

CHAPTER 6-COUNTING AND CLAIMING

An accurate counting and claiming system demonstrates integrity of program funds, which benefits all children participating in the school nutrition programs. SFAs can only claim reimbursement for meals that meet program requirements. School must ensure that meals claimed: 1) meet the required meal pattern requirements; 2) are only served to eligible children; 3) are tracked by the eligibility category; and 4) are served at the point of service. The number of meals claimed for reimbursement must have adequate documentation on file to support the claim. When an SFA applies to participate in the School Nutrition Programs, the Meal Counting and Collection Procedures form is completed. This form identifies the procedures used for counting and claiming.

STUDENT PARTICIPATION

Students enrolled in a participating school can participate in the National School Lunch Program, School Breakfast Program, or the Special Milk Program. This applies to both regular and special education students. Children 21 years of age or younger residing in a participating private nonprofit residential child care institution are eligible to receive meals offered by School Nutrition Programs. Counting and claiming students for reimbursement is based on their eligibility. Eligible students consist of paid students who do not qualify for supplemental assistance, students who have an approved application on file that qualifies them for reduced price meals and students that are eligible for free meals based on income, or categorical eligibility.

COUNTING AND COLLECTION PROCEDURES

All schools must develop counting and collection procedures. When SFAs apply for the School Nutrition Programs, a Meal Counting and Collection Procedures form is completed and submitted to ARDHS. The Meal Counting and Collection Procedures form identifies meal payment collection procedures, the number of food items served to each student receiving a reimbursable meal, the person(s) responsible for counting and claiming, and the point of service procedures. These procedures are approved as part of the SFA agreement with ARDHS. If procedures change, the SFA is responsible for notifying the School Nutrition Programs Unit of the changes.

Schools can use various methods to collect meal payments. Schools can collect payments daily, monthly or as part of the tuition payment. Schools may also use various mediums of exchange such as tickets, tokens, scan cards, rosters, and so forth. Regardless of the exchange method used, the school must prevent overt identification of students receiving reduced price and free meals.

POINT OF SERVICE MEAL COUNTS

Prior to filing a reimbursement claim, schools are required to count meals daily at the point of service. Point of service counts increases accuracy and consistency. The point of service is the point in the food service operation where it can be determined that a free, reduced-price or paid meal meeting the meal requirements has been served to an eligible student. This usually occurs at the end of the service line when staff can ensure that the meal taken by the student contains the required components and serving sizes and the meal is counted. Staff should refer the Counting and Collection Procedures to determine the SFAs policy. This is part of the SFAs permanent file for school food service.

To ensure a point of service count, the school must have a consistent meal counting system, and staff trained to identify reimbursable meals.

In order to count a meal at the point of service, the procedures must ensure that meals:

1. meet the required meal pattern;
2. reflect only free, reduced price and paid price eligible students;
3. are counted daily by category;
4. are claimed one meal per child;
5. served to adults and meals served as seconds are not counted.

To make a system reliable, all persons responsible for recording the meal counts must be able to identify a reimbursable meal. Teachers, houseparent's, and other staff must receive training to identify reimbursable meals in order to record meal counts correctly. When a meal is not reimbursable, food service programs must have procedures that allow staff to return the meal for a reimbursable one, or record the meal as non-reimbursable.

Alternate Point of Service

An alternative point of service is used when schools cannot count meals at the time of service. Schools may use alternate point of service counts only with prior approval by ARDHS. Alternate point of service counts must be accurate and reliable. The point of service counts is listed on the Meal Counting and Collection Procedure form. Any changes to these procedures must be submitted to ARDHS in writing and in detail. The state agency will review the detailed description of the alternative point of service to determine accuracy and reliability. If a counting system is not reliable, schools must take immediate steps to make it so.

Examples of Point of Service Counts:

- Meal is counted at the beginning of the serving line, staff ensures that the meal is reimbursable at the end of the serving line.
- Meals are vended to the unit floor or classroom, prepackaged. Kitchen staff ensures that the meals are packaged as reimbursable meals, classroom or unit staff records marks meal roster.

UNALLOWABLE MEAL COUNTS

At times, schools will implement a counting system that is not accurate or reliable. Listed below are examples of unreliable meal counts and cannot be counted as reimbursable.

