

Counting and Claiming—Table of Contents

Essential Features of Meal Count/Collection Procedures	7.1
<i>Medium of Exchange</i>	
<i>Prohibited Coding Practices</i>	
<i>Suggested Coding</i>	
<i>Distribution</i>	
<i>Collection</i>	
<i>Point-of-service Definition and Acceptable Counts</i>	
<i>Unacceptable Point-of-service Counts</i>	
Reimbursable Meal	7.4
<i>Equal Access for All Students</i>	
<i>Off-site Meal Consumption</i>	
<i>Meals Prepared for Field Trips</i>	
<i>Alternative Schools</i>	
Choosing a System	7.6
<i>Qualities of An Accurate Point-of-service Count</i>	
Commonly Used Collection Procedures/Systems	7.7
<i>Verbal Identifier/Cashier List System</i>	
<i>Common Errors When Using Master List/Roster</i>	
<i>Coded Tickets/Tokens</i>	
<i>Types of Tickets/Tokens Used to Establish Meal Counts</i>	
Meal Tickets: Lost, Stolen and Misused	7.8
Replacement of Medium of Exchange	7.9
Unacceptable Meal Count Systems	7.9
Master List/Roster	7.10
<i>Purpose of Master List/Roster</i>	
Daily Participation Report	7.11
Claim for Reimbursement	7.11
Accuclaim and the Meal Count/Collection Procedure	7.11
<i>Accuclaim Edit Checks</i>	
<i>Additional Situations for Claiming Students</i>	
Regulations Regarding Meal Claims	7.12
<i>Performing Edit Checks</i>	
Steps in Performing Accuclaim Edit Checks	7.14
<i>Possible Problems With Edit Checks</i>	
Accuclaim On-site Review	7.15
Prototype Forms for Verbal Identifier	7.16
Sample Coded Cashier’s List	7.19
Prototype Cashier’s List	7.20
Prototype Daily Participation Record	7.21
Sample Daily Participation Record	7.22
Prototype On-site Review Form	7.23

Counting and Claiming

Essential Features of Meal Count/Collection Procedures

Federal reimbursement is provided for each meal (free, reduced-price and paid) 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, adequate documentation must be kept on file to support the number of all meals served and claimed for reimbursement.

There is no model meal count/collection procedure that meets the needs of every school participating in the National School Lunch Program (NSLP). However, there are essential features or criteria that all systems must have to operate effectively. How each school meets each criterion can vary widely.

Medium of Exchange

The medium of exchange includes any type of ticket, token, ID, name or number that is issued to the students for obtaining a meal. The system in place that connects the application for free and reduced-price meals to the medium of exchange should provide for updates on a daily basis (noting transfers, withdrawals and changes in status due to verification, etc.). The meal count/collection system selected must ensure that the medium of exchange prevents overt identification of free and reduced-price meal recipients in the coding, distribution and collection process.

Suggested mediums of exchange could include verbal identifier, coded ticket/token, coded ID cards and coded bar line. Advantages and disadvantages of each system are listed in the following charts.

Additional suggestions include changing the medium of exchange coding system yearly to prevent the use of a previous year's tickets and tokens. Whenever possible, use a code other than a single-symbol code such as A, B, C; X, Y, Z; or 1, 2, 3. Single-symbol codes are most easily recognized by students.

Prohibited Coding Practices

Color coding by category and single-symbol coding using obvious identifiers, such as F, R, P, are prohibited.

