

# **School Breakfast Program Integrity**

## **GUIDEBOOK**

**Part of the Massachusetts  
After the Bell Toolkit Series**



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# School Breakfast Program Integrity Guidebook

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# I. School Breakfast Program Integrity Introduction

It is essential that Local Educational Agencies (LEAs) participating in the federal Child Nutrition Programs (CNP) develop and implement program integrity procedures to ensure compliance with the United States Department of Agriculture's (USDA) requirements that permit a School Food Authority (SFA) to receive reimbursement for each meal. The Massachusetts Department of Elementary and Secondary Education (DESE) administers the National School Lunch Program (NSLP) and School Breakfast Program (SBP) at the state level and ensures adherence to USDA CNP policies and regulations. The School Breakfast Program Integrity Guidebook was intended to help SFAs establish and implement systems to properly operate a successful School Breakfast Program in compliance with USDA regulations. This Integrity Guidebook was designed to set the regulatory framework and to be used in conjunction with the Massachusetts After the Bell Quick Guide Toolkit Series.

The fundamentals in this guidebook ensure program integrity of any School Breakfast Program whether in the cafeteria, in the classroom, or an alternative location. Alternative service models include serving Breakfast in the Classroom (BIC), Grab & Go at a kiosk in the hallway, or Second Chance Breakfast as a second opportunity occurring as part of the school day or during a break or passing time between morning classes. Alternative models have been shown to increase students' participation in the School Breakfast Program and are becoming more popular.

This guidebook addresses the seven essential elements of an acceptable meal counting and claiming system and reviews requirements specific to alternative breakfast service models. Also included are relevant links and resources in the DESE Security Portal to enhance the explanation of program integrity and specific on-demand modules from our online meal pattern training suite, Making It Count, which are highly recommended to test your knowledge.

# II. Meal Counting and Claiming

A participating SFA that meets the USDA accountability program requirements does so by implementing a robust meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed by category (i.e. free, reduced price and paid). The meal counting and claiming process must include a mechanism, whether manual or electronic, for counting meals and consolidating meal totals at each school within the SFA. The mechanism must include an internal control system that validates the total meal counts prior to the submission of the claim for reimbursement to DESE. This guidebook will review a few examples of meal counting and claiming processes.

The SFA must develop and maintain a meal counting and claiming system with the basic elements listed below. How each element is implemented may vary depending on the school. All necessary elements of a system must be in place and all food service personnel adequately trained before any meal counting and claiming system can meet accountability requirements.

## **Seven Essential Elements of an Acceptable Meal Counting and Claiming System:**

- |                                       |   |
|---------------------------------------|---|
| 1. Maintain Eligibility Documentation | 5. Submit Monthly Claim for Reimbursement |
| 2. Develop Collection Procedures      | 6. Conduct On-site Monitoring             |
| 3. Conduct Daily POS Meal Counts      | 7. Provide Staff Training                 |
| 4. Conduct Edit Checks                |   |

Each of these elements is critical in developing and maintaining a system of accountability. It is important to note all elements work together to build an acceptable system. No element should be left out or underemphasized.

## **1. Maintain Eligibility Documentation**

Program integrity relies on the student eligibility status system as the foundation for the NSLP and SBP. Sponsors need to develop procedures to maintain current student eligibility status throughout the program and school year. SFAs must have documentation to support the eligibility determination made for all categorically eligible free and reduced price students, though that is only the beginning of the process.

Regardless of the type of breakfast service model, the SFA needs to develop procedures that will ensure student names and eligibility statuses are accurately and timely documented. This includes:

- Eligibility documentation for each student receiving a free or reduced price meal
- An up-to-date number of eligible students in each category (free, reduced price and full price)
- Meal benefit issuance roster of students indicating their eligibility and source
- Accurate eligibility information within the medium of exchange (i.e. regularly transferred to school point of service locations or coded roster)

This needs to be accomplished while maintaining students' eligibility status as confidential information that does not need to be shared beyond the necessary individuals with integral roles in the SBP.

## **2. Develop Collection Procedures**

Once student eligibility is determined, SFAs must maintain good documentation to support the eligibility determination, including:

- A current, approved free and reduced price application
- Direct certification lists documenting students' exact match status for the current school year
- Student enrollment data documenting students' addresses when meal benefits are extended to members of the same economic (household) unit
- Homeless, foster and or migrant list as certified by the school district liaison

Collection procedures refer to all the steps within the meal count system involved in paying for meals and issuing and collecting the medium of exchange. The medium of exchange may be any type of ticket, token, meal card, ID card, name or personal identification number that is issued to the student for obtaining a meal. Procedures used must ensure that the medium of exchange prevents overt identification of students' eligibility status in the coding, distribution and collection processes.

