Overview of Meal Counting and Claiming Process for Connecticut School Nutrition Programs

This document provides important information and resources for Connecticut sponsors of the school nutrition programs regarding the U.S. Department of Agriculture's (USDA) requirements for the meal counting and claiming process for reimbursable meals and afterschool snacks. The USDA school nutrition programs include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP), Seamless Summer Option (SSO) of the NSLP, Fresh Fruit and Vegetable Program (FFVP), and Special Milk Program (SMP).

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Introduction

The USDA provides reimbursement for each meal and afterschool snack (free, reduced price, and paid) that meets program requirements and is served to an eligible student. To obtain this reimbursement, local education agencies (LEAs) must accurately count, record, and claim the number of meals and afterschool snacks served to students by eligibility category. LEAs must have adequate documentation on file to support the number of free and reduced-price meals and afterschool snacks served and claimed for reimbursement.

To receive reimbursement for milk in the SMP, LEAs must accurately count, record, and claim the number of milks served to students.

Point-of-service counts required

Meals, afterschool snacks, and milk must be counted at the point-of-service. The point-of-service is the moment in the meal service where staff can accurately determine that the child has been served all required meal components for a reimbursable meal or afterschool snack. For breakfast and lunch, the point-of-service is typically at the end of the serving line, after all the components of a reimbursable meal have been offered to the student. For afterschool snacks, the point-of-service is when the student has received both snack components. For the SMP, the point of service is when the child receives the milk.

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Required elements

The six essential elements of an acceptable counting and claiming system are listed below.

1. Eligibility documentation
2. Money collection system
3. Point-of-service count system
4. Reports (e.g., financial, edit check worksheets, and other required documents)
5. Claim for reimbursement
6. Internal controls

This document outlines the steps, timelines, LEA responsibilities, and resources for each element.

Prevent overt identification

LEAs must ensure that all counting and claiming processes prevent overt identification. The USDA defines overt identification as any action that may openly or physically identify a student being recognized as potentially eligible to receive or be certified for free or reduced-price meals and afterschool snacks or free milk. LEAs must ensure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced-price meals and afterschool snacks or free milk, including notification of eligibility, meal service in the cafeteria, at the point-of-service, and through the payment method.

Recordkeeping

LEAs (including all schools electing to participate in the Community Eligibility Provision (CEP) must retain all count records, eligibility documents, rosters, edit checks, site monitoring forms, and claims for reimbursement for three years plus the current year, or longer if there is an open audit.

CEP schools must maintain documentation to support the school's Identified Student Percentage (ISP). All CEP documentation must be maintained 1) the entire time CEP is in operation; 2) for three years after the last claim for reimbursement is submitted; and 3) if an audit is being conducted, until the audit is completed.

For additional guidance, refer to the CSDE's resource, *Records Retention Requirements for the School Nutrition Programs*.

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Steps, Timelines, Responsibilities, and Resources

The steps, timelines, responsibilities, and resources below assist LEAs with implementing the six required elements for an acceptable counting and claiming system (refer to "Required elements" in this document.

1 — Maintain Eligibility Documentation

Timeline

Ongoing.

Guidance and Responsibilities

- To ensure that meal, afterschool snack, and milk counts are recorded in the correct eligibility category, the LEA must accurately determine each student's eligibility and maintain proper documentation on file.
- **School meals:** The LEA must generate an accurate benefit issuance list for school meals (also called a roster) that identifies students who are eligible for free or reduced-price meals and is used in the meal/snack counting system.
- **Afterschool snacks:** For schools that are not site or area eligible, the LEA must generate an accurate roster that identifies students who are eligible for free or reduced-price snacks and is used in the snack counting system. **Note:** For detailed guidance on counting and claiming for schools that are not site/area eligible, refer to section 5 of the CSDE's *Afterschool Snack Program Handbook*.
- **Milk:** The roster must identify students who are eligible for free milk.
- The LEA must ensure that names on the roster match approved applications or direct certification data.

