

Category: **STUDENTS**

Issued: 6/18/09

Number: **A-815**Subject: ADMINISTRATION AND ACCOUNTABILITY IN THE SCHOOL  
FOOD SERVICE PROGRAM

Page: 1 of 1

**SUMMARY OF CHANGES**

This regulation supersedes Chancellor's Regulation A-815 dated August 23, 2005. It provides basic information on required accountability procedures for the school food service program.

**Changes:**

- The regulation has been updated to add new, approved methods of accountability, including the Key Tag Card, electronic Point-of-Sale (POS), and the Comprehensive Attendance, Administration, and Security System (CAASS).
- The regulation adds new accountability procedures for principals at participating non-public schools to document student eligibility in the Non-Public School Information System ([NPSIS](#)).
- The regulation adds proper procedures for principals and their designees for preparing the meal claim report for all meals served for breakfast and lunch.
- The regulation adds the direction for accessing the procedures to implement a cash collection system for reduced and full-priced participating students and preparing the cash receipts report for monies collected from students and households.

## ABSTRACT

This regulation provides basic information on accountability procedures to substantiate all claims for reimbursement submitted by the Department. The potential loss of revenue if proper procedures are not followed could adversely affect the food service programs. It is the responsibility of all personnel involved in the School Meals Program to familiarize themselves and adhere to these instructions.

### I. MEAL ACCOUNTABILITY

- A. An approved accountability system must be in effect from the first day of the school year. A child's eligibility from the previous year is applicable through the first 30 operating days of the school year, otherwise known as the carryover period, or until a new eligibility determination is made in the new school year, whichever comes first. Accountability is hereby defined as those methods and procedures used to accomplish the following:
1. Provide an accurate, documented daily Point-of-Service count of the number of breakfast and lunch meals served to children according to each child's eligibility category (free, reduced price, or full price) regardless of where meals are being consumed (e.g., cafeteria, classrooms, etc.) and;
  2. Ensure that meals served contain the required food components: three out of four mandated components at breakfast and three out of five components at lunch.
- B. The documented count of meals claimed for reimbursement is taken at a *Point-of-Service*, which is defined as that point in the food service operation where an accurate determination can be made that a reimbursable meal has been served to an eligible child. Either the principal or SchoolFood shall designate a staff person to be responsible for the meal accountability of students that participate in the program. All principals or designees are required to certify their school's breakfast and lunch participation and cash collections by submitting a [Report of Meals Served \(MIE-1\)](#) and a [Cash Receipt Worksheet \(MIE-2\)](#) form weekly. The two forms should be accompanied by a check, when applicable, to the Office of SchoolFood for the purpose of preparing a claim for federal and state reimbursement.
- C. Provisions must be made for the [collection and documentation of monies](#) for those participants required to pay full or reduced price for their meals. Detailed procedures on preparing the claim report for meals taken by students and for cash collection can be found in the Office of SchoolFood Finance Memos [FS-2](#), [FS-6](#) and [FS-7](#) which are sent annually to each school and posted on the SchoolFood website: <http://www.opt-osfns.org/osfns/resources/financialmemos/>. In instances where there is a cash register or system in place to collect reduced and full-priced monies at the Point-of-Service, a SchoolFood employee will be responsible for this function.
- D. Under *no* circumstances may a principal or a designee implement any accountability method other than those specified in this regulation. If any other method is preferred, that proposed method must be submitted in writing to the Office of SchoolFood for evaluation and written approval by the State Education Department. (The OSF address can be found at the end of this regulation.)

If a reimbursement disallowance is invoked by a federal or state agency because an individual school has not implemented an approved method of accountability or other requirement of the breakfast, lunch, or other meal program, the resulting loss of revenue will be addressed by the Executive Directors of Integrated Service Centers (ISC) in the manner outlined by the Chancellor's Office of Finance.

