



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
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**FOOD SERVICE  
ADMINISTRATIVE MEMO NO. 5  
SCHOOL YEAR 2023-2024**

**SUBJECT:** Proper Point of Service Meal Counting for School Nutrition Programs

**DATE:** March 11, 2024

The United States Department of Agriculture requires proper Point of Service (POS) meal counting in School Nutrition Programs. POS meal counting is an essential process in the day-to-day meal service. Meal counts must be accurately collected at the POS, where meals are served, and this data must be maintained and submitted at the end of each month for reimbursement.

What is POS? It is the point in the meal service process when you determine if a student has chosen or received a reimbursable meal. An accurate meal counting and claiming system is a requirement for all Child Nutrition Program sponsors. There must be a system in place to ensure that students are receiving one reimbursable meal per meal service, regardless of where the meals are served (such as breakfast in the classroom, cafeteria for lunch) and additional meals or items are being charged a la carte prices.

POS Counting System Requirements:

- Counts are taken daily at the POS to make sure a reimbursable meal is served to students.
- Counts are taken by student eligibility category (free, reduced-price, or paid), based on their approved application or Direct Certification list.
- Edit checks ensure that free, reduced-price, and paid meals claimed do not exceed the number of eligible students on file in attendance that day.
- If an electronic POS is used, there must be a back-up system in place in case of malfunction to document reimbursable meals at POS.
- Adult meals, a la carte items, and second meals are not included in counts that are claimed for reimbursement.

An improper POS system can result in submission of inaccurate claims and loss of reimbursement, fiscal consequences of paying back federal and state funds, or overt identification or lunch shaming of students who receive free or reduced-price meals.

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Community Eligibility Provision (CEP) schools may use different methods for counting meals because individual student eligibility is not collected. However, meal counts still must reflect the exact number of meals served per meal service with an acceptable counting system. Schools that are participating in the Michigan School Meals program still need to claim students based on the individual student eligibility, unless it is a CEP school. The Michigan School Meals program does not mean that all students are claimed as free. Accurate POS by student eligibility is still required.

What are edit checks? Edit checks are the procedure used by the sponsor to compare each school's daily counts of free, reduced price, and paid lunches against the product of the number of children in that school currently eligible for free, reduced price, and paid lunches, respectively, times an attendance factor (93.8%). Edit checks help identify consolidation or POS errors before claiming. It is a daily check to make sure there is an accurate claim for reimbursement. CEP and traditional claiming schools must all perform edit checks. If the sponsor uses a software program that automatically performs a daily edit check, the sponsor must review the computerized edit check to ensure that accurate data is reported every day. A daily summary report should provide the information. Electronic POS must provide more than just the total meals served at the end of the month.

#### Acceptable POS Counting Systems:

- List of students by classroom (class roster) check list, that is checked off when the student receives the meal
- List of students in the entire school check list, that is checked off when the student receives the meal
- Laminated barcode I.D. cards that are scanned at the POS
- Collecting meal tickets at the POS
- Cash register code system, such as PIN number entered on a touchpad at the cash register
- CEP meal count forms – best practice for CEP schools is still to use an electronic POS that is by student name

Best practice for POS is to count meals at the end of the serving line after a student has had access to all the meal components and use an electronic POS.

#### Unacceptable POS Counting Systems:

- Reusable (wipe-off) rosters are no longer allowed
- Morning classroom counts of meal orders
- Counts based on attendance records
- Counts based on tickets sold in advance
- Counts based on the number of eligible children
- Counts taken at the beginning of the serving line with no verification that required components were taken
- Counts based on visual identification or memory
- Counts based on the number of trays or plates used
- Counts based on the number of meals produced (from production sheets) or sent to a classroom
- Systems that overtly identify free or reduced students

- Clicker counter at CEP schools
- Any system that allows students to be counted twice – seconds can be purchased a la carte, but cannot be counted for reimbursement

Alternate serving locations still require accurate POS counting. Alternate serving locations could include breakfast in the classroom, preschool classroom, special education classroom, or kiosk in the hallway. Training is required for all staff that count meals, including teachers.

If meals are served in multiple locations, the consolidation of meal counts must be done carefully. Using an Excel spreadsheet can help prevent simple math errors. Keep meal count sheets used at the POS, even if they are consolidated into an electronic format. Reusable (wipe-off) rosters are no longer allowed because the record cannot be saved. To reduce paper, a weekly roster could be used, as long as meals are recorded daily. CEP schools may also use the Child Nutrition Program (CNP) Count mobile app. It is available for download from the Apple App Store and Google Play Store. Documentation must be kept for three years plus the current fiscal year for all Child Nutrition Programs.

Benefit issuance roster must be kept up to date with the list of student names who are eligible for free and reduced-price meals if they are not district-wide CEP. It should be updated monthly when there are changes in eligibility or students withdraw from school. This list supports the monthly claim for reimbursement.

In summary, POS Counting Systems and methods must:

- Accurately count each meal served
- Be counted at the time a reimbursable meal is served
- Track who each meal was served to (unless a CEP school)
- Identify that student's eligibility

A [Point of Service Counting online training module](#) is available on the Michigan Department of Education's online training website.

If you have any questions, please contact your School Nutrition Program analyst or [MDE-SchoolNutrition@michigan.gov](mailto:MDE-SchoolNutrition@michigan.gov).