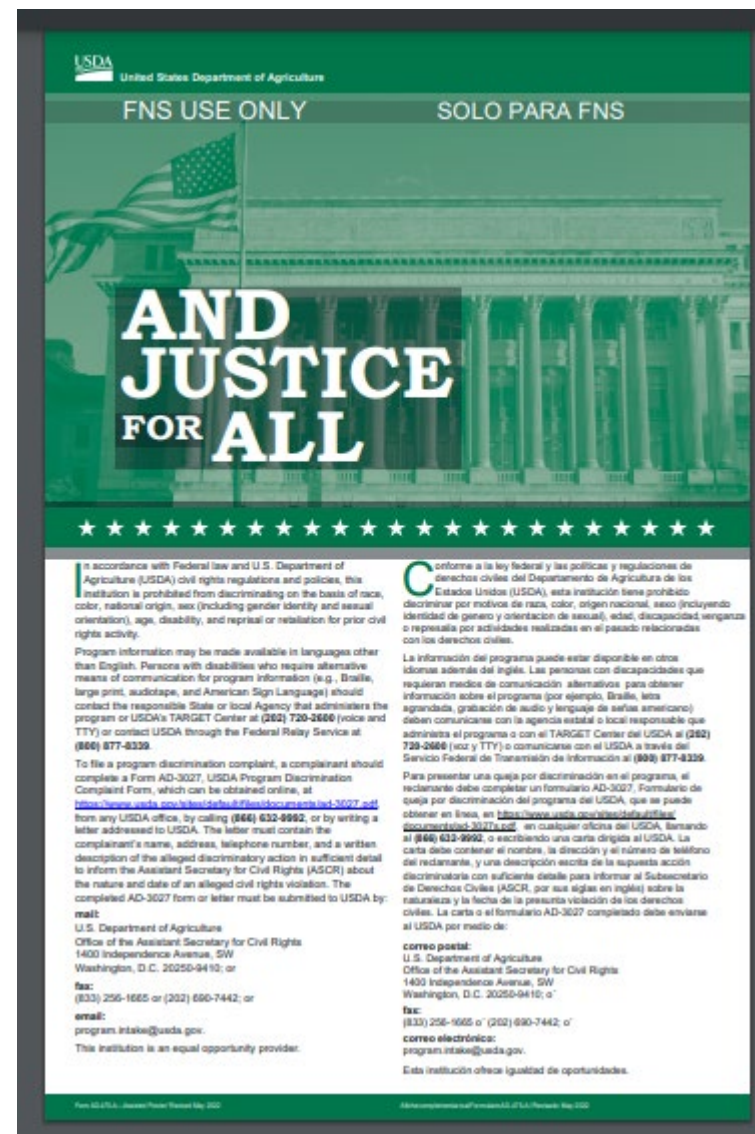
# And Justice for All Poster

The most recent poster must be displayed in a public location.

They are available on the USDA website to print at:

[And Justice for All Posters \(Guidance and Translations\) | USDA-FNS](#)

The poster must be printed in the approved size -11x14 or MDE can mail them to schools.







# Civil Rights Common Findings

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- Outdated non-discrimination statement
- Poster not displayed
- Missing compliant procedure, log and form
- Civil Rights training not completed



# On-Site Monitoring

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## MDE On-Site Monitoring Forms

- Due February 1<sup>st</sup> each year
  - All schools must be monitored for lunch
  - At least 50% of schools participating in breakfast
  - One Sponsor Level Monitoring Form per district
- Afterschool Snack Program Monitoring Form
  - Complete twice per year for each Afterschool Snack Program
  - Complete once in the first 4 weeks of program operation and again in the second half of the school year



# On-Site Monitoring Common Findings

23

- The on-site monitoring for breakfast and/or lunch was not completed prior to February 1.
- The on-site monitoring forms were not signed by the sponsor.
- Follow-up and documentation of corrective action not completed within 45 days



# Local Wellness Policy (LWP)

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## What is an LWP?

- Written document of official policies that guide a school district or organizations efforts to establish an environment that promotes student's health and well-being and ability to learn by supporting healthy eating and physical activity.
- Every sponsor that participates in the National School Lunch Program ( NSLP) must have a Local Wellness Policy.

## What are the requirements?

- [LWP Requirement Checklist](#)
  - Policy Documentation
  - Wellness Committee
  - Content: Specific Goals
  - Updates
  - Triennial Assessment
- [Triennial Assessment Plan](#)
- [LWP Resources](#)



# Local Wellness Policy Common Findings

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- Annual review and possible update of policy did not occur
- Stakeholders were not invited to participate
- Triennial assessment was not completed





# Smart Snacks

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- Rule covers all foods sold on campus during the school day: Includes Cafeteria, School Store, Vending Machines, Fundraisers, etc.
- Documentation
  - Copy of Smart Snacks SFA food sale policy; including person(s) responsible for monitoring.
  - Exempt Food Fundraiser Tracking Tool [Smart Snacks Tracking Tool](#)
  - Nutrition documentation for food and beverage items sold in site(s) selected for review (except for reimbursable meals), including food sold by entities outside of school food service. [Smart Snacks Product Calculator](#)



# Smart Snacks Common Findings

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- Foods and beverages sold to students during the school day do not meet smart snack standards.
- A combination building is not offering only beverages that meet the youngest age group per smart snack requirement.



[www.michigan.gov/mde](http://www.michigan.gov/mde)



# Professional Standards

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- [Professional Standards Guidance](#)
  - Training Standards
  - School Nutrition Director Hiring Standards
  - Tracking Tool
- Hiring Documentation that supports Education/Experience requirements for Food Service Directors hired after July 1, 2015.
- Training documentation for Food Service Management Company contract overseer (district employee). [Admin Memo No. 8: SY 2019-2020](#)
- Training Documentation that supports all school nutrition staff/personnel have met the minimum yearly training requirements for their position.





# Professional Standards Common Findings

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- Professional standards training requirements were not met for the school nutrition staff for the current school year.
- Training hours are not being tracked on an annual basis per professional standards guidelines.



# Buy American Provision

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Part of the National School Lunch Act- supports the mission of the Child Nutrition Programs to serve children nutritious meals and support American agriculture.

[Buy American Provision Form-](#) required to be completed for non-domestic food purchase exception.

Common Finding: Forms are not completed.



# Food Safety

Most recent health inspection posted in visible location.

Two health inspections required, per school, per school year.

[Food Safety Plans](#) for all serving sites, including classrooms. Template plans with Standard Operating Procedures (SOP) are available.

Temperature Logs





# Food Safety Common Findings

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- Health inspections are not posted or visible.
- Food Safety plans not available for all serving locations.
- Food Safety plans are not updated and reviewed with staff annually.



# Reporting and Recordkeeping

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- Reports must be submitted as required
- Records must be kept for 3 years plus the current fiscal year
  - Benefit Issuance Documents- student eligibility applications, direct certification, and verification
  - Claim Documents-count forms, POS reports, rosters
  - Meal Pattern documents-menu, production records
  - General Area documents-LWP, Civil Rights, Food Safety



# Reporting and Recordkeeping Common Findings

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- Reports are not submitted or by due date
- Accurate and complete production records are not being kept by the sponsor
- Production records not maintained or complete



# Outreach

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## School Breakfast

- Must be conducted at least 3 times per school year with documentation.
- Notify parents via newsletter, websites, open houses, etc.
- Outreach must include meal location, serving time and price (if applicable).

