School Meal Programs – CRE Checklist

Sponsors participating in the National School Lunch, School Breakfast and After School Care Snack Programs are responsible for maintaining federal, state and local compliance in all aspects of the School Meal Programs. Sponsors should gather and **have available** the following documents for the CRE Review:

1. **Permanent Agreement** – All School Food Authorities (SFA) must have a signed Permanent Agreement on file with the Ohio Department of Education (ODE), Office for Child Nutrition (OCN). The most current version is dated Fiscal Year 2009.

Student Eligibility for Free, Reduced-Price and Denied/Paid Meals

2. **All Direct Certification documents** and siblings of DC student documentation. Please note that all SFAs must complete the Direct Certification process at least three times per school year. Direct Certification results and documents must be maintained for three years plus the current year. Errors found with Direct Certification may result in fiscal penalty.

3. **All free, reduced-price, denied, withdrawn, and transferred student meal applications for the current school year for the building(s) selected for review**. Supplemental Nutrition Assistance Program (SNAP) and Ohio Works First (OWF) numbers must be 10-digit case numbers (16-digit Ohio Direction Card numbers or Medicaid numbers are not valid numbers). Errors found in application approval may result in fiscal penalty.

4. **Benefit Issuance documents** – a list (i.e. coded roster, class list, checklist) of free, reduced price, and denied/paid students for the month of review must be available. Errors found on the Benefit Issuance document may result in fiscal penalty.

5. **Verification documentation** -Applications selected for verification and all accompanying documentation (copies of letters sent to the selected households and copies of documents submitted to the school for the Verification Process). The Verification Process must be completed by November 15 each year. Verification is based on the number of paper applications on file as of October 1st of each year. Conduct the Confirmation review before contacting the households. The school must document that at least one follow-up contact was made to each family that did not respond to the initial request for documentation. Directly Certified students and siblings are ***not*** included in the Verification Process.

Menu Planning and Recordkeeping

6. **Menu Records for Breakfast, Lunch and After School Snack Programs for the Month of Review**- Menus must reflect that all components are offered daily. Alternate meals must also meet meal pattern. Errors found in menu planning may result in fiscal penalty.

7. **Milk** offered with the School Meal Programs must be either 1% fat or fat-free (skim) milk. Whole milk and 2% milk are not permitted in a reimbursable meal. A "variety" of milk must be offered; variety is defined as at least two different flavors, two different fat contents, two different types (1% fat or fat-free "regular" milk, lactose free milk, buttermilk etc.) or a combination of these. Flavored milk can only be in the fat-free variety.

8. **A medical statement from a licensed physician** is required to make substitutions for students with life-threatening allergies or disabilities. See *Accommodating Children with Special Dietary Needs* manual.

9. **Offer vs. Serve** – Student must select 3, 4 or 5 components at lunch (3 of the 4 at Breakfast; Offer vs. Serve is NOT permitted in the After School Snack Program). A reimbursable lunch must include at least ½ cup of Fruit or Vegetable.

10. **If Offer vs. Serve is not implemented**, ***every*** student must select ***all*** 5 components (4 at Breakfast). Failure to properly implement Offer vs. Serve could result in fiscal penalty.

11. **Daily Production Records for all School Meal Programs for the Month of Review** – Daily Production Records should indicate each food component served for the reimbursable meals, temperatures (unless these are kept elsewhere), amount of food prepared, serving size of the food, servings used, and left-overs.

12. **Meal Identification** – USDA requires that the content of reimbursable meals is identified near or at the beginning of serving line(s). Each School has discretion on how to identify the meals. The goal is to assure that students do not unintentionally purchase a la carte items.

13. **Breakfast and After-School Care Program** – Menus must be planned to meet the meal patterns.

14. **USDA/Commodity/Government Donated Foods** – The Regional Consultant will observe the inventory of USDA Foods and may ask to see a monthly inventory.

Collection and Counting Procedures

15. **Point-of-Service Meal Count** – All Programs will be observed to ensure that reimbursable meals are being counted at the Point-of-Service without overt identification. Errors found in counting student meals may result in fiscal penalty.

16. **Daily Worksheet(s) (CN-7 [Lunch], CN-6 [Breakfast], CN-7S [Snack]) for the Month of Review** - Errors found on daily worksheets may result in fiscal penalty.

