



Meal Counting and Claiming Requirements: Point of Service (POS) Guidance

OVERVIEW

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record, and claim the number of meals served to students by category (paid, reduced, free). Additionally, the number of meals served at free and reduced prices and claimed for reimbursement must have adequate documentation on file to support the claims. To do so, school food service meal counting and claiming systems must include several elements discussed in this document.

Meal counting involves accurately gathering and managing data at the point of sale/service (POS). This data is used to calculate monthly meal count totals, indicating the number of free, reduced-price, and paid meals served to facilitate reimbursement. Programs such as the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASSP), and Special Milk Program (SMP) all require meals, snacks, or milk to be recorded at the POS as the student receives the meal. It is important to note that the POS includes privately identifying a student's eligibility status (free, reduced, or paid) as well as ensuring the student has a reimbursable meal directly at the POS.

Elements of a Counting and Claiming System

Eligibility

Sponsor/school must have documentation supporting the eligibility of each student receiving free and reduced-priced meals. This includes free/reduced-price meal applications, direct certification list, and a certified list of homeless, migrant, foster, or runaway. Please note that a student's eligibility status carries over from the previous school year for 30 operating days into the new school year or until a new application is received to allow time to process a new application. If a student transfers from another school, their eligibility status follows them (new school may reach out to school transferred from to collect the benefit documentation and maintain on file). For more information, refer to the [Eligibility Manual](#).

Collection

Collection procedures include how a student pays for their meals. The school food service authority (SFA) must have a system in place that records students who have paid for their meals and/or are receiving free or reduced benefits. After students have paid for their meals, there must be a system in place that is updated as to which students have paid and which have free or reduced benefits. There are multiple ways of doing this. The most common is an electronic POS system. However, some use manual methods or a combination of the two.

It is of utmost priority to avoid overt identification of students' eligibility of benefit status. Overt identification is any action that may result in a child being recognized by their eligibility status. Electronic POS systems have the benefit of improved protection over student eligibility status. However, the screen must never be visible to other students or staff if benefit status is visible. Staff other than the school determining official (person qualified to determine student benefit status) will need a valid reason for view the eligibility status of students. The fewer individuals with access, the better. Avoid the use of indicators next to students' names with letters such as F, R, or P, highlighted names correlating to status, colored lunch tickets if applicable, or other obvious

makers that could disclose eligibility. Additionally, it is important to be mindful of how payment is accepted in line that could identify their status.

Point of Sale/Service (POS) System Counts

The point of service is the point at which a staff member who is trained to know the meal pattern accurately determines that a reimbursable meal has been served to an eligible student. The person responsible for monitoring the meals needs to observe every meal and should be trained in recognizing reimbursable meal components. Every meal must be counted at the POS to confirm that an eligible student has received a reimbursable meal. This entails ensuring that the student has all the necessary components on their tray for the selected service model (serve only or offer vs. serve) and that these items adhere to the specified meal pattern requirements in their correct amounts. **A tray count or an attendance/classroom count is not a point of service count and cannot verify that a reimbursable meal has been served.**

POS systems must be updated and accurate to ensure that students receive the correct benefit status in a timely manner after benefit determination. An accurate meal count system relies on a medium of exchange. This can be a name/pin number, as is the case in roster-based systems. It can also be a ticket, an ID card or cash. Accurate systems have accuracy built into them. Accurate meal count systems do not rely on special knowledge of the count taker to identify the eligibility category of the meal.

Schools must also track non-reimbursable meals, such as meals served to school staff members, food service employees, visiting adults, visiting students, and food sold a la carte as non-program revenue and ensure the revenue for providing these non-program meals accrues to the nonprofit school food service account (fund 12). It is important to have a backup POS system in place in case of an electronic system failure or if the personnel responsible for meal counts is unexpectedly unavailable.

Reports and Claims

The number of daily reimbursable meals, for each category (free, reduced, and paid) must be recorded. Reports can be either manual or electronic and must contain correct counts by category. When filed, reports must be easily read, have edit checks (internal controls that Local Education Agencies, LEAs, must have in place to ensure an accurate claim for reimbursement), and be consolidated for an accurate claim. The recording method must ensure that correct counts by category are reported in a way that can be easily read, edited, and entered accurately. Claims are entered monthly in the Montana Agreement and Payment System (MAPS).

