# CRE
## (Coordinated Review Effort)

## Self-Tracking Checklist

## for

# School Nutrition Services

# cde

## Nutrition Unit

## April 2007

# CRE Self-Tracking Checklist

**To be in compliance, district staff should respond "yes" to the questions.**

**Part I: Eligibility Determination**
**Applications, Direct Certification, Verification**

| Applications – Section 9 | Yes | No |
|---|:---:|:---:|
| 1) Can the district's current free and reduced-price meal applications be separated by eligibility category and school site for the CDE reviewers? | ☐ | ☐ |
| 2) Is there a separate file for inactive applications with the date of withdrawal noted either on the application or in the automated system? | ☐ | ☐ |
| 2) Does each school in the district use the current year's application form, letter to households and eligibility guidelines? | ☐ | ☐ |
| 3) Are the parents or guardians of all children enrolled in the district provided with a free and reduced-price application at the beginning of the school year? | ☐ | ☐ |

4) Does a review of the applications indicate that:
   a) All income applications include:

| | Yes | No |
|---|:---:|:---:|
| i) Name(s) of student(s) for whom application is made? | ☐ | ☐ |
| ii) Names of all household members? | ☐ | ☐ |
| iii) Signature of an adult household member? | ☐ | ☐ |
| iv) Social Security number of the adult who signed the application or an indication that he/she does not have one (the word "none")? | ☐ | ☐ |
| v) Income of each adult household member, by source? | ☐ | ☐ |

   b) All food stamp applications include:

| | Yes | No |
|---|:---:|:---:|
| i) Name of student? | ☐ | ☐ |
| ii) Food stamp case number (7 digit alpha-numeric)? | ☐ | ☐ |
| iii) Signature of an adult household member? | ☐ | ☐ |
| c) Each foster or institutionalized child is on an individual application? | ☐ | ☐ |
| 5) Was the correct eligibility determination ("free," "reduced" or "paid") made for each application processed? | ☐ | ☐ |

6) Does the district have a system for handling temporarily approved applications (applications indicating "zero income" or "not working") which includes:

| | Yes | No |
|---|:---:|:---:|
| a) A temporary approval of approximately 45 days? | ☐ | ☐ |
| b) A process for notifying the household that their benefits will expire unless the information on the application is updated? | ☐ | ☐ |
| c) Termination of benefits if the household fails to respond? | ☐ | ☐ |
| d) A method for completing and documenting 45-day follow-up? | ☐ | ☐ |
| 7) Is the determining official the same as is indicated in the letter to parents? | ☐ | ☐ |

|  | **Yes** | **No** |
|---|---|---|
| a) Does the determining official sign each application? | | |
| b) If computerized, does the determining official sign a statement regarding all approved applications? | | |
| 8) Is the fair hearing official, as indicated on the notification letter for free/reduced meals the same as that indicated on the letter to parents? | | |
| 9) Do students receive benefits based on last year's eligibility no longer than the first 30 operating days after the beginning of the school year? | | |
| 10) Is the hearing official a person who is not involved in the determination and/or verification process? | | |

| **Direct Certification – Section 9** | **Yes** | **No** |
|---|---|---|
| 1) Is the notice of predetermined eligibility sent to the parent or guardian of each directly certified student? | | |
| 2) Is the date that the notice is sent noted beside the name of the student on the direct certification list or elsewhere? | | |
| 3) When all children in the same household are not directly certified, is there an application on file to document their eligibility status? | | |
| 4) Is the list of directly certified students alphabetized by district? | | |

| **Verification – Section 10** | **Yes** | **No** |
|---|---|---|
| 1) Was a count of meal applications taken on October 1st? | | |
| 2) Were an adequate number of meal applications selected for verification? | | |
| 3) Was all required documentation obtained during the verification process? | | |
| 4) Was the verification process completed by November 15? | | |
| 5) Is the verification process documented by application? | | |
| 6) Is there a district summary of the verification results? | | |
| 7) Is the verification reporting form completed? | | |
| 8) Are changes in eligibility due to verification, etc., made: | | |
| a) Immediately for increases in benefits? | | |
| b) Immediately after the 10-day adverse notice period for decreases in benefits? | | |

| Meal Counting and Claiming – Section 11 | Yes | No |
|---|---|---|

Has the district submitted an up-to-date report on the distribution, collection, coding and point-of-service systems used in each school? CDE will provide a form. (If your district has changed to an automated system or changed POS software, you must submit this information.)

| Counting and Claiming | Yes | No |
|---|---|---|

1) Is the collection procedure in use at each meal site the same as the approved collection procedure indicated in the policy statement?

