

Module 4: Key Points

After completing this module, you will:

- ⇒ Understand the key elements of meal counting and claiming.
- ⇒ Be able to identify unacceptable meal counts.
- ⇒ Know where to find the requirements of a reimbursable meal based on the chosen menu planning approach.
- ⇒ Know how to count the daily reimbursable meals by category.
- ⇒ Realize the importance of no “overt identification” of students.
- ⇒ Be aware of how to include student workers in meal counts.
- ⇒ Understand why a backup system is necessary.
- ⇒ Be able to see how your daily meal counts become your audit trail.
- ⇒ Learn how to complete a claim for reimbursement and when it is due.
- ⇒ Understand why internal controls, such as edit checks and site monitoring, must be established.
- ⇒ Identify common problems that can be found during an edit check.
- ⇒ Learn how to submit an amended claim and when it is due.

Module 4: Tasks

You should complete the following tasks in Module 4:

- ⇒ Read the lesson
- ⇒ Read the lesson Summary
- ⇒ Do the Activity
- ⇒ Take the Self-Quiz
- ⇒ Review the Web sites and resources related to Module 4

Module 4: Target Audience

This module should be reviewed by the child nutrition director (or designee) and any staff involved in counting of meals served. School principals and other persons who may be involved in monitoring the lunch lines may need to be aware of these requirements.

Module 4: Estimated Time Required

Approximately 1 hour



Introduction

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 eligible category (i.e., paid, reduced-price, free).

The required elements of meal counting and claiming include:

- ⇒ Eligibility Documentation.
- ⇒ Collection Procedures.
- ⇒ Point-of-Service Meal Counts.
- ⇒ Daily Meal Count.
- ⇒ Claim for Reimbursement.
- ⇒ Internal Controls.



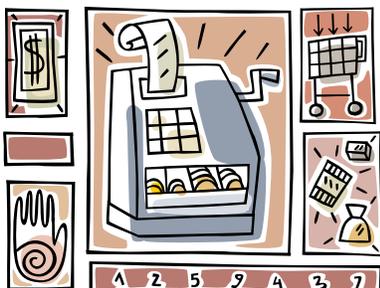
Eligibility Documentation

- ⇒ All schools must have on file documentation to support the eligibility of each student receiving free or reduced-price meals.
- ⇒ This documentation is (1) a current, approved free and reduced-price application; or (2) direct certification; or (3) notification from the Homeless Liaison or Migrant Worker Coordinator documenting an individual student's status.

Collection Procedures

- ⇒ You must have a system for receiving payment for meals from students and for issuing and collecting the medium of exchange (i.e., tickets, tokens, numbers, etc.) for those meals. **Ideal: Prepaid with no cash on line.**
- ⇒ The system must prevent overt identification.
- ⇒ The system must be available to all students, regardless of category.
- ⇒ Collection should occur at a common location and at a common time.

Point-of-Service Meal Counts



- ⇒ Meals must be counted at the point where it can be determined that a reimbursable free, reduced-price, or paid meal has been served to an eligible student.
- ⇒ Meals must meet the meal pattern requirements.
- ⇒ Meals are counted daily by category.

Point-of-Service Meal Counts (continued)

- ⇒ Only one lunch and one breakfast per student may be claimed for reimbursement.



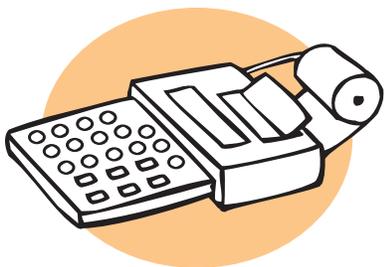
- ⇒ You must have a backup system which includes (1) a written list in case the power goes out, and (2) substitute(s) set up in case the regular cashier is absent.
- ⇒ Student workers must go through the point of service to make sure their meal meets the requirements and that they are counted in their eligible category.

