

To: Authorized Representatives Child Nutrition Programs
From: Child and Adult Nutrition Services
Date: May 10, 2018
Subject: On-Site Review Worksheet Assessment of the School Meal Count System
Memo Number: SNP 228-1

This numbered memo supersedes the previous memo #52.1. All Child & Adult Nutrition Services memos are available on the Child & Adult Nutrition Services website.

Every school year, each School Food Authority (SFA) with more than one school must perform no less than one on-site review of the meal counting and claiming system and some general areas identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and half of the schools operating the School Breakfast Program (SBP).

Procedure:

This on-site review shall take place prior to February 1 of each school year. If the review finds problems with a school's meal counting or claiming procedures or general areas, the SFA shall: ensure the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review must ensure that the school's claim is based on an acceptable and approved 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.

At a minimum, Attachment 1 must be completed annually by February 1 for each location where lunch meals are served and at least half of your breakfast meals are served. Attachment 2 is an optional review that can be completed to review all aspects of the Child Nutrition Programs whether there is only one site or multiple serving sites. Attachment 1 must be completed by the Authorized Representative to review meal counting and claiming procedures. Attachment 2 does not have a mandatory deadline but reviews a combination of food service concerns and can be completed by the school administrator and/or the food service director or kitchen manager. The completed attachments should be filed with yearly records and kept on file for the current year and the next three succeeding years.

Definitions:

- **Approved Point of Service:** the approval occurs in your annual application with CANS (in the iCAN system). Review your "Meal Count Method" Checklist document.
- **Civil rights:** In the operation of the School Nutrition Programs, no child shall be denied benefits or be otherwise discriminated against because of race, color, national origin, age, sex, or disability. State agencies and school food authorities shall comply with the requirements of: Title VI of the Civil Rights Act of 1964; title IX of the Education

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Amendments of 1972; section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Department of Agriculture regulations on nondiscrimination (7 CFR parts 15, 15a, and 15b); and FNS Instruction 113-1.

- **Competitive food:** all food and beverages other than reimbursable meals available for sale to students on the School campus during the School day (midnight before to 30 minutes after the school day ends).
- **Incomplete Meal:** a meal that does not contain the required meal components. The requirements for a complete meal are different for breakfast and lunch, and offer versus serve or no offer versus serve.
- **Indirect costs:** School food authorities must follow fair and consistent methodologies to identify and allocate allowable indirect costs to the nonprofit school food service account, in accordance with 2 CFR part 200 as implemented by 2 CFR part 400.
- **Nonprofit school food service account:** is the dedicated account for only food service operations conducted by the school food authority principally for the benefit of schoolchildren, all of the revenue from which is used solely for the operation or improvement of such food services.
- **Nonprogram Food:** are those foods and beverages: (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account. Revenue from nonprogram foods. The proportion of total revenue from the sale of nonprogram foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining nonprogram foods to (ii) The total costs associated with obtaining program and nonprogram foods from the account. All revenue from the sale of nonprogram foods shall accrue to the nonprofit school food service account of a participating school food authority.
- **Overt Identification:** when the eligibility of a student can be determined by using color, symbols, numbers, letters, codes, or another method of identification in the meal service area.
- **Paid Lunch Equity:** the average student paid lunch price is equal to/greater than the reimbursement difference (free reimbursement rate minus the paid reimbursement rate).
- **Point of Service:** means that point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid lunch has been served to an eligible child.
- **Professional Standards:** establishes minimum hiring standards for school nutrition program directors and continuing education/training standards for all staff with responsibility for school nutrition programs.

Attachment 1

On-Site Monitoring Required Worksheet

Assessment of the Meal Counting and Claiming System and Some General Areas

Complete once per school year, before February 1. Each School Food Authority (SFA) with more than one school site must perform at least one on-site review of the meal counting and claiming system and some general areas of review in each school site operating the National School Lunch Program (NSLP) and 50% of school sites 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 approved by CANS in the annual application, and yields the actual number of reimbursable free, reduced price, and paid meals, respectively, served for each day of operation.

If the review indicates problems with a school's meal counting and claiming procedures or general review areas, the SFA must ensure that the school site(s) 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: Answer the following questions.