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Resources

- **Application Forms for Free and Reduced Meals:** Eligibility for Free and Reduced-price Meals and Free Milk in School Nutrition Programs (CSDE webpage)
- **Calendar:** Calendar of School Nutrition Program Requirements and Activities (CSDE)
- **Data Sharing:** Disclosure Release Request for Free or Reduced Eligibility Status (CSDE)
    - USDA Memo SP 42-2014, SFSP 17-2014, and CACFP 11-2014: Sharing Aggregate Data to Expand Program Access and Services in Child Nutrition Programs
- **Documentation for Policy Statement for Free and Reduced-price Meals:** Meal Application and Data Management Process (CSDE)
- **Eligibility Criteria**
    - Direct Certification for School Nutrition Programs (CSDE webpage)
    - Eligibility Manual for School Meals (USDA)
    - Income Guidelines for School Nutrition Programs (CSDE webpage)

2 — Develop Money Collection System and Point-of-Service Count System for Breakfast and Lunch

Timeline

Completed at the time of submitting the new LEA application and updated as needed.

Guidance and Responsibilities

- LEAs must identify the type of money collection system and point-of-service system used for breakfast and lunch at each school or site under their jurisdiction.
- This information is submitted annually to the CSDE as part of the online application using the CSDE's *Site Information on Money Collection and Point-of-Service Meal Count Systems Form*. This form includes a chart with information on the allowable systems.
- Revisions must be approved by the CSDE prior to implementation.
- In addition to submitting site information on the money collection system and point-of-service meal count system, LEAs must consider policies and procedures for:
    - times of meal service;
    - handling negative meal account balances and student charging meal policies;
    - handling adult and visitor meals;
    - taking accurate point-of-service meal counts for in-classroom meals, field trips, student workers, and, for sponsors that participate in the split day-kindergarten SMP, ensuring recipients of milk are accurately counted at the point-of-service;
    - identifying reimbursable meals;
    - conducting edit checks and site monitoring;
    - handling/replacing/counting dropped or second meals;
    - consolidating meal counts; and
    - training staff.

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Resources

- **Classroom Meals:** Requirements for Classroom Meals in the National School Lunch Program and School Breakfast Program (CSDE)
- **Collection and point-of-service Meal Count Systems:** Site Information on Money Collection and Point-of-Service Meal Count Systems Form (CSDE)
- **Edit Checks:** Refer to "Edit Check Worksheets" in step 4.
- **Field Trip Meals:** Requirements for Field Trip Meals in the National School Lunch Program and School Breakfast Program (CSDE)
- **Lunch Periods:** Operational Memorandum No. 03-22: Updated Requirements for Lunch Periods in the National School Lunch Program (NSLP)
- **Meal Counting and Claiming:** Meal Counting and Claiming Manual (USDA)
- **Meal Patterns**
  - Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage)
  - Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage)
- **Offer versus Serve:** Offer versus Serve for Grades K-12 in School Nutrition Programs (CSDE webpage)

3 — Conduct Daily Point-of-Service Counts for Meals, Afterschool Snacks, and Milk

Timeline

Completed daily.

Guidance and Responsibilities

- Meals and afterschool snacks must be counted at the point in the meal service where staff can accurately determine that a reimbursable free, reduced-price, or paid meal or afterschool snack has been served to an eligible student. For the SMP, milk must be counted when the child receives the milk. During an Administrative Review of the school nutrition programs, the CSDE may take fiscal action if the LEA's counting system yields incorrect counts for meals, afterschool snacks, or milk.

- LEAs must implement all essential elements of point-of-service counts below.
    - Meals must be served to eligible students.
    - Adult meals cannot be counted.
    - For all schools except CEP schools, meals are counted in the correct eligibility category (free, reduced-price, and paid).
    - An application or other acceptable documentation must be on file for each student claimed for free or reduced-price meals. **Note:** CEP schools must have documentation to support the school's ISP.
    - Count only meals that meet the meal pattern requirements and offer versus serve criteria, if appropriate.
    - Count only afterschool snacks that meet the meal pattern requirements.
    - For cafeteria-style meal service, students must be counted one at a time as they go through the line. **Note:** Tickets or cards cannot be handed in as a group.
    - The point-of-service count system does not overtly identify students' eligibility categories.

- Examples of acceptable counting systems include:
    - coded rosters (codes such as "F, R, P" are prohibited);
    - coded tickets/tokens;
    - bar-coded and magnetic strip cards;
    - coded identification (ID) cards; and

  - pin pads.

- LEAs operating the programs below do not take point-of-service counts based on eligibility but instead take a **total count** using a tally sheet, roster, clicker, or an electronic point-of-sale system.
  - SSO
  - ASP (area eligible)
  - CEP

- LEAs using a computerized counting system must have a back-up system in place in case of system failure.