Unacceptable Meal Counts

- ⇒ Classroom counts
- ⇒ Attendance counts
- ⇒ A count of tickets/tokens sold or the number of meals paid for in advance
- ⇒ The number of free- and reduced-price-eligible students, instead of the number of free and reduced-price meals actually served
- ⇒ The count taken at the beginning of the service line without checking that the meals served are reimbursable (i.e., meet the meal pattern requirements)
- ⇒ Tray, plate or entrée counts
- ⇒ A count obtained by subtracting one category from the total count to get another eligibility category count
- ⇒ A count obtained by converting cash totals to meals
- ⇒ Delivery counts



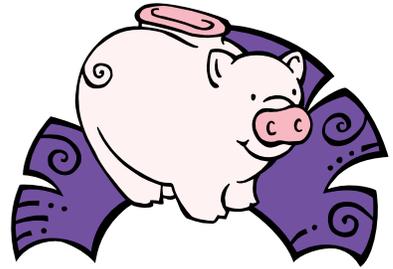
Daily Meal Count



- ⇒ **Importance:** Your daily meal count is the audit trail that supports your claim for reimbursement.
- ⇒ Meal count must be taken each day.
- ⇒ Your school must record the number of reimbursable meals served daily, by category, to eligible students.

Claim for Reimbursement

- ⇒ Cash reimbursements are sent to the School Food Authority after it has filed a Claim for Reimbursement.
- ⇒ Form SOE-25-2562-39/07/00 is no longer used for the claim for the claim for reimbursement. You will now submit your claims online at the CNPWeb secure system at: <http://cnpweb.schools.utah.gov/cnpweb>
- ⇒ The Claim for Reimbursement is due to the USOE Child Nutrition Program on or before the fourth working day of the month following the month to be claimed and must include an authorized signature.



Internal Controls

- ⇒ Internal controls must be established to ensure that the claim for reimbursement is accurate.
- ⇒ Two examples are **edit checks** and **site monitoring**.



Edit Checks

An edit check, part of the monthly Claim for Reimbursement process, compares meal count data to other information to identify possible problems, including:

- ⇒ Meal counts that exceed the number of eligible students in attendance on any given day.
- ⇒ Meal counts that are the same every day.
- ⇒ Meal counts that have a repeatable pattern.
- ⇒ A meal count that is equal to the number of meals delivered.

Site Monitoring

Site monitoring is required when the SFA has **more than one school**. The purpose of the monitoring is to ensure that:

- ⇒ Meal counts are based on the approved counting system.
- ⇒ Counting system results in an accurate count of reimbursable meals by category.



Monitoring must be completed each year for each site by **February 1st**.
(See the Administrative Module for further information.)

Amended Claims

During the course of the school year, it may be necessary to revise a previously submitted claim. A copy of the original claim should be retained by the School Food Authority. There are spaces on the claim form to enter amended figures opposite the original ones. In these spaces, enter the figures which will correct the claim; for example, if the original claimed 100 meals and the correct figure is 105 meals, line through the incorrect material and write the correct number in the amendment space in bold colors. Write “amendment” on top of the claim form. This amended copy of the claim form should then be re-signed, redated, and resubmitted to the USOE Child Nutrition Programs. You should retain a file copy.



Claim revisions that result in additional reimbursement (increases in the number of meals claimed) must be received by the USOE within 90 days after the end of the month being amended. Downward amendments may be submitted anytime.

Summary

- ⇒ Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student.
- ⇒ The required elements of meal counting and claiming include Eligibility Documentation, Collection Procedures, Point-of-Service Meal Counts, Daily Meal Count, Claim for Reimbursement, and Internal Controls
- ⇒ All schools must have on file documentation to support the eligibility of each student receiving free or reduced-price meals.
- ⇒ You must have a system for receiving payment for meals from students which, for confidentiality purposes, prevents overt identification of students.
- ⇒ At the point of service, the system you have set up must determine that meals are served to eligible students, counted daily by category, meet the meal pattern requirements, and include student workers in the count.
- ⇒ You must “foolproof” your system by (1) having more than one person be knowledgeable regarding meal service policies and (2) having a written list of student eligibility in case of a power outage or other technical problems.
- ⇒ Your daily meal count is the audit trail that supports your claim for reimbursement.
- ⇒ The Claim for Reimbursement is due to the USOE on or before the fourth working day of the month following the month to be claimed.
- ⇒ Internal controls, including edit checks and site monitoring, must be established to ensure that the claim for reimbursement is accurate.
- ⇒ Copies of original claims should be retained by the School Food Authority in case of the need for making changes and resubmitting to the USOE. Claim revisions that result in additional reimbursement must be received within 90 days after the end of the month being amended.

