



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY
12234-0055

Office of Elementary, Middle, Secondary and Continuing Education
School Operations and Management
Child Nutrition Program Administration
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January 2, 2013

TO: District Superintendents
Superintendents of Schools
Chief School Officers of Nonpublic Schools
Executive Directors of Residential Child Care Institutions
School Food Service Directors/Managers
New York City Department of Education

FROM: Paula Tyner-Doyle, Coordinator

SUBJECT: Annual Self-Review To Be Completed By February 1, 2013

Regulations of the National School Lunch Program (NSLP) and the final rule (July 1991) of the Coordinated Review Effort (CRE) continue to place responsibility for the accuracy of meal counts used for claiming purposes on the school food authority (SFA). The requirement is to conduct a monthly review of each day's claim, and a once a year on-site review of each building's counting and claiming system. SFA personnel must conduct the on-site review if the Child Nutrition Program is managed by a food service management company. Compliance with this regulation is considered an SFA responsibility.

ON-SITE REVIEWS

SFAs with more than one school must perform a minimum of **one on-site review per building prior to February 1 of each school year** to evaluate the school's procedures for counting and claiming meals for reimbursement. Regulations also require that if there is a problem, for example, with the accuracy of the data, the source of the counts, incomplete meals, etc., the SFA must ensure the school implements corrective action. A second review of the site must be conducted within 45 days to determine that the corrective action taken resolved the problems.

To perform the on-site review at each building, you may use one of the three enclosed school review forms, create one of your own, or use a narrative to describe the findings of the review. Regardless of the process used, neither the review form nor the results of your self-review are to be submitted to the State Agency. Instead, all documentation must be retained in the SFA and made available to reviewer(s) during the administrative review process. In addition, if an SFA is claiming After School Snacks, each snack site must be reviewed twice per year. The first review must be conducted during the first four weeks of the school year or the implementation of offering snacks.

A second review must be conducted during the school year. A prototype review form can be found in Attachment A or you may create your own.

DAILY CLAIMS REVIEW - MONTHLY RESPONSIBILITY

Section 210.8 of the NSLP regulations requires SFAs to establish internal controls, which ensure the accuracy of lunch counts prior to the submission of the monthly claim for reimbursement. At a minimum, these internal controls shall include reviewing the lunch count data for each school under its jurisdiction to ensure that monthly claims include only the number of free, reduced price and paid lunches served on any day of operation to children currently eligible for such lunches.

Each on-site review should ensure that the school's counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches respectively, served for each day of operation.

For those SFAs that had counting or claiming violations on their most recent CRE review or those that are not sure what internal controls to implement, regulations governing the School Lunch Program require that prior to the submission of a monthly claim for reimbursement, each SFA shall compare each school building's "daily counts of free, reduced price and paid lunches against the product of the number of children currently eligible for free, reduced price, and paid lunches, respectively, times an attendance factor."

Accordingly, each month before submitting your claim for reimbursement, you must compare the daily count of meals served by building against the number of attendance adjusted eligibles for free, reduced price and paid meals. For example, if a building has an enrollment of 200, an attendance factor of 93 percent, and 100 eligible free and 25 eligible reduced price students, their lunch claim for any day should not routinely exceed 93 free ($100 \times .93$), 24 reduced ($25 \times .93$), and 70 paid lunches ($200 - 125 \text{ free/reduced} \times .93$). Explanations should be noted in your records for those days exceeding the attendance factor. Statistically there will be some days when counts will be higher than the attendance factor and some that will be lower. However, on an average, for the month, counts should not exceed your attendance factor without documentation of unusual situations that substantiate the higher counts.

Information regarding this edit check is not to be included when you submit your monthly claim for reimbursement to the Department. Instead, it should be retained on file for examination by State and/or federal personnel during a program review.

If you have any questions regarding the self-review, the edit checks, or the enclosed forms, please contact your respective Child Nutrition Program representative.

Sample

On-Site School Review Form 1

**To be used for required self review/NOT to be submitted to SED
Review must be completed annually for each school prior to February 1.**

SCHOOL REVIEWED _____ DATE OF REVIEW _____

REVIEWER (S) _____

A. On _____, the lunch counting and claiming system at
(Date)

(School)

was reviewed and found to be **IN COMPLIANCE** with section 210.7 (c) of the regulations of the USDA Food and Nutrition Service. All meal counts were found to be accurate by category and to yield correct claims for reimbursement.

(Reviewer)

B. On _____, the lunch counting and claiming system at
(date)

(school)

was reviewed and found **NOT TO BE IN COMPLIANCE** with section 210.7 (c) of the regulations of the USDA Food and Nutrition Service.

(Reviewer)

C. The After School Snack site review was completed on _____, and was found to be **IN COMPLIANCE** with regulations.
(date)

(Reviewer) _____

D. The After School Snack site review was completed on _____, and was found **NOT IN COMPLIANCE** with regulations.
(date)

(Reviewer) _____

List below the problems noted during the review that require a corrective action plan.