Examples of unallowable meal counts:

- Meals are counted before and after service using attendance records.
- Meals counted at beginning of service line with no staff to ensure meal is reimbursable.
- Meals counted later in the day, relying on memory.
- Tally counts that do not identify categorically eligible children receiving meals.
- Meal counts recorded by staff that cannot identify reimbursable meals.
- Student counts instead of meal counts
- Trays counts
- Servings prepared instead of meal counts
- Adult Meals
- Second Meals

Visiting Students

Schools providing meals to students visiting from another school may claim those meals at the paid reimbursement rate. Meals served to visiting students eligible for free or reduced price meals may be claimed as free or reduced if the school complies with program regulations. Schools claiming visiting students must 1) receive documentation of the student's eligibility to receive paid, free or reduced price meal; 2) serve meals to visiting students that comply with meal pattern requirements for a reimbursable meal; 3) ensure that the visiting school is not claiming the same meals for the day of the visit.

Second Meals

Second meals served to students may not be claimed for reimbursement. Schools should document second servings separately from the reimbursable meals. Schools must take steps to ensure that only reimbursable meals are claimed.

PRESCHOOL AND DAY CARE PROGRAMS

Preschool programs located on a school campus and operated by the school are eligible to participate in the National School Lunch and School Breakfast Programs. Children attending the preschool program must be provided an income application or should be included on a sibling's application. Meals served to children in nonpricing programs such as day care or RCCI must be claimed in the appropriate category (free, reduced price or paid) even if there is no charge to the children.

Preschool programs located on school campuses that are not operated by the school may not participate in the NSLP. The sponsoring school may enter into a catering contract with the non-participating school to supply meals at a cost. The sponsoring schools food service program must receive all income for the meals catered to another school.

If a preschool program chooses to participate in the CACFP rather than the NSLP, the school may provide meals, but reimbursement would be claimed by the organization sponsoring the CACFP. For CACFP, apply with Arkansas Department Human Services.

Non-school Days

When an on-site day care program is open and the school is closed, meals are not reimbursable under the School Nutrition Programs. This includes private schools that have a day care program during the holidays, fall/spring breaks and summer.

CLAIMING DAYS FOR RCCIS

RCCIs are allowed to claim lunch and breakfast during the weekends, holidays and school vacations if the following criteria is met:

1. Breakfast and lunch are served on Saturday and Sunday as documented by meal counts, menus and production records, and;
2. Breakfast and lunch meet the minimum federal meal pattern requirements as documented by menus and production records.
3. Schools and RCCIs cannot claim snacks on the days school is not in session.

DAILY REPORTING

Schools should use the following procedures to increase the reliability in the counting and claiming system.

1. Record meals on a daily basis by name of student and eligibility category (free, reduced- price, or paid). Ensure that overt identification is prevented when recording meals. Students, volunteer parents, and non-authorized staff should not be able to identify the students eligible for free and reduced price meals. Use the sample roster for private schools and RCCIs to record the counts on page 12 & 13
2. If a student charges his meal, the meal is recorded by category on the day that it is served and not on the day the meal is paid. A charged meal is NOT counted as a served meal.
3. Where schools receive meals from a vendor or a central kitchen, record only those meals actually served, not the number delivered.
4. Adult meals and second meals served to children are not reimbursable and should never be claimed. Adult meals and second meals should be recorded for income purposes and to document the integrity of the program. If food service personnel eat free or at a reduced price, schools should record the meals served to food service personnel and non-program staff separately. Adult meals may be recorded on the student meal roster or a separate roster.
5. Conduct daily Edit Checks. School must conduct daily checks at each site to ensure that only the number of children eligible for free, reduced-price and paid meals are claimed. The edit check allows the SFA to compare the number of meals claimed to the number of allowable meals. Private school & RCCIS should use the form on page 14.
6. Record separately on the reimbursement claim the number of paid, reduced priced meals and free meals served. Submit the claim following each report month to ARDHS. Meal counts should be taken from the edit check form after meals are compared to the attendance factor rate. Contact ARDHS for revised claim form.

OVERT IDENTIFICATION

SFAs must avoid any policy or practice that has the effect of overtly identifying eligible children. Where necessary, local education agencies should promptly update their policy statements, implementation procedures, and operations to comply with this guidance. State agencies must assure that SFAs' practices address ways to prevent overt identification. This includes reviewing policy statements and point of service systems for new SFAs submitting applications for participation in the school meals programs. Further, State agencies are required to review the policy statement and the medium of exchange used as part of the general areas when conducting administrative reviews.

