

CONNECTICUT STATE DEPARTMENT OF EDUCATION
BUREAU OF ADULT EDUCATION AND NUTRITION PROGRAMS
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OPERATIONAL MEMORANDUM

TO: Sponsors of School Nutrition Programs

FROM: Maureen Staggenborg, Bureau Chief

DATE: December 22, 2003

SUBJECT: Operational Memorandum # 8-04: Reminder of Critical Performance Requirements

This Office wishes to remind all sponsors about program requirements with regard to accurate menu reporting, as well as the accurate counting and claiming of all student meals that are claimed for reimbursement. Please review the following issues for clarity of understanding, and also review each issue with your staff.

1. Written menus must reflect all components of the regulated meal pattern. This includes items that are available each day, such as milk choices and fresh fruit. You may list these items just once on the menu, but please state that these are available each day.
2. Regulations require that you count meals or milk **only** at the point that they are served to students, so that you can accurately observe students with a reimbursable meal that meets the meal pattern.
3. **Under NO conditions can you claim free or reduced price meals or free milk that you can not substantiate with valid, correctly determined applications.** Sponsors sometimes choose to continue the service of free or reduced meals to some students during the new applications transition that occurs on October 1. If you choose to do this, these meals can only be claimed at the paid rate. You may not claim any meals for free or reduced reimbursement unless you have a valid, current application on file for each child. The same is true if a student's status changes as a result of Verification.
3. There seems to be some confusion about the purpose of edit checks. The daily edit check requirement is a mechanism to help you notice if any of your counts seem unreasonable, given the numbers of free, reduced and full price children who ordinarily participate on a given school day in any single building.

Even if you operate with an electronic system, you still must establish an attendance factor, or use the current national factor, in that system. The electronic systems that are familiar to us have the capacity to edit your daily counts against the factor. If your system does not have this capacity, you will need to develop an alternate process to edit your counts.

IMPORTANT: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. An electronic copy may be requested from the Child Nutrition staff.

4. **The use of an electronic system does not excuse you of the responsibility to claim ONLY free and reduced meals that can be substantiated with current, valid applications.** While your counts may exceed the edited attendance factor on some days, your counts may never exceed the total of current, valid applications in file. We recognize that the electronic systems are a valuable resource to your programs, but they are not a license to compromise accuracy in your reporting. We expect that you will look at your system reports every day to confirm that you are not logging free or reduced counts beyond your allowable valid applications. If your electronic system allows for an override of the total of free and reduced applications, then we will expect you to develop an oversight system to ensure that this is not done. If your cashiers are counting more free or reduced students than you have valid applications for, this should signal to you that you have a problem in your system somewhere.

Sponsors whose programs are found deficient in these areas can anticipate filing amended claims, and will be subject to second reviews. Please contact one of the school consultants if you have questions about your counting and claiming procedures.