SYSTEM	ADVANTAGES	DISADVANTAGES
Verbal Identifier	<p><i>Cannot be lost, stolen or destroyed.</i></p> <p><i>Documentation of meal count is produced during meal service as names/numbers are checked off on a roster or number sheet. If used with a number sheet may be a fast method.</i></p>	<p><i>Can be used by another student or twice by the same student if more than one serving line.</i></p> <p><i>Coded roster sheet is time consuming for cashiers using manual systems. (Except in schools where students arrive in the cafeteria by class.) Students may forget their numbers, thus slowing down the line.</i></p>
Coded Ticket/Token	<p><i>When collected at point-of-service, provides a means of physically counting meals by category.</i></p> <p><i>When used in small-to-medium schools, counts by category can be completed quickly after the meal service.</i></p>	<p><i>Can be destroyed, transferred, lost, stolen or sold.</i></p> <p><i>In large schools, too cumbersome to collect and count all tickets or tokens by category after the meal service.</i></p> <p><i>If not coded properly, may result in overt identification.</i></p>
Coded ID Cards	<p><i>Not easily transferred if photo is on the card.</i></p> <p><i>Can be incorporated as function of student ID card, which may be a savings to school district.</i></p>	<p><i>Can be lost, stolen or destroyed.</i></p> <p><i>May be able to be used twice if more than one serving line.</i></p> <p><i>Possible high replacement cost.</i></p>
Automated Tab	<p><i>Saves time because count is taken simultaneously with collection of tickets.</i></p>	<p><i>Can be destroyed, lost, stolen or transferred.</i></p>
Coded Bar Line	<p><i>Provides accurate count and saves time; compiles the meal count by category at the same time the students are counted.</i></p> <p><i>Prevents overt identification on the line.</i></p> <p><i>Provides automated reports.</i></p>	<p><i>Can be lost, destroyed or transferred.</i></p> <p><i>Start up and operating costs may be high.</i></p> <p><i>If more than one service line, there may be two meals claimed if the electronic machines are not linked.</i></p>

Suggested Coding

When determining how the medium of exchange will be coded, consider these coding methods.

METHOD	EXAMPLES
<i>Coding series</i>	<i>1 through 1,999 free/2000 through 3,999 reduced/4,000 through 5,999 paid.</i>
<i>Coding by student number</i>	<i>Number ending in 0 or in an odd or even number.</i>
<i>Coding by variations</i>	<i>Variations in signatures, placement of date or ticket distributor, such as Mary Smith, Mary J. Smith, and M. Smith.</i>
<i>Coding by subtle differences</i>	<i>Differences in printing, such as capital letter, period, spacing of a line or differences in underlining.</i>
<i>Coding by number of digits</i>	<i>Four digits for free, five digits for reduced-price or six digits for paid.</i>
<i>Computer-coded student ID numbers</i>	<i>ID numbers assigned by the school and identified in the approval process as free, reduced-price or paid.</i>

Distribution

All meal count/collection systems must include a method for prepayment and/or post billing (charging). Post billing is seldom recommended. The provision allowing for prepayment and/or charging should make free and reduced-price meal recipients appear as students who have prepaid full price.

The option of prepayment and/or post billing (charging) of meals should be routinely publicized. This may be done by using methods such as posting signs, making public announcements, including the information in printed material, etc. Some districts offer incentives for prepayment options when cash is also accepted on the serving line.

When distributing the medium of exchange, use a common location and time where all students (free, prepaid reduced-price, and prepaid full-price) are required to obtain their tickets, tokens, etc. Allow adequate time and area for purchase or pick up of the medium of exchange to prevent overt identification.

Collection

Use the same collection procedures for free, prepaid reduced-price, and prepaid full-price meals to prevent overt identification when collecting the medium of exchange. Examples include common serving areas, dining areas and serving times for all students during meal service.

When students pay cash on the line for reduced-price and/or full-price meals, they may be counted in a different manner than those students who prepay or charge.

When there is no intent to pre-pay for meals, the student must be given the option to receive the

change from a cash transaction or to put the change on his/her account. Automatically applying the change from a cash transaction to a student's account when the student had no intent to pre-pay for meals is not allowed. School districts may establish a "no check cashing" policy under which all money submitted by check is credited onto the student's meal account. However, cashless reimbursable serving lines are not allowable.

Point-of-service Definition and Acceptable Counts

Regulations define a point-of-service meal count as "that point in the foodservice operation when a determination can accurately be made that a reimbursable free, reduced-price or paid meal has been served to an eligible child."

Acceptable point-of-service counting and claiming procedures are required in determining reimbursable meals. Any counting/collection procedure used must provide for someone stationed at the end of the serving line to monitor the meals selected to ensure that each meal claimed for reimbursement meets meal requirements. In addition, the procedure must provide a method for removing any meal that is not reimbursable from the proper meal count category. The above is also true of any system that stations the cashier/ticket taker/counter at the beginning of the line.

Unacceptable Point-of-service Counts

Counts taken anywhere other than at the point-of-service, such as attendance counts, the number of tickets sold/issued, head counts, tray counts and counts obtained by "backing into" the numbers of lunches or breakfasts served are not acceptable point-of-service counts.