- LEAs that have a full-service interschool agreement with another school to provide school meals must include the recipient site in the LEA's monthly count claim.

Resources

- **Afterschool Snack Program**
  - ASP Daily Snack Count and Production Record for Grades K-12 in Site/Area Eligible Schools (CSDE)
  - ASP Daily Snack Count and Production Record for Preschoolers in Site/Area Eligible Schools (CSDE)
  - ASP Daily Snack Count and Production Record for Preschoolers in Site/Area Eligible Schools (CSDE)
  - ASP Daily Snack Count Record for Grades K-12 in Site/Area Eligible Schools (CSDE)
  - ASP Daily Snack Count Record for Preschoolers in Site/Area Eligible Schools (CSDE)
  - ASP Monthly Attendance and Snack Count Record for Schools that are not Site/Area Eligible (CSDE)
  - SP Monthly Attendance and Snack Count Record for Schools that are not Site/Area Eligible (CSDE)

- **Calendar:** Calendar of School Nutrition Program Requirements and Activities (CSDE)

- Meal Clickers: Guidance for Using Meal Clickers to Count Reimbursable Meals for the School Nutrition Programs

- Non-pricing Programs
  - Community Eligibility Provision (CEP) (CSDE webpage)

- **Seamless Summer Option:** Daily Meal Count SSO (CSDE)

- **Special Milk Program**
  - SMP Daily Milk Count Form (CSDE)
  - Instructions for SMP Daily Milk Count Form (CSDE)
  - Sample Completed SMP Daily Milk Count Form (CSDE)

4 — Conduct Edit Checks for Breakfast and Lunch

Timeline

Completed monthly.

Guidance and Responsibilities

- Edit checks are an internal control for meal counts that LEAs must have in place to ensure an accurate claim for reimbursement.
- Prior to filing a monthly claim for reimbursement, all LEAs must perform meal count edit checks.
- **Daily Edit Check:** To perform daily meal count edit checks, LEAs must complete the steps below.
    1. Multiply the number of enrolled children approved in each category (free, reduced, and paid) by the attendance factor (AF). To find out more information regarding calculating a school's or district's attendance factor, refer to the Instructions for the Daily Lunch Count Edit Check Worksheet for the National School Lunch Program.
    2. Compare these numbers, known as **attendance-adjusted eligible figures**, to the daily counts of free, reduced-price, and paid meals served.
    3. Document calculations on an edit check form.
    4. If counts exceed the attendance-adjusted number on more than 50 percent of the operation days, provide a written justification on the edit check form next to each applicable date.
- Electronic meal counting systems may be able to calculate the daily meal count edit checks. However, LEAs **must** ensure that staff review the spreadsheets generated to monitor counts that exceed the attendance-adjusted number.
- Daily edit checks require the use of an AF calculated at either the site or district level. The AF can be calculated monthly or annually. **Note:** LEAs must annually update the AF in the Connecticut Online Application and Claiming System for Child Nutrition Programs (CNP System).

- The AF for residential child care institutions (RCCIs) without day students should be 100 percent.

Resources

- **Calendar:** Calendar of School Nutrition Program Requirements and Activities (CSDE)
- **Edit Check Worksheets** ("Edit Check Forms" section of CSDE's Meal Counting and Claiming for School Nutrition Programs webpage)
    - **CEP:** CEP Edit Check Worksheet and Instructions
    - **NSLP and SBP**
        - Edit Check Worksheet for Lunch
        - Instructions for Edit Check Worksheet for Lunch
        - Edit Check Worksheet for Breakfast and Lunch
        - Instructions for Edit Check Worksheet for Breakfast and Lunch

5 — Submit Monthly Claim for Reimbursement

Timeline

Completed monthly.

Guidance and Responsibilities

- LEAs submit their monthly claim for reimbursement electronically through the CSDE's CNP System.
- To complete the reimbursement claim, LEAs must total the point-of-service monthly meal/snacks counts by category for each site and enter them into the CNP System by site.
- The CNP System will immediately inform the LEA of any errors that must be corrected and resubmitted.
- The CNP System includes security measures to support adequate internal controls through **segregation of duties** (also known as separation of duties). This concept involves having more than one person involved in the completion of a task. When adequate internal controls or segregation of duties are in place, one person is prevented from having control over all aspects of a particular transaction, thereby minimizing the opportunity for errors and unintended reporting. For more information, refer to the CSDE's resource, *School Nutrition Programs User IDs and Passwords for Accessing Connecticut's Online Application and Claiming System*.
- After accepting the claim, the CNP System will process the claim for payment.
- The target date to submit claims for reimbursement is usually the 15th of the month following the month for which meals are being claimed.
- The final submission date for an original or adjusted claim is indicated on the CSDE's annual operational memorandum, *Schedule for Submission of Online Reimbursement Claim Data*.