NOTE: A follow-up visit **MUST** be conducted within 45 days of the corrective action plan.

On-Site School Review Form 2
To be used for required self review/NOT to be submitted to SED
Review must be completed annually for each school prior to February 1.

SCHOOL REVIEWED _____ DATE OF REVIEW _____

REVIEWER (S) _____

1. Can the cashier identify a complete reimbursable meal for your type of meal service?
Is Offer vs Serve implemented correctly? o Yes o No
o Yes o No
2. Does the cashier review the menu before the meal service? o Yes o No
3. Is the cashier located where a complete meal (i.e., at end of the line or when all required components are served) can be observed? o Yes o No
4. Does the cashier know the policies for handling charges?
Lost, stolen, forgotten or destroyed tickets, IDs/pin #s? o Yes o No
o Yes o No
A la carte selections? o Yes o No
Adult meals? o Yes o No
- *5. Is a current eligibility list maintained and available to the cashier for easy reference? o Yes o No
- *6. Is there an accurate method for counting meals by category? o Yes o No
7. Is there a procedure of recording nonreimbursable meals or a la carte sales (distinguishing them from reimbursable meals), i.e., second meals, meals that don't meet meal requirements? o Yes o No
8. Is there a second-party count for cashier's cash intake? o Yes o No
9. Is there a system to ensure that counts are not adjusted or "backed out" to correspond with cash intake? o Yes o No
10. Is there a method for tracking extra meals or a la carte sales? o Yes o No
11. Is cash reconciled daily and are discrepancies recorded? o Yes o No
12. Is a trained backup cashier available? o Yes o No
13. Are meal counts recorded, consolidated, reported and claimed correctly? o Yes o No
14. Does the school claim reimbursement for After School Snacks?
If yes: a) Have site reviews been conducted as required? Dates _____ o Yes o No
b) Have problems been noted with a corrective action plan?
15. Is a Corrective Action Plan required? If "YES", list below the problems noted that require a corrective Action plan and follow-up visit within 45 days. o Yes o No

***Does not apply to schools participating in the Community Eligibility Option**

On-Site School Review Form 3

To be used for required self review/NOT to be submitted to SED
Review must be completed annually for each school prior to February 1.

SCHOOL REVIEWED _____ DATE OF REVIEW _____

REVIEWER(S) _____

Is a Corrective Action Plan required? o Yes o No
If "YES," list below the problems noted that require a corrective action plan and follow-up visit within 45 days.

A. PERFORMANCE STANDARD 1-All free, reduced price and paid lunches claimed for reimbursement are served to children eligible for free, reduced price and paid lunches; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.

1. Eligibility:

a. Do all approved free and reduced price applications contain the required information listed below? o Yes o No

Required information:

- i. Application from Food Stamp/TANF (Temporary Assistance to Needy Families)
• Name of Child
• Food Stamp, TANF Number
• Signature of adult household member
ii. Applications from OTHER households:
• Names of all household members including foster children
• Last four digits of Social Security Number for the adult signing the application
• Amount of income received by each household member last month by source or indicate no income
• Signature of an adult household member – last four digits of the Social Security Number listed on the application must belong to this adult
• OR – Direct Certification Letter from NYS Office of Temporary and Disability Assistance or local social services
• OR – Eligibility for free meals obtained via data match

*b. Record the number of Free and Reduced Price applicants, lists of homeless, runaway or migrant children, direct certification or data matched applicants on _____ Free + Reduced = TOTAL
_____ for building reviewed:

*c. Check your system for issuing program benefits – rosters, tickets, point of sale.

1. Do all students receiving free or reduced price meals have a correctly approved application, Direct Certification letter or other data matched documentation (homeless, migrant) on file?

o Yes o No

*2. Explain how the cashier receives student eligibility information, changes in status, etc.?

*3. Are changes in a child's eligibility level resulting in an increase in benefit level (e.g., R→F, P,→R, P→F) made within three days? o Yes o No

*4. Are changes in a child's eligibility level resulting in a decrease in benefit level (e.g., F→P, F→R, R→P) made within 10 operating days? o Yes o No

* Does not apply to schools participating in the Community Eligibility Option

2. Point of Service:

- a. Do all cashiers
 - Know what constitutes a reimbursable meal Yes No
 - Understand the Offer vs. Serve regulation? Yes No
 - Review the menu prior to meal service? Yes No
 - Position themselves at end of service line? Yes No

- b. Are:
 - Double lunches claimed for reimbursement only once? Yes No
 - Other or a la carte sales properly recorded? Yes No
 - Charge lunches claimed for reimbursement on day served? Yes No
 - Pre-paid lunches claimed for reimbursement on day served? Yes No

NOTE: Only one lunch per child per day may be claimed for reimbursement.

c. Meal Count Comparison:

