



Meal Counting and Claiming Requirements

School and Community Nutrition
Kentucky Department of Education
RCCI Annual Training
June 2, 2015



Overview

- Requirements of an adequate counting and claiming system.
- Administrative Review
- Requirements of Meal Counting and Claiming procedures to be submitted to the State Agency for approval.



Reimbursement for Meals

Performance Standard 1

The meal counting and claiming system utilized is adequate to obtain accurate meal counts. (PS1)

Performance Standard 2

The meal pattern requirements by age/grade group have been met. (PS2)



Reimbursement for Meals

Reimbursement Limitations:

“To be entitled to reimbursement under this part, each school food authority shall ensure that Claims for Reimbursement are limited to the number of free, reduced price and paid lunches and meal supplements, respectively, for each day of operation.”

7 CFR 210(c)



Reimbursement for Meals

If the meal count system in place is inadequate, meals served to eligible children are not entitled to reimbursement even if meal pattern requirements have been met.



Meal Count System

A collection of procedures and processes utilized by a school food authority to obtain an accurate count of reimbursable meals, by eligibility type, for each meal served to submit for reimbursement.



Meal Count System Requirements

1. Obtains and maintains adequate documentation to establish eligibility status of children.
2. Has collection procedures that institutes an acceptable medium of exchange that does not overtly identify the status of children.
3. Obtains meal counts at a point of service.



Meal Count System Requirements

(continued)

4. Maintains a daily record of operations.
5. Accurately combines daily meal count records into a monthly claim for reimbursement.
6. Has adequately established internal controls to ensure accurate claims are submitted.



I. Documentation of Eligibility

Documentation required to establish eligibility:

- Individual Determination form on file for each residential child for which meals are claimed.*
- Free and Reduced Application or Direct Certification documentation for non residential children for which meals are claimed.*

*Processed according to current Eligibility Manual.



I. Documentation of Eligibility

Children's meals served without adequate documentation on file to establish eligibility can only be claimed at the paid rate.



I. Documentation of Eligibility

Benefit Issuance Document:

A roster, (whether manual or electronic) of all enrolled children with an indication of their current eligibility status that is used during the meal service to count the number of meals for reimbursement by eligibility type.



I. Documentation of Eligibility

Benefit Issuance Document vs. Attendance or other roster:

Benefit issuance rosters are only for the purpose of counting meals by category to submit for reimbursement.



I. Documentation of Eligibility

Benefit Issuance Document must be updated:

- New child is enrolled
- Eligibility status is changed
- Child is withdrawn



2. Collection Procedures

Refers to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange.

FNS-270

USDA, FNS

Meal Counting and Claiming Manual



2. Collection Procedures

Medium of Exchange:

Cash or any type of ticket, token, ID, name, biometric identification or number that students exchange to obtain a meal.

Used to identify children on benefit issuance document.

FNS-270

USDA, FNS

Meal Counting and Claiming Manual



2. Collection Procedures

Note:

Visual identification of students by staff is not an acceptable method of identifying a student at a point of service.



3. Point of Service

Point of service meal counts:

Meals are counted at that point in the food service operation where it can be accurately determined that a reimbursable free, reduced-price, or paid meal has been served to an eligible student.

FNS-270

USDA, FNS

Meal Counting and Claiming Manual



3. Point of Service

Procedures must ensure that meals counted:

- Meet the meal pattern requirements
- Are served to eligible students
- Are counted daily by category



4. Record of Daily Operations

The number of reimbursable meals served daily by category to eligible students.

- These numbers are obtained from the point of service meal counts recorded on the benefit issuance document.



5. Claim for Reimbursement

The number of meals documented on the record of daily operations are combined or consolidated to generate a monthly claim for reimbursement to submit to the State Agency.



6. Internal Controls

An SFA must establish internal controls to ensure that an accurate claim for reimbursement has been made. Edits and monitoring are examples of internal controls.

FNS-270

USDA, FNS

Meal Counting and Claiming Manual



6. Internal Controls

- Edits compare meal count data to other information to identify possible problems in the meal count system.
- Monitoring ensures that the meal count reports are based on the approved counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced-price, and paid meals served each day of operation.



6. Internal Controls

Edits to identify unreasonable meal counts:

- Meal counts that exceed the number of eligible students in attendance on any given day.
- Constant counts – meal counts are the same every day.
- Meal counts where extremely high percentages of eligible students eat every day.
- Pattern counts – counts that seem to repeat in patterns.
- Served count equal to delivery count.



6. Internal Controls

Daily and Monthly Edit Checks are required to be conducted on all meal counts submitted for reimbursement.



