

Transforming Lives • Impacting Communities

Food Services Policy and Procedure Manual

DATE IMPLEMENTED: April 10, 2017	BY: Food Service Director
DATE REVIEWED:	BY:
DATE REVISED: September 4, 2017	BY: Food Service Director
DATE REVISED: <u>January 3rd</u> , 2018	BY: Food Service Director
DATE REVISED: November 25th , 2019	BY: Food Service Director

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NATIONAL SCHOOL LUNCH PROGRAM

The National School Lunch Act of 1946, designed by Congress, established the National School Lunch Program to safeguard the health and nutritional well-being of our nation's children. In 1975, Congress amended this Act by adding a school breakfast component.

Under the National School Lunch Act, Congress appropriates funds, which are administered by State agencies and passed to local school districts in the form of reimbursements for each meal served in the breakfast and lunch programs.

Students are eligible to receive meals in the breakfast and lunch programs on a free, reduced price or full-paid basis. Eligibility may be determined by one of three methods:

- 1. An application completed by a child's parent or guardian and evaluated for eligibility on the basis of family income and number of family members per household.
- 2. The Direct Certification method by which the names of students from families receiving aid to Families With Dependent Children or Food Stamps have their eligibility determined automatically via COMPASS.
- 3. Children may also be categorically eligible if they have migrant, homeless, or runaway status. Foster children may also be categorically eligible.

Confidentiality of Information is maintained throughout the application process. The same menu is served to all students, regardless of the method of payment.

The Healthy, Hunger Free Kids Act of 2010 required major reform to school breakfast and school lunch programs. Significant changes include a focus on feeding children all year in communities where poverty and lower income families need additional support, changes to meal planning, fiscal accountability, annual review processes, and professional development for food services departments.

FREE AND REDUCED MEAL POLICY

Green Tree School & Services participates in the Federal Government's National School Lunch Program (NSLP) and School Breakfast Program (SBP) and accepts the responsibility for providing free and reduced price meals to eligible children in the school.

Green Tree School & Services, as the designated School Food Authority, assures the Pennsylvania Department of Education, the State Agency designated to oversee the program, that they will uniformly implement stated policies to determine each student's eligibility for free and reduced

price meals in all National School Lunch Program and Breakfast Program schools under its jurisdiction. In fulfilling its responsibilities, the Green Tree School & Services:

- A. Agrees to serve meals free or at a reduced price to children of families whose income is at or below the established income guidelines.
- B. Agrees that there will be no physical segregation of, nor any other discrimination against, any child because of their ability to pay the full price of the meal. The names of the children shall not be published, posted, or announced in any manner and there shall be no overt identification by any other means. Further assurance is given that children eligible for free or reduced price meals shall not be required to:
 - 1. Work for their meals.
 - 2. Use a separate lunchroom.
 - 3. Go through a separate serving line.
 - 4. Enter the lunchroom through a separate entrance.
 - 5. Eat meals at a different time.
 - 6. Eat a meal different from the one sold to children paying the full price.
- C. Agrees that in the operation of child nutrition programs, no child shall be discriminated against because of race, sex, color or national origin.
- D. Agrees to develop and have sent to each child's parent or guardian a letter including an application form for free or reduced price meals at the beginning of each school year and whenever there is a change in the eligibility criteria.

MISSION STATEMENT

It is the Mission of Green Tree School & Services to make a significant contribution to the general well-being, mental and physical capacity, and learning ability of each student, thereby affording the opportunity to fully participate in the education process.

This will be achieved by providing students with wholesome, nutritious and appetizing meals, served in a courteous manner, in a sanitary and pleasant dining environment.

The mission will be pursued in the most efficient and cost effective means possible, according to the regulatory and policy guidelines of the National School Lunch Act, Pennsylvania Department of Education, and local regulatory bodies.

PERSONNEL

Green Tree School & Services, an equal opportunity employer, will not discriminate in employment or education programs or activities, based on race, color, religion, age, national origin, ancestry, physical handicap, gender, sexual orientation, union membership, or limited English proficiency.

Personnel within the Food Services Department of Green Tree School & Services include the Food Services Director, the Food Services Manager, the Lead Food Service Worker, and additional Food Service Assistants as needed.

