



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

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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: Frances N. O'Donnell, Coordinator

SUBJECT: Annual Self-Review To Be Completed By February 1, 2005

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). This responsibility takes the form of conducting 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 no less than **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. In addition, regulations 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 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.

The regulatory requirement for a specific type of edit check on daily meal counts if no meal counting or claiming problems were identified on the most recent CRE review was eliminated. Instead, an SFA can develop and implement its own system of internal control to ensure the accuracy of claims with State Agency approval. If an SFA wants to develop its own internal control procedures, the SFA must submit those procedures to the State agency for approval.

For those SFAs that had counting or claiming violations 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 check, or the enclosed forms, please contact your respective Child Nutrition Program office.

Sample

# On-Site School Review Form 1

To be used for required self review/**NOT** to be submitted to any agency  
Review must be completed for each school prior to February 1, EACH YEAR

\_\_\_\_\_ 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.

Sample

## On-Site School Review Form 2

**To be used for required self review/NOT to be submitted to any agency  
Review must be completed for each school prior to February 1, EACH YEAR**

SCHOOL REVIEWED	DATE OF REVIEW	REVIEWER(S)

1. Can the cashier identify a complete reimbursable meal for your type of meal service:  

Offer vs. Serve?  Yes  No
2. Does the cashier review the menu before the meal service? .....  Yes  No
3. Is the cashier located where a complete meal (i.e., at the point of service) can be observed?.....  Yes  No
4. Does the cashier know the policies for handling:  

Lost, stolen, forgotten or destroyed tickets, IDs?  Yes  No

A la carte selections?  Yes  No

Adult meals?  Yes  No
5. Is a current eligibility list maintained and available to the cashier for easy reference?.....  Yes  No
6. Is there an accurate method for counting meals by category?.....  Yes  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?.....  Yes  No
8. Is there a second-party count for cashier's cash intake?.....  Yes  No
9. Is it ensured that counts are not adjusted or "backed out" to correspond with cash intake?.....  Yes  No
10. Is there a method for tracking extra or a la carte sales?.....  Yes  No
11. Is cash reconciled daily and are differences recorded?.....  Yes  No
12. Is a trained backup cashier available?.....  Yes  No
13. Are meal counts recorded, consolidated, reported and claimed correctly?.....  Yes  No
14. Does the school claim reimbursement for After School Snacks?  Yes  No  
 If yes: a) Have site reviews been conducted as required? Dates \_\_\_\_\_  Yes  No  
           b) Have problems been noted with a corrective action plan?  Yes  No

YES     NO    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.**

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**On-Site School Review Form 3**

To be used for required self review/NOT to be submitted to any agency  
 Review must be completed for each school prior to February 1, EACH YEAR

SCHOOL REVIEWED

DATE OF REVIEW

REVIEWER(S)

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.

**A. PERFORMANCE STANDARD 1**

**1. Applications:**

a. Do all approved free and reduced price applications contain the required information listed below?

Yes  No

Required information:

- i. Application from Food Stamp, ADC/TANF (Temporary Assistance to Needy Families)
  - Name of Child
  - Food Stamp, ADC/TANF Number
  - Signature of adult household member
  - OR – Original Direct Certification Letter from NYS Office of Temporary and Disability Assistance
- ii. Foster Child Applications:
  - Name of Child
  - Indication that the child is a Foster Child (check box)
  - Child's income or indicate N/A
  - Signature of Guardian
- iii. Applications from OTHER households:
  - Names of all household members
  - Social Security Number for the adult signing the application
  - Amount of income received by each household member last month by source
  - Signature of an adult household member – the Social Security Number listed on the application must belong to this adult

	Free	Reduced	TOTAL
b. Record the number of Free and Reduced Price applicants and direct certification applicants on file for building reviewed:	<input style="width: 80px; height: 25px;" type="text"/>	<input style="width: 80px; height: 25px;" type="text"/>	<input style="width: 100px; height: 25px;" type="text"/>

c. Check your system for issuing program benefits – rosters, tickets, etc.

1. Do all students receiving free or reduced price meals have a correctly approved application or Direct Certification letter on file?

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

**2. Point of Service:**

- a. Do all cashiers
- Know what constitutes a reimbursable meal under the menu planning option you have implemented?  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:

**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 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 Applications**

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 the cashier reports to the school daily report BY CATEGORY?  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. **Consolidation of School Counts**

Does the building or central office 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

Are these daily counts compared to the number of attendance adjusted eligible students?  Yes  No

e. **Monthly Claim for Reimbursement**

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

**B. PERFORMANCE STANDARD II**

**1. Meal Pattern:**

a. What menu planning option is being used in this site:

Nutrient Standard Menu Planning (NSMP).....

Assisted NSMP.....

Food-Based Model.....

Traditional Meal Pattern Meeting Dietary Guidelines.....

b. Is the meal pattern met for the option being used?  Yes  No

c. Were all required food items/components available throughout the meal service on all serving lines?  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Does each day of the month's menu meet meal pattern requirements for the menu planning option being implemented?  Yes  No

**C. OTHER AREAS**

**1. Free and Reduced Price Process:**

a. Do the tickets/rosters correctly indicate the student's category?  Yes  No

b. Are prepaid, full price lunches offered?  Yes  No

c. Is the availability of the prepaid, full price lunch advertised?  Yes  No

d. Is a student's eligibility category undetectable to the casual observer by:  
● Observing the prepayment of meals?  Yes  No  
● Observing the meal count system at the point of service?  Yes  No  
● The method in which rosters, tickets, etc. are coded or identified?  Yes  No

e. If completing this form after December 15, has the verification process been completed?  Yes  No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If you claim after school snacks:

Do menus meet meal pattern requirements?  Yes  No

Do all snacks claimed contain two complete components?  Yes  No

Are meal counts properly recorded?  Yes  No

Have the site reviews been conducted as required?  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 \_\_\_\_\_
- 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? Yes\_\_\_\_ No\_\_\_\_
- 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? 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\_\_\_\_\_