Tips



Meal counting procedures need to be reviewed a minimum of once per year, and should be outlined in writing so that new staff members can be trained at any time. After your procedure has been written, pull out the list of questions, *Do You Have an Acceptable Meal Counting System?*, located on page 11 of this module, to make sure you haven't forgotten anything.

Activity (Answers on page 9)

Read over the following case studies, then answer the listed questions in order to determine whether the SFA has an acceptable meal counting system. If the meal count system is not acceptable, explain what needs to be changed to make it acceptable.

Meal Count Systems Case Study #1

Prairie High School serves about 1200 students each day in the National School Lunch Program. Students receiving free and reduced-price meals use a coded card that they obtain from the school office anytime during the year. Cards are coded with a five-digit number. Cards ending with an even number signify a free meal, while those ending with an odd number signify a reduced-price meal. After obtaining their reimbursable breakfast or lunch, students who are eligible for free or reduced-price meals show their cards to the cashier. Students paying full price or anyone receiving a la carte food items pay the cashier each day in line. The cash register has programmed keys that the cashier pushes to show whether the meal is free or reduced price, but the category is not visible to the students. After the meal service is over, the cash register totals the number of free and reduced-price meals served. Money is counted and divided by the cost of the full-price meal to figure out the number of paid lunches. These are the totals recorded on the school's claim sheet.

Evaluation

Evaluate the meal count system by answering the questions below. If either answer is "no," the system is not acceptable.

1. Are meal counts taken at the point of service, and do they provide an accurate count of reimbursable meals served by category each day?
2. Does the meal count system prevent the overt identification of students at the time the meals are paid for and at the time the meals are served?

(Activity continued on the next page)

(Activity continued from the previous page)

Changes

If the meal count system is not acceptable, what needs to be changed to make it acceptable?



Meal Count Systems Case Study #2

Princeton Elementary serves lunch to students in grades one through six. Each day before school, the homeroom teacher sells meal cards to the students. Each student brings an envelope with lunch money in it to the teacher. Students who do not bring an envelope from home are given one by the teacher. Free students also take an envelope with their name on it up the teacher to get their card. All students are then issued cards that are collected as they enter the meal service line. Cards signaling a free meal have four digits, cards signaling a reduced-price meal have five digits, and cards signaling a paid lunch have six digits. The last food service employee in the line checks to see that all meals contain all components. The teacher gives the food service manager the list of students who received meal cards for that day. The manager compares the list to a master list of students' names and eligibility categories and counts the number of free, reduced-price, and paid meals sold that day. The number is used for the daily meal count by category and is transferred to the school's claim sheet.

Evaluation

Evaluate the meal count system by answering the questions below. If either answer is "no," the system is not acceptable.

1. Are meal counts taken at the point of service, and do they provide an accurate count of reimbursable meals served by category each day?
2. Does the meal count system prevent the overt identification of students at the time the meals are paid for and at the time the meals are served?

Changes

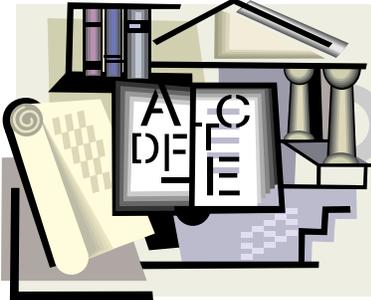
If the meal count system is not acceptable, what needs to be changed to make it acceptable?

Self-Quiz (Answers on page 10)

1. Name the six required elements of meal counting and claiming:
 - 1.
 - 2.
 - 3.
 - 4.
 - 5.
 - 6.
2. The SFA must have documentation to support the eligibility of each student receiving _____ or _____ - _____ meals.
3. Collection procedures must prevent _____ of students and must be made _____ to all students regardless of category.
4. _____ is the determining place where a reimbursable free, reduced-price, or paid meal has been served to an eligible student.
5. Only _____ lunch per student may be claimed daily.
6. True or False: Student workers are not required to go through the point of service if their meal is paid for by the SFA.
7. Your school must record the number of reimbursable meals served _____, by category, to eligible students.
8. The Claim for Reimbursement is due to the USOE Child Nutrition Programs on or before the _____ working day of the month following the month to be claimed and must include an authorized signature.
9. Internal controls, ensuring that your claim for reimbursement is accurate, include _____ and _____.
10. When doing an edit check on meal counts, list at least two circumstances which should be investigated:
 - 1.
 - 2.
11. Totaling cash and then converting the totals to meals is an _____ method to count meals.



