



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Chief *J. Frassinelli*
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: September 8, 2014

SUBJECT: **Operational Memorandum #51-14**
Edit Checks
Onsite Monitoring Reminder

Edit Checks – This is a reminder that Local Education Agencies (LEAs) are required to conduct a daily edit check of meal counts. According to the Code of Federal Regulations (CFR) for the National School Lunch Program (NSLP) (7 CFR §210.8(a)(3)(i) and 7 CFR §210.8(a)(4)):

*(3) **Edit checks.** (i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.*

*(4) **Follow-up activity.** The school food authority shall promptly follow-up through phone contact, on-site visits or other means when the internal controls used by schools in accordance with paragraph (a)(2)(i) of this section or the claims review process used by schools in accordance with paragraphs (a)(2)(ii) and (a)(3) of this section suggest the likelihood of lunch count problems. When problems or errors are identified, the lunch counts shall be corrected **prior to submission of the monthly Claim for Reimbursement**. Improvements to the lunch count system shall also be made to ensure that the lunch counting system consistently results in lunch counts of the actual number of reimbursable free, reduced price and paid lunches served for each day of operation.*

Sample Edit Check forms may be found on the [Forms for School Nutrition Programs](#) webpage. LEAs that choose to use a computer based edit check must ensure that there is an Edit Check Report that is reviewed daily by the LEA to assess that the counts are accurate, the attendance factor is applied and that the data does not exceed the free and reduced eligible figures.

On-site Monitoring – On-site Monitoring is part of the internal controls that are required by the United States Department of Agriculture. According to the CFR for the NSLP (7 CFR §210.8(a) and 7 CFR §210.8(a)(1)):

*(a) **Internal controls.** The school food authority shall 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: an on-site review of the lunch counting and claiming system employed by each school within the jurisdiction of the school food authority; comparisons of daily free, reduced price and paid lunch counts against data which will assist in the identification of lunch counts in excess of the number of free, reduced and paid lunches served each day to children eligible for such lunches; and a system for*

following up on those lunch counts which suggest the likelihood of lunch counting problems.

*(1) **On-site reviews.** Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school’s meal counting or claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school’s claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.*

The beginning of the school year is a good time to conduct the on-site reviews to ensure that each school/site is implementing accurate meal counting and claiming practices. A sample On-site Monitoring form may be found on the [Forms for School Nutrition Programs](#) webpage. Note that the monitoring forms do not get submitted to the State agency. LEAs are required to maintain these completed forms on file for audit purposes.

Questions pertaining to this memorandum may be directed to:

Consultants for School Nutrition Programs	
County	Consultant
• Fairfield County	Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129
• Hartford County (towns/cities beginning with A-R)	Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079
• Hartford County (towns/cities beginning with S-W) • Windham County	Susan Alston susan.alston@ct.gov 860-807-2081
• Litchfield County	Allison Calhoun-White allison.calhoun-white@ct.gov 860-807-2008
• Middlesex County • Tolland County	Andy Paul andrew.paul@ct.gov 860-807-2048
• New Haven County	Jackie Schipke jackie.schipke@ct.gov 860-807-2123
• New London County	Monica Pacheco monica.pacheco@ct.gov 860-807-2073

JF:tdd

Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the [Child Nutrition](#) website.