




DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

## MEMORANDUM

To: School Food Authorities

From:   
Elizabeth Leach  
School Programs Manager

Date: October 11, 2016

Re: Expansion of the National School Lunch Program and School Breakfast Program  
Monitoring

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State Agency Memo  
NSLP #10-17

The United States Department of Agriculture (USDA) released the [Final Rule: Administrative Reviews in the School Nutrition Programs](#) and recently released additional guidance supporting the Final Rule.

The purpose of this State Agency Memo is to inform school food authorities (SFA's) of updates in the Final Rule that require SFA action. If you have any questions, please reach out to myself or your designated program specialist.

### **SFA Annual On-Site Reviews of SBP and NSLP**

In addition to the review requirements already in place for an annual SFA on-site review of the National School Lunch Program (NSLP), the final rule adds this review requirement for the School Breakfast Program (SBP). SFAs are required to establish internal controls which ensure the accuracy of meal counts prior to the submission of the monthly Claim for Reimbursement. The internal controls must include an on-site review of the readily observable general areas of review and the meal counting and claiming system employed by each school approved to participate in the NSLP and at 50% of the schools approved to participate in the SBP within the jurisdiction of the SFA. While the annual requirement is to complete 50% of the schools approved to participate in the SBP in the SFA's jurisdiction, each school approved to participate in the SBP must be reviewed at least once every two years. SFAs with only one school are not required to conduct such on-site reviews for their approved school. However, the Food and Nutrition Service (FNS) highly encourages those SFAs to conduct a self-assessment in the form of an on-site review to ensure integrity and accountability of the Programs.

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA.

The on-site review must take place prior to February 1 of each school year. If the review discloses problems with a school's meal counting and claiming procedures or general review areas, the SFA must ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review must ensure the school's claim is based on the counting and claiming system, as implemented, and yields the actual number of reimbursable free, reduced price, and paid meals, respectively, served for each day of operation.

In an effort to assist SFAs in conducting these reviews, FNS is providing a prototype checklist for SFAs to use as a resource when conducting on-site reviews. The content of the prototype checklist covers the minimum requirements for the on-site reviews; therefore, SFAs do not need to make changes to their existing on-site review form(s) unless it does not reflect the information contained in the FNS prototype checklist. The checklist assesses meal counting and claiming procedures, system accuracy, point of service, and readily observable general areas of review as applicable. The checklist is included below for your use.

# **SCHOOL FOOD AUTHORITY ON-SITE REVIEW CHECKLIST** **ASSESSMENT OF THE MEAL COUNTING AND CLAIMING SYSTEM AND READILY** **OBSERVABLE GENERAL AREAS FOR THE SBP AND NSLP**

According to 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1), every school year, prior to February 1, each School Food Authority (SFA) with more than one school (as defined by 7 CFR Part 210.2 to include Residential Child Care Institutions (RCCIs)) must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and 50% of schools operating the School Breakfast Program (SBP) under its jurisdiction.

Each on-site review must ensure the school's claim is based on the counting and claiming system, as implemented, and yields the actual number of reimbursable free, reduced price, and paid meals, respectively, served for each day of operation.

If the review discloses problems with a school's meal counting and claiming procedures or general review areas, the SFA must ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems.

**School Name:** \_\_\_\_\_ **Review Date:** \_\_\_\_\_

**SFA Reviewer:** \_\_\_\_\_

## **SCHOOL BREAKFAST PROGRAM ON-SITE REVIEW**

The following questions are recommended at a minimum to complete the on-site review requirement:

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM			
<input type="checkbox"/>	<input type="checkbox"/>	1. Is the method used for counting reimbursable meals in compliance with the approved point of service requirement? (Meal counts must be taken at the location(s) where complete meals are served to children.)			
<input type="checkbox"/>	<input type="checkbox"/>	2. Is the point of service meal count used to determine the school's claim for reimbursement?			
<input type="checkbox"/>	<input type="checkbox"/>	3. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?			
<input type="checkbox"/>	<input type="checkbox"/>	4. Is the school correctly implementing policies for handling the following (as applicable):			
		<b>Yes</b>	<b>No</b>	<b>N/A</b>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incomplete meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Second meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visiting student meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adult and non-student meals (and identifying program vs non-program)?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A la carte?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Student worker meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Field Trips?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Charged and/or prepaid meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Offer vs Serve?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unpaid meal charges
<input type="checkbox"/>	<input type="checkbox"/>	5. Is there a method of identifying non-reimbursable meals (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.) and distinguishing them from reimbursable meals?			

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM CONT.	
<input type="checkbox"/>	<input type="checkbox"/>	6. Is someone trained as a backup for the monitor and the meal counter?	
<input type="checkbox"/>	<input type="checkbox"/>	7. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available? Do staff know when and how to implement them?	
<input type="checkbox"/>	<input type="checkbox"/>	8. Are daily counts correctly totaled and recorded?	
<input type="checkbox"/>	<input type="checkbox"/>	9. If claims are aggregated, are the meal counts correctly totaled and consolidated?	
<input type="checkbox"/>	<input type="checkbox"/>	10. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?	
		<i>Record today's meal counts by category and compare to the total number of students eligible by category</i>	
		<b>Number of Students Approved by Category</b>	<b>Today's Meal Counts by Category</b>
		Free:	Free:
		Reduced Price:	Reduced Price:
		Paid:	Paid
<input type="checkbox"/>	<input type="checkbox"/>	11. Does the system prevent overt identification of children receiving free or reduced price meals?	
<b>NOTE: The following two questions are for all SFAs <u>except</u> for SFAs on Provision 2 or 3 in non-base years, CEP, or RCCIs with only residential children</b>			
YES	NO		
<input type="checkbox"/>	<input type="checkbox"/>	12. Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals <b>by category</b> (free, reduced price, paid)?	
<input type="checkbox"/>	<input type="checkbox"/>	13. If applicable according to 7 CFR 220.11(d) are comparisons of daily free, reduced price and paid breakfast counts against data which will assist in the identification of breakfast counts in excess of the number of free, reduced price and paid breakfasts served each day to children eligible for such breakfasts completed?	