17. **The Edit-Check process** must be completed monthly (The top portion of the CN-7 document) - Check the daily free and reduced-priced meal counts to ensure that they do not exceed the adjusted number of approved free and reduced-priced applicants based on the attendance rate.

Claim for Reimbursement

18. **Claim(s) for the Month of Review** will be compared to Daily Worksheets.

Accountability Reviews

19. **On-Site Accountability reviews** of lunch service for Sponsors with more than one site. Annually, Sponsor must complete one review for each Site before February 1. The ODE, OCN prototype must be used.

20. **After-School Care Snack Program review** – Sponsors must complete two reviews; one during the first four weeks of operation and the second sometime before the end of program. The ODE, OCN prototype must be used.

Other federal requirements

21. **"And Justice For All" poster** must be visible to the public. Also, all School Meals literature sent or viewed by the public, including menus, ***must*** contain the Non-Discrimination statement.

22. **Paid Lunch Equity –** The Paid lunch price must be at least the difference between the Free and Paid reimbursement rates ($2.51 as of July 1, 2012).

23. **Potable (drinking) water** must be available during lunch at no charge to the student (reference USDA policy memo SP 28-2011 for details).

24. **Contracts with Vendors, Caterers, Food Service Management Companies and Exclusive Beverage Contracts -** All Sponsors must follow federal procurement practices, which includes formal bidding.

25. **Ohio Senate Bill 210 requires a Board-approved Policy regarding nutrition standards of a la carte food and beverage sales to students -** Refer to Ohio Revised Code 3313.814, 3313.816, and 3313.817. Only Residential Child Care Institutions and Board of Developmental Disability schools are exempt.

26. **Board-approved Wellness Policy -** Required policy for all Sponsors.

27. **Written HACCP Plan** – The plan must include:
    - All Standard Operating Procedures (SOPs)
    - Recipes that have been categorized into a three-column chart (No Cook, Same Day Cook and Serve, Cook/Cool, Reheat and Serve) with Critical Control Points (CCPs) [Time and Temperature]
    - Temperature log of freezers, refrigerators and cooked and cooled foods
    - Record of employee training (training on the HACCP Plan)
    - Any corrective actions that have been taken and their outcome

28. **Two annual Health Inspections are required annually-** The most current health inspection report must be posted in the cafeteria in public view. If two inspections are not possible (e.g. the local health department will not visit that often) obtain a letter from the local health department indicating why they will not make required visits.

29. **Annual Civil Rights Training** – All persons working with the Meal Programs are must obtain annual civil rights training. Sponsors must keep a record of employees and the date trained on civil rights (attendance records, certificate of attendance).

30. **School Breakfast Program household notifications -** All Sites that offer School Breakfast must send a notification to households to raise awareness breakfast availability. Maintain copies of these notifications for the review (reference USDA policy memo SP 40-2011 for details). Sending a menu does not meet the regulatory requirements.

31. **Summer Food Service Program (SFSP) notification** – Annually, Sponsors are required to access the ODE, OCN electronic map of Ohio to locate SFSP sites in their area and notify families in the school district.

32. **Foods of Minimal Nutritional Value (FMNV)** – Foods such as carbonated beverages, popsicles, gummy candy, chewing gums, breath mints and licorice **are not allowed to be sold to students during Program operation**.

33. **Competitive Foods** – No group or agency should compete with the National School Lunch or School Breakfast Programs. Competition with School Meals could harm the viability of the non-profit, self-operating programs.

34. **Financial Responsibilities** – Each SFA is responsible for tracking all costs and revenue for the non-profit school food service account. A cost module is included in the CRRS (Claiming) program, but the SFA may develop its own. Please have documents available to show that the non-profit school food service account is maintained separately from the General Funds account.

35. **Certification of Menu Compliance** – Beginning 2012-2013, schools should document and submit Menu Certification worksheets. Compliance with the New Meal Pattern will result in an extra six cents reimbursement per lunch meal. The USDA Certification worksheets are required.

Abbreviations
SFA = School Food Authority, or the school district
LEA = Local Education Agency, which includes public, community/charter and non-public schools, Educational Service Centers, Residential Facilities (RCCIs), jails and detention centers
NSLP = National School Lunch Program
SBP = School Breakfast Program

USDA = United States Department of Agriculture
SFSP = Summer Food Service program
SSO = Seamless Summer Option Program
FSMC = Food Service Management Company
RCCI = Residential Child Care Institution