Defining Overt Identification

Overt identification is any action that may result in a child being recognized as potentially eligible to receive or certified for free or reduced price school meals. SFAs must assure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced price meals, including notification of the availability of free or reduced price benefits; certification and notification of eligibility; provision of meals in the cafeteria; and the point of service.

Preventing Overt Identification of Directly Certified Children

SFAs are not required to provide applications to parents when children are eligible for free meals through direct certification, but must assure that these children are not overtly identified through the method used to distribute applications. If an SFA distributes applications to individual households, such as by mail (including e-mail), or in individual student packets; or online availability, applications do not have to be provided to households in which all children are determined eligible through direct certification. If the distribution method is not individualized, all households must be provided applications. (See 7 CFR 245.6(b)(10)).

Prohibited Actions

The following actions are prevented by law and regulation:

- Publicizing or announcing eligible households or children's names;
- Using different mediums of exchange (see below for additional discussion);
- Having separate dining areas, service times or serving lines;
- Limiting choices of reimbursable meals; and
- Requiring that children work for their meals.

Food Service Area Considerations

SFAs are prohibited from having separate dining areas, service times or serving lines or limiting the choices of reimbursable meals based on a student's eligibility status. In addition, SFAs choosing to sell competitive foods during the meal service are encouraged to ensure the operation of the sale of competitive foods does not inadvertently result in eligible children being identified. Ways to limit overt identification related to the sale of competitive foods include:

- Limit competitive foods to those also offered as part of reimbursable meals on the reimbursable lunch lines;
- Offer competitive foods on the same lines as reimbursable meals are offered; or
- Only allow competitive foods to be purchased with a pre-paid card.

Medium of Exchange

Schools must prevent overt identification at the point of service. Meal cards, tickets, tokens, ID numbers, or other methods to obtain reimbursable meals cannot be coded or colored in a manner that would overtly identify free and reduced price eligible children. In addition, SFAs must take steps to assure that rosters, computer-screens or other equipment used at the point of service cannot be viewed by anyone not needing the information, especially students. Further, the information on the rosters or screens should be masked or coded to avoid other students discerning any student's eligibility status.

Whichever medium of exchange is adopted in the meal count/collection system, the system must be complex enough to prevent other children from identifying the students receiving free and reduced price meals. Students can easily recognize single-symbol and coding to identify free and reduced price students. Schools should never use a single-symbol code

such as A, B, C; X, Y, Z; or 1, 2, 3. Additionally, color-coding by category and single-symbol coding using obvious identifiers such as F, R, P cannot be used.

Another system to prevent overt identification is prepayments. Schools should allow parents and student a way to make payments online, or prior to the lunch service.

Reducing a cash system reduces the identification of eligible students. However, schools cannot eliminate the cash basis altogether. Students must have a way to pay for their meals on a daily basis.

When recording meal counts, staff should use a consistent coding system to identify the various types of meals. If the counting system requires number or letter codes for children who are absent children, for second meals, adult meals, and reimbursable meals, the coding must be consistent. Example: if the letter N is used to notate a nonreimbursable meal and the letter X is used for mark a reimbursable meal, all staff responsible for recording counts, must be trained to use the same codes.

EDIT CHECKS

All schools & RCCIS are required to conduct an edit check process. The edit check process compares daily meals counts to the school's assigned attendance factor. The attendance factor is assigned by the state agency using the school's averaged enrollment and average daily attendance for the month of October. The form and instructions begin on page 15 of this chapter.

ACCOUNTABILITY REQUIREMENTS

Accountability Procedures

SFAs should maintain on file written procedures for the meal count system. If more than one system is in place at different sites, written procedures should be maintained for each site. Procedures should state how, when, and where a duty is to be performed and which personnel position is responsible. It should also identify procedures and personnel for the eligibility determination, verification, edit checks, and the claiming process. Written procedures should be specific enough to allow substitute staff to implement an accurate counting and claiming system.

Staff Training

Personnel responsible for counting, claiming and serving reimbursable meals should receive training. It is the staff's responsibility to ensure only reimbursable meals are counted during the point of service. Staff members should also receive orientation on their duties and responsibilities. Training should cover the following topics: meal pattern

requirements; offer versus serve, cash collection system; meal count system; daily and weekly reports; charge policy; lost, stolen, and misused tickets; adult sales; and a la carte/snack bar sales. Training should be documented, including name and title of instructors, dates, topics covered, and attendees.