2) If tickets are used for free, reduced-price and full-price meals, are they:
   a) Coded in a manner that does not cause overt identification of children receiving free and reduced-price meals? (Prohibited codes include obvious identifiers such as F, R and P.)
   b) Available through prepayment or charging thus making free and reduced price meal recipients appear as students who have prepaid or charged?
   c) Distributed using a common location at a common time for all students to obtain their tickets?
   d) Collected in a manner that ensures that the same procedures are used for all categories of meals?

3) Is the reimbursable meal count by category taken at the end of the serving line or point-of-sale (POS)?

4) If the cashier is at the beginning of the line, is there a monitor stationed at the end of the line who removes from the count any meal which does not contain sufficient components in order to claim reimbursement?

5) Is there a system in place to ensure that second meals are not claimed for reimbursement (whether system is automated or manual)?

6) After viewing the collection procedure in operation, does it appear that it yields an accurate count by category? (It is important to observe the cashier(s) at the end of the serving period to ensure that the count as taken on the line is the same as that reported on the daily record. Compare the counts by category taken on the day of the review to counts recorded for prior days that month to determine if they are reasonable.)

7) If there is more than one serving line, are the counts from all lines properly consolidated?

8) Is there a current application for all eligible students listed at point-of-sale?

9) Do the names on the list of eligible students match approved applications on file and on the direct certification lists (homeless, runaway and migrant)?

|  | **Yes** | **No** |
|---|:---:|:---:|

10) If more than one list is used, are all lists the same?

11) Is the count of eligible students updated immediately when changes occur?

12) Are attendance adjusted eligibles by category (edit check) compared to daily meal counts for each school before the monthly claim is submitted (on CDE 13 or included in automated system)?

13) When the daily meal counts by category exceed the attendance adjusted eligibles, is the validity of the count examined and documented prior to the submission of the claim?

14) Are all serving areas where meals are claimed for reimbursement open to students receiving free and reduced-price meal benefits as well as to students paying full price?

15) Are meals priced (and advertised) as a unit?

16) If reimbursable "mega-meals" (double entrees or larger portions) are offered, are free and reduced-price meal recipients given the option of receiving this meal at no additional charge?

17) Is the reduced-price breakfast $.30 or less and the lunch $.40 or less?

18) Are adult meal prices sufficient to cover the actual cost of the meal (food, labor, etc.)?

19) When reviewing the daily record of meals served, is research conducted for counts that reflect:
   a) Patterns in numbers
   b) Repetition of numbers
   c) Constant counts by category
   d) Served count equaling delivered count
   e) Identical counts for breakfast and lunch
   f) 100 percent participation
   g) Category count exceeding the number of eligible students
   h)  Are prepaid and charged meals counted on the day they are served, not the day the money is collected?

21) Is there a procedure for handling lost, stolen and misused meal tickets?

22)  Are students issued a minimum of three replacement meal tickets or special meal arrangements allowed each student before they are charged for a replacement ticket?

23)  When preparing the monthly reimbursement claim, are the numbers of meals claimed by category for all schools added correctly?

| **On-Site Reviews** (**Multi-Site Districts Only**) | **Yes** | **No** |
|---|---|---|
| 1) Is an on-site review of the meal counting and claiming procedure completed and documented before February 1 annually? (sample on pages 11.15-11.16) | ☐ | ☐ |
| 2) Is corrective action of the counting and claiming procedure developed as needed? | ☐ | ☐ |
| 3) Is a follow-up review conducted within 45 days to ensure that corrective action was taken? | ☐ | ☐ |
| 4) If the district has an After School Snack program, has an on-site review been completed within the first week of the program operation and second review completed within the time the program is being offered? *See CDE Nutrition website for a sample on-site review form.* | ☐ | ☐ |

| **Meeting Meal Pattern Requirements – Section 12** **Enhanced and Traditional Food-Based Options** | **Yes** | **No** |
|---|---|---|
| 1) Are each of the required five food items offered on every lunch menu? | ☐ | ☐ |
| 2) Are each of the required four food items offered on every breakfast menu? | ☐ | ☐ |
| 3) Have all district recipes been checked to ensure that they actually contribute the expected yield per serving? (Use the Food Buying Guide, the amount of creditable ingredients called for in the recipe and the number of portions the recipe yields to determine contribution per portion.) | ☐ | ☐ |
| 4) Does the district have a Child Nutrition label and Nutrition Facts label for the food products they are currently using? | ☐ | ☐ |
| 5) Are the purchased-prepared items documented in question #4 the same as those received, prepared and served in all of the district kitchens? | ☐ | ☐ |
| 6) Is the district following the USDA menu planning guidelines to ensure that school meal meet the USDA nutrient requirements. | ☐ | ☐ |

|  | **Yes** | **No** |
|---|---|---|

7) If cheese alternates are used, are they on the USDA-approved list, and are they always blended with no less than an equal amount of natural cheese? ☐ ☐