## **i. Acceptable Mediums of Exchange**

***Coded Roster (paper or electronic)*** Students give their name in exchange for the meal. The cashier (or teacher or classroom aid for Breakfast in the Classroom) identifies and marks the name on the roster as the student is served a reimbursable meal. The paper roster is coded so food service personnel can count the number of students in each eligibility category following the meal service.

- Coding on rosters must prevent overt identification to protect students' confidential eligibility information. When determining how the roster or medium of exchange will be coded, be sure to consider which methods are prohibited and which are acceptable. The point of service should never overtly identify who is free, reduced price, or paid.

***Coded Tickets/Token*** This system includes any kind of (coded) tickets or tokens, which students present to the food service staff to obtain a meal.

***Personal Identification Numbers (PIN)*** The district assigns all students a PIN. The SFA enters the students' eligibility for free, reduced price and paid meals into the POS computer system. During the meal service students enter their PIN into the POS pin pad in exchange for their meal.

***Computerized Bar Codes*** The district provides all students with an ID card with a barcode or magnetic strip. The SFA enters the students' eligibility for free, reduced price and paid meals into the point of service (POS) computer system. Students scan their card into the POS system in exchange for their meal.

***Coded ID Cards (manual register)*** Students are issued ID cards that are coded to indicate eligibility category. The cards are presented to the cashier. The cashier uses a coded roster or coded register to account for the meal served.

***Clickers*** For programs that offer Universal Free Breakfast either through Provision 2, or are participating in Community Eligibility Provision (CEP), a hand-held clicker counter may be used to count reimbursable meals at the point of service if the site can ensure that only one meal per child is being served. If a clicker is used to count meals, the flow of students must be counted in an orderly manner. If using this tool to track meals, additional methods of tracking incomplete meals and allergies should be maintained.

## **ii. Alternative Breakfast Service Model Collection Procedures**

- The use of coded rosters is typical for a BIC alternative service model. A school can continue to use traditional coding of rosters of students that does not overtly identify student eligibility. These rosters must be able to be updated when changes in eligibility occur. A school that utilizes tickets must keep student breakfast tickets near the service area so the student can readily access their ticket prior to getting their breakfast. Utilizing prepayment systems for all students for BIC to minimize the tasks of the teachers, or other school professionals, when serving meals is common practice.

- In addition to coded rosters and student breakfast tickets, electronic POS systems are common mediums of exchange for alternative Grab & Go and Second Chance Breakfast service models.
- For schools operating Special Provision Options (Provision 2 and CEP), no coding is required on the roster, except during the base year when they must count by eligibility category.

**Prohibited roster coding methods include (but are not limited to):**

- color-coding by eligibility category
- single-symbol coding
- using obvious identifiers such as F, R and P

To protect students' confidential eligibility information, student eligibility must not be discussed or observed at any point in the food service operation. Overt identification is prohibited.

The SFA must determine which collection procedure is best for each school. Procedures may also vary from breakfast to lunch depending on Special Provision Options being implemented in the LEA.

SFAs operating under Special Provision Options (Provision 2 and CEP) must maintain the eligibility determined in the approval year. This documentation provides the basis for claiming percentages for the duration of the Special Provision option and subsequent extension years where applicable. Lack of or missing documentation to support student eligibility can result in adjustment of claims retroactive to when the documentation error(s) began.

### **3. Conduct Daily Point of Service (POS) Meal Counts**

The POS is the point in the food service operation when a determination can accurately be made that a reimbursable meal has been served to an eligible student. Acceptable point of service counting and claiming procedures are required to determine the number of reimbursable meals served in each eligibility category (free, reduced price and paid).

#### **i. Developing a Point of Service Meal Count System**

The POS system should:

- Have a copy of the up-to-date roster even if a manual system is not used, for example, in case of a power failure, clarification when needed, etc.
- Have a method for recording non-reimbursable meals that distinguishes them from reimbursable meals
- Ensure that the POS person (such as a cashier or teacher if served in the classroom) has been trained on the requirements of a reimbursable meal for the meal types served
- Ensure there is a trained back-up cashier in case of illness or other issues

- Identify the procedures for any place other than the cafeteria that meals are served and counted for reimbursement (i.e. classroom, field trip, etc.)

POS meal counts must be taken where the student selects the meal and the person recording the meal counts determines whether the meal selected/served is reimbursable. Locations may include: cafeteria, classroom, hallway, building entrance and field trip.

