**Residential Child Care Institutions (RCCI)**

**Meal Counting and Claiming “Quick Reference”**

*USDA Meal Counting and Claiming Manual FNS-270 Aug 1991*

To obtain federal reimbursement for served meals an acceptable meal counting and claiming system must be used. Systems include six essential elements:

1. **Certification process** means an accurate determination of benefits (Free/Reduced).

**Documentation for meal eligibility:**

1. *Children’s Income Policy* *Statement* (CIPS) – allows sites to claim all in Free category.

Each child residing in an RCCI is a household of one. RCCIs use the *Children’s Income Policy* *Statement (CIPS)* submitted yearly with renewal*.* The CIPS back can be used to list child’s name, birth date, entry and exit dates plus any personal income received. If your organization has a different way of tracking these individual details please include that in your internal procedures.

1. For Day students *- Confidential Family Application for Free or Reduced Meals* on file and certified for day students to receive Free or Reduced Benefits. This includes providing current *application* to households. Benefits are issued after the RCCI’s Eligibility Official has approved applications using the current income guidelines and valid SNAP or TANF case numbers.

The Eligibility Official must at the bottom of applications date, sign and check the eligibility category for each application.

**Eligibility Official:** a person who determines students’ eligibility for free or reduced price meals from the *Confidential Family Application for Free or Reduced Meals.*

Benefits are issued after the Eligibility Official has approved applications using the current income guidelines or valid SNAP or TANF case numbers or FDPIR.

Applications must be dated, signed and eligibility category marked Free/Reduced.

***Remember approved applications (Free/Reduced) are confidential.***

These lists are called “Benefit Issuance”

1. **Collection Procedures** include the ‘medium of exchange’ *(defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal- USDA Meal Counting and Claiming Manual pg.4)* for counting students’ meals (PIN, name, roster, token, cash, accounting for payments).

These procedures are reported in CNPweb on the site sheet under *Accountability Procedures* # 131 – 142.

Collection procedures should prevent overt identification of free or reduced eligibility.

Whatever collection procedure is used must be updated in a timely manner for transfers, withdrawals, and changes in benefits.

An accurate “Point of Service” count is:

* Taken daily, as the meal is served,
* One meal type (breakfast, lunch, afterschool snack) per student according to eligibility (Free, Reduced, Paid) is counted
* Follows the approved meal counting and claiming procedure as stated in CNPweb site sheet.

When using **“Offer VS. Serve**” students may decline food items at breakfast and/or meal components at lunch.

* + - **School Breakfast** – Students must select 3 out of 4 food items with 1 being one-half cup fruit or vegetable or combination
    - **National School Lunch** – Students must select 3 out of 5 food components with 1 being one-half cup fruit or vegetable or combination

**When using** **pre-plated service** students cannot decline any item/component

* + School Breakfast - all 3 food items in the daily minimum portion must be served
  + National School Lunch - all 5 components at lunch must be served

**Afterschool Snack Program** - requires 2 out of 4 components. Snacks are claimed only on school days (no

weekends or holidays)

1. **Reports/Edit Checks** – daily and monthly meal count reports with edit checks (manual or computerized)

Number of students/clients in facility X number of operating days X Attendance Factor as listed in CNPweb, site sheet #55 = number meals CNPweb will allow to be claimed.

RCCI’s may use 100% attendance factor.

For residential students, follow the formula:

*Example: 30 students X 31 operating days X 100% = 930 breakfast/lunches*

For RCCIs with day students, use the national Attendance Factor 93.8%.

If the attendance is higher than 93.8% use the Attendance Factor Calculation form in found in

CNPweb on the packet tab. It must be submitted before your specialist will approve a higher Attendance Factor.

*Example: 15 students X 31 operating days X 93.8% = 436 breakfast/lunches*

1. **Reimbursement claims** must be submitted within 60 calendar days from the last day of the claim month to [**CNPweb**](https://cnp.ode.state.or.us/). The meal counts are reported by site by benefit category by month.

CNPweb consolidates the site claim counts into monthly totals. Sponsors must “*certify the information submitted is true and correct and claim is ready for payment”* by checking box #14 on Sponsor Claim.

CNPweb Payment Tab tracks sponsors’ payments.

1. **Internal controls - Sponsors “must establish internal controls to ensure that an accurate claim for reimbursement has been made. Internal controls protect sponsors from having erroneous claims and potential overclaims. pg.6”**

Internal controls include and are not limited to edit checks, recognizing reimbursable meals, personnel training, hardware, software, updating and support.

**Unacceptable meal count systems include** (*USDA Meal Counting and Claiming Manual pg.36)***:**

* **Residential Counts** **Attendance Counts** - Counting the number of students in attendance as a meal count.
* **Tray or entrée counts** – Counting the number of trays or entrees used during the meal service to obtain the meal count.
* **Classroom counts –** Counting the number of students in a class who indicate they intend to eat a meal prior to actual meal service.
* **Counts taken anywhere other than at the POS** – *(Unless State Agency approved* *POS Exceptions*), the only place an accurate count of reimbursable meals can be made is at the point where it can be determined that the meals are taken and reimbursable.
* **Cash converted to meals –** using cash totals to determine number of meal served.
* **Category/cash back-out system –** Free/reduce/paid categories are calculated by subtracting the number of meals from a total for each category.
* **Vended meals counts** – Counting the number of meals delivered to a site is not the number of meals actually served.
* **Second meals claimed for reimbursement** – Second meals served to students cannot be claimed. Sponsors can claim only one meal/snack, per eligible student, per day.
* **Ineligible persons claimed for reimbursement** – Adults or children not enrolled in the program cannot be claimed for reimbursable meals.
* **Any acceptable system not implemented properly**. Even if the system is approved on paper, all necessary procedures must be followed in order for the meal count system to be acceptable. All appropriate staff should be adequately trained in their responsibilities.

**Record Retention requirement: Meal Counting and claiming must be retained for 3 past years + the current operating year.**

[Archived FNS 270-Meal Counting & Claiming Manual](https://archive.org/details/CAT91944887)