



DEPARTMENT OF EDUCATION

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October 11, 2021

MEMORANDUM

TO: Directors of Residential Child Care Institutions
Other Appropriate Personnel

FROM: Aimee F. Beam, MS, RD, LDN *AFB*
Education Associate, Nutrition Programs

RE: **SY 2021-2022 Operational Memo #15**
On-site Review Monitoring Requirements

Per 7 CFR Part 210.8(a)(1), each school year (July 1 to June 30), School Food Authorities (SFAs) 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 Part 210.18(h) in each school operating the National School Lunch Program (NSLP) and in 50% of the schools operating the School Breakfast Program (SBP). Please note, the on-site review monitoring requirement applies to all SFAs, including those operating the NSLP/SBP and the Seamless Summer Option (SSO).

The on-site review must take place prior to February 1 of each school year. If the review discloses problems with a school/site's meal counting and claiming procedures or general observable review areas, the SFA must ensure that the school/site implements corrective action, and within 45 days of the on-site review, conduct a follow-up on-site review. Copies of your on-site review(s) must be available during an Administrative Review. If the on-site review has not been completed, this is considered a finding.

Please note that there is currently a nationwide waiver in effect (COVID-19: Child Nutrition Response #94) until 30 days after the end of the public health emergency, which allows the on-site review to be conducted offsite (e.g., through a desk audit). If you would like to participate in this waiver, please contact Brittany Coleman at brittany.coleman@doe.k12.de.us or Melissa Sayers at melissa.sayers@doe.k12.de.us. Program operators are still expected to ensure integrity of the SBP and NSLP to the maximum extent practicable.

USDA Food and Nutrition Services has provided prototype on-site review forms, one for breakfast and one for lunch; both forms are attached. If you have any questions regarding the process, please contact us at 302-857-3356.

Attachments: USDA Prototype On-Site Reviews - BKFT FY 17
USDA Prototype On-Site Reviews - LUNCH FY 17

cc: Nutrition Team

SCHOOL FOOD AUTHORITY ON-SITE REVIEW CHECKLIST
ASSESSMENT OF THE MEAL COUNTING AND CLAIMING SYSTEM AND READILY
OBSERVABLE GENERAL AREAS FOR THE NATIONAL SCHOOL LUNCH PROGRAM

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: _____

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"/>	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 meals correctly identifying reimbursable meals?			
<input type="checkbox"/>	<input type="checkbox"/>	4. Is the school correctly implementing policies for handling the following (as applicable):			
		Yes	No	N/A	
		<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>								
		<table border="1"> <thead> <tr> <th>Number of Students Approved by Category</th> <th>Today's Meal Counts by Category</th> </tr> </thead> <tbody> <tr> <td>Free:</td> <td>Free:</td> </tr> <tr> <td>Reduced Price:</td> <td>Reduced Price:</td> </tr> <tr> <td>Paid:</td> <td>Paid:</td> </tr> </tbody> </table>	Number of Students Approved by Category	Today's Meal Counts by Category	Free:	Free:	Reduced Price:	Reduced Price:	Paid:	Paid:
Number of Students Approved by Category	Today's Meal Counts by Category									
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?								
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"/>	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)?								
<input type="checkbox"/>	<input type="checkbox"/>	13. 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	N/A	READILY OBSERVABLE GENERAL AREAS			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14. Were any issues readily observed in relation to resource management?			
			YES	NO	N/A	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Paid Lunch Equity? (7 CFR 210.14(e))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Revenue from Nonprogram Foods? (7 CFR 210.14(f))
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15. Were any issues readily observed in other general areas?			
			YES	NO	N/A	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Civil Rights (7 CFR 210.23(b))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food Safety (7 CFR 210.13)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Competitive Food Service (7 CFR 210.11 and 220.12)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional Standards (7 CFR 210.30)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SBP and SFSP Outreach (7 CFR 210.12(d))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policies (7 CFR 210.30)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other			

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

SCHOOL FOOD AUTHORITY ON-SITE REVIEW CHECKLIST
ASSESSMENT OF THE MEAL COUNTING AND CLAIMING SYSTEM AND READILY
OBSERVABLE GENERAL AREAS FOR THE SCHOOL BREAKFAST PROGRAM (SBP)

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):		
		Yes	No	N/A
		<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?		

		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>	
		Number of Students Approved by Category	Today's Meal Counts by Category
		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?	
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"/>	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)?	
<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	N/A	READILY OBSERVABLE GENERAL AREAS			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Were any issues readily observed in relation to resource management?			
			YES	NO	N/A	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Paid Lunch Equity? (7 CFR 210.14(e))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Revenue from Nonprogram Foods? (7 CFR 210.14(f))
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Were any issues readily observed in other general areas?			
			YES	NO	N/A	
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Civil Rights (7 CFR 210.23(b))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food Safety (7 CFR 210.13)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Competitive Food Service (7 CFR 210.11 and 220.12)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional Standards (7 CFR 210.30)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SBP and SFSP Outreach (7 CFR 210.12(d))
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Local School Wellness Policies (7 CFR 210.30)
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other

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