- Late claims may be considered for payment in the instances below.
    - Upward adjusted claim to correct errors discovered on an earlier claim as identified by an independent audit or Administrative Review.
    - Utilizing the one-time only exception for one month (allowed once every 36 months) from the USDA.
    - Adjusting a claim that does not produce a payment.
    - Submitting a downward-adjusted claim that reduces the amount of reimbursement.

- The CSDE will consider one-time only claim submission exceptions for circumstances beyond the LEA's control. The CSDE handles these exceptions on a case-by-case basis.

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6 — Conduct On-site Monitoring for Breakfast, Lunch, and Afterschool Snacks

Timeline

- **NSLP:** Prior to February 1
- **SBP:** Prior to February 1 (only for 50 percent of the schools operating the SBP)
- **ASP:** Two times per year

Guidance and Responsibilities

- On-site monitoring is an internal control that LEAs must conduct to ensure an accurate meal/snack counting and collection process is in place.
- **Lunch:** LEAs with multiple sites must monitor their lunch service at all sites to evaluate meal counting procedures by February 1 each year.
- **Breakfast:** By February 1, LEAs must conduct an on-site review of the breakfast counting and claiming system in a minimum of 50 percent of the schools operating the SBP, with each school operating the SBP being monitored at least once every two years.
- **Afterschool Snack:** Twice per year, LEAs operating the ASP must assess each site's compliance with the ASP meal pattern and afterschool snack counting and claiming procedures.
- LEAs must document monitoring activities.
- To help identify potential errors, LEAs should rotate the staff that monitors district/agency meal/snack counting procedures.
- Staff that conduct monitoring should ensure that sites do not claim the following meals/snacks/foods:
    - adult meals;
    - second student meals;
    - meals/snacks not meeting the meal pattern;

  - meals served outside the required meal periods, unless an approved waiver is in place;
  - a la carte items; and
  - lunches provided at a RCCI when the student also received a lunch at his/her school.

- LEAs with a foodservice management company (FSMC) cannot allow FSMC personnel to conduct the on-site monitoring. Monitoring must be done by a LEA employee who does not work directly with the meal/snack counting and claiming system.

Resources

- **Afterschool Snack Program:** ASP Onsite Monitoring Form (CSDE)
- **Calendar:** Calendar of School Nutrition Program Requirements and Activities (CSDE)
- **School Nutrition Programs**
  - Onsite Review Checklist for the NSLP (CSDE)
  - Onsite Review Checklist for the SBP (CSDE)

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Glossary

administrative review: A comprehensive evaluation of schools and institutions participating in the NSLP and SBP, conducted every three years by the CSDE.

Afterschool Snack Program (ASP): The USDA's federally assisted snack program implemented through the NSLP. The ASP provides cash reimbursement to help schools serve snacks to children in afterschool activities aimed at promoting the health and well-being of children and youth. Schools must provide children with regularly scheduled activities in an organized, structured and supervised environment that includes educational or enrichment activities, e.g., mentoring/tutoring programs. Programs must meet state or local licensing requirements and health and safety standards. For more information, visit the CSDE's Afterschool Snack Program webpage.

attendance factor: A percentage developed at least once each school year that accounts for the difference between student enrollment and attendance, i.e., the average percentage of enrolled students typically attending school on any given day.

benefit issuance list: A list of students who are eligible for free or reduced-price meals.

claim for reimbursement: The monthly claim submitted to the CSDE by LEAs to receive reimbursement for meals served under the USDA Child Nutrition Programs.