Reimbursable Meal

What is a reimbursable meal? This depends on the menu planning system selected by each school district. For Enhanced Food Based and Traditional systems, it is a meal that offers all of the required meal pattern food items in the required serving sizes prior to the point-of-service. The student must select the required number of food items in accordance with the district's policy regarding offer versus serve. None of the meals served are reimbursable on a day when all five (four for breakfast) of the required meal pattern food items are not available in the meal offered. Each cashier or monitor must be knowledgeable and skilled in recognizing student selections that may be counted and claimed as reimbursable.

For Nutrient Standard and Assisted Nutrient Standard menus, a reimbursable meal consists of a minimum of three menu items: entree, fluid milk served as a beverage and side dishes offered prior to the point-of-service. The student must select the required food items in accordance with the district's policy regarding offer versus serve. None of the meals served are reimbursable on a day when all required menu items are not available in the meal offered.

Equal Access for All Students

When a school offers a selection of more than one type of meal that is claimed for reimbursement or a variety of foods and fluid milk for choice within the meal requirements, it must offer the same selection to all children regardless of whether the children are eligible for free, reduced-price or full-price meals. If certain items are not made available to all children, including those receiving free or reduced-price meals, those items may not be counted toward reimbursable meals.

Meals served on an all-cash line may never be claimed for reimbursement, even though the same items are offered on another serving line. If certain lines are not made available to all children, including those receiving free or reduced-price meals, meals served on those lines may not be claimed. When planning for special functions, parties, field trips, etc., the child nutrition department should be involved in the process to ensure that students are not overtly identified or denied meals and meals claimed for reimbursement meet requirements.

Off-site Meal Consumption

National School Lunch Program authorizing legislation and program regulations clearly intend that meals reimbursed under the programs are to be served and consumed on school or school-related premises. Therefore, meals may not be prepared for off-site consumption for adults or children. This would include meals given to children to eat on the bus or take home with them due to early dismissal, etc.

Meals Prepared for Field Trips

Meals consumed on school-sponsored, supervised field trips may be reimbursed since the meals are prepared by the Child Nutrition department and served and consumed as part of a school-related function. A list, roster or other method of claiming the meals by category should be used to record counts. Meals served during such field trips should be subject to especially stringent sanitary and precautionary measures to avoid food contamination and spoilage.

Alternative Schools

Districts operating alternative schools or in-school suspension (ISS) must establish procedures for maintaining applications and counting and claiming of reimbursable meals. Sometimes these procedures will vary from those procedures established for regular schools.

One accepted procedure requires the “host district” (physical site of the school campus) to keep copies of the students’ applications, direct certification eligibility or a roster with each students’ eligibility on file from the “sending district.” The host district, which is providing meal service, may claim reimbursement for eligible students in the proper category. In some situations a student’s attendance in such a school may be short-term (a few days) or long-term (entire school year). Adjustments and notations should be entered on the Accuclaim records to justify the claim when applicable and to document current numbers of approved students.

Another acceptable procedure requires the host district to charge the sending districts for the number of meals served to their students. The charge would be at a price to recoup the cost of providing the meals. The host school would not claim these meals even as a paying student. The host district would not have to keep a copy of the visiting students meal applications. The sending districts would pay the host school the billed amount and the sending districts would claim the meals at the approved status for those students.

If the district wants to use a different procedure than those mentioned, contact the state office.

Reimbursable meals served to eligible students may be claimed by the host district or the sending district but must not be claimed by both districts.

All students, including ISS students, must have equal access to foodservice (all lines and meal types) if they are allowed to go to the cafeteria to receive meals during regular meal periods. If ISS students are allowed access to the cafeteria, either before or after regular serving times, they may be limited to only one reimbursable line or meal type. In such a situation, the ISS students would have to be able to receive and consume their meals prior to, or after, the regular meal periods for other students.

Choosing a System

Meal count/collection systems should be chosen based on the degree of meal accountability, needs, priorities and available resources of the school or district. Several factors should be considered before making a decision. The system chosen will depend on the size of the school(s), the number of meals served, the number of students participating in the program, the percentage of students receiving free and reduced-price meal benefits, the grade levels involved (high school or elementary), the cost of implementing and maintaining a collection procedure and the staff resources available for implementing and maintaining the collection procedure(s).

Qualities of an Accurate Point-of-service Count

Whatever system is chosen, it must provide an accurate point-of-service count daily for the following:

- number of reimbursable meals served (one lunch/breakfast/snack per student per day).
- eligibility by free, reduced-price or paid category.

