SFA Annual On-Site Reviews of SBP and NSLP

In addition to the review requirements already in place at 7 CFR Part 210.8(a)(1) for an annual School Food Authority (SFA) on-site review of the National School Lunch Program (NSLP), the final rule adds this review requirement for the School Breakfast Program (SBP) at 7 CFR Part 220.11(d)(1). 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 identified under 7 CFR 210.18(h) and the meal counting and claiming system employed by each school (as defined in 7 CFR Part 210.2) 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 (as defined in 7 CFR Part 210.2, July 1 to June 30), 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 identified under 7 CFR 210.18(h) 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.

To assist SFAs in conducting these reviews, FNS has provided an optional 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, you do not need to make changes to your existing on-site review form(s) unless it does not reflect the information contained in the FNS prototype checklist. If a checklist for on-site reviews is not already in place at the SFA level, the prototype checklist which follows is for conducting on-site reviews. The checklist assesses meal counting and claiming procedures, system accuracy, point of service, and readily observable general areas of review as applicable.

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** |
|  |  | 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.)
 |
|  |  | 1. Is the point of service meal count used to determine the school’s claim for reimbursement?
 |
|  |  | 1. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?
 |
|  |  | 1. 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 versus non-program) |
|  |  |  | A la carte |
|  |  |  | Student worker meals |
|  |  |  | Field trips |
|  |  |  | Charged and/or prepaid meals |
|  |  |  | Offer versus Serve |
|  |  |  |  |  | Unpaid meal charges |
|  |  | 1. 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?
 |

|  |  |  |
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| **YES** | **NO** | **MEAL COUNTING AND CLAIMING SYSTEM (Continued)** |
|  |  | 1. Is someone trained as a backup for the monitor and the meal counter?
 |
|  |  | 1. 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?
 |
|  |  | 1. Are daily counts correctly totaled and recorded?
 |
|  |  | 1. If claims are aggregated, are the meal counts correctly totaled and consolidated?
 |
|  |  | 1. 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?

*Record today’s meal counts by category and compare to the total number of students eligible by category.* |
| **Number of Students Approved by Category** | **Today’s Meal Counts by Category** |
| Free:  | Free:  |
| Reduced-Price:  | Reduced-Price: |
| Paid:  | Paid |
|  |  | 1. 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** |  |
|  |  | 1. 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)?
 |
|  |  | 1. 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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| **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 210.14I) |
|  |  | Revenue from Nonprogram Foods? (7 CFR 210.14(f)) |
|  |  | Indirect Costs? (2 CFR Part 200 and 7 CFR 210.14(g)) |
|  |  | 1. 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 |

**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

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 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

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 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:

|  |  |  |
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| **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.)
 |
|  |  | 1. Is the point of service meal count used to determine the school’s claim for reimbursement?
 |
|  |  | 1. Is the person responsible for monitoring meals correctly identifying reimbursable meals?
 |
|  |  | 1. 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 versus non-program) |
|  |  |  | A la carte |
|  |  |  | Student worker meals |
|  |  |  | Field trips |
|  |  |  | Charged and/or prepaid meals |
|  |  |  | Offer versus Serve |
|  |  |  | Unpaid meal charges |
|  |  | 1. 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?
 |
|  |  | 1. Is someone trained as a backup for the monitor and the meal counter?
 |
|  |  | 1. 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?
 |
|  |  | 1. Are daily counts correctly totaled and recorded?
 |
|  |  | 1. If claims are aggregated, are the meal counts correctly totaled and consolidated?
 |
|  |  | 1. 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?

*Record today’s meal counts by category and compare to the total number of students eligible by category.* |
| **Number of Students Approved by Category** | **Today’s Meal Counts by Category** |
| Free:  | Free:  |
| Reduced-Price:  | Reduced-Price: |
| Paid:  | Paid |
|  |  | 1. 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** |  |
|  |  | 1. 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)?
 |
|  |  | 1. 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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| --- | --- | --- |
| **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)) |
|  |  | 1. 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 “YES” answers above):**

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

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

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 School Representative Title Date

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 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

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 SFA Reviewer Title Date