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM			
☐	☐	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.)			
☐	☐	2. Is the point of service meal count used to determine the school's claim for reimbursement?			
☐	☐	3. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?			
☐	☐	4. Is the school correctly implementing policies for handling the following (as applicable):			
		Yes	No	N/A	
		☐	☐	☐	Incomplete meals?
		☐	☐	☐	Second meals? (a complete 2 nd meal with all foods offered in the 1 st meal)
		☐	☐	☐	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
		☐	☐	☐	Visiting student meals?
		☐	☐	☐	Adult and non-student meals (and identifying program vs non-program)?
		☐	☐	☐	A la carte?
		☐	☐	☐	Student worker meals?
		☐	☐	☐	Field Trips?
		☐	☐	☐	Charged and/or prepaid meals?
		☐	☐	☐	Offer vs Serve?
		☐	☐	☐	Unpaid meal charges
☐	☐	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.	
☐	☐	6. Is someone trained as a backup for the monitor and the meal counter?	
☐	☐	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?	
☐	☐	8. Are daily counts correctly totaled and recorded?	
☐	☐	9. If claims are aggregated, are the meal counts correctly totaled and consolidated?	
☐	☐	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>	
		Number of Students Approved by Category	Today's Meal Counts by Category
		Free:	Free:
		Reduced Price:	Reduced Price:
		Paid:	Paid
☐	☐	11. Does the system prevent overt identification of children receiving free or reduced price meals?	

NOTE: The following two questions are for all SFAs except for SFAs on Provision 2 or 3 in non-base years, CEP, or RCCIs with only residential children

YES	NO	
☐	☐	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 by category (free, reduced price, paid)?
☐	☐	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):

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SPECIFY DATE SBP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

YES	NO	READILY OBSERVABLE GENERAL AREAS	
☐	☐	1. Were any issues readily observed in relation to resource management?	
		YES	NO
		☐	☐
		Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)	
		☐	☐
		Paid Lunch Equity? (7 CFR 210.14(e))	
		☐	☐
		Revenue from Nonprogram Foods? (7 CFR 210.14(f))	
		☐	☐
		Indirect Costs? (2 CFR Part 200 and 7 CFR 210.14(g))	

2. Were any issues readily observed in other general areas?		
YES	NO	
☐	☐	Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
☐	☐	Civil Rights (7 CFR 210.23(b))
☐	☐	Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
☐	☐	Food Safety (7 CFR 210.13)
☐	☐	Competitive Food Service (7 CFR 210.11 and 220.12)
☐	☐	Water must be made available during breakfast and lunch meal service (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
☐	☐	Professional Standards (7 CFR 210.31)
☐	☐	SBP and SFSP Outreach (7 CFR 210.12(d))
☐	☐	Local School Wellness Policies (7 CFR 210.30)
☐	☐	Other

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

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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:

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SIGNATURE: _____

School Representative	Title	Date
_____	_____	_____
SFA Reviewer	Title	Date
_____	_____	_____

NATIONAL SCHOOL LUNCH PROGRAM ON-SITE REVIEW (Review Date: _____)

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM			
☐	☐	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.)			
☐	☐	15. Is the point of service meal count used to determine the school's claim for reimbursement?			
☐	☐	16. Is the person responsible for monitoring meals correctly identifying reimbursable meals?			
		17. Is the school correctly implementing policies for handling the following (as applicable):			
		Yes	No	N/A	
		☐	☐	☐	Incomplete meals?
		☐	☐	☐	Second meals?
		☐	☐	☐	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
		☐	☐	☐	Visiting student meals?
		☐	☐	☐	Adult and non-student meals (and identifying program vs non-program)?
		☐	☐	☐	A la carte?
		☐	☐	☐	Student worker meals?
		☐	☐	☐	Field Trips?
		☐	☐	☐	Charged and/or prepaid meals?
		☐	☐	☐	Offer vs Serve?
		☐	☐	☐	Unpaid meal charges?
☐	☐	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?			
☐	☐	19. Is someone trained as a backup for the monitor and the meal counter?			
☐	☐	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?			
☐	☐	21. Are daily counts correctly totaled and recorded?			
☐	☐	22. If claims are aggregated, are the meal counts correctly totaled and consolidated?			
☐	☐	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>			
		Number of Students Approved by Category		Today's Meal Counts by Category	
		Free:		Free:	
		Reduced Price:		Reduced Price:	
		Paid:		Paid:	
☐	☐	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				
☐	☐	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 by category (free, reduced price, paid)?			
☐	☐	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)?
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NSLP CORRECTIVE ACTION PLAN (for any "NO" answers above):

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SPECIFY DATE NSLP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