Overt identification of students' eligibility is prohibited.

The type of system implemented will determine how these factors are involved in the actual meal count process. Since the meal count system is an integral part of the Child Nutrition Program, a district should assess the following elements and select a system that will effectively meet its needs.

Meal Accountability	Administrative Considerations	Cost of Implementation
<i>Point-of-service capabilities Prevention of overt identifica-</i>	<i>Edits and internal checks Reports, personnel/training</i>	<i>Daily operations Personnel training (cost/time) Hardware</i>
<i>Student eligibility recorded and controlled Reimbursable meals served/ counted</i>	<i>Account balances maintenance Financial analysis (budget/sales)</i>	<i>Software program Support/updating processes Maintenance/repair (registers, computer terminals, etc.)</i>

Also, consider these factors to help determine if a manual or an automated system would be best: cost, size and characteristics of the school and district, number of personnel needed to operate the system and amount of time needed to operate the system during the meal service, as well as in making counts and reports. If an automated system is chosen, the district must have a backup counting system in case of mechanical failure of the automated equipment. The process of system selection is very complex and unique to the individual school or district. For assistance in defining your needs and identifying a system that will meet them effectively, contact your ESC Child Nutrition Programs Specialist or the state office.

Commonly Used Collection Procedures/Systems

Several commonly used collection procedures/systems include verbal identifier, cashier list system, coded tickets and tokens.

Verbal Identifier/Cashier List System

Using this method, all students should give a verbal identifier such as a name or number to the cashier at the point-of-service. The cashier then identifies the category of the meal and records it in one of several ways. If the student's name is used as the identifier, a list is compiled that includes the student's name and category, either alphabetically or by classroom. The cashier checks the name of individual students as they pass through the serving line. The list is used for accounting purposes. A teacher's grade book at the point-of-service may also be used for this purpose. Refer to the end of this section for prototype forms.

A roster used to count "meals served" can also be used to record and track prepaid meals. Shading, highlighting or diagonal (/) lines placed in the day/date blocks on the roster indicate the number of days a paying student or a reduced-price student has prepaid. Free students on the roster should also appear to have prepaid to prevent overt identification. Refer to the Sample Coded Cashier's List at the end of this section.

Common Errors When Using Master List/Roster

When using a highlighter pen, the same color must be used for free as is used for prepaid reduced- and prepaid full-price meals to prevent overt identification.

If numbers are used as the identifier, a number list or an electronic cash register may be used to document that the student has received a reimbursable meal. The cashier or electronic cash register counts the meals by category. The number list or cash register reading is used for accounting purposes. Refer to the back of this section for a prototype worksheet to be used in a manual system. When using the numerical identifier method, the number list is used to record and count reimbursable meals served and claimed. The checklist is used to track individual students' prepaid meals served and the balance of any remaining prepaid meals. As long as tracking of prepaid meals is done after the serving period (not at the time of service), it is not necessary to include any names other than those of students who have prepaid for full- or reduced-price meals.

Refer to the section titled "Advantages and Disadvantages of Verbal Identifier."

Coded Tickets/Tokens

Using this method, all students or students who prepay, plus those receiving free or reduced-price meal benefits, receive a ticket or token that is later redeemed for a reimbursable meal.

Tickets or tokens may be issued or sold in the cafeteria, principal's office or classroom in advance of the meal service on a daily, weekly or monthly basis. Students receiving free and reduced-price meal benefits must be issued a ticket or token identical to the ones issued to students who prepay, except for the code that identifies the category. Whatever coding method is used, overt identification must be prevented.

Types of Tickets/Tokens Used to Establish Meal Counts

- Each student's ticket or token is examined as he receives a meal. A tally is made or a counting machine is pressed in a discreet manner for each meal served, by category.
- Each student's ticket or token is collected as the student receives a meal; these are later counted by category, and unexpired tickets are returned to the students to use for or on the following meal service.
- The tickets have a coded tear-off stub for each lunch or breakfast. A stub is collected as each student receives a meal; the stubs are later counted by category. In an automated tab ticket system, the meal count by category is made simultaneously with the collection of the ticket.
- Each student is issued a coded bar line card that is scanned electronically. The meal count by category is made simultaneously with the scanning of the card.
- Each student is issued a coded number that is entered on an electronic key pad. The meal count by category is made simultaneously as the number is entered.

Refer to the section named "Advantages and Disadvantages of Coded Ticket/Token."

