

USDA Administrative Review: Meal Counting and Claiming

Off-site Questions

300.	Does the SFA use an electronic or manual system to count and consolidate reimbursable meals? If a combination of electronic and manual is used check both boxes.	Electronic	Manual
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Tips:</p> <p>Electronic System: meal counts are generated by an automated Point of Service (POS) system that may connect to the claim for reimbursement. Electronic systems have the ability to identify a student's benefit category, tally daily meal counts, transfer daily meal counts to the SFA, consolidate meal counts for the SFA, and/or submit the claim for reimbursement. The system is limited to virtually NO MANUAL data entry at the POS. Meal counts are kept electronically.</p> <p>Manual System: meal counts are generated by a manual POS system. Meal counts are manually tallied, consolidated, and transferred to the SFA. Consolidation of meal counts by the SFA is completed manually. Hard copy records are kept on file.</p> <p>If the SFA has implemented an electronic system, but one or more aspect of the benefit issuance process is conducted manually (e.g., the SFA has an electronic POS, but utilizes a roster at an alternate service location and SFA staff manually enters meal counts from the alternate service location), the reviewer will consider it a manual/combination system.</p>			
301.	How does the SFA's point of service system identify a student's eligibility? Include all types of distinct counting methods (e.g., check-off list for grades 1-3, tickets for grades 4-8).		
<p>Tips: Explain how and if student eligibility is displayed at the point of sale. POS cannot have a single symbol identifier used in conjunction with a list price. Schools that have a dual payment system that accepts both cash and electronic payments must ensure that children are not overtly identified through the method of payment.</p>			
302.	Does the SFA have a backup system to their primary meal counting and claiming system should the primary system fail/not operate? If YES, describe backup system.	YES	NO
<p>Tips: Some type of backup system must be in place in case the main system fails. Best practices include periodically printing out rosters and backing up claim numbers in case the main system loses them.</p>			
303.	How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?		
<p>Tips: Cashiers must receive periodic training on the meal counting and claiming system. SFAs should incorporate an ongoing training process for all cashiers.</p>			
304.	At the end of meal service, how does the SFA obtain the daily meal counts by category from each school's point(s) of service?		
<p>Tips: Electronic or manual systems can be utilized. Many SFAs have electronic systems that automatically consolidate counts, other SFAs use manual methods.</p>			

305.	What are the SFA's meal counting and claiming procedures for the following situations (as applicable.
a) Offer vs. Serve?	Tips: Describe how meals are counted and claimed at the point of service when offer vs. serve is implemented. Only meals that have the required components and quantities at the point of service can be counted and claimed for reimbursement.
b) Incomplete/Non-Reimbursable Meals?	Tips: Describe how incomplete/non-reimbursable meals are handled at the point of service. These meals cannot be counted or claimed for reimbursement but can be counted as a la carte items.
c) Second Meals?	Tips: Describe how second meals are handled. Second meals cannot be counted or claimed for reimbursement. Indicate if there is a price associated with second meals or if they are provided free of charge. Additionally, are second meals being served intermittently due to leftovers, or are consistently made as an extra revenue source.
d) Visiting student meals?	<p>Tips: Describe how visiting student meals are handled. Visiting students enrolled in the SFA (at a different site) can be claimed as long as the eligibility category is known, required meal pattern is followed and the student is visiting for curricular activities. Students should be claimed at the site in which they are enrolled.</p> <p>Students enrolled in a different SFA can be claimed if the student is there for curricular activities. Can claim by eligibility status, if known and documented. Otherwise, claim as paid. If not there for curricular activities, count as visitor. Indicate if there is a price associated with visiting student meals or if they are provided free of charge.</p> <p>If the site is CEP or Provision 2 (non-base year) and it is the visiting student's regular meal, the SFA could include the visiting student meal in their tally, however, it is best practice to claim the student at the site in which they are enrolled.</p> <p>Students that are not enrolled in a site that participates in NSLP cannot be claimed under HSMA nor receive a free meal. The student must pay for the meal, or it must be covered by funds outside of fund 21 and the meal cannot be claimed.</p>
e) Adult and non-student meals?	Tips: Describe how adult meals are handled. Adult meals served free of charge to adults cannot be paid for from the food service account, nor can these adult meals be claimed in the portal. Non-student meals should be charged at the visiting/a la carte/adult rate. Indicate if there is a price associated with adult and non-student meals or if they are provided free of charge. If the meals are being provided at no cost to the adult or non-student, indicate how the district is covering the expense (i.e., general fund transfer).
f) Student worker meals?	Tips: Describe how student worker meals are handled at the point of service.
g) A la carte?	Tips: Describe how a la carte sales are handled at the point of service. A la carte items cannot be claimed for reimbursement.