The standard POS is located at the end of the serving line when a student has selected their meal. Meals counted at the beginning of the line (prior to the POS), must station personnel at the end of the serving line to monitor meals selected to ensure each meal counted and claimed complies with program requirements. Please note this method of counting is unconventional and should be minimally used.

Daily meal counts (for each category) must be recorded on the (monthly) FP-9 Meal Count Record. The SFA can use the edit check report/meal count report generated by the POS computer program as their FP9 record, if applicable. Please note it must mirror the USDA FP-9, with one record for the month with counts separated by daily totals for lunch and breakfast for each eligibility category.

## **ii. Alternative Breakfast Model Meal Counting Procedures**

Alternative breakfast models serve breakfast outside of the traditional cafeteria service. It is important for SFAs to recognize they must adhere to the same program integrity components addressed in this entire guidebook while implementing these alternative models, only the location of service changes.

### ***Breakfast in the Classroom***

- Classroom rosters must be provided and counts must be taken in the classroom when breakfasts are served. The meal counters (usually teachers or aides in the classroom) must be trained so they know how to identify reimbursable meals and be able to check off students names when they receive their meal.
- The non-nutrition staff involved in breakfast service must be trained so they know how to identify reimbursable meals and be able to check off students' names when they receive their meal.
- SFAs can make serving a reimbursable meal easier by pre-bagging a reimbursable meal in a clear plastic bag and offering students a choice of milk and even which type of fruit they want with breakfast. Counting these meals can be easier for non-food service staff.
- Signage letting students know what constitutes a reimbursable meal must be posted in the classroom. This can be done by putting the signage on the bag or cart used to transport the meals from the kitchen to the classroom.
- When utilizing classroom teachers and/or aides in the meal counting and claiming procedures under BIC, it is not recommended to implement Offer versus Serve (OVS). Best practices include the use of Serve Only and/or a bundled breakfast method. In each of these methods, classroom staff mark the roster when a student selects a breakfast bag.



### **Grab & Go**

- Pre-bagged breakfasts can be provided so students can grab their breakfasts as they go through the service line or kiosk. Additional items can be included on the side to be consistent with OVS. Students need to show the cashier what they took so the meal can be counted properly.
- Signage letting students know what constitutes a reimbursable meal must be posted near the beginning of the service line.
- A POS register is commonly used in this model and in some instances, a clicker can be used.

### **Second Chance Breakfast**

- The process to obtain POS meal counts for Second Chance Breakfast may require an additional step to ensure only one meal per student is counted for reimbursement. In most cases, daily POS meal counts are accounted for through a register, whether in the cafeteria or via kiosk. Signage letting students know what constitutes a reimbursable meal must be posted near the beginning of the service line.

### **iii. Unacceptable Meal Count Systems**

The following examples of meal count systems are NOT permitted. They do not provide an accurate point of service meal count of reimbursable meal by category.

- Attendance counts
- Tray/entrée counts
- Classroom counts
- Second meals
- Ineligible participants (adults, staff)
- Delivery counts

### **iv. Special Provision Options**

SFAs must continue to count breakfast daily at the point of service when the school(s) are operating a Universal Free Breakfast Program (UB) through Federal Provision 2 and Community Eligibility Provision (CEP).

Schools offering UB through Provision 2 will count breakfast meals by eligibility category (free, reduced price and paid) in the school(s) Base Year (BY). Once the BY has been established, only a total meal count will be collected and reported to DESE. DESE will allocate the meal counts to the appropriate eligibility categories based on the claiming percentages established in the base year (year 1 of the 4-year cycle).

- During the BY and subsequent years under UB and/or Provision 2, SFAs continue to use the meal counting procedures established.

Schools operating under CEP (district-wide or in school-groupings) will count total meals served by day. The DESE will distribute the meal counts to the appropriate eligibility categories based on the validated and approved Identified Student Percentage (ISP).

- During the BY and subsequent years under CEP, SFAs continue to use the meal counting procedures established. School(s) continue to use rosters, ID cards and/or POS systems to account for each breakfast served.

## **v. Equal Access for All Students**

The same meal must be available to all students throughout the entire meal service across all eligibility categories. SFAs are required to accommodate food substitutions when properly documented as a disability. In addition, food service personnel must prepare sufficient amounts of breakfast items. If certain items are not made available to all students, including those receiving free and reduced price meals, those items may not be counted as a reimbursable meal.

USDA requires all schools to post the “And Justice for All” poster in a prominent location near where students eat meals to alert students of their civil rights and how to file a complaint.