Meal Tickets: Lost, Stolen and Misused

Schools may establish their own procedures regarding the handling of lost, stolen and misused paid, free and reduced-price meal tickets (medium of exchange, i.e. bar code, scanning systems, etc.). However, any system that limits the number of tickets reissued must conform to the following standards:

- Parents and students must be advised in writing of the school's policy regarding missing meal tickets and of the student's corresponding responsibility for their tickets. Such notice shall be provided to all households at the time they begin receiving or purchasing meal tickets.
- A minimum of three replacements or special meal arrangements resulting from three lost or stolen tickets must be allowed each student within each school year (includes initial ticket plus three replacements).
- The school must maintain a list of students who have reported missing original tickets in the current school year and the number of occurrences for each student. Prior to denying a meal to any student without a ticket, the list should always be reviewed to determine if the student has already had at least three ticket replacements or special meal arrangements for lost or stolen tickets within that school year.
- At least one advance written warning must be given to the student and the parent(s) prior to refusal to allow additional meals or ticket replacements. The written warning must include an explanation that the student has repeatedly requested replacement tickets and that each subsequent time the student fails to have a ticket that he/she will be expected to either bring lunch/breakfast or pay full price for lunch/breakfast.

- Meals must always be provided to pre-kindergarten, kindergarten, and disabled students who may be unable to take full responsibility for a meal ticket.

Using the above criteria, school officials may develop the most administratively feasible system to handle missing tickets as determined by individual school circumstances and frequency of ticket issuance. In cases of repeated ticket loss or misuse, school administrators may wish to contact an adult household member to arrange a meeting to discuss the problem.

Replacement of Medium of Exchange

Some school districts are charging for the replacement of identification cards or other cards, tickets or tokens used as a medium of exchange in the school lunch and breakfast programs. These charges are being made on the initial replacement prior to the minimum replacement of three tickets. This is a reminder that the school district must replace a minimum of three tickets at no charge. However, if the district is using this card for other purposes as well as the school lunch and breakfast programs, there must be an alternate method for students to receive their meals. This could include making students get a temporary lunch card and go to the end of the line, then finding their names on the roster to confirm eligibility or use a number that is coded instead of the card.

Keep in mind that the meal cannot be denied to the student unless the lost, stolen and misused ticket procedure has been followed.

Unacceptable Meal Count Systems

Meal count systems that are not acceptable because they do not provide a daily count at the point-of-service for reimbursable meals, by category, include:

- **Attendance counts** — using the number of students in attendance as a meal count. This does not provide a count of meals actually served and those are the only meals that may be claimed for reimbursement.
- **Tray or entree counts** — counting the number of trays or entrees used during the meal service to obtain the meal count. This does not provide an accurate count of reimbursable meals—only of trays and entrees. There are no controls to ensure that trays contain all the necessary food items, that trays were not stuck together, that each entree was part of a complete meal, etc. Each meal must be monitored to ensure that all the meal requirements have been met.
- **Classroom counts** — Prior to service counting the number of students in the class who indicate that they intend to eat a meal (prior to the meal service itself). Students “intending” to eat may not actually do so. The count taken prior to the meal service will not reflect those changes and the count of meals served may not be accurate. Also, there are no controls at the point-of-service to ensure that the meals counted are actually reimbursable.
- **Counts taken anywhere other than at the point-of-service** — Unless approved by the state office, 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 actually reimbursable.

- **Prepaid/charged meals counted on day paid** — When students either prepay or charge their meals, these meals must be counted on the day that the student is served the meal, not on the day that the prepaid meal was purchased or the charged meal was repaid.
- **Second meals claimed for reimbursement** — second meals served to students in any category are claimed for reimbursement. Districts can claim only one meal, per eligible student, per day.
- **Ineligible persons claimed for reimbursement** — Ineligible adults or children not enrolled in district but claimed for reimbursement.
- **Cash converted to meals** — using cash totals to determine the number of meals served. This does not provide a count of reimbursable meals served. In addition, this allows cash collection errors to translate into meal count errors.
- **A la carte items** claimed for reimbursement — food items sold independently of the reimbursable meal and not priced as a unit are claimed for reimbursement.
- **Category/cash back-out system** — one or more of the meal categories are calculated by subtracting the number of meals of one or more meal categories (free, reduced-price or paid) from the total meal count to get a count of another meal category.
- **Delivery counts of meals produced off-site** — the number of meals delivered to a school is not necessarily the number of meals that were actually served.
- **Visual identification without backup** — eligibility is determined based only on the cashier's or counter's visual identification and knowledge of the students' eligibility categories. Even though this system may work, a backup system must be established for other cashiers to determine students' eligibility.
- **Improperly implemented system** — 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.