h) Field trips?	<p>Tips:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Describe how field trip meals are handled at the point of service; either in the building or on the field trip. Recommend having a field trip recipe/menu. <input type="checkbox"/> If students are scheduled to participate in school activities both before and after the lunch hour, the school is required to offer lunch. <input type="checkbox"/> Proper food safety standards, counting and claiming procedures, and meal pattern requirements (including offering milk) still must be followed. <input type="checkbox"/> Meals must be properly counted at the point of service (i.e.: when the student takes the reimbursable meal). <input type="checkbox"/> Avoid overtly identifying students.
i) Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, and PINS?	<p>Tips: Describe the SFA's process for forgotten IDs or PINS. SFAs should implement an organized process to look up students and avoid overt identification.</p>
j) Charged and/or pre-billed/pre paid meals?	<p>Tips: Describe the SFA's process for charged and prepaid meals (i.e., does the SFA offer a prepayment service?).</p>
k) Students without funds to pay for meals?	<p>Tips: Describe how SFA handles students without funds to pay for meals. SFAs must implement a local meal charge policy and communicate it to all parents, staff, and students at the beginning of the school year. If operating CO HSMA an unpaid meal charge policy is not required but is encouraged to keep on file.</p>
l) New students without approved certification of free or reduced-price benefits?	<p>Tips: Describe how new students without an approved application on file are handled at the point of service. These meals must be counted and claimed as paid until an application is approved or the student is directly certified.</p>
m) Local Charge Policy and	<p>Tips: Describe the policy the SFA has in place regarding local meal charges. SFAs operating NSLP and/or SBP must have in place a written local meal charge policy to address situations when children participating at the reduced-price or paid rate do not have funds to pay for their meal at the time of the</p>

Unpaid Meal Policy Procedures?	<p>meal service. If operating Colorado Healthy School Meals for All program, an unpaid meal charge policy is not required, but is encouraged to keep on file. Policy must be communicated to all households with children attending the SFA and all staff members responsible for the policy's enforcement.</p> <p>The materials should be made available to parents electronically or through a parent portal and a paper copy must be made available to those families with limited or no internet access; only posting the policy/procedure online is not acceptable.</p>			
306.	What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?			
<p>Comments:</p> <p>Tips: Describe how the SFA conducts checks to ensure meal counts are accurate. USDA requires edit checks for lunch and they are highly recommended for breakfast. An edit check is a calculation that compares the number of claimed meals by eligibility status to the number of students enrolled by eligibility status multiplied by the attendance factor. Electronic systems have a report that does this comparison or the SFA can use School Nutrition's sample edit check form.</p>				
307.	<p>Electronic Systems Only:</p> <p>Are meal counts automatically consolidated?</p> <p>If YES, does the software program contain edits and internal controls?</p> <p>If NO, when and how are edit checks and internal controls completed?</p>	<p>YES</p>	<p>NO</p>	<p>N/A</p>
<p>Tips: Edit checks are required for lunch and highly recommended for breakfast.</p>				
308.	<p>Have alternate points of service been approved by the SA?</p> <p>If there are alternative points of service, describe in the comments the number and types of alternate points of service operating during each meal service (e.g., meals in classrooms, bus).</p>	<p>YES</p>	<p>NO</p>	<p>N/A</p>
<p>Tips: Alternate points of service (i.e., two-person point of service) must be approved by CDE School Nutrition before implementation. Only specific circumstances will be approved. Serving meals in alternate location (e.g., breakfast in the classroom, food truck, etc.) does not need to be approved.</p>				
309.	If a school has more than one meal service line, how does the point of service system prevent duplicate or second meals from being claimed?			
<p>Tips: A method should be in place to ensure no double-counting of meals occurs.</p>				
310.	At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?			
<p>Tips: Describe how meals counted at different sites are consolidated and submitted to the SFA. This can occur via an electronic system or manually.</p>				
311.	Describe the SFA's procedures for consolidating daily meal counts by category for each site to process the claim for reimbursement, if applicable.			