ON-SITE REVIEW FOR MULTIPLE SITES

SFAs that have more than one site participating in the National School Lunch must conduct a site review at each site prior to February 1 of each year (see the On-site review of School Food Service Procedures, page 16). SFA must complete the review no later than February 1 and submit the summary form to ARDHS by February 15 (see Multiple Site Summary Report, page 19). The purpose of the site review is to ensure that meal counting procedures comply with federal requirement and agency procedures.

The School Food Authority must assign a reviewing official to conduct the on-site review for each school or site to ensure that counting and claiming systems meet program requirements. If the reviewing official identifies problems with their meal counting or claiming procedures, the school food authority take the following steps to correct the problems:

1. Assist the food service site in developing and implementing a corrective action plan.
2. Conduct a follow-up on-site review within 45 calendar days of the first review to ensure the corrective action corrected the problem.

REIMBURSEMENT CLAIMS

The School Nutrition Program requires SFAs to submit the Reimbursement Claim (form 23CD006E). The information for completing the Reimbursement Claim Form is found on the Edit Check Form. SFAs must thoroughly complete the claim form prior to submission. Incomplete forms or forms containing the incorrect address, agreement number and federal identification number cannot be processed. The School Nutrition Programs Unit will review the information to identify discrepancies in the claiming process. SFAs also have an option to file claims online using the ARDHS internet. Contact the State Agency for the reimbursement claim form.

Due Date

The state agency requests that SFAs submit all claims by the tenth (10th) of the month following the claim month. If the 10th day is on a Saturday, Sunday or a state holiday, SFAs can submit the claim on the following working day. Federal regulations allow the state agency to pay a claim if filed within 60 days after the claim month. In some cases, Federal regulations may prevent the state agency from paying a late claim. Claims submitted after 60 calendar days may be granted a one-time exception for payment if corrective action is taken to prevent future late claims. This exception is allowed only once for thirty-six (36) months. No other exceptions may be granted within the thirty-six (36) month period.

On-line Claiming

SFAs have the option to file a paper claim signed by the authorized representative or to file a claim on-line using the internet, user identification and password. Filing a claim increases the timeliness of payment. Built in edits checks will identify claiming errors such

as an overclaim or data entry error. Rejected claims will be returned to the SFA with a notice for the rejection. Only one person from each SFA is allowed to file a claim on-line. For assistance with on-line claiming, contact the State Agency.

Authorized representative

The authorized representative is the person who is authorized to sign the reimbursement claim and other documents required in the School Nutrition Programs. In many cases, the director, principal or financial officer is the authorized representative. In other cases, the director or principal will authorize other personnel, such as the food service manager to complete and sign the reimbursement claim. Authorized representatives must be approved by ARDHS.

To become an authorized representative, personnel must complete the SNP Change of Personnel Form. For online claiming, authorized representative must complete: (1) a Certificate of Authority Form.

Under no circumstances do authorized representatives share their user ID and password with anyone, staff or non-staff. The password and user ID is unique to the person authorized to claim online. If non-authorized personnel are caught trying to log onto the online claim system, the agency may lose the privilege of online claiming.

LATE CLAIM EXCEPTION OPTIONS

If your claim is received after the final deadline date, the following two options are available:

Within Your Control Exception

This option is used if the lateness of the claim or amendment submission is due to circumstances within your control. SNP has the authority to approve and process the payment of one late claim or amendment within a 36 month period. That approval is dependent upon receiving a corrective action plan (CAP) that includes:

1. Actions taken to avoid repetition of the situation linked to the late claim submission;
2. Actions to be taken to avoid any future late claim submission from the same or other causes;
3. A statement that your organization understands that an exception can be granted only once every 36 months for a late claim submission that is within your control. Future late claims will not be paid unless your organization has not been granted an exception during the previous 36 month period or the lateness can be attributed to conditions outside your control; and
4. The signature of the School Food Authority Official listed on the contract agreement with ARDHS for the School Meals Program.

The local agency shall forward its corrective action plan and the late claim to the School Board, Superintendent or other appropriate local senior level official for approval prior to forwarding it to the state agency.

The state agency shall review the corrective action plan and approve, at its discretion, only those which in its opinion warrant approval.

