

# Point of Service and Meal Counting Procedures

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## Overview

*Point of Service* refers to the location in the serving line where a determination can accurately be made that a reimbursable free, reduced-price or paid meal has been served to an eligible student. **The point of service meal counts must be made at the point students receive the meals. Typically this occurs at the end of the serving line. There are limited exceptions discussed on the [Standards for Alternative Point of Service Meal Counts](#) page.**

There are two purposes of the Point of Service (POS):

1. Identify a student's eligibility status (free, reduced-price, or paid) when they receive a reimbursable meal using a process that avoids overt identification.
2. Identify the student has selected a reimbursable meal that can be counted and claimed for reimbursement.

*Meal Counting* refers to the process of accurately collecting and maintaining data at the POS. The objective is to obtain accurate meal counts so that the School Food Authority (SFA) can submit meal count totals at the end of each month for reimbursement that include the number of free, reduced-price, and paid meals served.

The National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP), Special Milk Program (SMP) and Minnesota Kindergarten Milk Program (MKMP) all require meals/snacks/milk to be counted at the POS. The Fresh Fruit and Vegetable Program (FFVP) does not include a POS or meal count component.

## Why are POS Meal Counts Important?

Schools that choose to take part in school nutrition programs receive cash subsidies and USDA foods from the U.S. Department of Agriculture (USDA) for each meal they serve. In return, they must serve meals/snacks/milk that meet federal requirements. They must also offer free or reduced-price meals to eligible students.

The point of service is a crucial component of the NSLP, SBP, ASP, SMP, and MKMP because it ensures students receive a reimbursable meal. It also ensures that each reimbursable meal is counted, allowing the SFA to claim each meal and receive reimbursement from the USDA to cover the costs of offering school nutrition programs.

## Terminology

In order to set up a point of service area and maintain accurate meal counts, an SFA must be familiar with the following terminology:

*A la carte* – Refers to food items available for cash sale independent of the reimbursable meal. Items sold a la carte are not counted at the POS for purposes of receiving reimbursement. Food service staff must be able to properly distinguish reimbursable meals from a la carte purchases.

*Benefit issuance document* – A document (can be electronic or handwritten) that lists each student enrolled in the school and their school meal benefits status: free, reduced-price, or paid. This document must be kept confidential. Accurate maintenance of this document is a requirement of the NSLP and SBP.

*Eligibility status* – A student's free, reduced-price, or paid status as determined by:

- submission of an Application for Educational Benefits
- living in a household that is receiving Program Assistance benefits—Supplemental Nutrition Assistance Program (SNAP), Minnesota Family Investment Program (MFIP), Food Distribution Program on Indian Reservations (FDPIR)
- identified as a foster child, enrolled in Head Start
- certified by the proper liaison as a homeless, migrant, or runaway child.

*Offer versus Serve (OVS)*—A provision that allows students to decline a specific number of food components/food items depending on the menu planning approach used.

*Overt identification* – Any action that may result in a child being recognized as potentially eligible to receive, or be certified for, free or reduced-price school meals or free milk.

*Point of Service (POS)* – The point in the food service operation where a determination can accurately be made that a reimbursable free, reduced-price, or paid lunch has been served to an eligible child.

*Reimbursable* – A meal that meets federal requirements for meal components and dietary specifications.

## Meal Count Documentation

### Point of Service and Meal Counting Options

The SFA may use an electronic, manual/combination, or manual system for the POS.

1. An electronic system requires a POS software program. It includes steps like students swiping a meal card, students entering an identification number on a key pad, or a food service employee checking the students into the computer system at the POS. There are several POS software systems available for purchase on the market. The SFA should select a program that is appropriate to meet the needs of their site(s).
2. A manual/combination system is utilized when a food service employee uses a student list. The employee uses this roster to check students off at the POS as they receive a reimbursable meal. Once meal service is completed, the employee enters the students into a POS software program for counting purposes.
3. A manual system is utilized when a food service employee uses a student list to check students off at the POS as they receive a reimbursable meal.

Electronic, manual/combination, or manual systems are allowable for use at the POS, as long as the system and process used yields an accurate count of the total number of free, reduced-price, and paid reimbursable meals served.

**When the SFA's meal counting process involves several steps, multiple transfers of counts from one document/computer to another and/or many different sub processes within the main meal counting process, there is a high likelihood of errors occurring. The POS and subsequent meal counting process should be streamlined and consistent.**

### Edit Checks

An edit check refers to the procedure(s) used by the SFA to compare each site's daily counts of free, reduced-price, and paid meals against the number of children in that site currently eligible for free, reduced-price, and paid meals **and** the attendance adjusted enrollment. This process is required to be completed *prior* to submitting a claim for reimbursement. The process may be automated (completed by a POS software system) or manual. The SFA must have edit checks in place in the meal counting and claiming processes to ensure accuracy of the claims submitted and amounts received for reimbursement. See the [CLICS Claims and Reporting Page](#) for manual edit check and combination tools.

## Recordkeeping and Retention Requirements

The daily meal counts by school are required to be retained for three years plus the current school year for Child Nutrition Programs. An auditable record must be kept on file. If paper documents, dry erase sheets/boards, or other disposable forms of record keeping media are utilized, the data must be physically or electronically retained.

## Point of Service Considerations

### Backup Counting System

The SFA should have a method to collect meals in case the electronic system fails or if the individual assigned to take meal counts is unexpectedly not available. All SFAs who use an electronic system must have a backup system (e.g. a paper checklist). It is recommended that SFAs have written internal procedures on their meal counting system, including the back-up system, for staff.

