Point of Service Meal Counting

The National School Lunch Program, School Breakfast Program, Afterschool Snack Program and Special Milk Program require meals/snacks/milk to be counted at the Point of Service (POS). Meal counting refers to the process of accurately collecting and maintaining data at the POS to then be able to consolidate meal count totals for reimbursement. LEAs must have a meal counting system that consistently yields accurate claims.

Requirements:
- LEAs must have a Point of Service (POS) meal counting system that:
  - Identifies a student’s eligibility status, but not overtly, when they receive a reimbursable meal*
  - Identifies the student has selected items/components to meet the requirements of a reimbursable meal
- POS meal counting systems may be:
  - Electronic systems that utilize a software program, where students use a meal card, an identification number, etc.
  - Manual / combination systems that involve a paper roster that is used to check students off as they receive a reimbursable meal
    - Roster information may or may not be entered into an electronic system
    - Rosters are the source document and must be saved
- LEAs must establish internal controls to ensure the accuracy of meal counts prior to submitting a claim:
  - Annual On-site Review of the counting and claiming system at each school/site (due by February 1st)
  - Review process that ensures the accuracy of the monthly Claim for Reimbursement
  - Edit checks to compare school level daily meal counts for each eligibility category times an attendance factor
    - Attendance factor = 93.8%
    - Example:
      - Claim Month Enrollment
      - # Free Eligible: 60 x 93.8% = 57
      - # Reduced Eligible: 40 x 93.8% = 38
      - # Paid: 120 x 93.8% = 113
- LEAs must have a backup system in place to count student meals, in case the primary system is compromised
  - An up-to-date backup paper roster (benefit issuance document) should be kept on hand for all LEAs utilizing an electronic system
Additional Information:
- Ensure all supporting documents such as rosters used to consolidate and submit claims for reimbursement are retained according to record retention schedules.
- Train all staff, including substitute staff, involved in meal counting on proper POS meal counting procedures. This may include teachers or para educators, or aides, depending on your style of service.
- Develop processes and procedures for unique meal counting situations:
  - Field trips
  - Detention students
  - Meals served in the classroom (ECEAP/Head Start, special education, breakfast in the classroom)
- Meal counting methods that are NOT acceptable include:
  - Using classroom/attendance counts
  - Advance meals sold
  - Counts taken prior to the meal being served
  - Counts taken by number of trays used
  - Counts taken at beginning of service line with NO check for reimbursable meals at end of line
  - Back-out systems – Counts claimed by “backing out” meals

Special Claiming Options – Provision 2 and Community Eligibility Provision:
A simplified POS meal counting system may be used that tallies daily reimbursable meal counts without eligibility categories. Edits checks must still be conducted.

Reference:
- 7 CFR Part 210.7
- 7 CFR Part 210.8

Resources:
- On Site Review Reference Sheet
- Record Retention Schedule – Superintendent of Public Instruction

Acronym Reference
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<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>-CFR</td>
<td>Code of Federal Regulation</td>
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<tr>
<td>-CNS</td>
<td>Child Nutrition Services</td>
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<tr>
<td>-LEA</td>
<td>Local Education Agency</td>
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<td>-OSPI</td>
<td>Office of Superintendent of Public Instruction</td>
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