

# Meal Counts, Overt ID and Claims Review Process

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MISSISSIPPI  
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# Meal Counts

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- **Eligibility Documentation** – Meal Applications/DC(SNAP)
- **Collection Procedures** – Prevent overt identification
- **Point of Service Meal Counts** – Meet meal patterns/eligible students/counted daily by category

- **Accuracy** in counting, recording, and claiming the number of reimbursable meals served to students.
- **Documentation** on file that adequately supports the number of free, reduced priced, and full priced meals claimed.
- Have in effect an approved **medium of exchange**. (This includes any type of ticket, token, ID, name or number issued to the student to obtain a reimbursable meal.)

- **Reports** - reimbursable meals/ edited –consolidated for claims
- **Claim for Reimbursement** – *File meal counts by category (Snacks, Breakfast and Lunch)*
- **Internal Controls** -Edits and monitoring

- Have in place a method of prepayment and/or post billing (charging) in place.
  - Post billing (charging) is seldom recommended. Refer to your District's policy on meal charges.
  - *NOTE: post billing (charging) is allowed ONLY for students; teachers and adults must prepay or pay at POS*
- Point-of-service counting and claiming procedures that are acceptable.
- A method that is effective in determining reimbursable meals.
- All students have equal access.
- Consumption of meals on campus or at school.

Some type of backup system must be in place in case the main system fails. Best practices include periodically printing out **rosters** and backing up claim numbers in case the main system loses them.

# Preventing Overt Identification

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Any **action** that can **identify a child** as approved or potentially eligible to receive F/RP school meals or free milk.

A school food authority (SFA) must ensure that it does not disclose a child's eligibility status at any point in the process of providing F/RP meals, including

- notification of the availability of F/RP benefits,
- certification and notification of eligibility,
- provision of meals in the cafeteria, point-of-service, (POS) meal counts,
- and/or through the payment method.

## Title 7, Code of Federal Regulations (7 CFR), Section 245.8 prohibits SFAs from:

- Publicizing or announcing F/RP eligible households or children's names
- Using different mediums of exchange for F/RP school meals
- Having separate dining areas, service times, or serving lines for F/RP meals
- Limiting choices of reimbursable meals for F/RP meals
- Requiring that children work for their meals

- The coding, distribution, and collection process of the medium of exchange selected must ensure that the meal count/collection system used prevents overt identification of free and reduced-price meal recipients.
- When collecting the medium of exchange, use common serving areas, dining areas, and serving times, during the meal service for all students.

- Procedures for free, prepaid reduced price, and prepaid full price must be the same.
- Meal types must meet nutritional requirements
- May not identify free or reduced-price meals in regards to special functions, field trips, etc.

The F/RP Policy Statement must:

- Describe the procedures the SFA uses to distribute and collect F/RP applications and how the procedures prevent overt identification
- Describe the method(s) the SFA uses to collect payments from students paying the full price of a meal or milk, or the reduced price of a meal; the description must include how the method(s) prevents the overt identification of the students receiving F/RP meals or free milk

The F/RP Policy Statement must:

- Describe how the SFA prevents overt identification at the POS when serving free, reduced-price, or paid meals
- Describe how cafeteria staff and all meal service procedures, including those for competitive foods, prevent overt identification of students receiving F/RP meals or free milk
- Describe how an SFA that accepts both cash and electronic payments prevents overt identification of F/RP students

The following are payment considerations that prevent overt identification:

- SFAs must ensure to the maximum extent practicable that the method of payment does not identify a student as eligible for F/RP meals.
- SFAs must take steps to ensure that students cannot view rosters, computer screens, or other equipment used at the POS

The following are payment considerations that prevent overt identification:

- SFAs should mask or code information on the rosters or screens to prevent students or staff who should not see information regarding a student's eligibility status from being able to do so.
- Obvious identifiers such as F, R, P, or color coding by category are prohibited.



# Claim for Reimbursement

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- Average Daily Attendance (ADA)
- Average Daily Enrollment (ADE)
- Percentage of Enrollment Present (Attendance Factor)
- Average Daily Participation (ADP)

- The District is responsible for ensuring the claim for reimbursement is based on an accurate meal count by category, regardless of the system or procedure used.
- Districts can never claim more free, reduced priced, or paid meals than are served to eligible children.
- Districts will be required to repay any overclaim amounts in excess of the number of free, reduced price, paid, or total number of enrolled students claimed.

- All claim reimbursements must be based on a daily meal count, taken at the point of service.
- Only one breakfast and one lunch per eligible child per day may be claimed for reimbursement.
- Each day, eligibility, attendance, and enrollment must be compared to the claim for reimbursement prior to submission to ensure meals served are not in excess of students who participated.
- The edit check process must be completed monthly so any potential overclaims can be resolved before claim submission.

- Before February 1<sup>st</sup> of each year, the SFSA must conduct an on-site review of each school in the District.
  - Note: single site SFAs are exempt from this requirement, however conducting the monitoring visit is still encouraged
- A follow-up review must be conducted within 45 calendar days of the first review if any problems were addressed and corrective action was required.
- A big part of the on-site monitoring is to make sure that your meal counting and claiming procedures is accurate.

- All children who are enrolled in the District are eligible to participate in the National School Lunch Program (NSLP) or School Breakfast Program (SBP). They may or may not choose to participate.

- POS & Meal Counting Manual
- SP 45-2012: Preventing Overt Identification
- School Lunch Daily Report



# What Questions Do You Have?







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