## Summer Food Service Program

- Must be provided prior to the end of the school year
- Link to SFSP site locator map: [SFSP Site Map](#)
- [Sample Messages](#)





# Outreach Common Findings

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- School Breakfast
  - Outreach is not completed or less than 3 times
  - Missing required information
- Summer Food Service Program
  - Outreach was not provided







# School Nutrition Programs (SNP)

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PHONE:

517-241-  
5374



E-MAIL:

[MDE-  
SCHOOLNUTRITION  
@MICHIGAN.GOV](mailto:MDE-SCHOOLNUTRITION@MICHIGAN.GOV)



WEBSITE:

[WWW.MICHIGAN.GOV/SCHO  
OLNUTRITION](http://WWW.MICHIGAN.GOV/SCHOOLNUTRITION)

SNP TRAINING MODULES:  
[ONLINE TRAINING MODULES  
\(MICHIGAN.GOV\)](http://WWW.MICHIGAN.GOV/SCHOOLNUTRITION)

# Food Service Program Accountability

## Fiscal Compliance

Stacey Lamper-McFall  
Office of Nutrition Services

Michigan Department of Education  
MSBO Conference 2024



# School Nutrition Programs Flow of Funds

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USDA -  
FNS

MWRO

MDE

SFAs



# Regulations

## 7 CFR Part 210 – USDA Program Regulations

- 210.14 Resource Management
  - 210.14a Nonprofit School Food Service
  - 210.14b Net Cash Resources
  - 210.14c Financial Assurances
  - 210.14e Pricing Paid Lunches
  - 210.14f Revenue from Non-Program Foods
  - 210.14g Indirect Costs
- 210.19 Additional responsibilities
  - 210.19(a)(1) Assurance of compliance for finances
  - 210.19(a)(3) Program compliance
- 210.9 Agreement with State Agency

## 2 CFR Part 200 – Uniform Guidance

- 200.313, 200.407, 200.439 Equipment
- 200.318-326 Procurement
- 200.403 Allowable Costs
- 200.404-.405 Necessary, Reasonable, Allocable
- 200.412 Treated Consistently
- 200.420-.475 Allowability of Specific Items of Cost
- 200.414 Indirect Costs
- 200.501 Requiring Audits



# MDE Financial Requirements

## Michigan Public School Accounting Manual

- Consistent recording of financial transactions

## Financial Information Database

- Annual reporting requirement





# Revenue Account Structure

- Fund Code 25- Food Service Fund
- Major Class Code- basic account identifier for revenue
- Suffix is used to further distinguish between revenue sources
- The Grant Code is used to further describe revenue by grant

<b>Fund</b>	<b>Transaction</b>	<b>Major Class</b>	<b>Suffix</b>		<b>Grant</b>	<b>Other</b>
<b>XX</b>	<b>X</b>	<b>XXX</b>	<b>XXXX</b>	<b>XXX</b>	<b>XXXX</b>	<b>XXXXXX-XXXX</b>



# State Revenue Codes

<b>Current Year State Aid Section</b>	<b>Description</b>	<b>Fund</b>	<b>Major Class Code</b>	<b>Revenue Grant/State Code</b>
31a	At Risk Children	25	312	306X
31d	School Lunch Programs	25	312	310X
31f	School Breakfast Programs	25	312	311X
30d	Michigan School Meals - Breakfast	25	312	264X
30d	Michigan School Meals - Lunch	25	312	265X



# Expenditure Account Structure

- Fund Code 25- Food Service Fund
- The Function describes the activity for which a service or material is acquired, specifically Food Services (297)
- The Object Code describes the service or commodity obtained
- The Grant Code is used to further describe expenditures by grant
- Must use proper Grant Code for breakfast and lunch (i.e. 310, 311, 850, 851)

<b>Fund</b>	<b>Transaction</b>	<b>Function</b>	<b>Object</b>	<b>Program</b>	<b>Grant</b>	<b>Facility /School</b>	<b>Other</b>
<b>XX</b>	<b>X</b>	<b>XXX</b>	<b>XXXX</b>	<b>XXX</b>	<b>XXXX</b>	<b>XXXXXX</b>	<b>XXXX</b>



# Resource Management

# Resource Management (RM) Overview

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**Allowable use of  
food service  
program funds**

**Financial  
component of the  
Administrative  
Review (AR) of  
School Nutrition  
Programs**

**RM Reviews involve  
both the Food  
Service Director and  
the Business  
Manager**

**The Business  
Manager is the main  
point of contact for  
RM Reviews**





# Start with: Pre- assessment

Determines Risk and  
therefore the scale of the  
Resource Management  
Review.



# DESK AUDIT



# Four Sections of the RM Review

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Maintenance of the Non-Profit  
Food Service Account (NFSA)

Paid Lunch Equity (PLE)

Revenue from Nonprogram Foods

Indirect Costs







# Maintenance of the NFSA

- Allowable Costs
- Net Cash Resources
- Spend Down Plan
- Equipment Requests
- Written Policies and Procedures

# Maintenance of the NSFSA

51

This section looks at the financial “health” of your food service program and financial compliance



**MDE assesses the following:**

**FID or CNP-YER**

**Fund Balance**

**Transfers out of the NSFSA**



# WRITTEN INTERNAL CONTROL POLICIES AND PROCEDURES



## POLICY

A Policy is a general statement that lays the foundation and guides the decision making in an organization. It is a deliberate system of guidelines to guide decisions and achieve outcomes.

- Focus is broad
- Shows the “Why”
- Not changed frequently
- *Example: An Organizations has a policy on employee attendance* →
- *Example: A school district has a policy on managing grant funding* →

## PROCEDURES

A procedure is a document that details the step-by-step instructions that everyone should follow to tackle an issue or make a decision.

- Focuses on specifics
- Shows the: How? When? Where? Whom?
- Adjusted based on operational changes
- *Example: An Organization has a procedure how to report absences*
- *Example: A Food Service Department has procedures on how they handle cash when collecting funds at POS and who makes the deposit*



# Written Internal Control Procedures

## Child Nutrition Program

- Determine Allowable vs Unallowable
- Training
- Separation of Duties
- Physical Controls
- Equipment Purchases
- Allowable Fund Balance Tracking



PROCEDURES

# What Are Allowable Costs?

**Sp 60-2016**



# Examples of allowable costs

Food

Supplies

Salaries/Benefits

Food Service  
Equipment

Kitchen/Cafeteria  
Renovations



# Examples of Unallowable costs

Land

Infrastructure  
Costs

Contingency  
Fees

Security  
Cameras

Public  
Announcement  
Systems

Air  
Conditioning



# NET CASH RESOURCES





<b>Revenue</b>		<b>School Meals Beginning Fund Balance</b>	\$158,146.87
Local (11x-15x, 17x-19x)	\$2,379.08	<b>Total School Meals Revenue</b>	\$901,235.76
Pupil/Students (161)	\$194,419.38	<b>Total School Meals Cost w/o Capital Outlay</b>	\$782,913.93
Patron/Adults (162)	\$11,115.13	<b>Capital Outlay</b>	\$814.43
Milk (163)	\$0.00	<b>Prior Period Adjustment</b>	\$0.00
Ala Carte (164)	\$103,913.05	<b>School Meals Ending Fund Balance</b>	\$275,654.27
Catering (165)	\$47,737.51	<b>Allowable Fund Balance</b>	\$260,971.31
Other (169)	\$0.00	<b>Excess Fund Balance</b>	\$14,682.96
<b>Total Local (1xx)</b>	<b>\$359,564.15</b>		

Intermediate Revenue (2xx)	\$0.00	<b>Indirect Rate (Unrestricted)</b>	14.74%
State (31x)	\$29,324.04	<b>*Maximum Allowable Indirect</b>	\$63,274.93
Federal (41x)	\$460,481.89	<i>*N/A for Contracts exceeding \$25K Rule</i>	
Commodity (481)	\$51,865.68		
Bonus Commodity (482)	\$0.00		
Another Public School (518)	\$0.00	<b>2018</b>	<b>2019</b>
Other Finance Source (511-517,519-54x, 59x)	\$0.00	<b>Breakfast Meals Served</b>	37,879      39,047
Fund Modifications (6xx)	\$0.00	<b>Breakfast Cost per Meal</b>	\$2.78      \$2.77
<b>Total School Meals Revenue</b>	<b>\$901,235.76</b>	<b>Lunch Meals Served</b>	167,563      170,304
		<b>Lunch Cost per meal</b>	\$2.81      \$2.65

<b>Expenditures</b>	<b>Breakfast Grant Codes 306, 311, 850</b>	<b>Lunch Grant Codes 310, 851</b>	<b>All Other Programs*</b>	<b>Total</b>
Salaries	\$13,444.25	\$55,945.41	\$21,671.50	\$91,061.16
Benefits	\$5,885.98	\$24,493.29	\$8,979.01	\$39,358.28
Purchased Services	\$42,009.15	\$174,812.33	\$61,934.19	\$278,755.67
Thru another Public School	\$0.00	\$0.00	\$0.00	\$0.00
Supplies and Other	\$2,855.57	\$11,882.86	\$5,360.10	\$20,098.53
<b>Sub Total</b>	<b>\$64,194.95</b>	<b>\$267,133.89</b>	<b>\$97,944.80</b>	<b>\$429,273.64</b>
Food Costs	\$44,158.52	\$183,762.41	\$115,719.36	\$343,640.29



# FID SCHOOL MEALS REPORT





Revenue Worksheet	
<b>Non-profit Food Service Account Total Revenue</b>	
1. Revenue from Student Meal Payments :	\$189.60
2. Federal Revenue from SNP Claim Reimbursement :	\$406,877.22
3. Federal Revenue from CACFP Claim Reimbursement :	\$0.00
4. Federal Revenue from SFSP Claim Reimbursement :	\$51,559.27
5. Student A La Carte :	\$10,416.60
6. Adult Sales :	\$1,670.09
7. Catering :	\$1,176.00
8. Other Revenue :	\$21,119.70
9. Fund Modifications (+ or -) :	\$0.00
10. Total Revenue (sum of lines 1 through 9) :	\$498,002.48