Outside Your Control Exception

The second option is available if the lateness of the claim or amendment was beyond your control and you want to request an exception to the regulations. You need to submit:

1. A written request for an outside of your control exception.
2. A detailed description of the events and circumstances that prevented the claim or amendment from being submitted on time.

The information you submit will be reviewed by the state agency and forwarded to the United States Department of Agriculture (USDA) for review and approval. USDA is responsible for approving late claim exceptions for circumstances that are beyond the SFAs control. ARDHS does not have the authority to process this type of payment. That authority rests with the USDA regional office.

Other Late Claim Submissions

Downward Claim Adjustments

The 90-day time limit does not apply to downward adjustments. Federal regulations require that downward adjustments shall be made regardless of when it is determined that adjustments are necessary.

Review or Audit Findings

SNP may grant an exception for late upward adjustments that result from a review or audit. To request this type of exception, the sponsor must submit information to SNP as described in the Required Actions section of this memorandum.

Appeals - A sponsor may submit a written appeal to SNP regarding a claim or adjustment that has been denied due to 60 or 90-day submission deadlines.

Required Actions for Late Claims and Adjustments

- To submit a downward adjustment: Send revised claims to SNP at any time.
- To submit an original claim after 60 calendar days, or upward adjustments after 90 days, that is late due to circumstances outside of sponsor's control:

Request an exception from SNP by submitting a written description of the outside events and circumstances that prevented the claims from being submitted on time.

If USDA denies the exception request, the LEA will be ruled out of compliance and the claim will not be paid.

ARDHS School Nutrition Programs may take one or more of the following administrative actions to bring the SFA into compliance:

- Require the SFA to develop and carry out a plan for ensuring future compliance.
- Place the SFA in noncompliance on conditional status.
- Conduct on-site reviews of SFAs that are chronically in noncompliance.

To submit one original claim after 60 days, or one upward adjustment after 90 days, that is late due to circumstances within the sponsor's control (this exception available only if

sponsor has not already used this type of exception, for the program/s claimed, within the previous 36 months):

- Request an exception from SNP by submitting signed documentation, including an outline of the procedures/actions taken by sponsor to avoid repetition of the situation that caused the error in claiming.
- Before requesting this exception, sponsor should evaluate whether the late claim or adjustment is large enough, in relation to sponsor's usual total claim, to justify "using up" the exception for the affected program or programs for the next 36 months, or whether the exception should be "saved" for possible use during the following 36 months.

To submit late adjustments resulting from SNP review findings or from audit findings:

- a. If the adjustment resulted from an SNP review, SNP review staff will initiate the required claim adjustments;
- b. If the adjustment resulted from an audit, submit:
 1. Letter from auditor, or copy of audit finding, specifying the necessary adjustment(s);
 2. Signed documentation of the procedures/actions taken by sponsor to avoid repetition of the situation that caused the error.

Procedures applicable to requests for all types of exceptions:

- Submit an original or revised claim and other documents to ARDHS, School Nutrition Programs, PO Box 1437, Slot S 155, Little Rock, AR 72203.
- Ensure the claim is complete with authorized signature.
- Review documents to ensure that CAP contains sufficient details to enable ARDHS School Nutrition Programs and USDA to make a fair decision, provide a written description of the events and circumstances that prevented timely submittal of the claim. The statement must provide a complete written description of the circumstances and justification for not meeting the deadline, including documentation, if available.
- SNP will review the submitted information. If the exception is approved, claim(s) will be entered into the claim system by SNP staff for payment processing. If the exception is denied, formal correspondence will be sent to the sponsoring authority.

REIMBURSEMENT RATES

Each year, USDA Child Nutrition Programs will post the reimbursement rates for the National School Lunch Program, School Breakfast Program, Afterschool Snacks and the Special Milk Program. These reimbursement rates are in effect from July 1 through June 30 of each year. Some schools will receive additional assistance for their meal program, dependant on the number of children eligible to receive reduced price and free meals. Contact the State Agency after July 30 for the current reimbursement rates.

National School Lunch Reimbursement Rates

There are two different reimbursement rates for the school lunch program. Schools claiming less than 60% of the lunches as free or reduced price in the second preceding year will receive reimbursement at the regular rate. Schools that claimed 60% or more lunches

in the free or reduced price category in the second preceding year is eligible for an extra 2 cents per meal. The state agency will identify which schools will receive the higher rate.