The daily meal counts are used to add up the number of meals (consolidate) to be claimed for reimbursement at the end of the month. The school gets reimbursement for all the student's first meals. Prior to submitting a monthly claim for reimbursement, all LEAs must perform meal count [edit checks](#). Its purpose is to verify the accuracy of the meal claim before it is submitted for payment. This procedure can be executed either through automation or manual means.

Internal controls

Internal controls are established to ensure that an accurate claim for reimbursement has been made, this protects schools from potential claiming errors. Examples of internal controls include edits and monitoring procedures. Edit checks can compare meal count data against other information such as the number of eligible students, attendance, tray counts, etc. to identify possible errors in the meal count system. Meal counts that potentially contain errors should be investigated to ensure accuracy. Some examples of unreasonable scenarios include:

- Meal counts that exceed the number of eligible students for each category or the daily attendance count
- Meal counts that are the same every day for a period of time
- Unreasonably high or low meal counts

Scenarios to Consider at the Point of Sale

Offer vs. Serve

Only meals that have the required components and quantities at the point of service can be counted and claimed for reimbursement.

Second Meals

Schools that offer second meals to students may not be claimed for reimbursement. Second meals must be recorded separately. Additionally, it is important to keep note of whether second meals are being served intermittently because of leftovers or if they are made consistently with the intent of selling. If [extra servings or second meals](#) are provided for free, they should be included in the planned meal patterns and meet the [nutritional standards requirements](#). If the school does not charge students for second meals, the food service account should be reimbursed to cover the cost. If second meals are sold a la carte, they do not count toward meal pattern requirements, and are subject to competitive food standards (7 CFR 210.11) and non-program foods requirements (7CFR 210.14(f)).

Incomplete Meals

Meals are incomplete when they are missing components or minimums of meal patterns and are therefore not reimbursable. Staff should be trained on what to do in these situations. It is best practice to encourage the student to select additional items to make the meal reimbursable. If the student chooses not to, the meal cannot be counted as reimbursable and must be paid for by the student or out of a non-profit school food service account (Fund 12).

Visiting Students

Students visiting the school who are enrolled within the same district may receive a meal based on their eligibility status at their school. If the visiting student is from outside the school district and there is an agreement among districts as well as documentation has been given regarding their eligibility status, they may be charged and claimed accordingly. If the student is visiting from outside of the district and has no documentation or does not have an agreement between districts, the student must be claimed as paid.

Non-Program Adults

For visiting adults or non-program adults (those who do not work in the school food service) the meal is not reimbursable and therefore must be charged at the appropriate adult meal rate, see [OPI Adult Meal Rate](#). If the meals are being provided for no cost to the adult, the SFA must keep count of all adult meals not being paid for directly and cover the expense out of a non-food service account (like the district's general fund adding revenue into the food service fund).

Field Trips

SFAs may choose to provide (should provide) meals to students on field trips to ensure all students have the option of a school meal, to maintain a steady revenue stream, and for convenience of busy parents. Fewer student meals affect the funding schools receive in student payments, federal reimbursement, state match payment, and commodity allocations. This loss of revenue can add up over the course of the school year. In addition, it is difficult for school food service operations to appropriately adjust labor hours when there are occasional dips in participation, which may negatively affect productivity. Field trip meals are also a great convenience to busy parents. If students are receiving meals, they should be available to all students, regardless of free, reduced-price, or paid eligibility status. These meals must follow the meal pattern with all required components in their minimum amounts.

Teachers or chaperones must have a process for counting meals at the point of service. For example, checking names off a list if that student received a meal. The list must then be turned over to food service personnel for proper counting and claiming for reimbursement based on eligibility status. Counts of bag lunches sent or returned or field trip attendance counts may not be used as a meal count. For more information on providing portable field trip meals for students see [Field Trip Meals Resource](#) on OPI's website.

Meal Charging Policy

Each SFA is required to have a written and implemented [meal charging policy](#). This policy must be followed at all times as well as communicated with families of students and appropriate parties.

Resources for additional information:

[OPI Adult Meal Prices](#)

[OPI Meal Counting Policy](#)

[OPI Edit Check Resource for Schools Daily/Monthly Claims](#)

[OPI Non-Program Revenue Guidance](#)

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Washington, D.C. 20250-9410; or
2. FAX:
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