## II. APPROVED METHODS OF ACCOUNTABILITY

- A. One of the following [meal accountability methods](#) must be used to record the meals provided to students with the current year meal codes as reflected in [ATS](#) and [NPSIS](#):
1. An [electronic coded class or grade list](#) generated from [ATS](#) or [NPSIS](#);
  2. A manual [Numbered or Name Roster](#) system;
  3. [Permanent Meal Cards](#) with Numbered Roster (may be used in all schools);
  4. A [Key Tag Card](#), which replaces the Stub Book and is recommended for use in intermediate, junior high, and high schools; and
  5. [Electronic Point-of-Sale \(POS\)](#) system or the Comprehensive Attendance, Administration, and Security System ([CAASS](#)).
- B. Regardless of which method is used, there are functions that must occur at all schools:
1. The principal or designee must first determine student eligibility by an approved mechanism such as automatic coding in [ATS](#) or [NPSIS](#), a completed [School Meals Application](#) or valid Direct Certification letter.
  2. The accountability method must not allow for the overt identification of students by eligibility category, i.e., by physical segregation, the appearance of the meal card, an announced or published list of names, or by other means.
  3. At the end of each day's service, the cashier or principal's staff person must prepare and report the total number of meals served by eligibility category by the cashier or principal's staff person must be made and reported to the person responsible for completing the [Report of Meals Served \(MIE-1\)](#).
  4. Principals must assign a staff person to conduct separate Point-of-Service accountability at locations where there are multiple schools or other programs. Report meals served on the same [Report of Meals Served \(MIE-1\)](#). The staff person will report the student participation as outlined above and then give the final numbers to the designated main school staff person on a daily basis.
  5. When reporting daily meal participation for breakfast and lunch, all meal counts must be tallied and recorded on the weekly [Report of Meals Served \(MIE-1\)](#) form by eligibility categories of free, reduced, and paid. To ensure that all student meals are claimed accurately, the designated meal codes assigned to each participating student must be tallied daily from electronic systems (POS and CAASS), manual rosters, or meal cards as follows:  
  
Meal Code "A" and "1" counts are to be combined and recorded as **Free**;  
  
Meal Code "2" counts are to be recorded as **Reduced Price**; and  
  
Meal Code "3", "4" and "5" counts are to be combined and recorded as **Full Paid**.  
  
Daily meal counts for free and reduced price meals may not exceed the current number of eligible students on register in those categories.
- C. Detailed written descriptions of the [approved methods of accountability](#) are available from the Office of SchoolFood. SchoolFood personnel are also available to provide instruction on all requirements and consultation on which method may be most appropriate in a particular situation. If there are any immediate questions, the principal should discuss them with the SchoolFood Manager assigned to the school.

## III. DOCUMENTING ELIGIBILITY

- A. Administrative procedures must always be in place for the identification, by eligibility, of all students presenting themselves for meal service, including procedures to identify those students who have lost or misplaced their meal card. All student eligibility must be

documented in the official student databases, Automate the Schools ([ATS](#)), or the Non-Public School Information System ([NPSIS](#)), either automatically through a computer match or manually from a [School Meals Application](#) or Direct Certification letter (*see [Chancellor's Regulation A-810](#)*).

1. For public schools and participating charters, [ATS](#) will serve as the basis for all student meal accountability, and a master listing for student meal identifiers will be generated directly from the [ATS](#) RMEL report.
  2. For participating non-public schools, the [NPSIS](#) will serve as the basis for all student meal accountability and a master listing for student meal identifiers will be generated directly from this system.
  3. At schools where neither [ATS](#) nor [NPSIS](#) systems are in place, an accurate manual listing must be developed and maintained based on current eligibility requirements.
- B. Schools may continue to use the previous year's eligibility recorded on meal rosters or master eligibility list for the first 30 operating days of the school year (beginning the first day of the school year) – this is known as the eligibility carryover period. Thus, schools should generate their meal roster or master eligibility lists from [ATS](#) and [NPSIS](#) as soon as school opens for use through the eligibility carryover period only.
1. By the middle of September, all existing meal code designations from the prior school year will be removed (deleted) from [ATS](#) and [NPSIS](#) and a computer match of all students with Human Resources Administration data of recipients of public assistance (Temporary Assistance to Needy Families (TANF)) and food stamps will be conducted. Any matching students will automatically be coded in [ATS](#) and [NPSIS](#) as eligible for free lunch regardless of whether or not the family submits a completed School Meals Application. The scheduled date of when the meal codes will be deleted shall be communicated in the annual [student eligibility memorandum](#) distributed to schools, posted on the Office of SchoolFood website during the last week of August and announced in the [Principal's Weekly](#).
  2. At the end of the eligibility carryover period, meal rosters and other tools for Point-of-Service eligibility checks (e.g., class rosters, ID and Key Tag Cards) must be generated using the meal code reports from [ATS](#), [NPSIS](#), or manual listing, and eligibility must be based on current year data.