Severe Need Breakfast Reimbursement Rates

SFAs that serve 40% or more free and reduced-price lunches in the second preceding year are eligible for the Severe Need Breakfast Program and can receive a higher rate of reimbursement for free and reduced price meals. The state agency will determine which schools are eligible for severe need.

After School Care Snack Program

SFAs that administer after school care programs can receive a reimbursement for serving snacks. School who do not have more than 50% of the children eligible for free and reduced price lunches will receive the regular reimbursement rates for snacks claimed at the free, reduced and paid price. Sites located in areas served by a school in which at least 50 percent of the enrolled children are eligible for free and reduced-price meals are eligible to receive reimbursement at the free rate for snacks served to all children, regardless of each child's eligibility for free or reduced-price meals.

Only schools participating in NSLP can receive reimbursement for snacks. Under no circumstances may snacks be reimbursed in programs operated before or during the child's school day. Schools are not eligible to receive reimbursement under this provision for snacks served on weekends or holidays, including vacation periods.

SCHOOL FOOD AUTHORITY (SFA) EDIT CHECK WORKSHEET								
1. SITE					3. ATTENDANCE FACTOR			
2. MONTH					4. AVERAGE DAILY ATTENDANCE (ADA)			
5. DAY OF MONTH	6. HIGHEST ENROLLED FREE ELIGIBLE	7. FREE MEALS CLAIMED	8. HIGHEST ENROLLED REDUCED ELIGIBLE	9. REDUCED PRICE MEALS CLAIMED	10. HIGHEST ENROLLED PAID ELIGIBLE	11. PAID MEALS CLAIMED	12. TOTAL MEALS CLAIMED ONLY	COMMENTS
1								
2								
3								
4								
5								
6								
7								
8								
9								
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11								
12								
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24								
25								
26								
27								
28								
29								
30								
31								
TOTALS								

SIGNATURE: _____ DATE: _____

AVERAGE DAILY ATTENDANCE (ADA) = TOTAL MEALS CLAIMED DIVIDED BY # OF SERVING DAYS

ATTENDANCE FACTOR (AF) = ADA DIVIDED BY TOTAL ENROLLMENT

SITE/SCHOOL FOOD AUTHORITY (SFA)
EDIT CHECK WORKSHEET INSTRUCTIONS

1. School/RCCI: Record the name of the School or RCCI participating in a Child Nutrition Program.
2. Reporting Month: Record the month and year.
3. Attendance Factor (AF): Record the AF for the school food authority (SFA).
4. Average Daily Attendance - $ATTENDANCE\ FACTOR\ (AF) = ADA\ DIVIDED\ BY\ TOTAL\ ENROLLMENT$
5. Day of Month: Locate the day of the month, and begin recording on the corresponding line. The site may want to highlight or blackout any weekends, holidays, or professional days when the site is closed.
6. Highest Enrolled Free Eligible Students for Claim: Record the current number of enrolled students eligible for free meal benefits on the first serving day of the month. Each day, add any newly enrolled students who are eligible for free meal benefits. Do not deduct any students who withdraw during the month since this column is used to determine the highest number of free eligible students for the overall month. The highest number of enrolled free eligible students during the month is to be reported on the claim for reimbursement.
7. Free Meals claimed for that day.
8. Highest Enrolled Reduced-Price Eligible Students for Claim: Record the current number of enrolled students eligible for reduced price meal benefits on the first serving day of the month. Each day, add any newly enrolled students who are eligible for reduced price meal benefits. Do not deduct any students who withdraw during the month because this column is used to determine the highest number of reduced-price eligible students for the overall month. The number of enrolled reduced-price eligible students on the last day of the month is to be reported on the claim for reimbursement.
9. Reduced meals claimed.
10. Highest Enrolled Paid Eligible Students for Claim: Record the current number of enrolled students eligible for paid price meal benefits on the first serving day of the month. Each day, add any newly enrolled students who are eligible for reduced price meal benefits. Do not deduct any students who withdraw during the month because this column is used to determine the highest number of reduced-price eligible students for the overall month. The number of enrolled reduced-price eligible students on the last day of the month is to be reported on the claim for reimbursement.
11. Paid meals claimed.
12. Total Meals Claimed Daily: Add together the number of lunches served/claimed each day in columns 7, 9 and 11. .
13. Comments: Record any comments necessary to explain variations in meal service.
14. Totals: Column 7, 9, 11, and 12 may be totaled separately to get the total meals for each category (free, reduced price, and paid).
15. Signature: The person completing the form must sign the form and accept responsibility for the form's accuracy.
16. Date: The person completing the form must record the date by his or her signature.