YES	NO	READILY OBSERVABLE GENERAL AREAS	
		3. Were any issues readily observed in relation to resource management?	
		YES	NO
		☐	☐
			Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)
		☐	☐
			Paid Lunch Equity? (7 CFR 210.14(e))
		☐	☐
			Revenue from Nonprogram Foods? (7 CFR 210.14(f))
		☐	☐
			Indirect Costs? (2 CFR Part 200 and 7 CFR 210.14(g))
		4. Were any issues readily observed in other general areas?	
		YES	NO
		☐	☐
			Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
		☐	☐
			Civil Rights (7 CFR 210.23(b))
		☐	☐
			Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
		☐	☐
			Food Safety (7 CFR 210.13)
		☐	☐
			Competitive Food Service (7 CFR 210.11 and 220.12)
		☐	☐
			Water (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
		☐	☐
			Professional Standards (7 CFR 210.30)
		☐	☐
			SBP and SFSP Outreach (7 CFR 210.12(d))
		☐	☐
			Local School Wellness Policies (7 CFR 210.30)
		☐	☐
			Other

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

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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

SFA:	School:			
REVIEW AREAS	YES	NO	N/A	COMMENTS
For Provision 2 Agencies (Not a Base Year only, follow standard directions during a Base Year)				
18. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
19. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
20. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
21. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	
22. Are the applications from a base year still available? (Records must be kept longer than three years.)	☐	☐	☐	
23. Does the SFA report meal counts based on percentages that were established during the base year? (Is the base year monthly percentages chart used when submitting the monthly claims?)	☐	☐	☐	
24. Have administrative staff attended an approved refresher training offered by CANS for current school year?	☐	☐	☐	
For Provision 3 Agencies (Not a Base Year only, follow standard directions during a Base Year)				
25. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
26. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
27. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
28. Does the SFA submit monthly meal counts based on enrollment using percentage factor established in base year rather by student names or actual meal counts?	☐	☐	☐	
29. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	

30. Are the applications from the base year still available? (Records must be kept longer than three years.)	☐	☐	☐	
31. Have administrative staff participated in an approved refresher training offered by CANS for current school year?	☐	☐	☐	
For Community Eligibility Provision (CEP)				
18. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
19. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
20. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
21. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	
22. Is the documentation of student direct certification from the April prior to year one still available? (Records must be kept longer than three years.)	☐	☐	☐	
23. Does the SFA report meal counts based on percentages that were established during the base year? (Is the base year monthly percentages chart used when submitting the monthly claims?)	☐	☐	☐	
24. Have administrative staff attended an approved refresher training offered by CANS for current school year?	☐	☐	☐	

Attachment 2
On-Site Monitoring Optional Worksheet

SFA:	School:			
REVIEW AREAS	YES	NO	N/A	COMMENTS
Civil Rights				
1. Is the most current USDA/FNS "Justice for All" poster hung in a highly visible location that can be seen by students, faculty, and community people as they proceed through the tray line or where they receive their meal?	☐	☐	☐	
2. Are children eligible for free or reduced price meals allowed all the same choices as the paying children?	☐	☐	☐	
3. When using a name checklist in the lunchroom, is it coded in such a way that it is obvious to others which children are receiving free or reduced price meals (for example, color coding, symbols, numbers, obvious codes such as F,R,P; 1,2,3)?	☐	☐	☐	
4. When using a computer system for doing meal counts and cash transactions, does the system prevent overt identification? (for example, eligibility status does not show up on the screen)	☐	☐	☐	
5. Are multiple meal tickets available only to children eligible for free or reduced price meals?	☐	☐	☐	
6. Are single meal tickets available only to paid students?	☐	☐	☐	
7. Are accommodations made for students with physical disabilities so they can easily access the cafeteria and tray lines?	☐	☐	☐	
8. Does the SFA have policies and procedures for working with students needing special diets? (i.e., special diet request form completed by a physician and a resource such as a local dietician.)	☐	☐	☐	
Meal Patterns				
9. Is the food service staff planning and preparing meals according to the meal pattern indicated in the annual agreement? (for example, Traditional Menu Pattern, Enhanced Menu Pattern, Nutrient Standard Menu Pattern)	☐	☐	☐	
10. Does today's menu have all required menu components?	☐	☐	☐	
11. Are menus planned in advance to assure good use of commodities, foods on hand, adequate purchasing procedures?	☐	☐	☐	
12. Do the portion sizes appear to meet the minimum meal pattern requirements?	☐	☐	☐	
13. Is offer versus serve properly implemented?				
☐ Elementary	☐	☐	☐	
☐ Middle School / Jr. High	☐	☐	☐	
☐ High School	☐	☐	☐	
Explain "NO" answers in comments section.				