Expenditure Worksheet	
<b>Non-profit Food Service Account Total Costs</b>	
1. Salaries (Food Service Related) :	\$55,813.34
2. Employee Benefits :	\$4,269.82
3. Purchased Services :	\$20,816.10
4. Transportation Supplies :	\$0.00
5. Supplies and Other Materials :	\$9,963.32
6. SUBTOTAL :	\$89,462.58
7. Indirect Cost :	\$6,484.33
8. Food Cost :	\$192,779.35
9. Total Expenditures (sum of lines 6 through 8) :	\$288,726.26

Balance Sheet	
1. Beginning Balance (balance from last year's audit report) :	\$143,327.00
1.a. Adjusted Beginning Balance :	\$0.00
1.b. Provide Comment :	
2. Year End Revenue Total ((line 1 Beginning Balance plus Revenue Worksheet line 10 Total Revenue) :	\$636,329.48
3. Year End Expenditure Total (Expenditure Worksheet line 9) :	\$288,726.26
4. Capital Outlay :	\$81,375.68
5. Total Expenditures (line 3 plus line 4) :	\$370,101.94
6. Ending Fund Balance (line 2 minus line 5) :	\$266,227.54
7. Number of Months Claimed :	12
8. Allowable Fund Balance :	\$96,242.09
9. Excess Fund Balance :	\$169,985.45

# YEAR END REPORT



# Excess Fund Balances



- MDE assesses Net Cash Resources of the Nonprofit Food Service Account
- Three months average expenditures is allowed
- Calculation: (Total program expenditures without capital outlay  $\div$  9)  $\times$  3
- USDA Program Regulation 7 CFR Part 210.19(a)(1) requires each SFA to submit a formal Excess Fund Balance Spend Down Plan of Action





# Excess Fund Balance

# Spend Down Plan of Action

MDE GEMS/MARS emails notifications every January or February

SFA are required to fill out the online plan of action form and upload any supporting documents in GEMS/MARS

SFA must spend down excess funds by June 30, of the current year, or request a carryover extension

# Excess Fund Balances Spend Down Plan

MDE approval of SFA's Plan of Action will be sent via email notification from GEMS/MARS

Approved EFB Plan of Actions do not negate the need to submit a formal request to MDE for Equipment or Other Capital Expenditures, prior to incurring the cost

MDE Resource Management (RM) Reviews the prior 3-5 school years



# Excess Fund Balance Tools and Resources

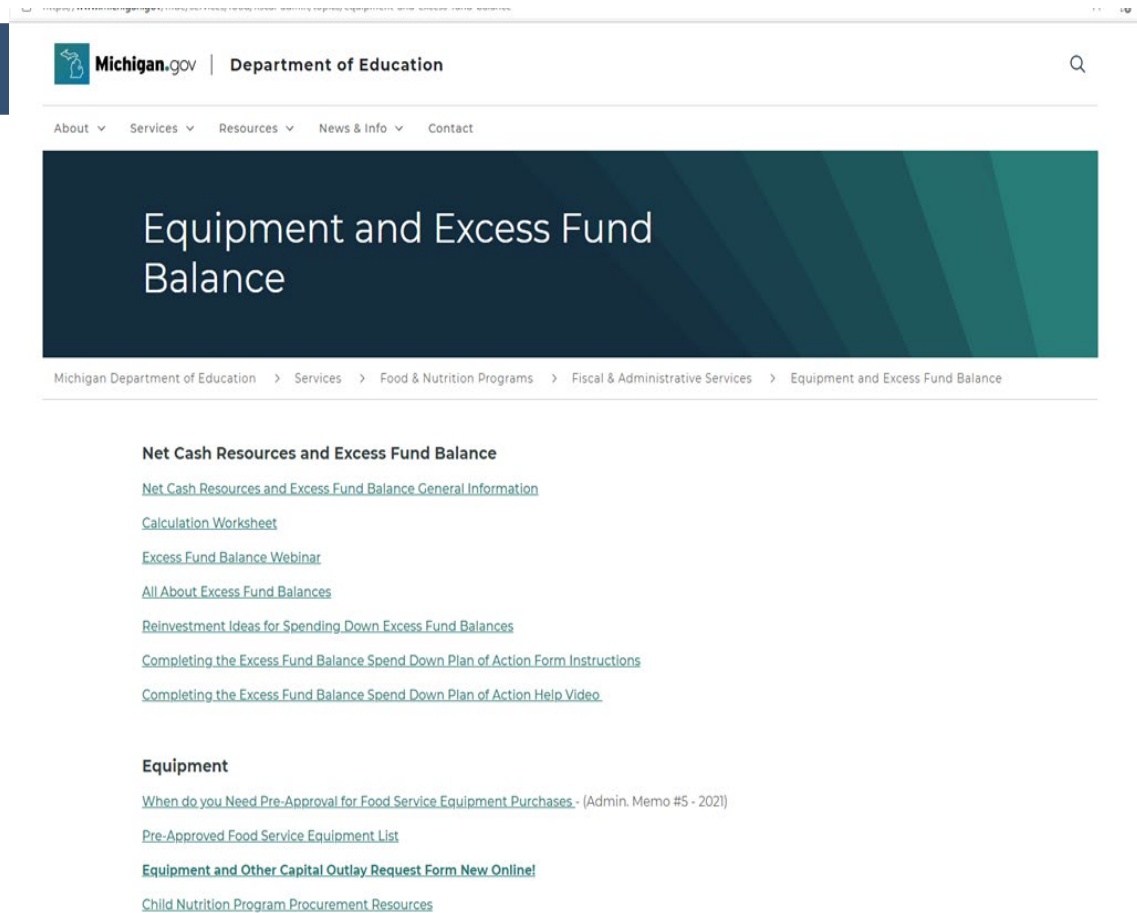
63

[ALL ABOUT EXCESS FUND BALANCES](#)

[MDE EFB PLAN OF ACTION TRACKER](#)

[Calculation Worksheet](#)

[REINVESTMENT IDEAS FOR SPENDING DOWN EXCESS FUND BALANCES](#)



The screenshot shows the Michigan Department of Education website. The header includes the Michigan.gov logo and the Department of Education name. A navigation menu contains links for About, Services, Resources, News & Info, and Contact. The main content area features a dark green banner with the title "Equipment and Excess Fund Balance". Below the banner is a breadcrumb trail: Michigan Department of Education > Services > Food & Nutrition Programs > Fiscal & Administrative Services > Equipment and Excess Fund Balance. The page content is organized into two main sections: "Net Cash Resources and Excess Fund Balance" and "Equipment". The first section lists several links: "Net Cash Resources and Excess Fund Balance General Information", "Calculation Worksheet", "Excess Fund Balance Webinar", "All About Excess Fund Balances", "Reinvestment Ideas for Spending Down Excess Fund Balances", "Completing the Excess Fund Balance Spend Down Plan of Action Form Instructions", and "Completing the Excess Fund Balance Spend Down Plan of Action Help Video". The second section, "Equipment", lists links for "When do you Need Pre-Approval for Food Service Equipment Purchases - (Admin. Memo #5 - 2021)", "Pre-Approved Food Service Equipment List", "Equipment and Other Capital Outlay Request Form New Online!", and "Child Nutrition Program Procurement Resources".

[MDE - Equipment and Excess Fund Balance \(michigan.gov\)](#)



# Allowable Ways to Spend Down Excess Fund Balances (EFB)

Focus on the quality of meals

Invest in Breakfast

Additional Point of Sale location to improve speed of service

Hire additional Food Service staff

Eliminate collection of Reduced Price Meals



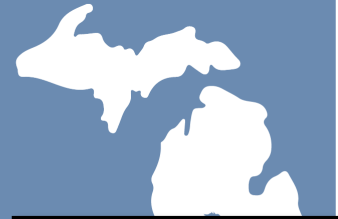


# Improve Program Quality

- You must quantify how you will be able to improve program quality when specifying a dollar amount







# Cafeteria Upgrades

- Kitchen/Café renovations
- Changing service area to improve customer service and feel of meal service lines
- Offer another POS Station







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## Kitchen/Café Equipment



- Breakfast carts
- Food prep equipment
- Reusable Bento Boxes

# Equipment/Capital Expenditures

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2 CFR Part 200.407 & 200.439 requires prior written approval for equipment and capital expenditures over \$5,000 or the Sponsor's capitalization threshold, whichever is less

Exception: Items on the Pre-approved Food Service Equipment List

**Failure to obtain MDE's prior approval results in an unallowable cost, requiring Sponsors to reimburse the food service account with non-federal funds**

***Guidance:*** MDE Admin Policy #5 When Do You Need Pre-Approval for Food Service Equipment Purchases?





# Equipment Requirements

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Sponsors must follow all Federal, State, and local procurement regulations for equipment purchases.