Master List/Roster

Master list/roster is a listing of all students and their approved categories by school. This listing must include, at a minimum, the following:

- Child's name,
- Approval status,
- Date approved,
- Date denoting any change such as drop, transfer, status change, etc. Any change must be dated and initialed by person making the change.

Other information that may assist you in identifying an individual student may be added, such as the following:

- Grade level,
- Teacher's name,
- Period child is scheduled to eat, if multiple eating periods.

This listing is usually alphabetical for simplicity.

Purpose of Master List/Roster

The purpose of the master list/roster is to provide the following:

- Establishes the highest number of eligibles that can be claimed for the month at a particular site.
- Illustrates if communication exists between the central Child Nutrition office, the school office, and the Child Nutrition site with regards to status changes of its population.
- Demonstrates if changes in status eligibility are made in a timely manner.
- Provides a record of benefit issuance to ensure that students are receiving benefits to which they are entitled.

Daily Participation Report

The numbers of reimbursable meals served daily, by category, to eligible students are recorded and reported by Child Nutrition personnel to the district. The recording method used must ensure that correct counts by category can be easily read, edited, and consolidated into an accurate monthly claim for reimbursement.

Any report format used must provide a complete record of the day's meal service so that the required information can be transferred to the district report. A sample meal count prototype can be found at the end of this section.

Claim for Reimbursement

School meal counts, by category, are submitted to the district level on a daily, weekly, or monthly basis. The counts from all schools are combined to generate a monthly claim for reimbursement. This is called consolidating the claim. Once the claims are consolidated, the district submits them to the state office via the CNPIMS automated system.

Reimbursement rates are different for each category of meal benefit (free, reduced-price, and paid) and for each type of meal served (lunch, breakfast and snack). Thus, accurately counting, recording, and consolidating the number of meals served by category is the only way a claim for reimbursement can be properly submitted ensuring the district is correctly paid for the meals served.

Refer to the Required Records section in this manual for additional information.

Accuclaim and the Meal Count/Collection Procedure

Federal regulations referred to as Accuclaim were developed to improve the accuracy and accountability of reimbursement claims by clarifying schools' and school districts' meal counting and claiming requirements.

Whatever system or procedure is used for counting and claiming meals, the school district is responsible for ensuring the reimbursement claim is based on accurate meal counts by category. A school or district can never claim more free, reduced-price or paid meals than are served to eligible children. If claims are in excess of the number of approved free, reduced-price, paid or total number of enrolled students, the district will be required to repay any overclaims. Proper

implementation of the Accuclaim regulations, which include edit checks and on-site reviews, will ensure an accurate system and prevent overclaims.

Accuclaim Edit Checks

Prior to the submission of a monthly claim for reimbursement, the district shall compare each school's daily claim using the Accuclaim Edit Check process. This process will assist in the identification and correction of claims for reimbursement that are in excess of the number of reimbursable free, reduced-price and paid lunches actually served that day to children eligible for such lunches. Such data shall, at a minimum, include the number of children currently approved for free and reduced-price lunches in that school. School districts shall also compare claims against any other data available to the school district, such as a school's average daily attendance, enrollment or membership data. Refer to the end of this section for a sample form and instructions.

Additional Situations for Claiming Students

- **Visiting Students** — The host school may claim reimbursement for meals served to visiting students. The students' meals may be claimed by category for reimbursement if the visiting school provides the host school with each student's eligibility determination. If the visiting school does not provide this information or if they are from a school that does not participate in the National School Lunch Program then the host school may claim reimbursement for the meals served to the students in the paid category. A notation should be entered on the Accuclaim records to justify the excessive claim, when applicable.
- **Student Workers** — All meals served to student workers should be claimed based on their eligibility category. The count must be taken at the point-of-service to assure a complete meal is served.

Regulations Regarding Meal Claims

The NSLP and SBP regulations require that reimbursement is claimed for only one breakfast, one lunch and one snack per eligible child per day. The Summer Program regulations require that reimbursement is claimed for only two meals per child per day. The meal must be determined to be reimbursable and must be counted by category at the point-of-service.

