



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

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GOVERNOR

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SUPERINTENDENT OF
PUBLIC INSTRUCTION

FOOD SERVICE

**ADMINISTRATIVE POLICY NO. 3
SCHOOL YEAR 2012-2013**

SUBJECT: On-Site Review for National School Lunch Program, School Breakfast Program, and Afterschool Snack Program

DATE: August 1, 2012

On-site reviews are a self-monitoring tool for School Food Authorities (SFAs) to ensure their programs are in compliance with National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program regulations.

NSLP regulations 7 CFR 210.8(a)(1) require that an SFA with more than one building, including Residential Child Care Institutions (RCCIs) with day programs, must conduct an annual on-site review in each building before February 1. Each Afterschool Snack Program must be reviewed by the SFA two times per year (7 CFR 210.9(c)(7)). The first review must be during the first four weeks that the snack program is in operation. The second review must be conducted during the second half of the school year.

NSLP and SBP On-Site Review must assess:

- *Application Approval/Direct Certification/Master Roster* – Local Educational Agencies (LEAs) must review all free, reduced price, and denied applications to ensure they have been accurately certified and students are receiving the correct benefits in compliance with the *Eligibility Manual for School Meals*.
- *Meal Count Systems* – Monthly claims for reimbursement must be supported by an accurate counting system for free, reduced price, and paid meals in each building. Systems that are not allowable include tray counts, attendance counts, and “back out” counts (i.e., dividing cash box total by lunch price to arrive at paid count, and subtracting that number from daily total of meals served to arrive at the free count). Overt identification of students is not permitted. An actual count of meals served at the point of service is acceptable.
- *Edit Checks* – Daily count of free, reduced price, and paid meals for each school are checked against: (1) the number of children in school currently eligible for free, reduced price, and paid meals, and (2) the number of attendance adjusted eligibles.

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The annual on-site review must include a review of the claim forms for one month.

The claims for the review month must be checked for the following:

- ▶ Meals claimed by category (free, reduced price, and paid) that exceed the number of approved free, reduced price, and paid eligible students.
 - ▶ Any day during the review month that the number of meals claimed by category (free, reduced price, and paid) exceeds the number of attendance adjusted eligible.
 - ▶ Evaluation, explanation, and documentation of any days during the review period that exceed attendance adjusted eligible or total number of eligible students (free, reduced price, and paid).
 - ▶ A record of accurately totaled daily meal counts.
 - ▶ Internal controls are established for monitoring and edit checks that ensure claims for reimbursement are based on accurate daily meal count consolidation for all schools.
- *Meal Planning/Food Production* – Menus and meals served must be checked at each site for availability of all meal components, offer versus serve, and required portion sizes. For more information, *A Menu Planner for Healthy School Meals* (USDA, Food and Nutrition Service – FNS#303–1998) can be viewed at the following website:
<http://www.fns.usda.gov/cnd/menu/menu.planning.NSLP.htm>.

Afterschool Snack Program On-Site Reviews must assess:

- *Area Eligibility Meal Count System* – A site is “area eligible” if it is located at a school or in the attendance area of a school where at least 50% of enrolled children are eligible for free or reduced price meals. The site must record and report total number of snacks served each day.
- *Non-Area Eligibility Meal Count System* - Monthly claim for reimbursement must be supported by an accurate counting system that provides an accurate count of free, reduced price, and paid snacks.
- *General Operations* - Eligible programs must include education or enrichment activities in organized, structured, and supervised environments. Program must operate at the end of the normal school day.
- *Meal Patterns/Food Production* - Menus and meals served must be checked at each site for availability of all meal components and required portion sizes.

Review findings discovered on either NSLP/SBP On-Site Review or Afterschool Snack Program On-Site Review must be discussed with the person overseeing meal service at the school building. A corrective action plan must be developed and implemented for the school building by the SFA.

In any building with a corrective action plan, a follow-up review must be conducted within 45 calendar days of initial review. This follow-up review must be conducted and documented by the SFA and identify that the finding(s) has/have been corrected.

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All On-Site Review forms must be maintained by the SFA. Forms will be reviewed during an Administrative Review. NSLP regulations require all records be retained for three years plus current year or until a pending audit is closed.

Food Service Management Company (FSMC) personnel *may not* perform on-site reviews. Only employees of the SFA may perform on-site reviews.

Questions regarding this Administrative Policy should be directed to the School Nutrition Programs Unit by e-mail to MDE-SchoolNutrition@michigan.gov.

NATIONAL SCHOOL LUNCH PROGRAM/SCHOOL BREAKFAST PROGRAM ON-SITE REVIEW

<i>School Name</i>	<i>Agreement #</i>
<i>School Food Authority & Title</i>	<i>Review Date</i>

One review per building MUST be completed by FEBRUARY 1.