## **4. Conduct Edit Checks**

To ensure accurate meal counting and claiming, USDA requires SFAs to compare each school’s daily meal counts of free, reduced price and paid to the number of students eligible in the corresponding categories as well as compare against the attendance factor at the site.

The attendance factor is the percentage of enrolled students in attendance on an average day. It is computed by dividing the average daily attendance by the enrollment.

When conducting edit checks, SFA personnel should note any patterns that may suggest a counting and claiming error and follow up with the site to ensure the counts are valid.

### **i. Alternative Breakfast Model Edit Checks**

#### ***Breakfast in the Classroom***

- In addition to edit checking the daily meal count record, edit checks for breakfast in the classroom would include reviewing classroom meal count records for completeness and spot-checking classroom counts to attendance records. Breakfast bags should be checked when they return to the kitchen to ensure that the classroom counts reconcile with the number of items returned.

#### ***Grab & Go***

- In addition to edit checking the daily meal count record, edit checks for Grab & Go might include a review of rosters for students where there is more than one POS to ensure only one meal per child is counted for reimbursement.

#### ***Second Chance***

- In addition to edit checking the daily meal count record, edit checks for Second Chance Breakfast should include a review of rosters or meal counts to ensure only one meal per child is counted for reimbursement, as students may have multiple opportunities to access breakfast.

## **5. Submit Claim for Reimbursement**

Reimbursement claims are due within 60 calendar days after the last day of the month for which meals are claimed. Claims must be supported with accurate daily records of meals served (maintained on site). All edit checks must be conducted prior to submission of the claim.

All records that support the claims for reimbursement must be retained for three (3) years plus the current year after the date of the final claim for reimbursement for the fiscal year. Records to support the SBP claim for reimbursement include: daily meal count documentation, eligibility records to support enrollment of free and reduced price students as well as total school enrollment, documentation to support claiming percentages established in the base year of sites operating under Special Provision Options, menus, production records, etc.

This process does not change for BIC, Grab & Go, or Second Chance, but additional edit checks would be required to ensure the counting and claiming procedures are yielding accurate meal counts.

## **6. Conduct On-site Monitoring**

SFAs with more than one school must conduct on-site monitoring prior to February 1st each school year. Monitoring efforts must be documented and maintained for a minimum of 50 percent of schools that participate in SBP. All sites must still be monitored to ensure compliance. The monitor must be an employee of the SFA and should work in the food service program. Managers should not review their own schools.

The purpose of on-site reviews is to ensure the meal counting and claiming systems are being implemented according to program requirements. The SFA On-site Review Checklist (Accuclaim monitoring review form) must be used to document areas on non-compliance and/or technical assistance provided. The checklist can be found in the document and reference library of the DESE security portal.

Consistent monitoring with alternative service models is important and reinforces required meal counting and claiming procedures.

Effective on-site monitoring is crucial to maintaining program integrity. Accuclaim guides SFAs to conduct on-site monitoring every year for half of the SFA's breakfast program sites. Monitoring all the schools is recommended. Alternative service models should be monitored frequently to ensure continued compliance. Food service staff can hone their monitoring when edit checks reveal classrooms that may have problems with their counting and claiming procedures.

## **7. Provide Staff Training**

SFAs must train food service personnel annually regarding all program requirements relevant to their role in the food service operation. Training must be job-specific and intended to help employees perform their duties well.

SFAs must train staff involved with counting and claiming breakfast, including classroom teacher and/or aides that are counting reimbursable meals. Program training can count toward the required USDA Professional Development Standards.

To be successful, alternative models require additional training, support and oversight to ensure they are operating according to program requirements. Staff training for BIC will require many non-food service staff be trained in what are traditional food service roles. Be prepared to train frequently and follow up to ensure staff understands program requirements.

### **III. School Breakfast Meal Pattern Requirements**

Under the USDA SBP Meal Pattern, three components must be offered to meet minimum meal pattern requirements. Schools must plan breakfast menus to meet the requirements for the age-grade groups (K-5, 6-8 and 9-12), dietary specifications for calories, saturated fat and sodium, and all foods offered must contain zero grams of trans fat per portion. Schools must meet both the daily and weekly requirements for SBP, one of which must be a ½ cup of fruit.

#### **1. Offer versus Serve (OVS)**

OVS is a concept that applies to menu planning and the meal service. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat. This decision will determine how meals must be offered to students and what students must take in order to count the meal as reimbursable. When implementing Offer versus Serve, the site must offer the three food components in at least four food items. A food component is one of the three food groups that comprise a reimbursable breakfast. A food item is a specific food offered within each of the food components. Under Offer versus Serve, a reimbursable breakfast must contain at least three of the four food items offered, one of which must be 1/2-cup serving of fruit.