Performing Edit Checks

The authorized representative who submits each claim through CNPIMS is responsible for reviewing and analyzing meal counts to ensure the accuracy of the claim.

Some terms that are commonly referred to in the edit check process are as follows:

- **ADA** — Average daily attendance (number).
- **ADP** — Average daily participation.
- **Attendance factor** — to obtain, divide the ADA by the total enrollment. This can be done on the school level or district level. TDA recommends that the school level factor be used since it is the most accurate.

- Daily number of meals served by category.
- Number of children approved free.
- Number of children approved reduced.
- Any other enrollment or membership data useful in identifying discrepancies, such as:
 - Maximum allowable free meals equal to the number of approved free multiplied by the number of operating days.
 - Maximum allowable reduced-price meals equal to the number of approved reduced multiplied by the number of operating days.

Steps in Performing Accuclaim Edit Checks

Using the Daily Record of Participation Form (or a similar locally-developed form) perform the following edit checks for each feeding site:

Step 1 — Compare the daily number of free and reduced-price lunches claimed against the number of children currently approved for free and reduced-price meals. Free and reduced-price meals may not be claimed in excess of the number of students approved for such benefits.

Step 2 — Divide the daily number of paid, reduced-price and free meals claimed by the number approved for each category to obtain the percent participation for each category. Compare this percentage to the attendance factor.

Whenever the number of paid, reduced-price or free meals claimed exceed the estimated percent in attendance, the attendance records should be evaluated to determine the maximum number of students by category who were present at school. The number of meals claimed by category should not exceed the number of students in attendance by category unless the school can document through other means that its meal counts are correct.

Document any changes made to the daily count and compare the daily number of paid, reduced-price and free lunches claimed against the number of students eligible times the attendance factor.

Possible Problems With Edit Checks

The personnel performing the edit checks should be aware of other indications of possible problems. Some items to watch for are as follows:

- Patterns of numbers, repetition of numbers or constant counts by category.
- Identical counts for breakfast and lunch.
- 100 percent participation (and % greater than attendance factor).
- Category count exceeding number of children eligible for free and reduced-price meals.

Edit checks should be performed each month on a daily basis. Adjustments or modifications may be done on a weekly basis. When discrepancies are found or potential problems are suspected, they should be resolved through further investigation. Any findings should be documented (with attendance records, etc.) and kept with the school's daily record of meals claimed.

Refer to the sample at the end of this section.

Accuclaim On-site Review

The Accuclaim regulations require that each school district with more than one feeding site shall perform an on-site review of the meal counting and recording procedures in each school for lunch prior to February 1 of each school year. Schools serving breakfast only must conduct on-site reviews for the breakfast program prior to February 1 of each school year.

An on-site review should ensure, at a minimum, the following:

- the counting system is consistent with the district's policy statement as approved by the state office.
- the counting system, as implemented, yields the actual number of reimbursable free, reduced-price and paid lunches served for each day of operation.
- the counting system prevents overt identification of students receiving free and reduced-price lunches.
- the system provides for adequate monitoring to ensure that only reimbursable meals are counted.

If the review discloses problems with the feeding site meal counting or claiming procedures, the district shall ensure that the feeding site develops and implements a corrective action plan. The plan should be in writing and developed jointly by the Child Nutrition manager and the district foodservice supervisor, director or whoever performed the review. It should detail the corrective action necessary to bring the feeding site into compliance and assign responsibility for implementing the plan. The district shall conduct a follow-up on-site review within 45 days to determine that the corrective action resolved the problems.

A prototype On-site Review Form is provided at the end of this section.