REVIEW AREAS	YES	NO	N/A	COMMENTS
Point of Service Reimbursable Meal Count				
14. Are daily meals claimed based on morning classroom counts, or counts taken at any other location before the meals is served?	☐	☐	☐	
15. Are daily meals claimed based on attendance records?	☐	☐	☐	
16. Is the point of service and meal count person located at the end of the tray line?	☐	☐	☐	
17. If CANS has given approval to do meal counts at the beginning of the tray line, is there someone who is responsible at the end of the line to be sure each tray has all the required menu components?	☐	☐	☐	
18. Are meal counts based only on tray or plate counts?	☐	☐	☐	
19. Does the meal count person look at each tray to be sure students have selected the minimum number of menu components so their meal can be claimed for reimbursement?	☐	☐	☐	
20. Are any of the required menu components located in the lunch room after students go through the tray line that would be not considered extra items? (for example the milk cooler, salad bar, or specialty bar. All menu components must be available to students at point of service.)	☐	☐	☐	
Menu Production Records				
21. Is the food service staff completing a daily production record for each meal service? (for example, a breakfast menu record, a lunch menu record, a snack menu record)	☐	☐	☐	
22. If the SFA has an outside entity prepare the daily meals, is a daily production record provided?	☐	☐	☐	
23. Is the staff keeping daily production records in a safe location, such as a 3-ring binder, in date order?	☐	☐	☐	
24. Is the staff using an approved production record form appropriate for Traditional Menus, Enhanced Menus, or Nutrient Standard Menus? (See NSLP Memo #9A for prototype forms and instructions.)	☐	☐	☐	
25. If the food service is using a production record that is not one of the prototypes shown in NSLP Memo #9A, has it been approved for use by CANS?	☐	☐	☐	
26. Are all sections of the daily production record being completed daily? (for example, planned servings for each menu item and age group; planned portions for seconds, adults, and ala carte; quantities for leftovers or added foods; total number of student and adult meals.)	☐	☐	☐	
27. Is the most recent health/sanitation report posted in a highly visible location for students, staff or community people to read?	☐	☐	☐	
28. Have the errors that may have been cited on the last health inspection report been corrected?	☐	☐	☐	
29. Have errors that may have been cited on the last fire inspection report been corrected?	☐	☐	☐	
30. Does the food service manager/director/head cook have a written food safety plan that itemizes standard operating procedures?	☐	☐	☐	

REVIEW AREAS	YES	NO	N/A	COMMENTS
31. Is the kitchen staff completing food temperature logs for their refrigerator/cooler and freezer?	☐	☐	☐	
32. Are toxic or poisonous items stored away from food items?	☐	☐	☐	
33. Does the SFA have policies and procedures in place for:				
• Controlling keys to kitchen and storage areas?	☐	☐	☐	
• Keeping food supply safe and secure?	☐	☐	☐	
• When outside groups use the kitchen facilities?	☐	☐	☐	
• Controlling unauthorized people/traffic in kitchen area?	☐	☐	☐	
• Monitoring freezer temps during school breaks?	☐	☐	☐	
34. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)	☐	☐	☐	
35. Is first in, first out method of inventory rotation practiced? (FIFO)	☐	☐	☐	
36. Are all foods stored in facilities belonging to the local agency?	☐	☐	☐	
USDA Commodities				
37. Does the School Food Authority (SFA) receive commodities? If no, skip questions 37-44.	☐	☐	☐	
38. Does the food service staff have a perpetual inventory record of all USDA commodities that is up to date?	☐	☐	☐	
39. Is adequate space available for storage?	☐	☐	☐	
40. Is there an excess supply of any commodity product? (an amount of stock which would exceed a 6 month supply)	☐	☐	☐	
41. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)	☐	☐	☐	
42. Is first in, first out method of inventory rotation practiced? (FIFO)	☐	☐	☐	
43. Are all foods stored in facilities belonging to the local agency?	☐	☐	☐	
44. Do program personnel know the procedures for submitting claims for loss of USDA commodities?	☐	☐	☐	
Other				
45. Is space available for food service staff to complete and store records at the school? (No work papers of confidential nature should be worked on or kept at home.)	☐	☐	☐	
46. Are there any other food service program concerns that need to be addressed at this time? (Describe in comments section area.)	☐	☐	☐	

Corrective Action Plan: (Recommended Corrective Action for above "NO" answers):

Follow-Up Visit: (Corrective Action taken by school and date implemented):

School Site Signature (Food Service Director or Manager)

Title

Date

School Food Authority Signature

Title

Date