ON-SITE REVIEW CHECKLIST

ASSESSMENT OF THE MEAL COUNTING AND CLAIMING SYSTEM

According to 7 CFR 210.8(a)(1), every school year, **prior to February 1**, each School Food Authority (SFA) with more than one school (as defined 7 CFR Part 210.2 to include Residential Child Care Institutions (RCCIs)) must perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction.

Each on-site review must ensure the school's claim is based on the counting system, as implemented, and yields the actual number of reimbursable free, reduced price, and paid lunches, respectively, served for each day of operation.

If the review discloses problems with a school's meal counting or claiming procedures, the SFA must ensure that the school implements corrective action, and within 45 days of the review conduct a follow-up on-site review to determine that the corrective action resolved the problems.

SCHOOL FOOD AUTHORITY _____
(NAME OF ORGANIZATION)

SITE NAME: _____ **REVIEW DATE:** _____

SFA REVIEWER:

The following questions are recommended at a minimum to complete the on-site review requirement:

YES NO

1. Is the method used for counting reimbursable meals in compliance with the approved *point of service* requirement? (Meal counts must be taken at the location where complete meals are served to children.)
2. Is the *point of service* meal count used to determine the school's claim for reimbursement?
3. Is the person responsible for monitoring meals correctly identifying reimbursable meals for the menu planning option selected by the SFA?
4. Is the school correctly implementing policies for handling the following (as applicable):
- | Yes | No | N/A | |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Incomplete meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Second meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Visiting student meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Adult and non-student meals (and identifying program vs. non-program)? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A la carte? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Student worker meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Field Trips? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Charged and/or prepaid meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Offer vs. Serve? |

YES NO

5. Is there a method of identifying non-reimbursable meals (i.e. not meeting meal pattern requirements, seconds, adult meals, etc.), distinguishing them from reimbursable meals?
6. Is someone trained as a backup for the monitor and the meal counter?
7. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available and do staff know when and how to implement it?
8. Are daily counts correctly totaled and recorded?
9. If claims are aggregated, are the meal counts correctly totaled and consolidated?
10. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim for reimbursement is made? Record today's meal counts by category and compare to the number of students eligible by category.

Number of Students Approved by Category

Free:

Reduced price:

Paid:

Today's Meal Counts by Category

Free:

Reduced price:

Paid:

11. Does the system prevent overt identification of children receiving free or reduced price meals?

**NOTE: THE FOLLOWING TWO QUESTIONS ARE FOR ALL SFAS
EXCEPT FOR SFAS ON PROVISION 2 OR 3 IN NON-BASE
YEARS OR RCCIs WITH ONLY RESIDENTIAL CHILDREN:**

12. Is a current eligibility list kept up-to-date and used by the meal count system to provide an accurate daily count of reimbursable meals **by category** (free, reduced price, paid)?
13. If applicable according to 7 CFR 210.8(a)(3), are edit checks completed and documented which compare the daily counts of free, reduced price and paid lunches against the product of the number of children currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor (and any discrepancies accounted for)?

CORRECTIVE ACTION PLAN (FOR ABOVE "NO" ANSWERS):

SPECIFY DATE CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

SIGNATURE: _____

School Representative

Title

Date

SFA Reviewer

Title

Date

FOLLOW-UP VISIT (must be conducted within 45 days if corrective action was required):

Observations of corrective action implementation:

SPECIFY DATE CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

SIGNATURE: _____

School Representative

Title

Date

SFA Reviewer

Title

Date

ON-SITE REVIEW SUMMARY OF FOOD SERVICE SITES

For School Food Authorities with Multiple Sites

School Food Authority

(district or sponsoring agency) _____

Summary Report Date _____

Reviewing Official and Title _____

Name of School/Site	Location	Date of First Review	Corrective Actions Required	Date Follow-up Review	Date Follow-up Completed

Due February 15: Submit Summary to ARDHS, School Nutrition Programs, and PO Box 1437, S-155. Little Rock, AR 72203-1437

*If corrective action is required, SFAs must send a follow-up summary form within 45 days after the initial review. A follow-up report for corrective action must be submitted to ARDHS no later than April 1.