Sample Coded Cashier's List

School Somewhere Elementary

Lunch

Teacher's Name Mrs. Goodcheer

Dates: **April 2005**

Student Name	Code	1	2	3	4	7	8	9	10	11	14	15	16	17	18	21	22	23	24	25	28	29	30
Lori Review	123	²⁰ ✓	✓	✓	✓	A	✓																
Carol Marketing	103	⁵ ✓	✓	✓	✓	✓	✓																
Susan News	113	¹⁰ ✓	✓	✓	✓	✓	✓																
Nancy Nutrition	113	✓	✓	✓	✓	✓	✓																
Deb Compliance	123	¹⁵ ✓	✓	✓	✓	✓	✓																
Gary Finance	103	²⁰ ✓	✓	✓	✓	✓	A																
Brenda Trainer	113	¹⁰ ✓	A	✓	✓	✓	✓																
Sandy Purchase	123	²⁰ ✓	✓	✓	✓	✓	✓																
Natalie Newmom	103	²⁰ ✓	✓	✓	✓	✓	✓																
James Monitor	103	²⁰ ✓	✓	A	✓	✓	✓																
Ray Purchase	113	⁵ ✓	✓	✓	✓	✓	✓																
John Director	123	¹⁰ ✓	✓	✓	✓	✓	✓																
Lorenda Baker	123	⁵ ✓	✓	✓	✓	A	A																
Joan Detail	103	✓	✓	A	✓	✓	✓																
Jim Accountant	123	²⁰ ✓	✓	✓	✓	✓	✓																
Totals	Code	103	5	5	3	5	5	4															
	Code	113	4	3	4	4	4	4															
	Code	123	6	6	6	6	4	5															

Shading or highlighting can be used to track pre-paid meals. Some free students are also shaded to prevent overt identification. The numbers entered on April 1 indicate the number of meals that have been prepaid.

Date: _____ School: _____

Signature: _____

	M	T	W	T	F		M	T	W	T	F		M	T	W	T	F		M	T	W	T	F		
3501						3541						3601						3701							
3502						3542						3602						3702							
3503						3543						3603						3703							
3504						3544						3604						3704							
3505						3545						3605						3705							
3506						3546						3606						3706							
3507						3547						3607						3707							
3508						3548						3608						3708							
3509						3549						3609						3709							
3510						3550						3610						3710							
3511						3551						3611						3711							
3512						3552						3612						3712							
3513						3553						3613						3713							
3514						3554						3614						3714							
3515						3555						3615						3715							
3516						3556						3616						3716							
3517						3557						3617						3717							
3518						3558						3618						3718							
3519						3559						3619						3719							
3520						3560						3620						3720							
3521						3561						3621						3721							
3522						3562						3622						3722							
3523						3563						3623						3723							
3524						3564						3624						3724							
3525						3565						3625						3725							
3526						3566						3626						3726							
3527						3567						3627						3727							
3528						3568						3628						3728							
3529						3569						3629						3729							
3530						3570						3630						3730							
3531						3571						3631						3731							
3532						3572						3632						3732							
3533						3573						3633						3733							
3534						3574						3634						3734							
3535						3575						3635						3735							
3536						3576						3636						3736							
3537						3577						3637						3737							
3538						3578						3638						3738							
3539						3579						3639						3739							
3540						3580						3640						3740							

Total

Texas Department of Agriculture National School Lunch and Breakfast Programs On-site School Review

District Name	County District No.
School Name	Date of Review

	Attendance Factor _____ %	
	Meal Count on Day of Review	Currently Approved
Paid	_____	_____
Reduced-Price	_____	_____
Free	_____	_____

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
<i>I. Application Approval</i>			
1. Are applications approved at this school? Responsible party _____	_____	_____	_____
2. Are applications on file correctly approved?	_____	_____	_____
<i>II. Direct Certification</i>			
1. Is direct certification correctly utilized by the school?	_____	_____	_____
2. If YES, is required documentation maintained at the district level?	_____	_____	_____
<i>III. Master List</i>			
1. Is a master list used in the meal system?	_____	_____	_____
2. Do names listed on the master list match approved applications on file and on the direct certification list?	_____	_____	_____
3. If more than one list is used (e.g. master list / ticket issuance list / foodservice line list), then are all lists the same?	_____	_____	_____
4. Are all lists updated as needed?	_____	_____	_____
<i>IV. Meal Count System</i>			
1. Does the meal count system produce an accurate count of reimbursable meals (free / reduced-price / paid) served to eligible children?	_____	_____	_____
a. Is the implemented collection procedure the approved collection procedure?	_____	_____	_____
b. If the meal count is not taken at the end of the foodservice line, does the school have a system to account for reimbursable meals?	_____	_____	_____
c. Are only meals that meet meal requirements counted and claimed for reimbursement?	_____	_____	_____
d. Does the collection procedure in use ensure that only one meal per child per day is claimed for reimbursement?	_____	_____	_____
2. Does the meal count system prevent overt identification?	_____	_____	_____
a. Is the medium of exchange made available to all students at the same location?	_____	_____	_____
b. Does the medium of exchange use accepted codes for identifying students as free, reduced or paid?	_____	_____	_____