### Staff Training

All staff, including substitute employees who work at the POS, must receive adequate training. POS training includes two things:

1. Staff must understand the importance of checking in every student who receives a meal.
2. Staff need to be able to recognize when a student has selected a reimbursable meal.

Staff training may occur by attendance at state agency training or local training provided by the food service director. If training occurs at the local level, a sign in sheet and agenda must be kept on file for three years plus the current year.

### Reimbursable Meals Signage

In order to have a compliant POS system, the SFA must identify near, or at the beginning of the service line, what constitutes a reimbursable meal. Signage allows students to know what items they must select in order to have their meal count as reimbursable. It also helps students avoid selecting additional a la carte items that they do not wish to purchase. Identifying a reimbursable meal may be accomplished by utilizing signage and/or white boards that are updated daily.

### Meal Signage Printable Tools:

[Breakfast and Lunch Menu Boards](#) – Minnesota Department of Education (MDE)

[Offer versus Serve National School Lunch Program Posters](#) – (USDA)

### Overt Identification

Maintaining the confidentiality of a student's free, reduced-price, or paid status is of the highest importance. SFAs must ensure that a student's eligibility status is not disclosed at any point in the process of providing free or reduced-price meals. Overt identification can be a challenge at the POS. Students may need to provide money and/or a fund balance may be visible on a computer screen if an electronic POS system is being used. Schools

must ensure, to the maximum extent practicable, that the method of payment at the POS system does not result in children being inadvertently identified as receiving free or reduced-price meal benefits and that student benefit status is never visible at the POS.

## **Incomplete/Non-reimbursable Meals**

If it is identified at the POS that a student has not selected a reimbursable meal, there are two options:

1. The food service employee can request the student return to the meal service line and select the necessary food component(s) to provide a reimbursable meal. If the student goes back and makes the necessary additions to their meal, they can be included in the meal count and no further action is necessary. In order to make it easier for students to select a reimbursable meal, some schools choose to keep commonly missed items at the point of service for students to grab, such as whole fruit, dried fruit or packaged grain items.
2. If the student declines to return to select the required food components, the student must be charged a la carte pricing for each individual item on their tray. In this option, their meal cannot be counted and claimed for reimbursement.

## **Second Meals**

Schools choosing to offer students a second meal may not claim these meals for federal reimbursement. They should ensure that the second meal counts are separately recorded. Second meals must be charged at the adult meal price at a minimum so that all costs associated with producing the meal are recovered.

## **Visiting Student Meals**

Students who are enrolled in one school but are visiting a school in another school district (and whose benefit status is undocumented) can be charged the student meal price and claimed as paid. If there is an agreement among school districts and benefit status is documented, the visiting student may be charged and claimed in accordance with his or her benefit status. Students and/or siblings who are not enrolled in any school must be charged the adult meal price.

## **Student Worker Meals**

Schools with student workers must claim these meals according to the benefit issuance list which documents free, reduced-price, or paid status. If compensation is provided, student workers must be compensated through a means other than a free meal.

## **Adult and Non-Student Meals**

Meals may be served to adults at sites at the discretion of the SFA. Adult meals are treated differently than meals served to children, as adult meals are not counted and claimed for reimbursement. Adults should be served the same portion size as 9-12 grade students or charged additionally for larger portions.

Adults are classified as either a program or a non-program adult.

1. Program adults are directly involved with School Nutrition Programs (for example: cooking, serving, taking meal counts, claims, billing, processing applications for free/reduced price meals, clearing the kitchen) as volunteers or paid employees and spend at least 50 percent of their time at the school performing these School Nutrition Program tasks. Meals may be served free to adults who meet this

definition at the SFA's discretion. These meals may not be claimed for reimbursement, but may be counted as legitimate operating costs from the nonprofit foodservice fund.

2. Non-program adults spend less than 50 percent of their work hours in School Nutrition Programs at the site, such as a teacher or school staff. SFAs must charge at least at the minimum adult lunch and breakfast prices that the Minnesota Department of Education (MDE) announces each year. Refer to the Adult Meal Pricing Requirements document, available on the Meal Pricing and Non-Program Foods page of the MDE Food and Nutrition Services (FNS) website, or use other non-program funds to cover the cost of non-program adult meals

## Field Trips

Providing meals on field trips is not mandatory, but at the SFA's discretion. It is recommended that SFAs consider a way to ensure students receive adequate nutrition on the day of a field trip. If meals are provided on a field trip, they should be available to all students, regardless of free, reduced-price or paid eligibility status at the rate normally charged for meals. If cafeteria meal service times are altered to feed students leaving or returning from a field trip, all lunches must be served within the USDA approved times of 10am and 2pm in order to claim the meals for reimbursement.

OVS is not required as part of field trip meal service. The SFA must devise a local process to accurately count meals served at off-site events at the POS. An example of this would be a teacher checking off students on a paper student list at the POS at the field trip site. The student list would need to be returned to foodservice to be entered into the total meal counts for the day. Another option is to have students come through the cafeteria, select a bag lunch and enter their PIN prior to leaving for the field trip. Counts of bag lunches sent or returned or field trip attendance counts may not be used as a meal count.

More information related to requirements for menu planning is available for [Special Circumstance Meals](#), such as field trips, on the MDE website.

## Students without Funds to Pay for Meals

The SFA must create and implement a Student Meal Charging Policy. This policy is created at the local level. The effectiveness of the Student Meal Charging Policy and how unpaid balances are addressed at the end of the school year will be observed during an administrative review. See the [Meal Pricing and Non-Program Foods](#) page for resources related to the Student Meal Charge Policy. Students should not be denied a meal in a way that demeans and/or stigmatizes the student.