If equipment will be shared with other programs outside of food service, the amount funded by the Non-Profit Food Service Account (NFSA) must be prorated.

Selling equipment purchased with Federal funds must comply with regulations. The proceeds from the sale must be deposited into the NFSA.

MDE must confirm that equipment and capital outlay purchases are an allowable use of Federal funds from the Sponsor's NFSA.

# Pre-approved Food Service Equipment List

## Carts/Cabinets

- Can Dispenser Rack
- Condiment Cart/Bar
- Dish Dolly/Caddy
- Heated Transport Cart
- Holding Cabinet
- Insulated Transport Cart
- Kiosk
- Proofing Cabinet
- Refrigerated Transport Cart
- Sheet Pan Rack/Speed Rack
- Storage Rack
- Trash Cart
- Tray Dispenser
- Utility Cart

## Cleaning

- Commercial Sinks/Three Compartment Sinks
- Containers to Handle Recyclables
- Dish Machine/Dishwasher
- Dish Tables
- Floor Troughs
- Garbage Disposal
- Pot and Pan Machine
- Specialty Sinks: Hand, Pot and Pan, Prep, Produce, Utility
- Sprayer Hose
- Water Booster Heater
- Water Softener (food service exclusive)

## Computers/Hardware & Software

- Cash Registers/Point-of-Sale (POS) Equipment/Hardware
- Computer hardware
- Point of Sale (POS) Software

- Software/programs for management (i.e. inventory, nutritional analysis)
- Meal Counts, Eligibility Application Approval

## Cooking

- Barbeque
- Broiler
- Char broiler
- Cook Chill Kettle
- Cook Top/Range
- Exhaust Hood/System
- Fryer Dump Station
- Fryer
- Griddle/Flat Top Grill
- Hot Plates
- Induction Cooker
- Microwave Oven
- Oven: Combi, Convection, Conventional, Cook and Hold, Pizza, Retherm, Rotary, Rotisserie
- Smoker
- Soup Kettle
- Steam Kettle
- Steamer: Convection, Double Stack
- Tilt Skillet/Braising Pan
- Toaster

## Dry Storage

- Dunnage, Pan Tray Rack
- Stainless Steel Cabinets/Counters
- Shelving/Shelf System



# Paid Lunch Equity (PLE) Tool



# Paid Lunch Equity (PLE) Tool Update

The SY2024-25 PLE Tool will be on the Fiscal Website soon.

[www.Michigan.gov/mde/Services/Food/Fiscal-Admin](http://www.Michigan.gov/mde/Services/Food/Fiscal-Admin)

- SFAs with a **negative** fund balance as of June 30, 2023, must follow the minimum pricing requirements indicated by their completed PLE Tool
- SFAs with a **positive** fund balance may use the USDA Exemption to forgo raising prices if they choose



# Resource Management Review

A whole pizza with a thick crust, topped with melted cheese, sliced cherry tomatoes, yellow and green bell peppers, and mushrooms. One slice has been removed and is placed to the right of the main pizza. The background is a solid teal color.

Non-Program Foods





# What are Non-Program Foods?

- A La Carte sales to students
- Adult meals
- Catering
- Vending
- Concessions
- Any other sales outside of a reimbursable meal





# Non-program Foods Revenue Requirements

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:

- All revenue from the sale of Non-program foods accrues to the Non-profit School Food Service Account (NSFSA); and
- Revenue available to support the production of reimbursable school meals does not subsidize the sale of Non-program foods



Current guidance: USDA Memo **SP20-2016**



**Ala Carte Pricing Worksheet**

School District Name

Schools Using These Prices

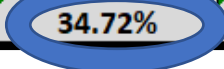
Desired Food Cost Percentage: 40.00%

The desired food cost percentage can be changed by the SFA however keep in mind that food cost percentages above the industry standard of 40% are in jeopardy of non-compliance with the requirements in USDA Memo SP20-2016.

NOTE: Sales tax must be added to all adult sales. See column F. Your Point of Sale (POS) System may have the capability of calculating tax on the total adult purchase. Make sure you do not charge tax twice, once built into the items' sale price and again on the total adult purchase.

# Ala Carte Pricing Worksheet

A La Carte Items	Total Unit Cost	Recommended Selling Price	Student Actual Selling Price	Food Cost %	Adult Selling Price with Sales Tax
Milk (example)	\$0.24	\$0.60	\$0.60	40.00%	\$0.64
Pizza (example)	\$0.74	\$1.85	\$2.25	32.89%	\$2.39
Chips (104 ct) (example)	\$0.27	\$0.68	\$0.75	36.00%	\$0.80
<b>Total</b>	<b>\$1.25</b>	<b>\$3.13</b>	<b>\$3.60</b>	<b>34.72%</b>	<b>\$3.82</b>





# Catering Pricing

MONTHLY MENU COSTING WORKSHEET				
MONTH:		LUNCH PRICE:	\$3.20	
SCHOOL:		FOOD COST PERCENTAGE:	39.8%	
	MONDAY	\$1.27	TUESDAY	\$0.00
WEEK 1	Item	Cost	Item	Cost
Entrée	Pizza	\$0.74		
Entrée	Turkey Veg Wrap	\$0.86		
	Apple	\$0.13		
	Carrots	\$0.10		
	<i>EXAMPLE</i>			
	Milk	\$0.24		
	Total Cost	\$1.27	Total Cost	\$0.00
... <a href="#">Ala Carte Pricing</a> <a href="#">Revenue Ratio Instructions</a> <a href="#">Revenue Ratio</a> <a href="#">Optional Menu Costing</a>				





# Non-program Foods Revenue Ratio Calculation

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## Revenue Ratio Calculation

Nonprogram Food Revenue Ratio		Nonprogram Food Cost Ratio	
		34.72%	SFA's Current Average Food Costs Percentage
100,000.00	Nonprogram Food Revenue	34,722.22	Nonprogram Food Cost
725,000.00	Total Revenue	275,000.00	Total Food Cost
0.13793	Revenue Ratio	0.12626	Food Cost Ratio

# SCHOOL MEALS REPORT

<b>Revenue</b>		<b>School Meals Beginning Fund Balance</b>	\$3,004,775.96
Local (11x-15x, 17x-19x)	\$54,308.40	<b>Total School Meals Revenue</b>	\$14,391,556.71
Pupil/Students (161)	\$479,232.08	<b>Total School Meals Cost w/o Capital Outlay</b>	\$14,987,218.01
Patron/Adults (162)	\$7,962.75	<b>Capital Outlay</b>	\$56,990.26
Milk (163)	\$0.00	<b>For Period Adjustment</b>	\$0.00
Ala Carte (164)	\$109,451.40	<b>School Meals Ending Fund Balance</b>	\$2,352,124.40
Catering (165)	\$52,136.19	<b>Allowable Fund Balance</b>	\$4,995,739.34
Other (169)	\$0.00	<b>Excess Fund Balance</b>	\$0.00
<b>Total Local (1xx)</b>	<b>\$703,090.82</b>		

Intermediate Revenue (2xx)	\$0.00	<b>Indirect Rate (Unrestricted)</b>	15.00%
State (31x)	\$745,362.02	<b>*Maximum Allowable Indirect</b>	\$1,127,360.80
Federal (41x)	\$12,025,976.47	*N/A for Contracts exceeding \$25K Rule	
Commodity (481)	\$877,438.45		
Bonus Commodity (482)	\$36,204.09		
Another Public School (518)	\$3,484.86		
Other Finance Source (511-517,519-54x, 59x)	\$0.00		
Fund Modifications (6xx)	\$0.00		

	2022	2023
<b>Breakfast Meals Served</b>	1,020,287	1,004,962
<b>Breakfast Cost per Meal</b>	\$2.64	\$2.89
<b>Lunch Meals Served</b>	2,119,607	2,037,622
<b>Lunch Cost per meal</b>	\$4.52	\$5.26

<b>Expenditures</b>	<b>Breakfast Grant Codes 306, 311, 850</b>	<b>Lunch Grant Codes 310, 851</b>	<b>All Other Programs*</b>	<b>Total</b>
Salaries	\$923,071.92	\$2,153,078.27	\$126,932.59	\$3,203,082.78
Benefits	\$653,848.48	\$1,508,044.69	\$72,118.92	\$2,234,012.09
Purchased Services	\$344,026.70	\$1,352,185.42	\$9,670.05	\$1,705,882.17
Thru another Public School	\$0.00	\$262,582.94	\$0.00	\$262,582.94
Supplies and Other	\$31,681.46	\$78,497.20	\$0.00	\$110,178.66
<b>Sub Total</b>	<b>\$1,952,628.56</b>	<b>\$5,354,388.52</b>	<b>\$208,721.56</b>	<b>\$7,515,738.64</b>
Food Costs	\$713,336.53	\$4,698,499.26	\$1,135,871.66	\$6,547,707.45
Indirect Costs	\$235,046.29	\$659,405.65	\$29,319.98	\$923,771.92
<b>Total Program Cost</b>	<b>\$2,901,011.38</b>	<b>\$10,712,293.43</b>	<b>\$1,373,913.20</b>	<b>\$14,987,218.01</b>
Capital Outlay	\$3,023.61	\$53,966.65	\$0.00	\$56,990.26

**Technical Notes**

**Object Codes:** Salaries (1xxx), Benefits (2xxx), Purchased Services (3xxx, 4xxx), Thru Another Public School (82xx), Supplies and Others (55xx, 57xx, 59xx, 7xxx), Food Costs (56xx), Indirect Costs (99xx), Capital Outlay (6xxx).