DUTIES AND RESPONSIBILITIES:

Food Service Assistant: Assists with the preparation of meals in the cafeteria, supports food service during lunch and breakfast, and helps clean the preparation and service areas.

Lead Food Service Worker: Responsible for the ordering, receipt, preparation and distribution of meals as a part of the school breakfast and lunch programs. This individual is responsible for overseeing food service to students, handling point of service (POS) compliance and POS student rosters record keeping. This individual also helps clean food preparation, service, and storage areas.

Food Services Manager: Oversees food service activities including procurement, preparation, and services of food. This individual is responsible for review of weekly menus, safety inspections of the sanitary conditions of the kitchen and dining areas, and the overall efficiency of food service operations. This individual provides oversight and supervision to the Food Service Workers, and maintains accurate records for meal counting and meal claiming completed by the finance department.

Food Services Director: Responsible for planning, monitoring, and evaluating all aspects of the school nutrition program, including oversight of the annual training for all food service employees, review and modifications as needed to food service policies and procedures, and communication with regulatory bodies (e.g., PDE, Department of Health Inspections, etc.). This individual provides oversight and supervision to the Food Services Manager, and receives administrative supervision from the Chief Administrative Officer, Executive Director of Green Tree School & Services.

Other administrative staff of Green Tree School & Services provide support to the Food Services Department, including fiscal support with claim submissions and administrative support in the distribution of applications for free and/or reduced lunches to students/families. All administrative support staff responsible for tasks related to the NSLP will complete annual trainings related their assigned tasks, in addition to the Food Services Department staff listed above.

PROFESSIONAL STANDARDS FOR FOOD SERVICE PERSONNEL

Green Tree School & Services shall comply with the professional standards for school food service personnel who manage and operate the National School Lunch Program and the School Breakfast Program. For purposes of this policy, professional standards include hiring standards for new food service program directors, and annual continuing education/training for all individuals involved in the operation and administration of school meal programs.

ADMINISTRATIVE GUIDELINES

PROGRAM AVAILABILITY

As a School Food Authority, Green Tree School & Services will inform all applicants and participants about their rights and responsibilities publicly on the school website. Information regarding program changes, applications and the steps for completing an application, as well as notices regarding other community based programs (e.g., Summer Food Service Programs) will be updated regularly on the school website, and distributed to families (e.g., flyers) via mail and automated calls to the home.

STATEMENT OF NONDISCRIMATION

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

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

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

(1) Mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) Fax: (202) 690-7442

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

This institution is an equal opportunity provider.

The Non-Discrimination statement will be included on all Food Services program materials and announcements.

COMPLAINTS

- 1. If Green Tree School receives a Civil Rights complaint from the complainant (i.e. parent).
 - a. Sponsor must inform complainant of Federal Civil Rights rules and regulations that have been established for protected classes. (A protected class is any person or group of people who are protected from discrimination based on):
 - i. Race
 - ii. Color
 - iii. National Origin
 - iv. Age
 - v. Sex
 - vi. Disability
 - b. Sponsor must provide complainant the necessary information to file a complaint, which is:
 - i. Mailing address of the USDA:
 U.S. Department of Agriculture
 Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW
 Washington, D.C. 20250-9410;
 - ii. USDA's Telephone/Fax numbers and Email address: (866) 632-9992 / (202) 690-7442 F/ program.intake@usda.gov
 - iii. Electronic link to file a civil rights complaint: http://www.ascr.usda.gov/complaint_filing_cust.html

Note: If the sponsor is unsure if the complaint falls under a protected class, sponsor should provide complainant the federal complaint information.

c. After providing the complainant with the information on how to file a
Civil Rights complaint directly at the Federal level, the sponsor may
attempt to resolve the complaint if it is a matter that can be resolved quickly.
Resolving complaints in real-time at the lowest possible level is encouraged.
(*Note: This is not an investigation as neither the sponsor nor the State
agency has the authority to conduct complaint investigations. This is simply
trying to resolve the situation if it was potentially caused by a

miscommunication.)

