

## Chapter 7:

### SFA Monitoring/Recordkeeping Responsibilities

#### Monitoring

The SFA must monitor the operation of the FSMC through periodic on-site visits in order to ensure that the FSMC complies with the contract and any other applicable Federal, State, and local rules and regulations.

The SFA should maintain documentation of its monitoring and whether or not corrective action was taken. The SFA's contract monitoring responsibilities include, but are not limited to, evaluating:

**Cycle Menu**—adherence to the cycle menu and any and all deviations allowed under the contract.

**Meal Pattern**—adherence to the meal pattern requirements specified in 7 CFR Parts 210 and/or 220.

**Claim Documentation**—records, by school, to support the Claim for Reimbursement (meal/milk counts and any other data on the claim for which the FSMC is responsible).

**Cost Records**—cost records, including source documentation supporting charges for contractually approved costs for cost-based contracts, e.g., time and attendance records for staff hours charged.

**Meal Count Records**—meal count records for meals not covered by the Claim for Reimbursement, e.g., adult meals.

**Revenue Records**—revenue records broken down by source, type and category of meal or food service, e.g., a la carte sales, reduced price and full price NSLP and SBP meals, vending machine sales.

**Outside Activities**—outside food service activities.

**Preparation Facilities**—the FSMC meal preparation facilities.

**USDA Donated Foods**—that they have conducted a reconciliation at least annually (and upon termination of the contract) to ensure that the FSMC has credited it for the value of all donated foods received for use in the SFA’s food service in the school year, including, in accordance with requirements in 7 CFR 250.51(a), the value of donated foods contained in processed end products.

Please Note: If the FSMC is in charge of the meal counting and claiming system, refer to the regulations at 210.8(a)(1) which state that every school year a SFA with more than one school must perform at least one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. Therefore, if the FSMC is, in fact, in charge of the meal counting and claiming system, the SFA would be monitoring that portion of their services every school year.

**Additional  
Monitoring  
Responsibilities**

The SFA must conduct on-site school reviews and must monitor through these reviews and by other means:

**Civil Rights**—compliance with civil rights requirements. In addition to monitoring compliance, the SFA must ensure the FSMC complies with the procedures established by the SFA for referring any civil rights complaints to the SFA.

**Free and Reduced Price Policy**—adherence to the SFA's approved free and reduced price meal policy statement.

**Offer versus Serve**—compliance with offer versus serve requirements.

**Competitive Foods**—compliance with the competitive foods requirements of the NSLP regulations in all schools by all parties.

**SFA Policies**—compliance with all policies established by the SFA.

**Recordkeeping  
Responsibilities**

As discussed in Chapter 3, the SFA must maintain any books, documents, papers and records directly pertinent to: the solicitation, award or extension of any given contract and the implementation of that contract. Such records must be maintained for a period of 3 years, as specified in 7 CFR 210.23(c).

Additionally, the SFA must ensure that the contract/solicitation for the FSMC includes a provision outlining the recordkeeping responsibilities.