6. Internal Controls

Daily Edit Checks:

(By type) The daily count of meals compared to the number of eligible children times an attendance factor.

Monthly Edit Check:

(By type) The number of meals to claim compared to the highest number of eligible children on a day in the month times the number of operating days.



6. Internal Controls

Monitor Reviews

All sponsors who have more than one site approved in their application and agreement must conduct an onsite monitor review at each facility by February 1st of each year.

Recommended for sponsors with only one site to conduct a monitor review if there is more than one point of service to obtain meal counts.



6. Internal Controls

When problems with meal counting or claiming identified in a monitor review:

- Ensure that corrective action is implemented.
- Within 45 days of the review, conduct a follow-up review to determine that the corrective action resolved the problem.



6. Internal Controls

When the internal controls used suggest the likelihood of meal count problems:

- Investigate and correct the claim for reimbursement prior to submission when errors or problems are identified.
- Ensure that improvements are made to the meal counting system if needed to ensure adequate counts are consistently obtained.
- Document investigation, results and action taken.



Family Style Meal Service

NSLP Memorandum 2012-02

TO: All NSLP Sponsors

FROM: Denise Hagan, Director
School & Community Nutrition

RE: Family Style Meal Service in the NSLP and SBP

DATE: January 27, 2012

The purpose of this memo is to clarify reimbursable meals served family style in the NSLP and SBP programs. Several schools and districts have implemented a family style service most prevalently for preschool aged children and have been claiming those meals for reimbursement through the NSLP and SBP. USDA Policy Memo SP 35-2011 provides States the option of authorizing family style meal service in the NSLP and SBP. The Division of School and Community Nutrition has not adopted that option to allow family style meal service in Kentucky in the NSLP and SBP. As such, meals served family style are not reimbursable.

Through the course of CRE reviews, critical issues have been consistently observed where this meal service style has been implemented. The required procedures as described in FNS Instruction 783-9 were not implemented, invalid meal counting procedures utilized, non-reimbursable meals or components served, lack of temperature holding equipment utilized for hot and cold foods throughout the meal service and inadequate record keeping to support the meals claimed maintained.

For schools and districts that wish to continue or adopt a family style meal service for students, the CACFP program may be an appropriate option in which reimbursement of the meals may be allowable.

Director
School & Community Nutrition
500 Mero Street
23rd Floor Capital Plaza Tower
Frankfort, KY 40601

Should you have questions regarding this policy, please contact Sue Bartenfield at 502/564-5625, extension 4922.



Offer Versus Serve

- All food items at breakfast and all food components at lunch must be offered to all children.
- All children must take 3 food items at breakfast and 3 full components at lunch.
- Within the 3 food items and 3 full components, the child must have selected a $\frac{1}{2}$ cup fruit, vegetable or combination of both in order for the meal to be reimbursable.



Meal Counting and Claiming Procedures

- Review your procedures annual and make any updates as needed.
- Updates are to be uploaded into CNIPS for SA approval.
- Once approved, these new procedures must be implemented and monitored.

Meal Counting and Claiming Procedures

Answer question #28 in the sponsor application as “yes” to create a checklist item in order to upload procedures for approval.

Procedures

28. Have your meal counting and claiming procedures at any of your sites been revised?

Yes

No



Meal Counting and Claiming Procedures

- All 6 elements of an adequate counting and claiming system must be identified and sufficient detail provided to determine that requirements are met for any meal count that will be submitted for reimbursement.
- All forms that will be used must be submitted as part of the procedures.



Administrative Review

- Review of the records to establish eligibility (individual determination forms).
- Review benefit issuance roster to determine if kept up to date.
- Review menu compliance to ensure that reimbursable meals are served and eligible to be counted for claiming.
- Review each point of service and related records to ensure that meals are counted in a manner that is eligible for claiming.



Administrative Review

Ensure meal counting and claiming processes in place leave an auditable trail in order to avoid PSI violations and fiscal action during an administrative review.



Administrative Reviews

Problems cited in past reviews:

- No individual determination forms
- No benefit issuance roster maintained and kept up to date
- Multiple POS without documentation of meal service or meal counts (production records, rosters, etc...)
- Benefit issuance roster accessible on a public drive within the organization



Administrative Reviews

Problems (continued)

Unacceptable Meal Counting:

- Meal count taken prior to the meal service or in a location other than the location where the meal is served.
- Based on attendance or enrollment records
- Not at a point of service
- “Backed out” (total in attendance minus those observed not to have a reimbursable meal)
- Plate or tray counts
- Meal service attendance records



Questions?

“The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (in Spanish).