If the complainant refuses to discuss the matter any further with the sponsor or if the matter cannot be resolved quickly, then the sponsor should:

- d. reiterate the complaint filing procedures in 1)b),
- e. document the complaint and actions taken (i.e. referral to Federal complaint procedures) in a Civil Rights complaint log that is separate from any other complaint log, (*Note: A separate Civil Rights complaint log is necessary due to confidentiality and privacy laws. See complaint log requirements in d) below.), and
- f. notify the State agency of the discussion. (*Note: it is important for the sponsor to notify the State agency because regular communication between the sponsor and State agency is key to operating the program successfully.)

If the complainant is willing to try to resolve the issue with the sponsor and a satisfactory resolution is achieved, then the sponsor should still remind the complainant (using the information in 1)b)) of his/her right to file at the Federal level if necessary. (*Note: Complainants retain the right to file at the Federal level even if a resolution seems to have been reached at the sponsor level.) The sponsor needs to document the complaint and actions taken (i.e. how resolution was achieved) in a log that is separate from any other complaint log, and notify the State agency of the resolution.

- 2. Regardless if the complainant wishes to file at the Federal level, the sponsor should document as much information as possible in their Civil Rights complaint log including, but not limited to, the following:
- ➤ Date Complaint Received
- ➤ Complainant's Name
- > Complainant's Address
- ➤ Complainant's Telephone Number
- > Complainant's Email Address
- ➤ Allegation of Discrimination/Issue (i.e. FNS program involved, protected class(es) involved, etc.)
- ➤ Date of Alleged Discriminatory Action
- 3. The sponsor must forward the information, within 5 days of receipt of complaint from complainant, to the State agency (process depicted below):
 - a. State Agency Civil Rights Coordinator ► State Agency Director* ► FNS
 Regional Office Civil Rights Contact ► FNS Headquarters Civil Rights ►
 Office Complainant
- 4. *State Agency level must forward complaint information, within 5 days of receipt of complaint from sponsor, to the FNS regional office.
- 5. FNS team conducts complaint review and investigation, which includes contact with the complainant, State agency, sponsor, etc.

Additional Information:

- a. Complainants must file within 180 days of the alleged action
- b. Confidentiality is extremely important
- c. USDA complaint form:
- > English version:

 $http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf$

> Spanish version:

 $http://www.ocio.usda.gov/sites/default/files/docs/2012/Spanish_Form_508_Compliant_6_8_12_0.$

ELIGIBILITY AND VERIFICATION

Students are eligible to receive meals in the breakfast and lunch programs on a free, reduced price or full-paid basis. Eligibility may be determined by one of three methods:

- 1. An application completed by a child's parent or guardian and evaluated for eligibility on the basis of family income and number of family members per household.
- 2. The Direct Certification method by which the names of students from families receiving aid to Families With Dependent Children or Food Stamps have categorical eligibility determined automatically via COMPASS.
- 3. Children may also be categorically eligible if they have migrant, homeless, or runaway status. Foster children may also be categorically eligible.

DISTRIBUTION AND RETURN OF APPLICATONS

- Free and Reduced Price Meal Applications are submitted by families at the beginning of each school year.
- It is important that every child be given an opportunity to receive free or reduced price meals not be overtly identified. Therefore, application must be distributed to every child in the school.
- The Food Services Director is responsible the oversight of the distribution of Household Applications for Free and Reduced Price Meals. The Admissions Coordinator is the administrative support staff that will ensure that the meal applications are distributed annually to all students, and upon admissions for new admissions throughout the academic year. The Food Service Manager will process all Household Applications for Free and Reduced Price Meals, and ensure notification to families within 10 operating days of receiving the complete application.
- If the parent or guardian wishes to apply for free or reduced price meals for their child they should complete and submit an application to the child's school.
- Spanish applications are available upon request.
- The meal application is also available for downloading and completing on www.compass.compass.state.pa.us

- Families can mail or hand deliver completed and signed applications to the Admissions
 Coordinator. As an administrative support, the Program Coordinator that is also responsible
 for confidential student education records is also trained to receive confidential meal
 applications in the event that the Admissions Coordinator is unavailable.
- The Admissions Coordinator or Program Coordinator will stamp the date of receipt on applications submitted to Green Tree School and submit the applications to the Food Services Manager for review.
- The Food Services Manager will review the application for completeness and contact any households that have incomplete applications to try to obtain the missing information. The Food Service Manager must document all attempts to contact households with incomplete applications in the notes section of the application on PrimeroEdge.