**\*Grant Codes:** "All Other Programs" include Adult, Ala Carte, Catering and all other Federal Child Nutrition Programs.

**Error Notes:**  
 Cost Per Meal - Meals served require expenditures to be reported using Grant code 850x for the School Breakfast Program and/or Grant Code 851x for the National School Lunch Program.



# Adult Meal Pricing

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School Year 2023-2024	
<b>School Breakfast Program Adult Pricing Minimum</b>	
Free Breakfast Reimbursement Rate (SY 2023-2024)	\$2.73
Subtotal	\$2.73
Sales tax	\$0.16
<b>Total minimum Adult price</b>	<b>\$2.89</b>
<b>National School Lunch Program Adult Pricing Minimum</b>	
Free Lunch Reimbursement Rate (SY 2023-2024)	\$4.35
Lunch Commodity Entitlement Rate (SY 2023-2024)	\$0.2950
Subtotal	\$4.65
Sales tax	\$0.28
<b>Total minimum Adult price</b>	<b>\$4.92</b>



**Ensures equitable revenue per adult meal as student meals!**



# Common Findings: Nonprogram Foods

Non-program foods prices too low or offered free of charge

Insufficient process to assess compliance

Revenue ratio is less than cost ratio for Non-program foods

Non-program revenue did not book to the NFSA

Not all revenue categories are tracked and reported separately





# Indirect Costs

Must be calculated and charged per the methodology outlined in the USDA SP60-2016

- Use the unrestricted rate published by MDE annually
- [www.Michigan.gov/mde](http://www.Michigan.gov/mde)
  - Public Schools: 15% max
  - Nonpublic: 10%max
- MDE provides an Indirect Cost Worksheet
- The only allowable transfer from the NSFSA is indirect costs





# Examples of Typical Costs



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## Direct Costs

- Salaries & Wages of food service workers
- Cost of purchased food
- Food service supplies
- Capital expenditures relating to food service (e.g., food service equipment – never land or building)

## Indirect Costs

- Payroll Services
- Human Resources
- Custodial
- Procurement
- Worker's Compensation
- Superintendent's and Business office
- Gas, Electricity
- Water, Sewer
- Trash

# Indirect Cost Calculation



Start with Total Program Cost

Less: Food Costs

Less: Capital Outlay

Less: Prior Year Adjustments

Less: Contracts exceeding \$25,000 (portion above \$25K)

Equals the Modified Direct Cost Base

Then apply the Unrestricted Indirect Cost Rate

To achieve the Maximum Allowable Indirect Costs



# MDE Indirect Cost Template

<b>Total Food Service Program Expenditures</b>	
Food Costs (Object Codes: 56XX)	
Indirect Costs Already Charged (Object Code 99XX)	
Capital Outlay (Object Codes: 6XXX)	
Prior Period Adjustments	
Costs that Benefit Multiple Programs Charged Directly	
*Excluded Purchased Service Vendor(s) >\$25,000 (Object Codes 3XXX, 4XXX)	\$0.00
<b>Total Unallowable Costs</b>	<b>\$0.00</b>
<b>Modified Direct Cost Base</b>	<b>\$0.00</b>
<b>Unrestricted Indirect Cost Rate</b>	
<b>Maximum Indirect Costs Allowed</b>	<b>\$0.00</b>
<b>SFA Actual Indirect Costs Charged</b>	
<b>Within Allowable Amount; Check Calculation for Accuracy</b>	<b>\$0.00</b>



# Purchased Services / Contracts

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<i>Example</i>			
<b>Food Service Contracts and/or Purchased Services Greater than \$25,000</b>	<b>Annual Food Service Expense</b>	<b>Allowable Portion</b>	<b>Excluded Portion</b>
ABC Food Service Management Company	\$100,000.00	\$25,000.00	\$75,000.00
XYZ Equipment Repair Company	\$35,000.00	\$25,000.00	\$10,000.00
Pest Control, LLC	\$24,000.00	\$24,000.00	\$0.00
		<b>TOTAL</b>	<b>\$85,000.00</b>

# Common Findings for Indirect Costs

Indirect costs charged improperly

Not treated consistently across all programs

Calculations supporting documentation not available

Indirect costs charged in excess of approved unrestricted rate

Indirect costs exceed the maximum allowable





# QUESTIONS?





# Fiscal and Administrative Services - School Nutrition Programs

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**PHONE:**  
**517-241-5380**



**E-MAIL:**  
[MDE-  
FISCAL@MICHIGAN.  
GOV](mailto:MDE-FISCAL@MICHIGAN.GOV)



**WEBSITE:**  
**WWW.MICHIGAN.GOV/  
MDE-FAST**

# Food Service Program Accountability

## Procurement Compliance

Jasmine Stinson  
Office of Nutrition Services

Michigan Department of Education  
MSBO Conference 2024



# Agenda



- What is Procurement Compliance?
- Types of Reviews
- Procurement Requirements
- SNP Procurement Review Process
- Food Service Contract Reviews
- Procurement Training Requirements
- Website & Resources

# What is Procurement Compliance?





# Regulations

## Federal

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards [2 CFR Part 200.317](#)  
[Procurement Standards](#)
- National School Lunch Program [7 CFR 210.1\(a\)](#)
- School Breakfast Program [7 CFR 220.16](#)
- Summer Food Service Program [7 CFR 225.17](#)
- Child and Adult Care Food Program [7 CFR 226](#)
- Methods of Procurement [2 CFR 200.320-3.26](#)

## State

- Michigan Revised School Code Sections [380.1267](#) and [380.1274](#)

## Local

- State and local law or policy may be more restrictive than Federal regulation
- Sponsors must follow the most restrictive policy (i.e., school/district)





# USDA Guidance

The USDA releases guidance for Child Nutrition Programs on an as needed basis or as new Final Rules are announced.

## USDA Program Guidance

United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) issues guidance memos with clarification and additional information on specific topics. Memos and guidance relevant to procurement in Child Nutrition Programs are shown below. Additional USDA guidance is available here: [FNS Documents & Resources | Food and Nutrition Service \(usda.gov\)](#).

[Updates to the Federal Micro-Purchase Threshold in 2 cfr200.320\(a\)\(1\)](#) - (SP 02-2022, CACFP 03-2022, SFSP 01-2022 (Corrected): 12/15/2021)

[Federal Micro-Purchase and Simplified Acquisition Thresholds](#) - (SP20 CACFP07 SFSP06-2019: 10/30/2019)

[Buy American and the Agriculture Improvement Act of 2018](#) - (SP32-2019: 08/15/2019)

[Market Basket Analysis when Procuring Program Goods and Modifying Contracted-For-Produce Lists](#) - (FD-144, SP04 SFSP01 CACFP04-2018: 01/18/2018)





## Purpose of a Procurement Review



Assess compliance with procurement standards



Provide technical assistance



Utilize full and open competition



Allowable costs



# WHAT EVERY SPONSOR MUST KNOW!



Procurement Policy  
and Procedure



Employee Code of  
Conduct



Procurement  
Methods



Threshold Amounts



Regulations

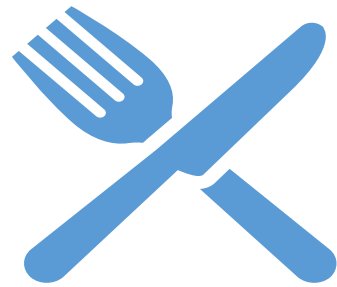


Allowable Costs

# Types of Reviews



# Review Types



## **SNP Procurement Review**

Sponsors with Food Service Contracts



## **Food Service Contract Review**

Food Service Contract Renewal Review

# Procurement Requirements



# SPONSOR INFORMATION FORM



Required for the Review



Available in GEMS/MARS



Must be completed prior to entrance call





# Areas of focus

## Procurement Review

General Procurement

Procurement Methods

Food Service Contracts



## **1. Procurement Policy**

- ✓ Should be located within board policies

## **2. Procurement Procedures/Plan**

- ✓ Consistent with board policy
- ✓ Instructions and detailed descriptions for acquiring goods & services