**SBP CORRECTIVE ACTION PLAN (for any "NO" answers above):**

**SPECIFY DATE SBP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:** \_\_\_\_\_

**BY WHOM:** \_\_\_\_\_

YES	NO	READILY OBSERVABLE GENERAL AREAS	
<input type="checkbox"/>	<input type="checkbox"/>	1. Were any issues readily observed in relation to resource management?	
		YES	NO
		<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. Were any issues readily observed in other general areas?	
		YES	NO
		<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"/>	<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"/>

**SBP CORRECTIVE ACTION PLAN (for any “YES” answers above):**

**SPECIFY DATE SBP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:** \_\_\_\_\_

**BY WHOM:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_  
School Representative Title Date

\_\_\_\_\_  
SFA Reviewer Title Date

**SBP FOLLOW-UP VISIT** (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up: \_\_\_\_\_

Observations of corrective action implementation:

**SIGNATURE:** \_\_\_\_\_  
School Representative Title Date

\_\_\_\_\_  
SFA Reviewer Title Date

**NATIONAL SCHOOL LUNCH PROGRAM ON-SITE REVIEW (Review Date: \_\_\_\_\_)**

The following questions are recommended at a minimum to complete the on-site review requirement:

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM			
<input type="checkbox"/>	<input type="checkbox"/>	14. Is the method used for counting reimbursable meals in compliance with the approved point of service requirement? (Meal counts must be taken at the location(s) where complete meals are served to children.)			
<input type="checkbox"/>	<input type="checkbox"/>	15. Is the point of service meal count used to determine the school's claim for reimbursement?			
<input type="checkbox"/>	<input type="checkbox"/>	16. Is the person responsible for monitoring meals correctly identifying reimbursable meals?			
<input type="checkbox"/>	<input type="checkbox"/>	17. Is the school correctly implementing policies for handling the following (as applicable):			
		<b>Yes</b>	<b>No</b>	<b>N/A</b>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incomplete meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Second meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visiting student meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adult and non-student meals (and identifying program vs non-program)?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A la carte?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Student worker meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Field Trips?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Charged and/or prepaid meals?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Offer vs Serve?
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unpaid meal charges?
<input type="checkbox"/>	<input type="checkbox"/>	18. Is there a method of identifying non-reimbursable meals (i.e. not meeting meal pattern requirements, seconds, adult meals, etc.) and distinguishing them from reimbursable meals?			
YES	NO	MEAL COUNTING AND CLAIMING SYSTEM CONT.			
<input type="checkbox"/>	<input type="checkbox"/>	19. Is someone trained as a backup for the monitor and the meal counter?			
<input type="checkbox"/>	<input type="checkbox"/>	20. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available? Do staff know when and how to implement them?			
<input type="checkbox"/>	<input type="checkbox"/>	21. Are daily counts correctly totaled and recorded?			
<input type="checkbox"/>	<input type="checkbox"/>	22. If claims are aggregated, are the meal counts correctly totaled and consolidated?			
<input type="checkbox"/>	<input type="checkbox"/>	23. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?			
		<i>Record today's meal counts by category and compare to the total number of students eligible by category</i>			
		<b>Number of Students Approved by Category</b>		<b>Today's Meal Counts by Category</b>	
		Free:		Free:	
		Reduced Price:		Reduced Price:	
		Paid:		Paid	
<input type="checkbox"/>	<input type="checkbox"/>	24. Does the system prevent overt identification of children receiving free or reduced price meals?			

NOTE: The following two questions are for all SFAs <u>except</u> for SFAs on Provision 2 or 3 in non-base years, CEP, or RCCIs with only residential children		
YES	NO	
<input type="checkbox"/>	<input type="checkbox"/>	25. Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals <b>by category</b> (free, reduced price, paid)?
<input type="checkbox"/>	<input type="checkbox"/>	26. If applicable according to 7 CFR 210.8(a)(3), are edit checks completed and documented which compare the daily counts of free, reduced price, and paid meals against the product of the number of children currently eligible for free, reduced price, and paid meals, respectively, times an attendance factor (and any discrepancies accounted for)?

**NSLP CORRECTIVE ACTION PLAN (for any “NO” answers above):**

**SPECIFY DATE NSLP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:** \_\_\_\_\_

**BY WHOM:** \_\_\_\_\_

YES	NO	READILY OBSERVABLE GENERAL AREAS	
<input type="checkbox"/>	<input type="checkbox"/>	3. Were any issues readily observed in relation to resource management?	
		YES	NO
		<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. Were any issues readily observed in other general areas?	
		YES	NO
		<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"/>	<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"/>

**NSLP CORRECTIVE ACTION PLAN (for any “YES” answers above):**

**SPECIFY DATE NSLP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:** \_\_\_\_\_

**BY WHOM:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_  

School Representative
Title
Date

\_\_\_\_\_  

SFA Reviewer
Title
Date

**NSLP FOLLOW-UP VISIT** (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up: \_\_\_\_\_

Observations of corrective action implementation:

**SIGNATURE:** \_\_\_\_\_  

School Representative
Title
Date

\_\_\_\_\_  

SFA Reviewer
Title
Date