

Alternative Meal Counting and Claiming Requirements

Per 7 CFR 210.7(c)(2)(i), State Agencies may authorize alternatives to the point of service lunch counts provided that such alternatives result in accurate, reliable counts of the number of free, reduced price and paid lunches served, respectively, for each serving day. The traditional method for a point of service meal count system involves an exchange of medium to document that a reimbursable meal was served. This documentation is tied to an individual child's identity and eligibility status so that the meal claimed by eligibility status can be validated. Examples of documents used in the traditional method include the use of rosters, tickets, pin numbers, finger print scans, etc...

Increasingly more schools are adopting special provision options in which reimbursement is based upon the total number of meals served and not the individual eligibility of the children, such as in a Provision 2 non-base year and the Community Eligibility Provision. In these instances alternative points of service is an acceptable method of meal counting provided they still provide accurate count of the number of reimbursable meals served to eligible children.

Acceptable alternative points of service:

- Are not based on attendance.
- Are not based on tray counts, bag counts, milk usage counts, etc.. The meal count totals are an actual count of the number of reimbursable meals observed by staff to have been served to eligible children.
- Have written procedures for ensuring that second meals served are not counted for reimbursement and are appropriately charged as ala carte sales.
- Utilizes forms or other documents that correctly identify the meal service type, the date of the meal service and has a signature certifying that the meal counts are correct and only those eligible for reimbursement are marked by the individual counting and documenting the number of meals served.
- Utilizes documents in which the method that meals are marked clearly indicates that each meal was individually counted. Example, a meal count form similar to the daily meal count sheet used for SFSP is utilized to count meals served in the classroom. Each number must be marked individually in order to be a valid meal count.

Any alternative point of service system must be included in the SFA's meal counting and claiming procedures in their Policy Statement on file with the State Agency. The meal counting and claiming procedures must clearly demonstrate that accurate meal counting practices are instituted, provide a description of the procedures that will be used to ensure that there are no second meals counted for reimbursement, identify which schools will employ the alternative POS system, provide a description of the internal controls that will be employed to monitor for problems in the meal counting system and a provide a copy of any forms that will be used.

Additionally, SFA's must provide and maintain documentation of training on the alternative point of service procedures with all applicable staff (whether or not they are Child Nutrition staff) as well as the required USDA civil rights training and applicable HACCP procedures.