Resources



- ⇒ Child Nutrition Programs Administrative Manual and Regulations, 7 CFR Part 210.7(c)
- ⇒ USOE Child Nutrition Programs website: www.schools.utah.gov/cnp
- ⇒ USOE Child Nutrition Programs Staff: (801) 538-7680

Activity Answers

Meal Count Systems Case Study #1

1. Are meal counts taken at the point of service and do they provide an accurate count of reimbursable meals served by category each day? **No.**
While counting of free and reduced-price meals appears to be done at the point of service, a count obtained by converting cash totals to meals (as done for the paid meals) is an unacceptable meal count. The cash register would need to have a programmed key that can count a paid meal at the point of service as well.
2. Does the meal count system prevent the overt identification of students at the time the meals are paid for and at the time the meals are served? **No.**
While the system prevents distinguishing students receiving free meals from those receiving reduced-price meals, the system **does not** prevent distinguishing students who receive some form of meal benefits. The system should have a method for distributing cards to students who are paying full price for their lunches before the point of service so as to prevent overt identification.

Meal Count Systems Case Study #2

1. Are meal counts taken at the point of service and do they provide an accurate count of reimbursable meals served by category each day? **No.**
The manager counts the number of free, reduced-price, and paid meals **sold** that day, which is an unacceptable meal count. The system needs to be changed so that the meal count for each category is based on the number of meals **served**.
2. Does the meal count system prevent the overt identification of students at the time the meals are paid for and at the time the meals are served? **Yes.**

Self-Quiz Answers

1. Name the six required elements of meal counting and claiming:
 1. Eligibility Documentation
 2. Collection Procedures
 3. Point-of-Service Meal Counts
 4. Daily Meal Count
 5. Claim for Reimbursement
 6. Internal Controls
2. The SFA must have documentation to support the eligibility of each student receiving **free** or **reduced-price** meals.
3. Collection procedures must prevent **overt identification** of students and must be made **available** to all students regardless of category.
4. **Point of service** is the determining place where a reimbursable free, reduced-price, or paid meal has been served to an eligible student.
5. Only **one** lunch per student may be claimed daily.
6. True or **False**: Student workers are not required to go through the point of service if their meal is paid for by the SFA.
Student workers must go through the point of service to make sure their meal meets the requirements and that they are counted in their eligible category.
7. Your school must record the number of reimbursable meals served **daily**, by category, to eligible students.
8. The Claim for Reimbursement is due to the USOE Child Nutrition Programs on or before the **fourth** working day of the month following the month to be claimed and must include an authorized signature.
9. Internal controls, ensuring that your claim for reimbursement is accurate, include **edit checks** and **site monitoring**.
10. When doing an edit check on meal counts, list at least two circumstances which should be investigated: **(Any of the below answers would be correct.)**
(1) Meal counts that exceed the number of eligible students in attendance on any given day; (2) meal counts that are the same every day; (3) meal counts that have a repeatable pattern; (4) meal count that is equal to the number of meals delivered.
11. Totaling cash and then converting the totals to meals is an **unacceptable** method to count meals.

Do You Have an Acceptable Meal Counting System?

- Yes No Can the person responsible for monitoring meals identify a reimbursable meal?
- Yes No Is someone trained as a backup for the meal counter?
- Yes No Is a current eligibility list maintained and available to the appropriate personnel?
- Yes No Is the method used for counting meals in compliance with the points of service requirement or with the approved exception policy (see administrative manual for details on the exception policy)?
- Yes No Is the method for counting meals by category accurate?
- Yes No Is there a method of distinguishing non-reimbursable meals from reimbursable meals and recording them (e.g., second meals that are sold, meals that don't meet the requirements, adult meals)?
- Yes No Does the system prevent overt identification?
- Yes No Is the point-of-service meal count used to determine the school's claim for reimbursement?
- Yes No Are daily counts for all serving lines and meal periods correctly totaled and recorded?
- Yes No Are school level edit checks completed and documented?
- Yes No Is there a second-party count of cashier's cash intake?
- Yes No Is cash reconciled daily, and are differences recorded?
- Yes No Is there assurance that counts are not adjusted or "backed out" to correspond with cash intake?

