



Regulation of the Chancellor

Category: STUDENTS

Number: [A-815](#)

Subject: ADMINISTRATION AND ACCOUNTABILITY IN THE SCHOOL FOOD SERVICE PROGRAM

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Issued: 8/23/05

SUMMARY OF CHANGES

This regulation supersedes A-815 dated July 21, 2004.

It provides basic information on required accountability procedures for the school food service program.

Changes:

- The regulation has been updated to add another approved method of accountability
- The regulation adds new accountability procedures for principals at locations with multiple schools and/or programs.



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ABSTRACT

Breakfast and lunch service must begin in public schools on the first day of school sessions and be served and accounted for every school day including administrative half-days. 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 both educational and nutrition programs. It is the responsibility of all personnel involved in the School Meals Program to familiarize themselves and adhere to these instructions.

I. ACCOUNTABILITY

- A. 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 breakfasts and lunches 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. Provisions must be made for the collection and documentation of monies for those participants required to pay full or reduced price for their meals.

II. 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 had their meal card or stub book stolen. All student eligibility must be documented in ATS, either automatically through a computer match, or manually from a SD1041 application or Direct Certification letter (*see Chancellor's Regulation A-810*).



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1. 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 run.
- B. During September, schools may continue to use the previous year's meal rosters or master eligibility list until October 21, 2005. Thus, public schools should preserve their meal rosters or master eligibility lists generated from ATS as soon as school opens for use until this date only.
 1. By the middle of September, all existing meal code designations will be removed (deleted) from ATS and a computer match of all students with Human Resources Administration data on 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 as eligible for free lunch regardless of whether or not the family submits a completed school lunch application.
 2. Beginning October 24, 2005, meal rosters and other tools for Point-of-Service eligibility checks (e.g., class rosters, ID cards and meal stubs) must be generated using the RMEL report from ATS, and eligibility must be based on current-year data. Schools should not use hand-written rosters.

III. MANDATED METHODS OF ACCOUNTABILITY

- A. The following accountability methods (and only these), all of which must conform to current year meal codes reflected in ATS, may be used:
 1. A coded class list from RMEL in ATS (may be used in all schools).
 2. Permanent Meal Cards with Numbered Roster (may be used in all schools).
 3. Stub Book (may be used in intermediate, junior high and high schools).
 4. Electronic Point-of-Service (POS) system.
- B. No matter which method is used, there are some functions that remain the same.
 1. The principal or designee must first determine student eligibility by an approved mechanism such as automatic coding in ATS, a completed SD1041 form or valid Direct Certification letter.
 2. The accountability method may not allow for the identification of students by eligibility category by the physical appearance of the card, stub, etc.
 3. At the end of each day's service, totals must be made of the meals served by eligibility category by the cashier or principal's staff person and reported to the person responsible for completing the Report of Meals Served (MIE-1).



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4. At locations where there are multiple schools or other programs that will report the meals served on the same claim report (Report of Meals Served Form "MIE-1"), those principals must assign a staff person to conduct separate Point-of-Service accountability. 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. Appropriate documentation must be maintained for three years plus the current year.
- C. Detailed written descriptions of the approved methods of accountability are available from the Office of SchoolFood. SchoolFood field staff is 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 questions, the principal should discuss them with the SchoolFood Manager assigned to the school.

IV. UNIVERSAL SCHOOL MEALS PROCESS

A. First or Base Year

1. The school must issue a lunch application (SD 1041) to each student at the school.
2. The school must certify student lunch applications as free, reduced price or paid in accordance with the current federal guidelines and Chancellor's Regulation A-810.
3. The school must implement one of the methods of accountability as outlined above.
4. The school must ensure that all student meals (breakfast and lunch) 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. The method of accountability must be implemented daily at breakfast and lunch service, including on half days and trip days and for classroom or other locations where meal service occurs.
6. No money is to be collected for breakfast and lunch, except for student and adult a la carte sales.
7. An MIE-1 (Report of Meals Served) form and MIE-2 (Cash Receipt Worksheet) form must be completed and submitted to SchoolFood Manager on the Monday following the week of service.



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8. The school must retain all records (applications, rosters, stubs, MIE-1 & 2 forms, master listings etc.) on file for three years plus the current year if the school is not approved for universal meals. If the school is approved, the records are kept for the same duration after the end of the universal meals cycle.

B. Years 2-4 (After SED Approval as a Universal Meals School)

1. On a daily basis, at the Point-of-Service, the principal's staff person must count the number of complete breakfasts and lunches served to students. A clicker must be used to take the meal count. Tray, milk, food portions or deduction methods are not acceptable methods of counting meals.
2. At the end of each day, the principal's staff person must give the total number of complete breakfasts and lunches served to students to the person preparing the MIE-1 form. This number must be recorded on the total line only.
3. 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.

V. **POSTING OF SIGN FOR SALE OF DAILY MEAL CARDS OR STUBS**

- A. In non-Universal School Meals schools, a sign must be posted conspicuously in the cafeteria in order to ensure that daily meal cards or stubs are available for purchase **prior** to the meal. That sign should read:

DAILY MEAL CARDS OR STUBS ARE AVAILABLE FOR PURCHASE DAILY.

- B. This notice should also be included in homeroom notices that are read to students.

VI. **ADMINISTRATION OF ACCOUNTABILITY SYSTEM**

- A. Under *no* circumstances may a principal or a designee implement any accountability method other than the ones specified in this regulation. If any other method is preferred, that proposed method must be submitted to the Office of SchoolFood address listed at the end of this regulation for submission for evaluation and written approval by the State Education Department.

- B. 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 made up from the tax levy funds of the responsible school district or instructional division.



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VII. REPORTING OF BREAKFAST AND LUNCH DATA

- A. All principals or designees are required to certify their school's breakfast and lunch participation and cash collections by submitting weekly a Report of Meals Served (MIE-1) form and a Cash Receipts Worksheet (MIE-2) form with accompanying check to Office of SchoolFood for the purpose of preparing a claim for federal and state reimbursement.
- B. 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 October 21, 2005 or when a new eligibility determination is made in the new school year, whichever comes first.
- C. All permanent meal cards, stubs, rosters, daily lunch tickets/cards, MIE-1 forms, 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 three years plus the current year and be available for review by city, state and federal auditors during regular school hours.

VIII. INQUIRIES

Inquiries pertaining to this regulation should be addressed to:

Telephone
(718) 707-4250

Office of SchoolFood
Internal Audit Unit
NYC Department of Education
44-36 Vernon Boulevard
Long Island City, NY 11101

Fax
(718) 349-5463