Community Eligibility Provision (CEP): The CEP allows schools that predominantly serve low-income children to offer free NSLP and SBP meals, without collecting individual household applications for free and reduced-price meals. For more information, visit the CSDE's CEP webpage.

direct certification: A process conducted by states and LEAs to certify eligible children for free meals without collecting household applications. For more information, visit the CSDE's Direct Certification for School Nutrition Programs webpage.

edit check: A required internal control that ensures an accurate claim for reimbursement by comparing the number of students eligible for free, reduced and paid meals with the number of free, reduced and paid meals served.

fiscal action: The recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid claims for reimbursement, submission of a revised claim for reimbursement, and correction of records to ensure that unfiled claims for reimbursement are corrected when filed.

late claim: A monthly claim for reimbursement that is submitted by the LEA after the final deadline required by the CSDE. For more information, refer to the CSDE's first operational memorandum of each school year, *Schedule for Submission of Online Reimbursement Claim Data*, which is available on the CSDE's Operational Memoranda for School Nutrition Programs webpage.

local educational agency (LEA): A public board of education or other public or private nonprofit authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public or private nonprofit elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or for a combination of school districts or counties that is recognized in a state as an administrative agency for its public or private nonprofit elementary schools or secondary schools. The term also includes any other public or private nonprofit institution or agency having administrative control and direction of a public or private nonprofit elementary school or secondary school, including residential child care institutions, Bureau of Indian Affairs schools, and educational service agencies and consortia of those agencies, as well as the state educational agency in a state or territory in which the state educational agency is the sole educational agency for all public or private nonprofit schools.

meal pattern: The required meal components and minimum serving sizes that schools and institutions participating in the USDA Child Nutrition Programs must provide to children to receive federal reimbursement for meals and afterschool snack served.

money collection system: The system used by the school food authority to collect money from students for free, reduced-price, and paid meals. For information on allowable systems, refer to the CSDE's resource, *Site Information on Money Collection and Point-of-Service Meal Count System*.

National School Lunch Program (NSLP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The NSLP provides nutritionally balanced, low-cost or free lunches to children each school day. It was established under the National School Lunch Act, signed by President Harry Truman in 1946. For more information, visit the CSDE's National School Lunch Program webpage.

offer versus serve (OVS): A provision that applies to menu planning and the determination of reimbursable school meals in the NSLP and SBP. OVS allows children to decline a certain number of meal components or items in the meal. All required meal components must be offered to each child. In the NSLP, students must select at least ½ cup of fruits or vegetables and the full portion (minimum serving size) of at least two other meal components. In the SBP, students must select at least three food items including at least ½ cup of fruit (or vegetable substitutions, if offered). OVS must be implemented in senior high schools for lunch but is optional for breakfast. For junior high, middle schools and elementary schools, OVS is optional for both breakfast and lunch. For more information, visit the CSDE's Offer versus Serve for Grades K-12 in School Nutrition Programs webpage.

on-site monitoring: A requirement for LEAs with more than one school that requires monitoring of the lunch and breakfast counting and claiming system used in each school under the LEA by February 1 of each year.

overt identification: Any action that may openly or physically identify a student being recognized as potentially eligible to receive or be certified for free or reduced-price meals.

point-of-service: The moment in the food service operation where staff can accurately determine that a reimbursable free, reduced-price, or paid meal or afterschool snack has been served to a student.

reimbursable meal: A meal that meets the USDA meal pattern requirements.

School Breakfast Program (SBP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The SBP provides nutritionally balanced, low-cost or free breakfasts to children each school day. The program was established under the Child Nutrition Act of 1966 to ensure that all children have access to a healthy breakfast at school to promote learning readiness and healthy eating behaviors. For more information, visit the CSDE's School Breakfast Program webpage.

segregation of duties: An internal control process where more than one person involved in the completion of a task so that one person is prevented from having control over all aspects of a particular transaction, thereby minimizing the opportunity for errors and unintended reporting.

Seamless Summer Option (SSO) of the NSLP: The USDA's federally assisted summer feeding program that combines features of the NSLP, SBP and Summer Food Service Program (SFSP) and serves meals free of charge to children ages 18 and younger from low-income areas. School districts participating in the NSLP or SBP are eligible to apply to the CSDE to participate in the SSFP. SSFP meals follow the meal patterns of the NSLP and SBP. For more information, visit the Seamless Summer Option of the NSLP webpage.

Special Milk Program (SMP): The USDA's federally assisted program that provides milk to children in schools and child care institutions that do not participate in other federal meal service programs. The SMP reimburses schools for the milk they serve. Schools in the NSLP or SBP may also participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs. For more information, visit the CSDE's Special Milk Program webpage.

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For more information, visit the CSDE's Meal Counting and Claiming for School Nutrition Programs webpage or contact the school nutrition programs staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/forms/mealcount/overview_meal_counting_claiming_snp.pdf.

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1. mail: U.S. Department of Agriculture
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