8) Are menu worksheets completed correctly for all meals claimed for reimbursement, including food bars and all other serving lines? ☐ ☐
   a) Recipe numbers, portion sizes and yield ☐ ☐
   b) Bulk entrees in pounds (not number of cases) ☐ ☐
   c) Fresh/frozen fruits and vegetables in pounds ☐ ☐
   d) Amounts "prepared" are recorded ☐ ☐
   e) Amounts "planned" represent number of servings of each menu item that contributes to a reimbursable meal only (no adults, padding, a la carte) ☐ ☐

9) Are substitutions made in the menu reflected on the menu worksheets? ☐ ☐

10) If breaded fruit and/or vegetable products are used, is their contribution to the meal pattern documented, and does production reflect adequate serving size? ☐ ☐

11) Is full-strength fruit juice contributing no more than one-half of the required serving of fruit/vegetable component for lunch? ☐ ☐

12) If 50% or greater juice-based drinks are used to contribute to the breakfast and/or lunch patterns, are they credited properly? ☐ ☐

13) Are standard-sized serving utensils used for portioning all fruits and vegetables? ☐ ☐

14) Are sufficient servings of bread offered each week with a minimum of one serving per day? ☐ ☐

15) If purchased-prepared bread items are offered:
   a) Is the primary ingredient by weight, enriched or whole grain flour or meal? ☐ ☐
   b) Is documentation in the form of a label or product analysis sheet available to substantiate the product's creditability?
   c) Is there a variety of whole grain breads and/or grains offered?

16) Based on the menu system being used, are the required number of bread servings offered each week?
   a) Traditional Food-Based        Grades K-12: 8 servings /week ☐ ☐
   b) Enhanced Food-Based         Grades K-6: 12 servings/week ☐ ☐
                                            Grades 7-12: 15 servings/week ☐ ☐
                                            Optional K-3: 10 servings/week ☐ ☐
17) No more than one grain/bread per day is credited from a grain-based dessert. ☐ ☐

18) Is a variety of fat levels available for milk on every reimbursable line during the entire lunch serving period? ☐ ☐

|  | Yes | No |
|---|---|---|
| 19) Are each child permitted to select from the required choices of milk? (Milk should not be placed on a child's tray without permitting him/her to choose.) | ☐ | ☐ |
| 20) Are all required components/menu items offered in sufficient amounts before the cashier counts the meal as reimbursable? | ☐ | ☐ |
| 21) If the school is operating under offer versus serve, may a child refuse any one or two of the food items offered at lunch? | ☐ | ☐ |
| 22) Are menu items reviewed and changed based on student popularity? | ☐ | ☐ |
| 23) Are students offered daily choices of menu items (i.e., fruit, vegetable, milk)? | ☐ | ☐ |
| 24) Is offer vs. serve operating at the high school level? | ☐ | ☐ |
| 25) Are carbonated beverages, pure sugar candies, pure water ices and gums excluded from sales in the foodservice area during meal periods? | ☐ | ☐ |

**NuMenus and Assisted NuMenus**

|  | Yes | No |
|---|---|---|
| 1) Are an entrée, milk and at least one side dish offered at lunch? | ☐ | ☐ |
| 2) Are milk and at least two other menu items offered at breakfast? | ☐ | ☐ |
| 3) Are menus analyzed using USDA-approved software? | ☐ | ☐ |
| 4) Are menu worksheets maintained on all meals claimed for reimbursement, including breakfasts, food bars and various other serving lines? | ☐ | ☐ |
|    a) Recipe numbers, portion sizes and yield | ☐ | ☐ |
|    b) Bulk entrees in pounds (not number of cases) | ☐ | ☐ |
|    c) Fresh/frozen fruits and vegetables in pounds | ☐ | ☐ |
|    d) Amounts "planned" and "prepared" are recorded | ☐ | ☐ |
| 5) If the district is operating under offer versus serve for lunch:<br>   a) Has the student selected an entrée and at least one other item? | ☐ | ☐ |
|    b) Has the student declined no more than two items when four or more items are offered? | ☐ | ☐ |
| 6) Are carbonated beverages, pure sugar candies, pure water ices and gums excluded from sales in the foodservice area during meal periods? | ☐ | ☐ |