Tips: Describe how the SFA consolidates meals from different sites to submit the claim. This can occur via an electronic system or manually.

On-site Questions – SFA Level

314.	Is the SFA following their approved SFA-SA Agreement/application (including POS)? If NO, explain.	YES	NO

Tips: SFAs must update the sponsor and site applications on an ongoing basis to ensure all information in the applications is correct and up-to-date.

315.	Does the SFA consolidate the Claim for Reimbursement? If YES, complete question 316.	YES	NO

Tips: Colorado has site-based claiming rather than SFA-wide consolidated claiming.

316.	a. Complete the chart below for all schools for the review period. b. Were the counts from all schools for the review period correctly consolidated and claimed by the SFA? If NO, explain and indicate whether the problem was non-systemic or systemic.	NSLP			SBP [] N/A		
		YES	NO	N/A	YES	NO	N/A

NSLP	SFA Claim	SA count	Diff +/-	SBP	SFA Claim	SA count	Diff +/-
Free				Free			
Reduced				Reduced			
Paid				Paid			

Tips: Colorado has site-based claiming rather than SFA-wide consolidated claiming.

_____ Non-systemic
_____ Systemic

On-site Question – School Level

317.	a. Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced-price benefits? If NO, explain.	NSLP			SBP		
		YES	NO	N/A	YES	NO	N/A

	<p>b. Does the school have separate dining areas, meal service times, or serving lines based on a student's eligibility status?</p> <p>c. Does the school limit choice of reimbursable meals based on a student's eligibility status?</p> <p>d. Does the school use different mediums of exchange based on eligibility status?</p> <p>If YES to b, c, or d, explain.</p>						
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Tips: SFAs must ensure student eligibility statuses are not overtly identified. Best practices include no cash on the line, moving POS screen out of the site of students, or utilizing privacy screens. Separate eating areas, limiting choices, and use of different mediums of exchange for different statuses are not allowed.

318.	<p>At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?</p> <p>If NO, describe the problem and indicate whether the problem was non-systemic or systemic. If second meals or meals served to ineligible were observed, list the total in the comments section. Combine this total with errors identified in #321 and record in S-1, 12.</p>	NSLP			SBP		
		YES	NO	N/A	YES	NO	N/A

Tips: SFAs must ensure procedures are in place to ensure meal counts are accurate. Counts must be taken at the point of service (this includes breakfast in the classroom), or an alternate point of service must be pre-approved by School Nutrition.

_____ Non-systemic
_____ Systemic

319.	<p>a. <u>Electronic Systems Only</u>: On the day of review, are excessive overrides used at the POS?</p> <p>b. If yes, for what purposes?</p> <p>c. Is the use/purpose of the overrides reasonable? If NO to c, describe the problem and indicate whether the problem was non-systemic or systemic.</p>	NSLP			SBP		
		YES	NO	N/A	YES	NO	N/A

Tips: Overrides should be infrequent. Train cashiers as needed, including how to efficiently operate the point of service system and recognize a reimbursable meal.