DETERMINATION OF ELIGIBILITY

- The Food Services Manager will scan and/or manually enter Household Applications for Free or Reduced Price Meals into PrimeroEdge, in order to determine the meal eligibility for each complete application received, within 10 operating days of the date received that is stamped on the application. If the application was originally incomplete, then the Food Service Manager will note on the paper application and in PrimeroEdge, the date that the missing information was provided by the family, in order to ensure that the application is processed within 10 operating days of that date.
- The Food Services Manager will notify the family of the determined meal eligibility within 10 operating days of receipt stamped on the application. Families that are denied benefits will receive written notification of their denial, that includes the reason for the denial, information on their right to appeal, and a statement that the household can reapply at any time during the school year.
- The Food Services Manager will maintain the meal application onsite for four years.
- An application is not necessary for students who have been directly certified as eligible for free meals. Direct certification is a process which automatically identifies eligible students through a computer match of our enrollment list and the Pennsylvania Department of Welfare records via COMPASS.
- In September of every school year, the Food Service Director will use eligibility status from June of the preceding school year, to determine eligibility status while awaiting new applications or updated direct certifications from COMPASS. Eligible students that were receiving free or reduced price meal benefits in the preceding school year, will carry over those benefits for the first 30 operating days of the new school year, or until a new application is approved.

- When the parent/guardian returns an application indicating that the student will bring a lunch from home, place all copies of the application in a "NOT INTERESTED" file.
- The food services office will use a tablet computer of all students eligible for meals weekly, based on approved applications and direct certification. This list is to be used to determine students' eligibility at point of service. An updated spreadsheet will be maintained, the Lead Food Services Worker, or designee, must obtain an updated eligibility list at least weekly from the Food Services Manager. Listed below are the codes as they appear on the eligibility list produced:
 - 1. Free
 - 2. Paid
 - 3. Reduced

VERIFICATION

Green Tree School & Services, as the designated School Food Authority, is required to conduct verification of the reported income and eligibility of a percentage of randomly selected participating students on an annual basis. Verification is conducted in accordance with policies and procedures established by the Pennsylvania Department of Education, the State Agency designated to oversee the National School Lunch and Breakfast Program. This process is conducted so that only eligible students will participate in the National School Breakfast and Lunch Program. Verification begins on **October 1**st of each year and ends on **November 15**th of the year.

Administrative support for the Food Services Department will be responsible for sending letters of notification to Parents and for coordinating the verification process.

Verification Process

- 1. Food Service Director will determine the percentage of non-response for verification from the previous school year and then select the proper verification sampling method.
- 2. Food Services Director will differentiate between error prone applications and non-errorprone applications, count the number of approved current year applications, and select the applications to be verified.
- 3. Food Service Director will complete the confirmation review of the sample applications selected. Changes to eligibility and notification to effected families will occur as needed following the confirmation review.
- 4. Administrative support will send *Selection for Verification* letters to families that have been selected for verification of income.
- 5. Administration support will provide the Food Services Director with COMPASS verification for applications that have SANP or TANF case numbers.
- 6. Send a 2nd Selection for Verification letter to families that do not respond and document

- all correspondence (e.g., email, telephone) and attempts to reach non-responsive families.
- 7. Complete the verification process by **November 15**th and the Food Services Director will complete the Verification Collection report on PEARS by **February 1**st of each year.
- 8. Food Services Manager will maintain copies of all documents, received and sent, for four year.

COMMUNITY ELIGIBILITY PROVISION (CEP)

The Healthy, Hunger Free Kids Act of 2010 includes a provision for students in high-poverty areas to provide free school breakfast and lunch to all students at no cost. As an approved private school in an urban community, Green Tree School & Services will complete applications with the Pennsylvania Department of Education Food and Nutrition Division for participation in CEP on an annual basis. If eligible and approved for CEP, the Food Services Department at Green Tree School & Services would receive the following benefits:

- Student and household applications are not required to be collected, consequently no verification process is required
- All students are able to eat for free and there is no full or reduced pricing
- Meal counting processes can be simplified, with no need for potential overt identification issues of students (Paid vs. Free vs. Reduced) at meal points of service

NUTRITIONAL STANDARDS

In compliance with the Healthy, Hunger Free Kids Act of 2010, Green Tree School & Services will provide grade group, specific meal components, in specific portion sizes, to every child every day. Our menu planning meets the USDA program requirements while being appetizing, appealing, and acceptable to the student population.