## Civil Rights – Section 3

| | Yes | No |
|---|---|---|
| 1) Is the USDA/FCS-approved poster displayed in a prominent place in the school cafeteria and visible to the general public and recipients? | | |
| 2) Is the most recent (2006) nondiscrimination statement and information as to where a complaint may be filed included on program materials? | | |
| 3) Did the district send out a public release to the media and community/grass roots organizations that includes the letter to parents, application form and the complete income eligibility guidelines? | | |
| 4) If a significant number of persons in the community speak a language other than English, are foreign language translations available? | | |
| 5) Is there no separation by race, color, sex, disability, age or national origin in the eating periods, seating arrangements, serving lines or eating areas? | | |
| 6) Are disabled/special needs students provided program benefits as prescribed by regulations? | | |

## Record Keeping – Section 8

| | Yes | No |
|---|---|---|
| 1) Are records maintained for a period of four years (three years plus the current school year) or until resolution of any audits or reviews? | | |
| 2) a) Are the foodservice account's net cash resources less than three months operating expenditures? | | |
| b) If not, is documentation on file explaining reason for exceeding? | | |
| 3) Are program expenditures kept by food, labor and other? | | |
| 4) Is a copy of the food service depreciation schedule available for CDE reviewer? | | |
| 5) Do all employees paid from the school foodservice account have direct responsibility to the operation of the programs? | | |
| 6) Is a copy of the most recent health inspection report displayed in the cafeteria in full view of all participants and the general public? | | |

**Wellness Policy**

1. Does the Wellness Policy:

|  | **Yes** | **No** |
|---|---|---|
| a) Include goals for nutrition education, physical activity, and other school-based activities that promote student wellness in a manner that SFA determines appropriate? | ☐ | ☐ |
| b) Include nutrition guidelines selected by the local educational agency for all foods available on each school campus during the school day with the objectives of promoting student health and reducing obesity? | ☐ | ☐ |
| c) Provide an assurance that guidelines for reimbursable school meals meet the USDA regulations? | ☐ | ☐ |
| d) Have a plan for measuring implementation of the wellness policy, including designation of one or more persons within the SFA, as appropriate, charged with operational responsibility for ensuring that the school meets the local wellness policy? Name and title of this person: _____ | ☐ | ☐ |

**HACCP Plan**

1. Does the School District:

|  | **Yes** | **No** |
|---|---|---|
| a) Have a letter on file from all vendors stating that they have a HACCP program or follow good manufacturing practices? | ☐ | ☐ |
| b) Periodically review and revise the HACCP plan as necessary and at least once per year? | ☐ | ☐ |
| c) Provide an initial food safety training for all new employees? | ☐ | ☐ |
| d) Provide on-going food safety training and keep a record of training for each employee? | ☐ | ☐ |
| e) Review standard operating procedures (SOP) with all employees? | ☐ | ☐ |

2)  Does each school/serving/prep site:　　　　　　　　　　　　　　　**Yes**　　　　**No**

    a)  Have a HACCP plan with SOPs that are specific to their operation? ☐ ☐

    b) Have all menu items in one of the three processes or "other" category? ☐ ☐

    c)  Have recipes that include final and holding temperatures? ☐ ☐

    d)  Have SOPs for all foods that do not have a recipe? ☐ ☐

    e)  Have SOPs for cooling and reheating food? ☐ ☐

    f)  Monitor and document control measures for:

        1. All food (time and temperature charts)? ☐ ☐

        2. Refrigerator, freezer and milk cooler temperatures? ☐ ☐

        3. Dishmachine wash and rinse temperatures? ☐ ☐

        4. Sanitizing solution temperatures and concentrations? ☐ ☐

        5. Food thermometer calibrations and two thermometers for each freezer and cooler; oven thermometer? ☐ ☐

    g)  Record corrective actions taken? ☐ ☐

    h)  Keep all HACCP records (SOPs, time and temperature charts, corrective actions taken, calibration records, receiving logs) for a minimum of three years? ☐ ☐

3)  Does the manager monitor training standards and ensure SOPs are followed? ☐ ☐