

DATE: January 7, 2013

TO: School Food Authorities (SFAs)

FROM: Christine Emerson, Director  
School Nutrition Programs

SUBJECT: Meal Counting Requirements for the **School Breakfast Program** and the  
**National School Lunch Program**

Daily meal counts for the School Breakfast Program (SBP) and the National School Lunch Program (NSLP) are required for daily program administration by the SFA. It is imperative that the SFA follow correct meal counting procedures for each meal service operations to receive reimbursement for meals served.

The following meal counting requirements are for both the SBP and NSLP as defined by 7 CFR 210.7 and the Montana School Nutrition Programs:

#### ***Point of Service (POS)***

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 meal must contain the required food items to be reimbursable. 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.

#### ***Determining Reimbursable Meals***

A meal count system must identify that meals counted for reimbursement contain the required quantity and type of food items. The meal count system must also provide a way to separate out meals that are not eligible for reimbursement. Only one meal per student per meal service may be claimed for reimbursement. Adult meals, a la carte items, and second or partial meals are not reimbursable and should be accounted for separately.

#### ***Accuracy***

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.

#### ***Meal Counts by Eligibility Category***

The daily meal count system must distinguish which meals/students are claimed as free, reduced price, or full price. For example, a roster can be checked as students come through the line. The eligibility category of students can be a code on the roster, or can be compared to an eligibility list after the meal service to determine the meal count by category.

### ***Count Does Not Overtly Identify Eligibility***

To prevent overt identification, coded rosters or cards are often used. The codes must not be obvious to the casual observer. Single letter codes (F, R, P) or single digit codes (1, 2, 3) are not acceptable. If a computer system is used by the SFA, students and staff should not be able to see any screens that identify a student's pay status. In addition, federal and state policy states that children eligible for free or reduced price meals shall not be required to work for their meals; use a separate lunch room; go through a separate serving line; enter the lunchroom through a separate entrance; eat meals at a different time; eat a different meal from the meal sold to children paying the full price.

If a SFA wishes to elect a meal count system that is not described in this memorandum, a letter requesting the alternate meal counting system needs to be submitted to this office. The letter needs to provide a description of the meal counting system with enough detail to assess whether the proposed alternative would provide an accurate and reliable count of the number of lunches, by type, served each day to eligible children. An acceptable meal counting system is one which yields an accurate daily count of reimbursable meals, by category, which is taken at the point of service and does not overtly identify eligibility status of students.

If you have questions about daily meal counts, please contact School Nutrition Programs at (406) 444-2501.