Application Approval/Direct Certification/Master Roster

	Yes	No	N/A
1. Are all free and reduced price applications on file correctly approved or denied?			
2. Is correct direct certification documentation maintained?			
3. Do names listed on Master Roster match approved applications on file and names on direct certification list?			

Meal Count Systems

4. Is the method used for counting reimbursable meals in compliance with the approved Point of Service requirement? (Meal counts <i>must</i> be taken at the location where complete meals are served to children.)			
5. Is the Point of Service meal count used to determine the school's claim for reimbursement?			
6. Is the person responsible for monitoring meals correctly identifying reimbursable meals for the menu planning option selected by the SFA?			
7. Are only meals that meet meal pattern requirements counted and claimed for reimbursement?			
8. Does the meal count system prevent overt identification?			
9. Does the school have a backup counting system in case of mechanical failure of an automated system?			
10. Is the school correctly implementing policies for handling the following (as applicable):			
a. A la carte?			
b. Adult and non-student meals (and identifying program vs. non-program)?			
c. Charged and/or prepaid meals?			
d. Field trips?			
e. Incomplete meals?			
f. Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs?			
g. Offer vs. Serve?			
h. Second meals?			
i. Student worker meals?			
j. Visiting student meals?			
11. Is there a method of identifying non-reimbursable meals (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.), distinguishing them from reimbursable meals?			

ON-SITE REVIEW (cont.)

Edit Checks

	Yes	No	N/A
12. For any day during review month, does number of meals claimed by category (free, reduced price, and paid) exceed number of approved free, reduced price, and paid eligible students?			
13. For any day during review month, does number of meals claimed by category (free, reduced price, and paid) exceed number of attendance adjusted eligibles?			
14. If number of meals claimed by category (free, reduced price, and paid) any day during review period exceeds attendance adjusted eligibles or total number of eligible students, is it evaluated and documented?			
15. Are daily counts correctly totaled and recorded?			
16. Are the claims for all schools consolidated and 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 for reimbursement is made? Record today's meal counts by category and compare to the number of students eligible by category.			

Meal Planning/Food Production

17. Does the menu for the review month meet meal planning system requirements?			
18. Does the menu on the day of review meet meal planning system requirements?			
19. Are production records completed daily for all school meals programs, including breakfast, lunch, and afterschool snack?			
20. Do production records document that enough food is prepared to meet the requirements for reimbursable meals for number of meals claimed?			

Review Results

21. If a Corrective Action Plan is required, what is the Corrective Action Plan Due Date? _____	
<i>Required Corrective Action Plan as discussed with school representative:</i>	
22. If a Follow Up Review is required, what is the Follow Up Due Date? _____ <i>(within 45 days of original review)</i>	
<i>Comments, Notes, and Observations:</i>	
X	X

SFA Reviewer Signature and Title

School Site Representative Signature and Title

AFTERSCHOOL SNACK PROGRAM ON-SITE REVIEW

<i>School Name</i>	<i>Agreement #</i>
<i>School Food Authority & Title</i>	<i>Review Date</i>

One review per building MUST be completed TWO TIMES per school year.

Area Eligible Meal Count System

	Yes	No	N/A
1. Is the site area eligible?			
2. Are children receiving snacks at no charge?			
3. Are snacks served to children being counted and claimed as free?			
4. Are snacks served to children being counted at Point of Service?			

Non-Area Eligible Meal Count System

5. Is the site non-area eligible?			
6. Does the meal count system produce an accurate count of reimbursable snacks by category (free, reduced price, and paid) served to eligible children at Point of Service?			
7. Are snacks that meet meal pattern requirements counted and claimed for reimbursement?			
8. Does meal count system prevent overt identification?			

General Operations

9. Time(s) of operation for the snack program: _____ p.m.			
10. Is the program operated after the end of the normal school day?			
11. Is there a sign-in sheet or roster of students who participate in the Afterschool Snack Program?			
12. Does program provide care for children?			
13. Is there an educational and/or enrichment element in program?			
14. Are care and activities supervised?			

Meal Pattern/Food Production

15. Does menu for review month meet snack meal pattern requirements?			
16. Does menu on day of review meet snack meal pattern requirements?			
17. Are production records completed daily for Afterschool Snack Program?			
18. Do production records document that enough food is prepared to meet the requirements for reimbursable snacks for the number of snacks claimed?			

Review Results

19. If a Corrective Action Plan is required, what is the Corrective Action Plan Due Date? _____	
<i>Required Corrective Action Plan as discussed with school representative:</i>	
20. If a Follow Up Review is required, what is the Follow Up Review Due Date? <i>(within 45 days of original review)</i> _____	
<i>Comments, Notes, and Observations:</i>	
X	X

SFA Reviewer Signature and Title

School Site Representative Signature & Title