## **3. Written Code of Conduct**

- ✓ Covering conflicts of interest and actions of its employees involved in the selection, award, and administration of contracts

# Required Documents



# More information on.... Procurement Policy/Procedures

## Contents:

- General Procurement ([2 CFR 200.318](#))
- Competition ([2 CFR 200.319](#))
- Methods of Procurement ([2 CFR 200.320](#))
- Small and Minority Businesses and Women's Business Enterprises ([2 CFR 200.321](#))
- Cost and Price Analysis ([2 CFR 200.324](#))
- Availability of Documents for Review ([2 CFR 200.325](#))
- Contract Provisions ([2 CFR 200.327](#), [2 CFR Appendix II](#))
- Buy American ([7 CFR, sections 210.21\(d\)](#) and [220.16\(d\)](#) )



# Thresholds for Purchases

Federal= \$250,000 (services)

Michigan= \$100,000 (food)

Michigan= \$29,572 (non-food and supplies)

Local = varies

Micro-Purchase = \$10,000

[Procuring Local Foods | Food and Nutrition Service \(usda.gov\)](https://www.usda.gov)  
[MCL - Section 380.1274 - Michigan Legislature](#)



# Programs use either of Two Types of Procurement Methods:



## **Informal**

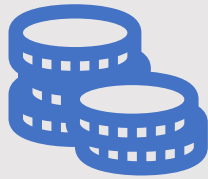
Request for Quotation  
Micro-Purchasing



## **Formal**

Invitation for Bid (IFB)  
Request for Proposal (RFP)

# Micro-Purchasing Informal Procurement Method



## Distribute

Spread the wealth among  
suppliers



## Award

Award without soliciting  
competitive quotes, if price  
is reasonable



## Document

Maintain documentation  
(purchase details, price,  
vendor info and all  
communications)



# Small Purchase/Request for Quotation Informal Procurement Method



## Quotes

Requires price or rate quotes an adequate amount of sources



## Develop

Develop written specifications



## Document

Maintain documentation of all quotes and communication



## Award

Evaluate & Award



# Formal Procurement Method

## Invitation for Bids (IFB)

- Sealed bidding
- Selected primarily on price (fixed price contract)
- Used when there is no difference between the products or service

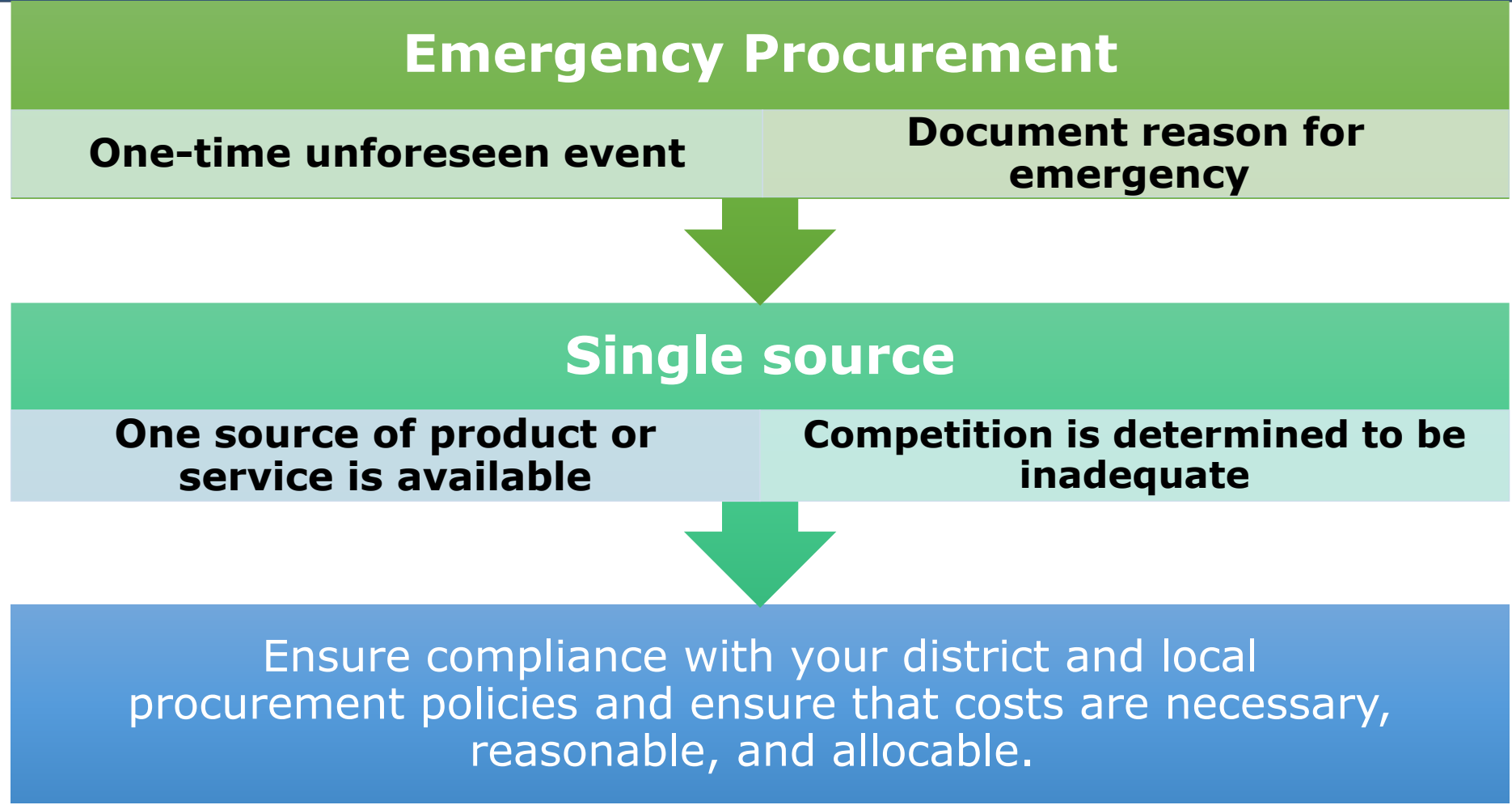
## Request for Proposal (RFP)

- Competitive negotiations
- Price is not the only deciding factor
- Used for complex projects where all factors are considered

Publicly Publish Solicitation & Evaluate/Award



# Procurement Methods for Unique Circumstances



# SNP Procurement Review Process





# Procurement Review for Self-Operated Sponsors

- General Procurement
- Micro-Purchases
- Small/Informal purchases
- Formal purchases



# Procurement Review for Sponsors with Food Service Contracts

General  
Procurement

Invoices

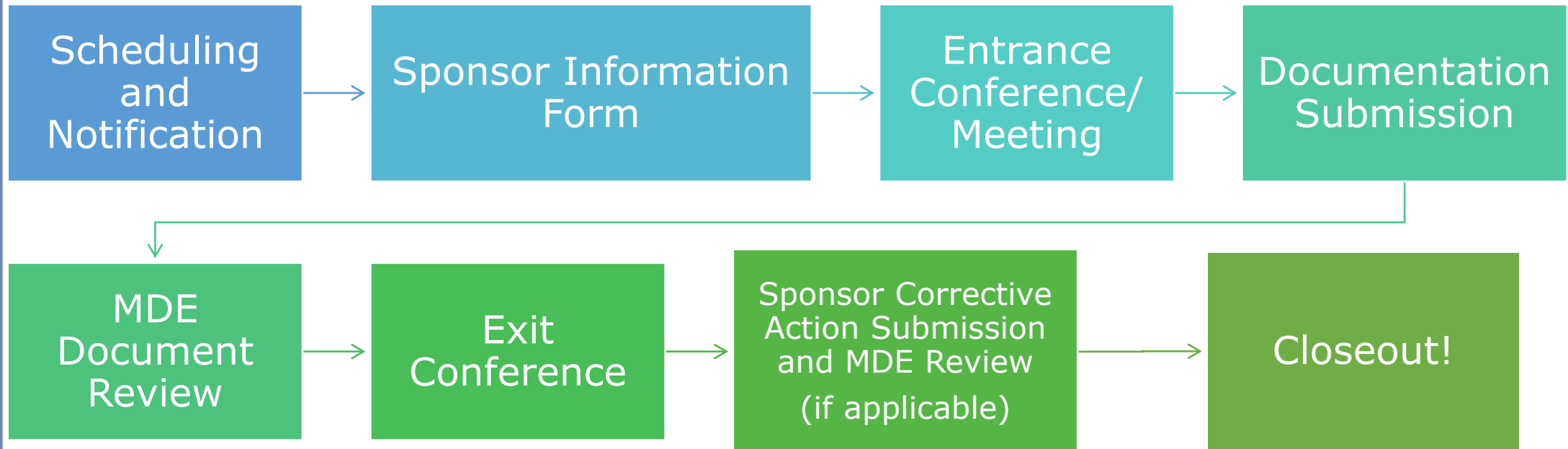
Operating  
Statements  
(if applicable)

Other  
procurement





# Process Overview



# Scheduling and Notification

An emailed letter will include the following:

- Date and Time for entrance conference meeting
- GEMS/MARS access information
- Sponsor Information Form
- Due dates
- Contact information
- Links to resources



At the bottom of the page, you can save your progress and return later or submit when finished.