BREAKFAST REQUIREMENTS

Four food items will be offered as a part of a reimbursable breakfast, and these food items must include grains, a fruit or vegetable, and milk. Meat or a meat alternative is optional for breakfast. In compliance with the Healthy, Hunger Free Kids Act of 2010, breakfast meal patterns offered to students at Green Tree School & Services will include the following:

Meal Pattern	Grades: K-8	Grades: 9-12
Meat/Meat Alternative	0	0
Grains	1 oz. min/daily	1 oz. min/daily
	8 oz. weekly	9 oz. weekly
Fruit or Vegetable	1 cup daily	1 cup daily
	5 cups weekly	5 cups weekly

Milk	8 oz. daily	8 oz. daily
Minimum – Maximum Calories	400-500	450-600
Saturated Fat (% of total Calories)	<10%	<10%
Sodium	≤ 540	≤ 640
Tran Fat	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.	

OFFER VS. SERVE AT BREAKFAST

Offer versus serve (OVS) is used to reduce waste and allow students to make their own choices of the food item(s) they eat. Students at Green Tree School & Services must select a minimum of **three (3) food items** for the breakfast to be a reimbursable meal. OVS will be utilized at breakfast for all high school students (grades 9-12), and when selecting the 3 food items, the student must include ½ cup of a fruit, vegetable, or juice. Breakfast to all students (K-12) is provided in the classroom in the mornings, prior to 1st period class.

LUNCH REQUIREMENTS

Five food items will be offered as a part of a reimbursable lunch, and these food items must include grains, a fruit, vegetable subgroups, meat or a meat alternative, and milk. In compliance with the Healthy, Hunger Free Kids Act of 2010, breakfast meal patterns offered to students at Green Tree School & Services will include the following:

Meal Pattern	Grades: K-8	Grades: 9-12
Meat/Meat Alternative	1 oz. min/daily	2 oz. min/daily
	9 oz. weekly	10 oz. weekly
Grains	1 oz. min/daily	2 oz. min/daily
	8 oz. weekly	10 oz. weekly
Vegetable (Total Cups)	3 3/4 cups weekly	5 cups weekly
Dark Green	½ cup weekly	½ cup weekly
Read/Orange	³ / ₄ cup weekly	1 ¼ cup weekly
Starchy	½ cup weekly	½ cup weekly
Legumes	½ cup weekly	½ cup weekly
Other Vegetables	½ cup weekly	³ / ₄ cup weekly
Extra Weekly Vegetables	1 cup weekly	1 ½ cup weekly
Fruit	½ cup daily	1 cup daily
	2 ½ cups weekly	5 cups weekly
Milk	8 oz. daily	8 oz. daily
Minimum – Maximum	600-650	750-850

Calories		
Saturated Fat (% of total	<10%	<10%
Calories)		
Sodium	≤ 1230	≤ 1420
Tran Fat	Nutrition label or manufacturer specifications must indicate	
	zero grams of trans fat per serving.	

OFFER VS. SERVE AT LUNCH

Offer versus serve (OVS) is used to reduce waste and allow students to make their own choices of the food item(s) they eat. Students at Green Tree School & Services must select a minimum of **three (3) food items** for the lunch to be a reimbursable meal. OVS will be utilized at lunch for all high school students (grades 9-12), and when selecting the 3 food items, the student must include ½ cup of a fruit or vegetable. Lunch for all students (K-12) will be provided in the cafeteria, so students in K-8 will also have the option of selecting food for lunch.

