School Food Authority On-site Review Checklist for the School Breakfast Program

Assessment of the Meal Counting and Claiming System and Readily Observable General Areas

The U.S. Department of Agriculture (USDA) regulations 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1) require that **prior to February 1** of every school year, each school food authority (SFA) with more than one school must perform at least 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 50 percent of schools operating the School Breakfast Program (SBP) under its jurisdiction. Schools are defined by 7 CFR 210.2 and include residential child care institutions (RCCIs).

Each on-site review must ensure the school's monthly claim for reimbursement is based on the counting and claiming system, as implemented, and yields the actual number of reimbursable free, reduced-price, and paid meals 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. The SFA must conduct a follow-up on-site review **within 45 days** to determine that the corrective action resolved the problems.

School name:_____Review date: _____

SFA reviewer: _____

Part 1: SBP On-site Review

Review each point of service including in-classroom if applicable.
At a minimum, the on-site review should address the areas indicated below.

SBP Meal Counting and Claiming System

1. Does the method used for counting reimbursable meals comply with the approved point-of-service requirement? *Meal counts must be taken at locations where complete meals are served to children.*
   ☐ Yes ☐ No

2. Are meals served in a classroom?
   ☐ Yes ☐ No

   a. If yes, have applicable staff been trained on the requirements for in-classroom meals?
      ☐ Yes ☐ No

3. Is the point-of-service meal count used to determine the school's claim for reimbursement?
   ☐ Yes ☐ No

4. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?
   ☐ Yes ☐ No

5. Indicate if the school is correctly implementing policies for handling the following (as applicable):

a.	Incomplete meals applicable	☐ Yes	☐ No	☐ Not
b.	Second meals applicable	☐ Yes	☐ No	☐ Not
c.	In-classroom meals applicable	☐ Yes	☐ No	☐ Not
d.	Lost, stolen, misused, forgotten, or destroyed tickets, tokens, IDs, etc. applicable	☐ Yes	☐ No	☐ Not
e.	Visiting student meals applicable	☐ Yes	☐ No	☐ Not
f.	Adult and non-student meals (and identifying program versus non-program) applicable	☐ Yes	☐ No	☐ Not
g.	A la carte foods and beverages applicable	☐ Yes	☐ No	☐ Not
h.	Student worker meals applicable	☐ Yes	☐ No	☐ Not
i.	Field trips applicable	☐ Yes	☐ No	☐ Not
j.	Charged and/or prepaid meals applicable	☐ Yes	☐ No	☐ Not
k.	Offer versus serve (OVS) applicable	☐ Yes	☐ No	☐ Not
l.	Unpaid meal charges applicable	☐ Yes	☐ No	☐ Not

6. Is there a method of identifying nonreimbursable meals and distinguishing them from reimbursable meals? *Examples of nonreimbursable meals include meals that do not meet the SBP meal pattern requirements, second meals, and adult meals.*
   ☐ Yes ☐ No

7. Is someone trained as a backup for the monitor and the meal counter?
   ☐ Yes ☐ No

8. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available and do staff know when and how to implement them?
   ☐ Yes ☐ No

9. Are daily counts correctly totaled and recorded?
   ☐ Yes ☐ No

10. If claims are combined, are the meal counts correctly totaled and consolidated?
    ☐ Yes ☐ No ☐ Not applicable: claims are not combined

11. Are internal controls such as edit checks and monitoring established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?
    ☐ Yes ☐ No

12. **Complete only if CEP school:** If the school participates in the Community Eligibility Program (CEP), complete the information below:

    Enrollment: _____

    Today's reimbursable meal breakfast counts:_____

13. **Complete only if non CEP school:** Enter the number of students eligible for each category (free, reduced price, and paid). Record today's breakfast counts by category (free, reduced price, and paid). Compare today's breakfast counts to student eligibility.

    Eligibility: Number of students approved

    Free:_____

    Reduced price:_____

    Paid:_____

    Today's reimbursable meal breakfast counts

    Free:_____

    Reduced price:_____

    Paid:_____

14. Does the system prevent overt identification of children receiving free or reduced-price meals?
    ☐ Yes ☐ No

15. Is a current eligibility list (e.g., benefit issuance document) 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)?
    ☐ Yes ☐ No ☐ Not applicable (Provision 2 or 3, CEP, or RCCI with only residential children)

16. As required by 7 CFR 210.8(a)(3), did the school complete and document edit checks and account for any discrepancies? *Edit checks compare the daily counts of free, reduced-price, and paid breakfasts against the number of children currently eligible for free, reduced-price, and paid breakfasts, respectively, multiplied by an attendance factor. For CEP schools and RCCIs, an edit check is required, using an attendance factor and the daily total enrollment of the site.*
    ☐ Yes ☐ No

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Part 2: NSLP Readily Observable General Areas

17. **Were any issues readily observed in relation to resource management?**

a.	Maintenance of the nonprofit school food service account (NSFSA) (7 CFR 210.2, 210.14, 210.19(a), 210.21)	☐ Yes ☐ No
b.	Paid lunch equity (7 CFR 210.14(e))	☐ Yes ☐ No
c.	Revenue from nonprogram foods (7 CFR 210.14(f))	☐ Yes ☐ No
d.	Indirect costs (2 CFR 200 and 7 CFR 210.14(g))	☐ Yes ☐ No

18. **Were any issues readily observed in other general areas?**

a.	Free and reduced-price procedures, including verification, notification, and other procedures (7 CFR 245)	☐ Yes ☐ No
b.	Civil rights (7 CFR 210.23(b))	☐ Yes ☐ No
c.	Reporting and recordkeeping (7 CFR Parts 210, 220, and 245)	☐ Yes ☐ No
d.	Food safety (7 CFR 210.13)	☐ Yes ☐ No
e.	Competitive food service (7 CFR 210.11 and 220.12)	☐ Yes ☐ No
f.	Plain potable water available during meal service (7 CFR 210.10(a)(1)(i))	☐ Yes ☐ No
g.	SBP and Summer Food Service Program (SFSP) outreach (7 CFR 210.12(d))	☐ Yes ☐ No
h.	Local school wellness policies (7 CFR 210.30)	☐ Yes ☐ No
i.	Other areas *If yes, specify other areas below:*	☐ Yes ☐ No

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SBP Corrective Action Plan for Readily Observable General Areas

For any "Yes" answers to the questions in parts 1 and 2, list the question number and indicate the corrective action plan below.

Specify date corrective actions will be implemented: _____

By whom (name and title): _____

☐ If corrective action is not required, check this box and sign below.

School/Site Food Service Manager

Signature: _____

Title: _____

Date: _____

SFA Reviewer

Signature: _____

Title: _____

Date: _____

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Part 3: SBP Follow-up Visit

Must be conducted within 45 days if corrective action was required.

Dates of follow-up: _____

Indicate observations of corrective action implementation below.

School/Site Food Service Manager

Signature: _____

Title: _____

Date: _____

SFA Reviewer

Signature: _____

Title: _____

Date: _____

School Food Authority On-site Review Checklist for the School Breakfast Program

For more information, visit the CSDE's Meal Counting and Claiming for School Nutrition Programs webpage or contact the school nutrition programs staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/forms/mealcount/onsite_review_checklist_sbp.pdf.

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