### Sponsor Information

Sponsor Name:

How many people are responsible for procurement on behalf of the Sponsor's School Nutrition Department?

#### Details for responsible parties:

Name	Position/Title	Email	Phone	List procurement duties
Jane Procurement	Business Manager	JaneP@abcschools.com	111-111-1111	Formal, and contract manag
John Purchases	Food Service Director	JohnP@abcschools.com	111-111-1111	Small purchase, micro

#### Comments

Jane is responsible for all formal procurements, general contract management, and provides feedback to all school departments on purchasing procedures. John handles all informal procurement for Child Nutrition Programs, including RFQs and micro-purchases with p-card.

### General Procurement

Upload all documents related to procurement practices. Include Procurement Policy, Procedures, and Code of Conduct  
[Download Files](#)

Drop files here or click to upload

File Name	File Size
-----------	-----------

### Micro & Small Purchase Threshold Information

Enter the sponsors threshold amounts under each category. If using the State of MI thresholds, list the amounts in the categories.

What is the Sponsor's Micro purchase threshold?

What is the Sponsor's small purchase threshold for Food?

What is the Sponsor's small purchase threshold for Services?

What is the Sponsor's small purchase threshold for Supplies, Materials, and Equipment?

#### Comments about General Procurement

# SPONSOR INFORMATION FORM



# Sponsor Information Form (Areas of review)



General  
Procurement



Procurement  
Methods Used



Group Purchasing  
Information



Market Basket  
Analysis



Small/Informal  
Purchases



Non-  
Competitive  
Procurement



Formal Purchases/  
Contracts



Food Service  
Contracts



# Entrance Conference/Meeting



## ☐ Meeting format

- Teams Meeting
- Could be in-person at the beginning of an on-site review

## ☐ Who should attend?

- Staff involved in procurement and purchasing
- This may include:
  - Business Manager
  - Food Service Director
  - Cafeteria Manager
  - Administrative Support Staff



# Documentation Submission



Written Code of  
Conduct



Procurement  
Procedure and  
Policy



Vendor Paid List



Supporting  
Documentation





# Vendor Paid List Information

## Vendor Paid List

- Summary of Total Expenditures by Vendor Report (nonprofit food service account only)
- Microsoft Excel file or pulled from an accounting or finance software (sorted by vendor name, amount, etc.)





# Vendor Paid List Details

## **Typical cost(s):**

- Equipment
  - Computer
  - Kitchen
  - Office
- Materials and Supplies
- Food Service Vehicles
  - Repairs (if not performed by District personnel)
  - Rentals
- Miscellaneous
  - Software/hardware
  - Training
  - Nutrition education supplies

## **Exclude cost(s):**

- Advertising
- Bank charges
- In house print shop charges
- Mileage reimbursement
- Travel and Conference expenses
- Petty cash payments
- Dues and membership fees(Co-op excluded)
- Postage
- Utilities and more.

# Supporting Documentation

- Solicitations
- Evaluations
- Contracts
- Vendor invoices
- Written communication
- Evidence of Contract Management
- Board Meeting Minutes, if applicable

*For each vendor selected for review!*



# Document Review Process...

Are regulations and procurement procedures being followed?

Did full and open competition occur?

Is required language and provisions in contracts?

Did the sponsor follow the applicable method of procurement?

Is procurement documentation maintained?

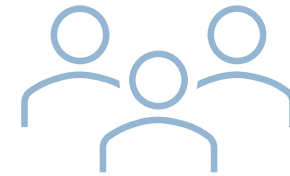


# Findings Report and Exit Conference



## Findings Report

- Listing of all findings
- Explanation of the requirement(s)
- Resources



## Exit Conference

- All documentation has been reviewed for compliance
- Findings have been identified (if applicable)

# Corrective Action Submission & Review!



- Corrective Action Submission (*if applicable*)
  - Entered in GEMS/MARS
  - Examples:
    - ✓ Updated policies and procedures
    - ✓ Action Plan with details on how future procurement will be handled
    - ✓ Amending contracts to remove unallowable terms
    - ✓ Re-soliciting contracts
    - ✓ Attending training





# THE FINAL STEP CLOSEOUT!

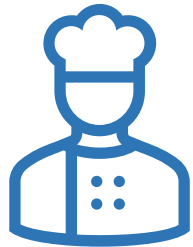


# Food Service Contract Reviews





# Types of Food Service Contracts



## **Food Service Management Company (FSMC)**

Third party vendor MANAGES the food service program

- Cost-Reimbursable Contract
- Fixed Price Contract



## **Vended Meals**

Third party vendor provides MEALS ONLY

- Fixed Price Contracts Only



# Food Service Contract Review

## Who

- All Child Nutrition Program Sponsors contracting with a Food Service Management Company or Vended Service Meal Company

## What

- Full review of all contract documents, amendments, and renewals as well as procurement related technical assistance

## Where

- Virtual review via teams, email and/or GEMS/MARS

## When

- Prior to new contract or renewal execution for the following school year



# New Food Service Contract Bid (Re-bid) Review

## Website

- [Food Service Contracts \(michigan.gov\)](http://michigan.gov)

## Training

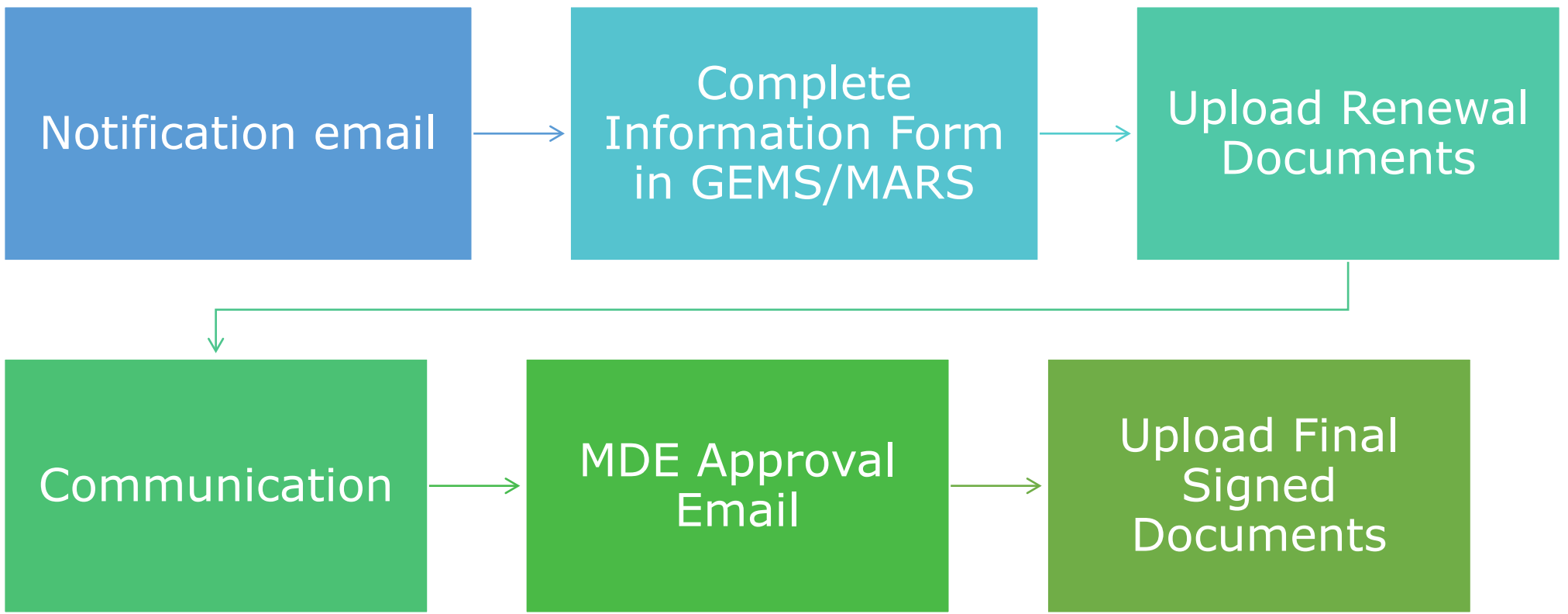
- [Procuring a Vended Meals Contract: The Bid Process for School Sponsors](#)
- [Procuring a Food Service Management Company Contract: The Bid Process for School Sponsors](#)