ACCOMODATING STUDENTS WITH SPECIAL DIETARY NEEDS

Green Tree School & Services shall make appropriate accommodations to students with special dietary needs in accordance with applicable law, regulations, and school policy. Meal accommodations that fit in offer versus serve will be one (1) option the Food Services program can use to accommodate students/families with dietary requests. It is the parents'/guardians' responsibility to complete a Medical Plan of Care for School Food Services in the event any dietary change has occurred. When a new dietary condition is diagnosed, the Food Services Department will honor the request "temporary." Families have five (5) days to get the necessary completed forms and or doctors' notes back to the Food Services Office.

MEAL COUNTING AND CLAIMING

POINT OF SERVICE MEAL COUNTING

Green Tree School & Services Food Service workers will ensure that meals will be counted at the end of the serving line, once the staff can be certain that the student has selected their meal components required for the meal to be a reimbursable meal.

Breakfast:

The Food Service Workers deliver breakfast to each classroom. Food items are kept in temperature control boxes and students are given a reimbursable bagged breakfast. Tracking of the distribution of reimbursable breakfasts will be recorded manuals on meal checklists organized by classroom. The Food Service Workers are responsible for visually accounting for what each student is selecting and marking off the students' name on the meal checklist. The Food Service Workers will accurately identify a reimbursable meal spreadsheet.

Once breakfast delivery is complete, the designated Food Service Worker will use the manual

meal checklist to enter all breakfasts served to the applicable students in our Student Information System (Skyward). Before the close of the day of service, a different Food Service Worker will complete an audit of the breakfast entries in Skyward. This audit will be conducted by running a "Daily Activity Report" in Skyward for the date of service, and cross checking that report with the manual meal checklists from breakfast delivery. Any errors will be corrected prior to closing the batch of meal service for the day.

Lunch:

The Food Service Workers will use a tablet computer and bar code scanner at the end of the point of service line. At the point of service, stationed at the end of the serving line, the meal items the student selects are accounted for in the Food Service section of Skyward. Skyward is populated with all student demographic information and is updated as changes are needed. The Food Service Workers are responsible for visually accounting for each students' barcode and accurately accounting for what each student is taking. The Food Service Workers will accurately identify a reimbursable meal in the Skyward Touch Screen at the Point of Service.

Once the final lunch period is complete, the Food Service Manager will complete an audit by reviewing the "Daily Activity Report" for lunches served to confirm meal counts for lunch service Any errors will be corrected prior to closing the batch of meal service for the day.

REPORTS AND CLAIMS FOR REIMBURSEMENT

The Lead Food Service worker will ensure that daily meal counts are recorded for every breakfast and lunch served at Green Tree School & Services. The Food Services Manager will review these daily meal count forms on a weekly basis prior to submission to Administrative support for the reimbursement claims to be generated. Claims for reimbursement will be completed in PEARS within 30 days of the last day of the month being claimed. Designated Administrative Support will compile the data collected & reviewed weekly by the Food Service Manager, to ensure adherence to these timelines. If more than 30 days is needed to complete the claims in PEARS, the Food Services Manager will inform the Food Services Director for approval. All claims for reimbursement **must** be submitted via PEARS within 60 days of the last day of the month being claimed.

The Food Services Manager will provide regular monitoring to ensure that Food Services Staff are accurately completing the meal counting forms at the point of service. Internal controls used to ensure accuracy in claims at Green Tree School & Services will include edit check worksheets and on-site monitoring. The Food Service Manager will complete an edit check worksheet starting every **November 30th**, during which time the meal count records for the month of October will be compared to attendance records for October to check for potential errors. The Food Service Manager will complete monthly edit check worksheets and investigate any areas of discrepancy.

Any discrepancies that cannot be resolved will not be included in the monthly claim report. The Food Services Director will review signed edit check worksheets on a monthly basis, prior to submission to Administrative Support for claim generation.

The Food Services Director will complete on-site monitoring of both a lunch and breakfast service by **January 15**th of every year to ensure that the meal count reports are based on the approved counting system for Green Tree School & Services. If there is a problem with the counting and claiming procedure discovered during the On-Site Monitoring, the Food Services Director will implement a corrective action plan and conduct a follow-up review in 45 calendar days to determine resolution of the error. Meal counting documentation, including daily meal count forms, edit check worksheets, and on-site monitoring forms must be maintained a minimum of four (4) years.