In Massachusetts, the use of share tables can only be used with prior written approval from the local board of health. It is important to note that share tables should only be viewed as a technique to reduce food waste and not as a cost-saving measure. Students cannot be required or asked to take a breakfast meal to purposely place on a share table for consumption later in the day. Excessive food items placed on a share table warrants a review of menus.

#### **2. Serve Only**

Schools implementing Serve Only choose to have students take all of the food items offered at breakfast and not give students the opportunity to decline an item to meet the criteria of a reimbursable breakfast. This option is commonly used when the schools have meals delivered pre-packaged by a vendor, or students receive meals in a location like in Breakfast in the Classroom (BIC).

## IV. Resources

### ***a. Documents & Memorandums***

*The following can be found on the DESE Document and Reference Library on the Security Portal*

- i. Point of Service Meal Count Roster
- ii. SFA On-Site Monitoring Review Checklist (Accuclaim Form)
- iii. Share Tables and Reducing Food Waste in School Meal Programs (DESE Memo)
- iv. Share Table Guidance
- v. The Use of Share Tables in Child Nutrition Programs (USDA Memo)
- vi. Professional Standards for School Nutrition Professionals (DESE Memo)
- vii. Meal Flexibilities (DESE Memo)
- viii. Preschool Meal Pattern (DESE Memo)
- ix. Choking Prevention Policy - Nutrition for Young Children (DESE Memo)
- x. USDA Offer versus Serve Manual
- xi. USDA Eligibility Manual for School Meals
- xii. USDA Community Eligibility Guidance
- xiii. USDA Provision 2 Guidance
- xiv. Nuts and Bolts of School Nutrition Programs - School Breakfast Meal Pattern Presentation

### ***b. Making It Count On-Demand Videos***

*To further your knowledge*

- i. Making It Count Access Module
  1. <http://www.makingitcount.info/making-it-count/access>
- ii. Developing an Acceptable Meal Counting and Claiming System
  1. <http://www.makingitcount.info/making-it-count/mod07>
- iii. Is this coded correctly?
  1. <http://www.makingitcount.info/making-it-count/is-this-coded-correctly>
- iv. Developing a Point of Service Meal Count System
  1. <http://www.makingitcount.info/making-it-count/mod06>
- v. Alternative Breakfast Programs
  1. <http://www.makingitcount.info/making-it-count/brkpart2>
- vi. Making the FP-9 Count
  1. <http://www.makingitcount.info/making-it-count/making-fp9-count>
- vii. What's for Breakfast?
  1. <http://www.makingitcount.info/making-it-count/breakfast/whats-breakfast>
- viii. USDA Meal Pattern and Requirements
  1. <http://www.makingitcount.info/making-it-count/brkpart1b>
- ix. Recognizing a Reimbursable Offer versus Serve Breakfast
  1. <http://www.makingitcount.info/making-it-count/brkpart2>

## V. Regulations Covered In This Guidebook

### a. 7 CFR 220 – School Breakfast Program

- §220.1 General purpose and scope.
- §220.2 Definitions.
- §220.6 Use of funds.
- §220.7 Requirements for participation.
- §220.8 Meal requirements for breakfasts.
- §220.9 Reimbursement payments.
- §220.10 Effective date for reimbursement.
- §220.11 Reimbursement procedures.
- §220.12 Competitive food services.
- §220.14 Claims against school food authorities.
- §220.20 Free and reduced price breakfasts.

### b. 7 CFR 245 – Determining Eligibility for Free and Reduced Price Meals and Free Milk in Schools

- § 245.1 General purpose and scope.
- § 245.2 Definitions.
- § 245.3 Eligibility standards and criteria.
- § 245.5 Public announcement of the eligibility criteria.
- § 245.6 Application, eligibility and certification of children for free and reduced price meals and free milk.
- § 245.6a Verification requirements.
- § 245.7 Hearing procedure for families and local educational agencies.
- § 245.8 Nondiscrimination practices for children eligible to receive free and reduced price meals and free milk.
- § 245.9 Special assistance certification and reimbursement alternatives.
- § 245.10 Action by local educational agencies.

*Please contact DESE for additional guidance, technical assistance and support (Massachusetts Department of Elementary & Secondary Education, Office for Food and Nutrition Programs at 781-338-6480; Nutrition@doe.mass.edu).*

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## Notes



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