Month Reviewed: _____ Number of Days of Service _____

- i. Is there a difference between:
 The number of free, reduced, and paid meals claimed on day of review and
 the average number claimed during the prior month? Yes No
 If "YES" explain:

ii. Determining attendance adjusted eligibles: ADA=Average daily attendance

Free: _____ X **ADA** _____ % =

Reduced: _____ X **ADA** _____ % =

Paid (Enrollment
 minus the total of
 free and reduced): _____ X **ADA** _____ % =

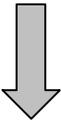
- iii. Are there unexplained instances where lunch counts exceeded adjusted eligibles or
 or when counts appear questionable? (Counts should not exceed attendance adjusted
 eligibles for the month, but this may occur on several days each month.) Yes No

Comments:

3. Consolidation of Meal Counts for Reimbursement Claim:

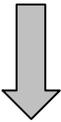
Does the system used for counting and recording meal totals (paid, reduced, and free) at both the school building and sponsor level yield correct claims? Yes No

a. **Free & Reduced Price Eligibles** Does the consolidation process compare the number of free and reduced price meals served daily with the number of correctly approved free and reduced price applicants? Yes No



Comments:

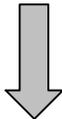
b. **Point of Service** Are daily counts properly taken in this building from each serving-line and recorded by category on a daily cashier report? Yes No



Comments:

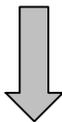
c. **School Count by Category** Are meal counts from each serving line properly consolidated from cashier reports to the school daily report BY CATEGORY? Yes No

Comments:



d. **Consolidation of School Counts** Does the building or central offices accurately compile its daily meal counts by category into a monthly statement? Yes No

Are these DAILY building counts compared to the maximum number of children eligible to receive free and reduced price meals? Yes No NA



e. **Monthly Claim for Reimbursement** Are these daily counts compared to the number of attendance adjusted eligible students? Yes No

Are the total meal counts by category correctly and accurately carried forward to the monthly claim for reimbursement? Yes No

Is a Corrective Action Plan required? Yes No

If "YES", list below the problems noted that require a corrective action plan and follow-up visit within 45 days

PERFORMANCE STANDARD II-Lunches claimed for reimbursement within the school food authority contain food items/components as required by program regulations.

1. Meal Pattern:

- a. Are all menus throughout the month meeting the menu planning option? Yes No
- b. Is the signage for students to identify a reimbursable meal located near or at the beginning of the line? Yes No
- c. Does each reimbursable meal contain at least ½ cup of fruit and/or vegetable? Yes No
- d. Do production records document the foods served in the required quantities? Yes No
- e. Does the cashier correctly record meals for reimbursement? Yes No
- f. Does the cashier correctly record incomplete meals as a la carte sales? Yes No
- g. Are two varieties of 1% or fat free milk available to students with all meals? Yes No
- h. Is plain potable water available to students free of charge? Yes No

General Areas

- a. Is the certification of acceptance from the policy booklet completed? Yes No
- b. Is verification being conducted? If the review is done after November 15th, is the process completed? Yes No
Is documentation on file to support the process? Yes No
- c. Is Attachment G completed? Yes No
- d. Are denied applications correct? Yes No
- e. Are applications for students that left the SFA separated from current applications? Yes No
- f. Are civil rights posters posted in all serving areas? Yes No
- g. Have all food service staff viewed the civil rights powerpoint training and signed off? Yes No
- h. Have 2 health inspections been conducted and is the most recent inspection in view? Yes No
- i. Are food safety plans in place? Yes No
- j. Is the wellness policy complete? Yes No

AFTER SCHOOL SNACKS SITE REVIEW FORM

_____ First Review (Within first 4 weeks of school year or snack implementation)

_____ Second Review

Name of School Building _____ What time school ends? _____

When are snacks served? _____

1) Are the snacks claimed only in approved after-school programs/initiatives? Yes ___ No ___

Specify the after school programs/initiatives _____

Is this an extended school day? Yes ___ No ___

If yes, can snacks be served during the school day? _____

2) If site has less than 50% free/reduced price eligibles, does the after-school program have the appropriate applications and rosters on file so all snacks are correctly claimed categorically? Yes ___ No ___

3) Is there an accurate point of service accountability for counting snacks when:
over 50% are free eligible? Yes ___ No ___
less than 50% are free eligible?

4) What is the school's count of snacks on the day of visit? _____

What is the reviewer's count on the day of visit _____

If there are significant differences in the counts, why is this occurring?

5) Does the site have an appropriate and accurate system to document daily attendance? Yes ___ No ___

6) Does the snack menu meet the snack meal pattern requirements? (two complete components) Yes ___ No ___

7) Do all snacks claimed for reimbursement on the day of visit meet meal pattern requirements? Yes ___ No ___

8) Is corrective action required? Yes ___ No ___

If yes, what must be changed? _____

When will it be corrected and by whom? _____

Name of Reviewer _____

Date of Review _____