_____ Non-systemic
_____ Systemic

320.	Are meal count totals by category combined and recorded correctly? If NO, describe the problem and indicate whether the problem is systemic or non-systemic. Record any differences on the S-1, 15.				NSLP			SBP		
					YES	NO	N/A	YES	NO	N/A
NSLP	School count	SA count	Diff +/-	SBP	School Count	SA count	Diff +/-			
Free				Free						
Reduced				Reduced						
Paid				Paid						
Tips: School Nutrition will determine if the count of reimbursable meals for day of review is accurate.								_____Non-systemic _____Systemic		
321.	a. Are total meal counts by category for the review period reasonable compared to meal counts for the day of review? b. If NO, obtain the school's explanation and record in the Comments section. c. Does the explanation describe an acceptable meal count system? d. If NO, explain and list total number of second meals and meals served to ineligible students in the comments section. Combine this total with errors identified in #318 and record in S-1, 12.				NSLP			SBP		
					YES	NO	N/A	YES	NO	N/A
NSLP - Day of Review Meal Counts Free 33 _____ Reduced 4 _____ Paid 18 _____ NSLP Review Period Meal Counts Lowest to Highest Free 29 _____ to 36 _____ Reduced 3 _____ to 6 _____ Paid 14 _____ to 20 _____				SBP - Day of Review Meal Counts Free 4 _____ Reduced 0 _____ Paid 4 _____ SBP - Review Period Meal Counts Lowest to Highest Free 3 _____ to 12 _____ Reduced 0 _____ to 0 _____ Paid 0 _____ to 3 _____						
Tips: School Nutrition will compare on-site review day counts with counts from the review period.										
On-site Questions – Review Period										
322.	a. Were there any days when the free, reduced price, or paid meal counts exceeded the number of free, reduced price, or paid eligible students? b. If YES to a, indicate which dates and determine whether there was an acceptable explanation available for each day.				NSLP			SBP		
					YES	NO	N/A	YES	NO	N/A

	c. If no acceptable explanation is available, explain and list the number of ineligible meals in the comments. Combine this total with errors identified in #323-324 and record in S-1, 16.						
NSLP School Free Eligible Count: School Reduced-price Eligible Count: School Paid Eligible Count: Dates Exceeding Eligibles: Free: Reduced: Paid:		SBP School Free Eligible Count: School Reduced-price Eligible Count: School Paid Eligible Count: Dates Exceeding Eligibles: Free: Reduced: Paid:					
Tips: SFAs should never have days when the meal counts exceed eligibility.							
323.	a. Were there any days when the free, reduced price, or paid <u>lunch</u> counts exceeded the number of attendance adjusted eligible students? b. If YES to a, was it 50% or more of the serving days? c. If YES to b, was there an acceptable explanation? d. If NO to c, explain and list the number of ineligible lunches in the comments. Combine this total with errors identified by Program in #322 and #324, and record in S-1, 16.	YES	NO				
NSLP Dates Exceeding Attendance Adjusted Eligibles: Free: Reduced: Paid:							
Tips: The attendance factor is established at the local or state level and is typically set at 96%. The attendance factor is used as part of the edit check to ensure meals claimed are accurate.							
324.	a. Were there patterns in the free, reduced, or paid meal counts which appear questionable? b. If YES, obtain the school's explanation and record in the comments section. c. After consideration of this explanation, do the patterns indicate questionable meal count practices? If YES to c, explain and list the number of ineligible meals by Program in comments. Combine this total with errors identified in #322 and #323 and record on the S-1, 16.	NSLP YES NO N/A			SBP YES NO N/A		
Tips: School Nutrition will review one month of submitted claims to determine if counts appear questionable.							
325.	a. For the review period, complete the chart in the comments section for the selected school.	NSLP YES NO N/A			SBP YES NO N/A		

b. Were the counts by category correctly used in the Claim for Reimbursement? c. If NO, explain and indicate whether the problem was non-systemic or systemic. List the number of ineligible meals by Program in the comments. Record differences on the S-1, 19.									
NSLP	School Count	SFA Count	SA Count	Diff. +/-	SBP	School Count	SFA Count	SA Count	Diff. +/-
Free					Free				
Red.					Red.				
Paid					Paid				
Total					Total				
_____Nonsystemic _____Systemic					_____Nonsystemic _____Systemic				
Tips: School Nutrition will determine if the number of meals claimed during the review period is accurate based on source documentation used to submit the claim.									