## MDE Templates and Resources

- [School Nutrition Programs - FSMC Bid Process Guide](#)
- [FSMC Cost Reimbursable Bid Process Instructions](#)
- [FSMC Fixed Price Bid Process Instructions](#)
- [School Nutrition Programs - VSMC Company Bid Process Guide](#)
- [VSMC RFP Over \\$250k Bid Process Instructions](#)
- [VSMC RFQ Under \\$250k Bid Process Instructions](#)



# Food Service Contract Renewal Review





# Contract Management and Invoice Review

## Review all invoices and compare to agreed upon contract terms

- For cost-reimbursable contracts, sponsors must also compare with standard pricing to ensure that all discounts are credited back to the sponsor then discuss with the company.

## Detailed descriptions of Charges, Discounts, Rebates and Credits

- Sponsors must receive the full benefit of any discounts, rebates or other applicable credits.
- Descriptions must be clear to identify allowable and unallowable costs.



# Contract Management

## **Know the contract**

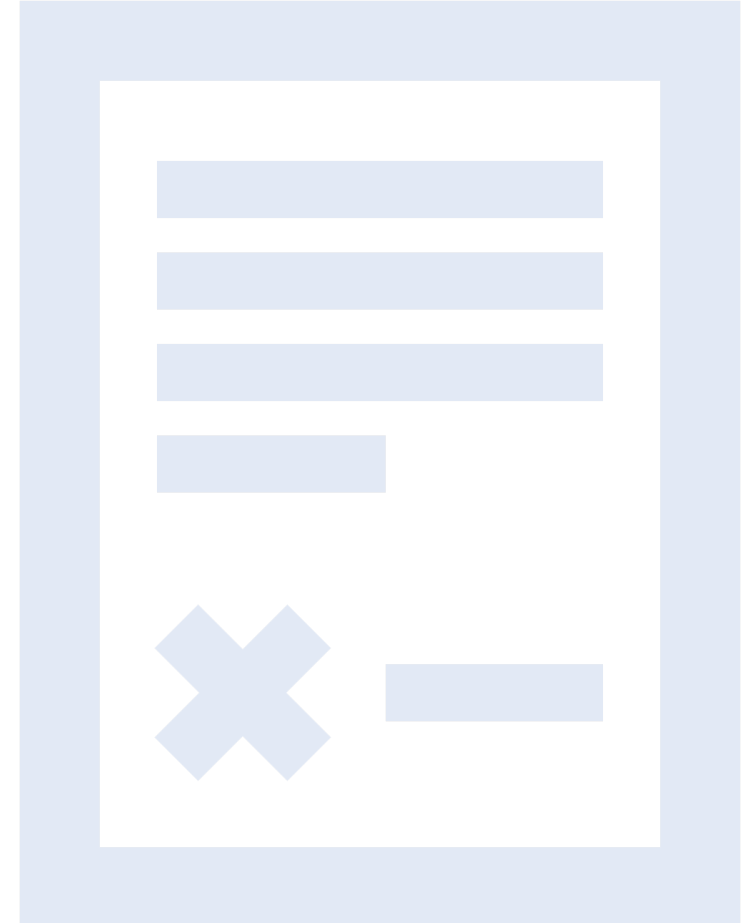
- ✓ Read and understand what is included in the contract.

## **Monitor the service**

- ✓ Check that meals served match menus, are reimbursable and meet food quality standards.
- ✓ Check invoices to ensure accuracy and that costs are allowable.

## **Communicate with the company**

- ✓ Question discrepancies.
- ✓ Ensure terms are met.
- ✓ Resolve issues and complaints.
- ✓ Enforce the contract.





# Procurement Training Requirements

# Annual NSLP Procurement Training

Required for school nutrition program directors, management, and staff who work on NSLP procurement activities and standards.

## **Professional Standards Code for School Food Procurement**

Operations 2000

2400 – Implement purchasing procedures and practices in order to appropriately and best utilize supplies and USDA Foods to meet menu requirements and comply with all Federal, State, and local regulations.

**Begins August 23, 2024**





# Procurement Training Offerings

CNP: Procurement 101: [CNP: Procurement 101 - Overview \(state.mi.us\)](https://state.mi.us)

Annual Compliance Review Training (In-person and will soon be available online)

USDA Professional Standards:

[The Professional Standards Training Database | Professional Standards \(usda.gov\)](https://www.usda.gov)

Institute of Child Nutrition (ICN) - ICN registration is required:

[School Nutrition Dashboard - ICN iLearn \(docebosaa.com\)](https://docebosaa.com)

# Procurement and Contract Website & Resources





# Procurement and Contracts

## Topics



About Us



Contact Us



Food Service Contracts



Resources



School Nutrition Program Procurement Review



Local Purchasing

# Procurement and Contracts Website

[PROCUREMENT AND CONTRACTS \(MICHIGAN.GOV\)](https://www.michigan.gov/procurement)



## **MDE Templates and Resources**

[Procurement Quick Reference Guide](#) - Updated August 2023

[MDE Procurement Plan Template](#)

[Micro-Purchase Log](#)

[Emergency Purchase Log](#)

[Informal Procurement Log](#) (Food and supply purchases)

[Informal Procurement Checklist](#)

[CNP: Procurement 101](#)

[Annual Bid Threshold](#)

[Buy American](#)

## **Program Specific Information**

[NSLP Procurement Information](#)

[CACFP Procurement Information](#)

[SFSP Procurement Information](#)

# Procurement Resources

[Resources \(michigan.gov\)](https://michigan.gov)



# Procurement Review Website

[School Nutrition Program Procurement Reviews \(michigan.gov\)](#)

## School Nutrition Program Procurement Reviews

[Home](#) > [Services](#) > [Food & Nutrition Programs](#) > [Procurement and Contracts](#) > [School Nutrition Program Procurement Reviews](#)

### Overview

The procurement of goods and services is a significant responsibility of a School Nutrition Program Sponsor. Obtaining the most economical purchase should be considered in all purchases when using Federal funds. Federal, state, and local laws and regulations specify the procurement methods, terms, and conditions. Sponsors competitively procure goods and services, award contracts, and oversee contractor performance. State agency oversight is required to ensure Sponsors comply with the applicable provisions through audits, Procurement Reviews, technical assistance, training guidance materials, and by other means.

A Procurement Review will be conducted of each School nutrition program Sponsor within an Administrative Review cycle (once every five years). The Procurement Review may or may not occur in the same school year as a Resource Management or Administrative Review.





# Food Service Contract Resources

[Home](#) > [Services](#) > [Food & Nutrition Programs](#) > [Procurement and Contracts](#) > [Food Service Contracts](#)

## Child Nutrition Program Food Service Contracts

The Child Nutrition Program Procurement Team provides technical assistance and guidance to Child Nutrition Program Sponsors that wish to work with a Company or another Sponsor to provide meals and/or management. To learn more about these types of food service contracts, obtain prototype documents, or for questions email [MDE-FSMC-Vended@michigan.gov](mailto:MDE-FSMC-Vended@michigan.gov). For assistance with all other procurement contracts or issues, please refer to the [Procurement Resources webpage](#).

## Training

- [Procuring a Vended Meals Contract: The Bid Process for School Sponsors](#)
- [Procuring a Food Service Management Company Contract: The Bid Process for School Sponsors](#)

## MDE Templates and Resources

[School Nutrition Programs - FSMC Bid Process Guide](#)

[FSMC Cost Reimbursable Bid Process Instructions](#)

[FSMC Fixed Price Bid Process Instructions](#)

[School Nutrition Programs - VSMC Company Bid Process Guide](#)



Questions





# Thank You!

Heather Holland

[HollandH3@michigan.gov](mailto:HollandH3@michigan.gov)

Stacey Lamper-McFall

[LamperMcFallS@michigan.gov](mailto:LamperMcFallS@michigan.gov)

Jasmine Stinson

[stinsonj5@michigan.gov](mailto:stinsonj5@michigan.gov)