#### IV. RETENTION OF RECORDS

All permanent meal cards, manual rosters, or electronic transaction records, [Report of Meals Served \(MIE-1\)](#) forms, [Cash Receipt Worksheet \(MIE-2\)](#) forms and any other records (e.g., cash register tapes) associated with the school's method of accountability must be kept on file at the school for four years and be available for review by city, state, and federal auditors during regular school hours. Schools in the first or base year of the Universal School Meals (USM) program are required to retain all base year documentation for an additional three years after the USM cycle ends for a total of seven years.

#### V. UNIVERSAL SCHOOL MEALS (USM) PROCESS

- A. First or base year, all schools must:
1. issue a [School Meals Application](#) (SD1041) to each student at the school;
  2. certify student meal applications as free, reduced price, or paid in accordance with the current federal guidelines and Chancellor's Regulation A-810;
  3. implement one of the methods of accountability as outlined above in Section II.A: Approved Methods of Accountability;
  4. ensure that all student meals are claimed accurately at the Point-of-Service on a daily basis per eligibility category as free, reduced price, or paid based on meal counts taken from the accountability system;

5. implement the method of accountability daily at breakfast and lunch service, including on half days and trip days, and for classroom or other locations where meal service occurs;
  6. ensure that no money is collected for breakfast or lunch, except for student and adult a la carte sales;
  7. complete and submit [Report of Meals Served \(MIE-1\)](#) and [Cash Receipt Worksheet \(MIE-2\)](#) forms to the SchoolFood Manager on the Monday following the week of service; and
  8. retain all records (applications, manual rosters, or electronic transaction records, MIE-1 & 2 forms, master listings, etc.) on file for four years (the first/base year plus three additional years) if the school is not approved for universal meals. If the school is approved, the base year records are kept for an additional three years after the end of the Universal Meals Program cycle, totaling seven years.
- B. After State Education Department's Approval for USM (Years 2 through 4)
1. On a daily basis, at the Point-of-Service, the principal's staff person or SchoolFood employee responsible for meal accountability must count the number of complete breakfast and lunch meals served to students. A clicker, the approved method of accountability, must be used to take the meal count. Tray, milk, food portions or deduction methods are not acceptable methods of counting meals.
  2. Meals that are served to students and claimed for reimbursement must be complete meals. The meal must contain the required food components. Therefore, a reimbursable student breakfast must have at least three out of the four food components. A reimbursable student lunch must have at least three out of the five food components.
  3. At the end of each day, the principal's staff person or SchoolFood employee must provide the total number of complete breakfast and lunch meals served to students to the person preparing the [Report of Meals Served \(MIE-1\)](#). This number must be recorded on the "**Total**" line only.

## VI. SALE OF DAILY MEAL CARDS

- A. Junior high or high schools that use meal cards and are not currently in the Universal School Meals (USM) program are required to prominently post a sign in the cafeteria in order to ensure that these cards are available for purchase **prior** to the meal. The [Sale of Daily Meal Cards Notice](#) should be placed in a location where it can be seen by students and should include the time and location where the meal cards can be purchased.
- B. This information should also be included in homeroom notices that are verbally announced or visibly posted for students to read.

## VII. INQUIRIES

Inquiries pertaining to this regulation should be addressed to:

Telephone: 718-707-4471	<i>Office of SchoolFood Compliance and Monitoring Unit</i> N.Y.C. Department of Education 44-36 Vernon Boulevard Long Island City, NY 11101	Fax: 718-349-5463
----------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------