

Topic: Elements of an Acceptable Counting and Claiming System

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 actually served to students by category, (i.e., paid, reduced-price, and free). Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim. To do this, meal counting and claiming systems must contain all basic elements outlined in FNS-270-Meal Counting and Claiming Manual.

Elements of an acceptable counting and claiming system include:

- 1) Eligibility documentation
- 2) Collection procedures
- 3) Point of Service (POS)
- 4) Reports and edit checks
- 5) Claims for reimbursement
- 6) Internal Controls

Each of these elements is essential to operating an accountable system. It is important to realize that all elements work together to make an acceptable and accurate system. No part should be left out or underemphasized.

Below is a brief explanation of each element. Please visit the [Helpful Resource](#) section at the bottom of this document for additional information and resources.

Requirements:

✓ Eligibility documentation

- Documentation based on accurate free and reduced-price eligibility determinations supporting the eligibility status of each student receiving free and reduced-price meals.
 - A current, approved free or reduced-price application
 - Confirmation of participating in an assistance program
 - A child or any member of the household receives benefits from an assistance program, as determined through either direct certification or an application with the appropriate case number.
 - Documentation a child meets the applicable definition of:
 - Homeless, runaway, or migrant child;
 - Foster child; or
 - Enrolled in a federally funded Head Start or comparable State- or Indian Tribal Organization-funded Head Start or pre-kindergarten program.

- Residential Child Care Institutions (RCCI) must:
 - Complete the [Child Income Policy Statement](#) if all children are residing in the RCCI, foster children, or children in day programs who have Other Source Categorical Eligibility; or
 - For children attending but not residing in the RCCI (day students), their eligibility is determined using a household application or through direct certification.
- ✓ **Collection procedures**
 - Refers to all steps within the meal counting system involved in paying for meals and issuing and collecting the medium of exchange. A medium of exchange is defined as cash or any type of ticket, token, ID, name, or number which eligible students exchange to obtain a meal.
 - Collection often occurs simultaneously with meal counting. Collection procedures should facilitate rather than inhibit the meal count system.

OVERT IDENTIFICATION: Eligibility information must never be publicized or used in such a way that other students may recognize students' eligibility categories. Students receiving free or reduced-price benefits must not, at any time, be treated differently from students who do not receive these benefits. School Food Authorities (SFAs) are required to ensure that there is no physical segregation, discrimination, or overt identification of any student eligible for free or reduced-price benefits.

- ✓ **Point of Service (POS)**
 - 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.

REIMBURSABLE MEALS: All meals served in the National School Lunch and School Breakfast Programs and counted for reimbursement must meet the meal pattern requirements specified in the program regulations and be served to eligible students. For further information concerning reimbursable meals and *Offer Versus Serve* refer to the [Breakfast At a Glance](#) and [Lunch At a Glance](#) and the [Offer Versus Serve Manual](#).

- There are different ways to count meals served by category each day. Your procedures must ensure that meals counted:
 - Meet the meal pattern
 - Are served to eligible students
 - Are counted daily by category (unless approved to operate a special provision (Provision 2 or CEP))
- In addition, only one meal per student per meal service per day may be claimed for reimbursement.

- Adult meals, meals not meeting meal pattern or offer versus serve requirements, a la carte items, and second meals are not reimbursable and must be accounted for separately.
- For additional information about meal counting and claiming, please visit the resource section at the bottom of this document.
- ✓ **Reports and edit checks**
 - The number of reimbursable meals served daily, by category to eligible students, are recorded and reported by school food service personnel to the School Food Authority (SFA). The particular recording method used must ensure that correct counts by category are legibly reported, verified, and consolidated into an accurate monthly claim for reimbursement.

Edit checks apply to all counting and claiming systems including standard counting and claiming, Community Eligibility Provision and Provision 2. Schools with attendance factors other than 93.8% should use their attendance factor.

- **Daily Edit Check** – The number of students in each category (free, reduced price, paid) multiplied by USDA Attendance Factor percentage (93.8%). This provides you a maximum number of meals that should be claimed daily, assuming 93.8% of your student’s are in attendance. This number is used to signal if one of the categories has too many meals claimed. It is not meant to be an absolute that those meals cannot be claimed; it is meant as a signal to double check and to ensure accurate counts have been recorded.

Daily edit check example –

75 (free students) X 93.8% = 70.35 *maximum number of free meals in a day*

60 (reduced price) X 93.8% = 56.28 *maximum number of reduced price in a day*

30 (paid students) X 93.8% = 28.14 *maximum number of reduced price in a day*

- **Monthly Edit Check** –The number of students multiplied by the number of operating days multiplied by the USDA Attendance Factor percentage (93.8%). This is the number meals CNPweb will allow to be claimed. It may be overridden by ODE when supporting documentation is submitted. Contact your Child Nutrition Specialist for assistance.

Monthly edit check example –

150 students X 20 operating days X 93.8% = 2814 breakfast/lunches

Exceeding CNPweb edit check/claim over-ride - When a site exceeds the CNPweb edit check, confirm students in all categories were in attendance and had received the meal in question. Document the information. If claim numbers are correct, contact your Child Nutrition Specialist.

- ✓ **Claim for reimbursement**
 - School meal counts, by category, are submitted to the SFA on a daily, weekly, or monthly basis.
 - The counts from each site are combined to generate the sponsor monthly claim for reimbursement.
- ✓ **Internal Controls**
 - An SFA must establish internal controls to ensure that an accurate claim for reimbursement has been made. Edit checks and monitoring are examples of internal controls.

Helpful Resources:

- ✓ [FNS-270-Meal Counting and Claiming Manual](#)
- ✓ [Eligibility Manual for School Meals](#)
- ✓ [Breakfast At a Glance](#)
- ✓ [Lunch At a Glance](#)
- ✓ [Offer Versus Serve Manual](#)

Regulatory Reference:

- ✓ [7 CFR 210.8\(a\)7](#)
- ✓ [7 CFR 210.8\(2\)](#)
- ✓ [7 CFR 210.8\(3\)\(i\)](#)
- ✓ [7 CFR 210.8\(5\)](#)

This institution is an equal opportunity provider.